28 September 2026

Draft Western Swamp Tortoise Recovery Plan - 5th Edition, May 2026

Via email: fauna.recovery@dbca.wa.gov.au

Introducing the Urban Bushland Council

The Urban Bushland Council WA Inc. (UBC) is the peak WA community organisation for urban bushland recognition and protection. UBC is an incorporated, not-for-profit organisation registered as a charity. We are a voluntary community association with more than 90 member groups and additional individual supporters, all with a common interest in the conservation and protection of urban bushland, wetlands and ecological linkages in Western Australia.

UBC advocates for the protection, conservation and active management of urban bushlands, wetlands and ecological linkages; ending the clearing of native vegetation in urban areas; increasing tree canopy cover; better management of threatening processes; and urban planning that results in net positive vegetation outcomes and conserves biodiversity.

UBC welcomes the opportunity to comment on the draft Western Swamp Tortoise Recovery Plan, 5th Edition, May 2026.

Submission position

UBC strongly supports the preparation of a new Recovery Plan for the Western Swamp Tortoise. The species is Critically Endangered and remains at real risk of extinction in the wild. This Recovery Plan is therefore not simply a management document; it is a central instrument for saving one of Australia's most threatened species.

The draft Recovery Plan states that it provides the research and management actions needed to stop decline and support recovery so that the Western Swamp Tortoise's chance of long-term survival in the wild is maximised.

However, the final Recovery Plan must be complete, unambiguous, funded, measurable and clearly connected to the statutory and planning processes that will determine whether habitat is actually protected.

UBC focuses this submission on five matters that will make the greatest difference:

1. secure and increase habitat through land acquisition, critical habitat protection and binding tenure;
2. make hydrology and climate adaptation central to recovery;
3. include a fully costed implementation budget and stronger funding model;
4. ensure the Recovery Plan, EPP, MRS Amendment 1411 and North Ellenbrook East DSP dovetail;
5. strengthen implementation, monitoring, public reporting and accountability.

1. Habitat security and land acquisition must be strengthened

The primary limiting factor for recovery is the extent and long-term security of suitable habitat. The draft Recovery Plan recognises that urban, industrial and infrastructure development may alter hydrological processes, limit dispersal and recolonisation opportunities, and reduce landscape resilience in the face of climate change. It also states that urban development remains the most significant threat to Western Swamp Tortoise subpopulations on the Swan Coastal Plain.

UBC strongly supports **Objective 1**, to enhance the extent and quality of habitat for existing wild and translocated subpopulations, and the 2036 criterion for a net increase in area and condition of habitat within conservation estate or managed lands.

However, Action 1.1 — to increase protected WST habitat through acquisition of suitable land — is too general. The final Recovery Plan should include a dedicated Land Acquisition and Habitat Security Program with named priority areas, timeframes, responsible agencies, costings and fallback mechanisms.

This program should include acquisition, reserve addition, conservation covenants, section 8A management agreements, critical habitat listing and other binding protection mechanisms. Priority should be given to land that provides or supports core wetland habitat, nesting and aestivation habitat, movement and dispersal habitat, hydrological support areas, drought refuges, and buffers to Ellen Brook and Twin Swamps Nature Reserves.

The Recovery Plan already states that lands adjacent to and surrounding Ellen Brook and Twin Swamps may provide nesting and aestivation habitat, facilitate movement, support hydrology, buffer urbanisation and provide drought refuges such as farm dams and clay pits.

The final Plan should make clear that these lands are not peripheral. They are part of the recovery task.

UBC's concerns also sit within a broader concern about the Biodiversity Conservation Act framework. UBC has supported calls for stronger critical habitat provisions, including a standalone definition and protections that have primacy and force over relevant planning laws.

The Recovery Plan should therefore include a specific action to identify, map and progress formal protection of critical habitat for the Western Swamp Tortoise.

2. Hydrology and climate adaptation must be core recovery requirements

The Western Swamp Tortoise depends on seasonal wetlands, suitable hydroperiods, clean water, aquatic prey and safe terrestrial habitat. The draft Recovery Plan identifies key habitat features including shallow winter- and spring-wet swamps, aquatic invertebrate prey, perched wetlands on clay or sand-over-clay soils, and aestivation refuges that protect against desiccation, heat stress and fire.

The Plan also recognises climate change as a significant threat. Reduced rainfall, shortened hydroperiods and drying wetlands can reduce breeding success, compromise hatchling survival, lengthen time to reproductive maturity, prevent egg production and increase risks during aestivation.

UBC supports **Action 1.3**, to maintain water quality and quantity over a suitable hydroperiod, including monitoring water quality and identifying drought-proofing and hydrological intervention works.

However, this should be strengthened into a clear Hydrology and Climate Adaptation Action Plan.

The final Plan should specify hydroperiod targets for each subpopulation, groundwater and surface-water monitoring requirements, water-quality targets, aquatic prey monitoring, drought-response triggers, criteria for groundwater supplementation or other intervention, and requirements to assess development, drainage, roads and fill where they may alter hydrology.

Without this clarity, the Recovery Plan risks identifying hydrology as a threat without securing the intervention needed to maintain habitat in a drying climate.

