



Office of
Environment
& Heritage

Amendments to the NSW Threatened Species Priorities Action Statement

Response to submissions

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Introduction

The NSW Threatened Species Conservation Act 1995 (TSC Act) was established to identify the plants, animals, populations and ecological communities that are threatened with extinction in NSW and to provide for their protection. The NSW Threatened Species Priorities Action Statement (PAS) is the NSW Government's primary tool for managing the more than 1,000 threatened species, populations and communities that live in NSW. The Office of Environment and Heritage (OEH) administers the PAS, as set out in Part 5A, of the TSC Act. The PAS:

- identifies strategies to help recover threatened plants and animals
- establishes priorities to implement these strategies
- identifies actions for all listed species, populations and ecological communities
- identifies actions to manage key threatening processes.

A review of the achievements in implementing the PAS strategies between 2007 and 2010 provided a number of recommendations to improve threatened species management in NSW (OEH 2013a). These recommendations have been implemented through the *Saving our Species* (SoS) program, which:

- aligns everyone's efforts under a single banner, so investment in threatened species conservation can be assessed
- assigns threatened species to different management streams so the individual requirements of each species can be met
- invites the NSW community and businesses to participate, because projects to save threatened species are collaborative efforts.

SoS was launched in December 2013 and, at the same time, the Chief Executive of OEH released the proposed amendments to the PAS, including:

- replacing the current recovery and threat abatement strategies for 370 species with [new draft recovery and threat abatement strategies](#)
- [adding strategies](#) for 114 species, populations, ecological communities and key threatening processes that have been developed since the last public exhibition of the PAS
- changing how relative priorities for implementing recovery and threat abatement strategies are established
- establishing performance indicators to facilitate reporting on achievements in implementing recovery and threat abatement strategies.

The amendments were publically exhibited from 18 December 2013 to 14 February 2014, with notices in newspapers with state-wide circulation (e.g. *The Sydney Morning Herald*, *The Telegraph*) and on the OEH website. Peak stakeholder groups were also informed of the consultation process. Documents outlining the proposed amendments were made available on the OEH website and were also available in hardcopy on request. The process of public consultation provided the community and interested parties with the opportunity to write a submission on the amendments to the PAS.

OEH appreciates the effort that went into providing submissions and this valuable feedback has helped identify aspects of SoS, and specifically the PAS, that needed refinement, clarification and/or reconsideration. This report is a summary of, and response to, those submissions.

Submissions

During the public exhibition period of the PAS, 15 submissions were received from public authorities, conservation groups and the community (Table 1). In general, submissions were supportive of SoS, particularly with regard to grouping species with similar management requirements (i.e. management streams); provision of spatial information and associated management actions for species; prioritising investment; and improved monitoring and reporting requirements. Government agencies, including local government, strongly supported increasing coordination efforts into the conservation and management of threatened species across NSW.

Table 1: Number and source of submissions received

Source of submission	Number received
Government agencies and councils	5
Individual community members	1
Community interest groups and/or environmental groups	9
Total	15

Response to submissions

OEH reviewed each submission and identified the issues raised. Similar issues were grouped together under the following themes:

Theme 1 – *Saving our Species* objectives and approach

Theme 2 – Management streams

Theme 3 – Species specific information

Theme 4 – Implementation

Theme 5 – Involvement and communication

Theme 6 – Regulatory frameworks

Within each of these themes, the key issues raised were identified and the adequacy of the SoS program, as the overarching framework to deliver the PAS in relation to these, is discussed.

Theme 1 – *Saving our Species* objectives and approach

Of the 15 submissions received, three discussed the objectives and prioritisation approach in SoS. These submissions were well considered and highly detailed; the key issues raised are addressed below.

1. The objectives of the SoS program should be revised to better reflect the TSC Act

Concerns with the SoS objectives and approach were expressed in submissions, specifically that the focus should be on the ‘recovery’ of species rather than ‘limiting further decline’.

The program-wide objective of SoS is ‘to maximise the number of threatened species that are secure in the wild in NSW for 100 years’. This is consistent with s. 90 of the TSC Act, which states that the PAS ‘sets out the strategies (**recovery and threat abatement strategies**) to be adopted for promoting the recovery of each threatened species,

population and ecological community to a position of viability in nature'. For example, conservation projects for site-managed species have been developed specifically to meet these criteria (i.e. to be 95% confident that the species will be secure in the wild for the next 100 years) (see also Issue 3 below).