3. The Recovery Plan needs a fully costed implementation budget

UBC is concerned that the draft Recovery Plan does not provide a sufficiently clear funding framework for a species at this level of risk. Action 4.3 is to "pursue funding opportunities to support WST recovery. The Plan itself identifies many essential actions, but they cannot and should not be delivered through short-term grants, uncertain future funding or volunteer effort.

The final Recovery Plan should include a fully costed 10-year implementation budget, including annual costs for each action, confirmed funding, funding gaps, responsible agencies, land acquisition costs, hydrological intervention costs, monitoring and reporting costs, and emergency drought and fire response funding.

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UBC has partnered with others for calls for a step change in nature funding in Western Australia. We see that including the establishment of an independent statutory conservation trust to partner with willing landholders to permanently protect, manage and restore biodiversity through mechanisms such as conservation covenants and incentive payments. Such an approach is directly relevant to Western Swamp Tortoise recovery, particularly where suitable habitat occurs outside existing conservation tenure.

4. The Recovery Plan, EPP, MRS Amendment 1411 and North Ellenbrook East DSP must work together

The Recovery Plan cannot sit apart from planning decisions that determine whether habitat is protected, fragmented, drained, filled or urbanised.

UBC made a submission to the EPA on the draft Western Swamp Tortoise EPP. We argued that:

- the EPP policy area should be expanded,
- reliance on MRS Amendment 1411 and the North Ellenbrook East District Structure Plan were not sufficient to protect the wetland and associated ancillary habitat on the northern portions of Lots 29–32 Maralla Road,
- the EPP must optimise the statutory context for the Recovery Plan to succeed.

The draft Recovery Plan recognises that Ellen Brook and Twin Swamps are within a semi-rural environment, that Western Swamp Tortoises use surrounding lands which support and influence hydrology, and that land-use and development controls in and near the EPP area assist implementation of the Recovery Plan.

This connection must be made stronger. The final Recovery Plan should include a specific action requiring DBCA to work with EPA, DPLH, WAPC, City of Swan and other authorities to ensure that planning, water-management, infrastructure and land-use decisions are consistent with Recovery Plan objectives.

UBC advocates that public authorities should be required to make decisions consistent with recovery plans, rather than merely needing to "have regard" to them. If land is relied upon as ancillary habitat, drought refuge, hydrological support area or movement habitat, it should be secured through the strongest available mechanism before urban development proceeds.

5. Implementation, monitoring and reporting must be measurable and public

UBC supports the draft Plan's actions for monitoring, predator control, fire planning, captive breeding, translocation and community engagement. These are all essential to recovery.

The draft Plan also includes long-term monitoring for all subpopulations, wetland ecosystem health monitoring, genetic research, review of captive breeding and translocation protocols, and continued monitoring at trial translocation sites.

UBC also advocates that the plan includes annual public reporting. It is important that those implementing the recovery plan secure community confidence in their actions and the best way is through public reporting of recovery plan implementation and outcomes monitoring.

Requested modifications

UBC requests that the final Recovery Plan be modified to include:

1. a dedicated Land Acquisition and Habitat Security Program with named priorities, mechanisms, timeframes and costings;
2. explicit recognition that surrounding lands, movement habitat, aestivation habitat, hydrological support areas and drought refuges are essential to recovery;
3. specific attention to the northern portions of Lots 29–32 Maralla Road as potential ancillary habitat and drought refuge requiring secure protection;
4. a Hydrology and Climate Adaptation Action Plan with hydroperiod targets, monitoring, intervention triggers, drought-proofing actions and funding;
5. a fully costed 10-year implementation budget;
6. clear alignment between the Recovery Plan, WST EPP, MRS Amendment 1411, North Ellenbrook East DSP and local planning processes;

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7. a requirement that public authorities make planning, water-management, infrastructure and land-use decisions consistently with the Recovery Plan;
8. stronger use of critical habitat listing, reserve addition, acquisition, covenants, section 8A agreements and other binding protection mechanisms;
9. measurable predator control, fire management, captive breeding, translocation and monitoring targets;
10. annual public reporting on implementation, funding, habitat condition, hydrology and population outcomes, with adaptive management triggers where recovery objectives are not being met.

Conclusion

The Western Swamp Tortoise remains Critically Endangered. It has survived because of decades of committed recovery work, but survival is not the same as recovery. The next Recovery Plan must be strong enough to move the species away from the edge of extinction.

UBC supports the draft Recovery Plan but submits that it must be strengthened so that the actions needed to save the species are complete, unambiguous, funded, measurable and linked to the statutory and planning mechanisms that determine whether habitat will actually be protected.

Most importantly, all related processes, whether planning or environmental protection, must dovetail. The Recovery Plan, the WST EPP, MRS Amendment 1411, the North Ellenbrook East District Structure Plan and local planning processes must work together to ensure that Western Swamp Tortoise habitat is protected before development decisions narrow or remove recovery options.

For a species this close to extinction, recovery planning must be clear about what is needed, who must act, how it will be funded, and how the community will know whether the species is being saved in the wild.

Thank you for the opportunity to comment.

Yours sincerely

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