2. Role of 'indicator' species

Submissions suggested that greater emphasis be placed on 'indicator' species, whose status can be used to reflect the functioning of an ecosystem, in prioritisation and project selection.

Indicator species will be considered when developing approaches to manage threatened entities whose viability is inextricably linked to the quality and extent of suitable habitat across large areas such as landscape species and threatened ecological communities. Given the requirements of the TSC Act, wherever SoS seeks to use indicator species or other surrogates for management or monitoring purposes, it must be validated to ensure that there is a real and meaningful association and that the specific requirements of each species listed on the Schedules of the Act are addressed.

3. The objective for site-managed species does not adequately consider the risks to a species' viability

One submission suggested that the stated objective for site-managed species – '*To maximise the number of threatened species that are secure in the wild in NSW for 100 years*' – was insufficient to ensure long-term sustainable recovery of biodiversity. Particular reference was made to the lack of explicit consideration of risks to species viability such as climate change, reduced genetic diversity and stochastic threatening processes.

First, in the development of the PAS for site-managed species, experts were tasked with designing a project (identifying critical management sites and actions) with an explicit objective; ensuring a 95% probability of having at least one viable population in the wild in 100 years. Implicit in this objective was that the projects address all threats that could predictably impact on the species' viability over a 100-year timeframe, for example, climate change, loss of genetic diversity or stochastic events. Typical methods for addressing these types of threats in different projects include ensuring that the location of management sites capture species' geographic and altitudinal ranges and/or selecting sites that are physically isolated from one-another with respect to propagating threats such as fire or disease (i.e. spreading risk). Assuming that a given project meets this objective, this implies that, under successful implementation of the project, the species' 100-year extinction risk would be reduced to 5% (reciprocal of 95% probability of having an extant population in 100 years). This means that under IUCN Red List Criterion *E* (IUCN 2010), which provides a quantitative analysis of the probability of extinction in the wild, the species would fall below the threshold for listing as vulnerable which quantifies the risk of extinction as greater than or equal to 10% in 100 years. Thus the objective of the project could justifiably be considered equivalent to *recovery* (*sensu* Tear *et al.* 1993; Neel *et al.* 2012).

Second, the inherent risk of decreasing species' long-term viability associated with taking a cost-effective approach to project design (i.e. when proposing management for only a subset of a species' geographic range) has been identified by OEH and others (NSW Scientific Committee, external peer reviewers) throughout the development of SoS. In response, the agency is undertaking a research project to assess and quantify this risk. The project will investigate a sample of site-managed species from different taxonomic groups and threat statuses, comparing each SoS project (i.e. spatial distribution and extent of nominated management sites) to the species' known distribution (via observation records). Using a number of surrogates for adaptive capacity (e.g. latitudinal, altitudinal and geological range, extent of occurrence), the analysis will identify if and

where the design of conservation projects exposes species to a significant increase in extinction risk. Recommendations for changes to individual conservation projects stemming from this project will be incorporated to ensure that the program is likely to meet its long-term objectives.

4. Revise ‘additional strategies’ for threatened entities including ecological communities

Several submissions expressed confusion about the purpose and value of the ‘additional strategies’ listed on the SoS website.

The NSW TSC Act requires PAS actions for all threatened entities listed on the schedules of the TSC Act. The goal of SoS is to provide specific, measureable actions developed and reviewed by species experts. OEH is currently developing a targeted approach for managing entities in several management streams (e.g. landscape species and threatened ecological communities). For these entities the actions listed on the SoS website are interim only and will be up-dated as management strategies are developed (see Theme 4, Issue 1 for more details).

5. Further detail on monitoring programs

Submissions requested further information on the process to monitor and report on the outcomes of SoS.

One of the key objectives of SoS (and a recommendation of the PAS Review) is to improve monitoring, evaluation and reporting of investment and outcomes for threatened species management across NSW.

OEH is currently developing a monitoring, evaluation and reporting framework which will include clear objectives/outcomes for each management stream; the indicators to be monitored to evaluate progress against those objectives; simple progress report cards; and a process for data management and analysis. The framework will be publicly exhibited in 2014.

6. Changes in species status and/or new listings

Submissions sought clarification on how changes to the TSC Act schedules would be accommodated under SoS.

The listing and management of threatened species in NSW are dynamic processes. Nominations are continually being assessed by the NSW Threatened Species Scientific Committee, leading to the addition and removal of entities to/from the schedules of the TSC Act. Threatened species management requirements are also continually changing.

Therefore, the PAS for each species is designed to be adaptive with the ability to up-date information on an on-going basis. Changes to existing PAS actions and those developed for newly listed species will be reviewed by expert scientific panels and will require public exhibition.

Theme 2 – Management streams¹

Approximately a quarter of submissions commented on at least one of the six management streams in SoS. Submissions supported the idea of targeting management based on ecological and/or intrinsic characteristics of a species and facilitating this via the categorisation of species into management streams. However, issues were raised with regard to the proposed management approach under each stream and these are addressed below.

¹ Comments received with regard to data-deficient species have been dealt with under Themes 4, 5 and 7.

Site-managed species

1. Geographic distribution of priority sites

One submission expressed concern that the majority of priority sites for site-managed species are biased towards coastal areas, even when the geographic distribution of a species extends across NSW.

OEH recognises that investing in management at sites representing only a subset of a species' geographic range inherently increases extinction risk, compared to managing the species across its distribution. The extent and reality of this risk under SoS will be assessed in the coming 12 months (see Theme 1, Issue 3 for more detail).

2. Mammals are insufficiently represented and prioritised

Submissions indicated concern that mammals, as a taxonomic group, were under represented in the higher priority bands. Given their importance to the community consideration should be given to incorporating the social value of a species explicitly in the prioritisation process.

Whilst these values may not have been 'measured' in the prioritisation metric, social and cultural value of mammals was considered in allocation of resources to threatened species under SoS. For example, the iconic stream was created in recognition that some species are important not only ecologically but also socially, culturally and economically and the community expects them to be effectively managed and protected. This stream currently includes the koala and the brush-tailed rock wallaby. Further mammal species will be added to this stream as part of the reintroduction of locally extinct species, recognising that mammals have undergone major extinctions in NSW. Overall, land-based mammals, which represent approximately 6% of threatened species (marine mammals 1%), received 17% of the total SoS budget during the 2013–14 financial year.

3. Expert and agency roles and interaction in the prioritisation process

One submission requested clarification on the role of experts and OEH in developing PAS actions, including publication of the experts involved, information they provided and the process for dealing with conflicting opinions.

Over 260 species experts were consulted during the development of conservation projects for site-managed species. Two key sources provide substantial information on their role:

- i. *Saving our Species Technical Report* (OEH 2013b)
- ii. *Saving Our Species Database* (or Conservation Projects Database) – available to registered users via email request to savingourspecies@environment.nsw.gov.au

The scientific community continue to be involved in the development and evaluation of aspects of SoS (see Theme 5, Issue 2), which will enable OEH to build a scientifically robust evidence base to assist in decision-making.

4. Timing of applying the prioritisation process to site-managed conservation projects

Submissions argued that the prioritisation analysis should be run triennially and/or when triggered by special circumstances, rather than annually, as proposed by SoS. It was felt that annual priority reviews would be of limited value given trends are likely to be discernible only over longer timeframes.

Running the prioritisation process annually enables SoS to incorporate threatened species newly listed in the Schedules of the TSC Act (e.g. approximately 30 species are added to the Schedules by the NSW Threatened Species Scientific Committee each

year) and incorporate new knowledge and/or changed environmental conditions that impact on threatened species management and decision-making.

Iconic species

5. Better outline the process for selecting 'iconic' species

Several submissions requested OEH provide greater transparency in identifying iconic species, including a clear process for community consultation and engagement with Indigenous peoples and conservation organisations.

Currently, iconic species are defined as those that have intrinsic value to the NSW community and have attracted significant investment from government and/or the community for their management (OEH 2013c).

Partnership species

6. Clarify the definition of a partnership species

One submission expressed confusion with regard to the definition of partnership species, providing examples where reference is made to '*...less than 10% of [a species] distribution in NSW*' whilst elsewhere it is defined as '*...less than 10% of its population..*' (OEH 2013b).

Species allocated to the partnership management stream are those with less than 10% of their total population occurring in NSW. However, 'population' is assessed using the highest resolution data available for the species; i.e. the NSW proportion of total species abundance in the first instance, followed by area or occupancy, extent of occurrence and count of sighting records, respectively (see OEH 2013b).

7. Consider the potential impact of climate change on range edge species

Several submissions highlighted the need to consider the impacts of climate change on partnership species whose distributional range crosses into NSW.

OEH is currently developing PAS projects for some partnership species where high priority populations, as identified by experts, are declining or likely to decline in the future due to particular threats such as climate change.

8. Intergovernmental support for managing partnership species

Two submissions highlighted the need to commit to actively seeking, and reporting on success in achieving, intergovernmental support for the management of partnership species.

OEH will continue to work with the Federal and State Governments to manage high priority threatened species that are listed in multiple jurisdictions.

Keep watch species

9. Funding should be allocated to monitor these species

Concern was expressed that without sufficient funding to monitor keep watch species, significant changes in populations may go undetected.

To meet the program-wide objective '*to maximise the number of threatened species that are secure in the wild in NSW for 100 years*' OEH intends to monitor keep watch species. A series of options are currently under consideration, for example, conducting a three-year review of available information to capture trends in populations.

10. Review the list of keep watch species

Several submissions provided examples of species currently allocated to the keep watch stream that would be better placed in alternative management streams.

OEH recognises the need to review **all** species in the six management streams to ensure the allocation criteria have been consistently applied. A panel of scientific experts will be established in 2014 to provide expert technical advice on aspects of SoS, including the allocation of species to management streams.

Landscape species

11. Clarify the approach to manage landscape species

Submissions requested further information on the approach to manage landscape species.

OEH is currently developing an operational policy to support the management of species allocated to this stream. A draft implementation plan will be publically exhibited towards the end of 2014.

Theme 3 – Species specific information

Over half of submissions received commented on one or more threatened entities. These submissions provided valuable information on individual species, specific projects and general/minor corrections (e.g. species common names, site names).

Submissions relating to particular species were provided to the relevant OEH staff for consideration and action (see Appendix A for detailed responses).

Theme 4 – Implementation

Two submissions discussed issues relating to the implementation of SoS. The key issues raised in these submissions are addressed below.

1. Timeframes for planning and achievement of SoS

Section 90A(e) of the TSC Act requires that the PAS ‘sets out clear timetables for recovery and threat abatement planning and achievement...’. Submissions sought clarity on these timetables.

The SoS program includes over 370 specific site-managed and iconic species PAS projects, and research strategies to address knowledge gaps for over 100 data-deficient species. The approximate timing for developing strategies to manage species allocated to the remaining management streams and listed entities are:

- Landscape species – strategy developed by the end of 2014
- Partnership species – conservation projects for select species to be completed in 2015
- Keep watch species – monitoring approach, developed as part of the monitoring, evaluation and reporting framework for SoS, to be available in 2015
- Endangered ecological communities – strategy to be developed in 2015
- Key threatening processes – strategy to be developed in 2015.

OEH will publish an **Annual Program Report**, which will outline the:

- progress on implementing projects and their effectiveness
- levels of involvement by the community and other stakeholders in the program
- progress made to further develop the program (as outlined above).

A more detailed three-yearly review of SoS will be conducted in July–November 2016. The review will report on project success, effectiveness and uptake of the overall SoS program.

2. Funding

Three submissions discussed funding issues. Submissions supported the prioritisation process recognising that it better directs and coordinates investment in threatened species management but noted the need for an overall increase in funding to effectively conserve threatened species.

OEH recognises that the successful implementation of SoS, and indeed the conservation of threatened species, will require considerable long-term investment from all sectors of NSW. To that end the NSW Government is not only funding threatened species projects but is also building long-term partnerships with, community groups, schools, land holders and organisations to invest in targeted conservation management and to leverage funds from private investors who could, for example, donate to secure a species.

3. Implementation of management actions for species not funded under SoS

Submissions questioned how the NSW Government intended to implement actions for threatened species that were not selected to receive funding under SoS.

There is clear evidence that clarifying and costing the critical actions required to manage threatened species and prioritising investment can lead to an increase in the number of species secured in the wild. For example, since implementing a program to prioritise threatened species management, the New Zealand Department of Conservation has been able to actively manage an additional 42 threatened species (compared to previous years) and has improved the security of 238 threatened species at one or more sites (New Zealand Department of Conservation 2013).

Additionally, a key premise of SoS is that threatened species management is the responsibility of all in partnership. Threatened species management is occurring more broadly across NSW by a range of stakeholders. OEH is seeking advice on work currently being undertaken so that it is clear which species are receiving investment, so as to reduce duplication of resources. The work undertaken by OEH and others will be captured in the SoS database enabling OEH to report more completely on investment in, and management of, threatened species in NSW.

4. Interaction between SoS and recovery plans

Submissions sought clarification on the role of recovery plans in managing threatened species given the significant shift in management approach under SoS.

The PAS was introduced in 2007 as a mechanism to overcome the impracticalities of preparing individual recovery plans for the large number of species, populations and communities listed under the TSC Act (over 1000 entities with some plans costing up to \$200 000 to prepare and many years to achieve approval).

Existing recovery plans remain an important source of information about threatened species in NSW. For example, the actions identified in the Wollemi Pine Recovery Plan (NSW Department of Environment and Conservation 2006) have been adopted as the PAS for that species and OEH will continue to implement and invest in those actions.

Theme 5 – Involvement and communication

Community involvement and communication was discussed in four submissions, including requests for further information or opportunities to become involved in SoS. The key issues raised are addressed below.

1. Targeted information for key stakeholder groups

Two submissions requested information sessions and/or fact sheets for specific stakeholder groups, in particular local council.

Currently, information on SoS is available from the OEH *Saving Our Species* website including frequently asked questions, links to species profiles, papers, brochures and the quarterly newsletter. Opportunities for volunteering on specific projects are identified in the SoS database.

Additionally, OEH will host a series of workshops in the second half of 2014 at key regional centres in NSW. Workshops will provide an opportunity for a more detailed discussion about SoS, including the potential to identify conservation priorities for regional agencies and how community groups and landholders can contribute to the program. Information on workshops will be posted on the OEH website.

2. Actively engage with the research sector

Several submissions identified the need to actively engage the research sector to maximise collaboration and/or resourcing.

To date more than 260 scientific experts have been involved in the development of SoS, in various capacities. OEH will continue to collaborate with the research community to:

- provide advice on data-deficient species and look at developing collaborations to meet the knowledge gaps needed to shift these species into other management streams
- provide input into refining site-managed species projects and developing new species projects
- consider on-going development and evaluation of the overall program.

Theme 6 – Regulatory frameworks

Two submissions discussed the legislative and regulatory frameworks that will influence, and/or impact on, the successful implementation of SoS, the key issue raised is addressed below.

1. SoS should be integrated into planning and regulatory frameworks

Submissions emphasised the need to integrate SoS into regulatory frameworks such as the planning system (including the NSW *Environmental Planning and Assessment Act 1979*, draft strategic plans, development approvals), private native forestry, and catchment management. Concern was expressed with the lack of recognition of the broader operating context of SoS where *'many other legal and policy mechanisms.....are driving towards reduced protection for threatened species.'*

The SoS framework has been developed specifically as a decision support tool to better direct and coordinate investment in threatened species management. All listed entities remain equally protected throughout their range. For example, priority sites identified in a conservation project for a site-managed species have the same legal standing as any site that supports that species throughout its range.

OEH and the broader NSW Government are integrating SoS into existing, new and developing regulatory frameworks and programs where an opportunity for clearly identified costed investment is present (e.g. [NSW Biodiversity Offsets Policy for Major Projects](#)).

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Appendix A: Species specific issues and responses

Table 1A: Summary of issues relating to specific species and OEH response

Issue raised	OEH response/action taken
Fungi	
Recognition of Fungi as a Kingdom rather than referring to 'animal and plant species' or identifying fungi under 'plants'.	OEH will review relevant materials on the OEH website and amend any references to 'animals and plants' to also recognise fungi, where it is appropriate to do so. Any changes to the definition of 'species' in the <i>Threatened Species Conservation Act 1995</i> requires legislative amendment.
<i>Caladenia porphyrea</i>	
Consider reallocating this species to a different management stream	<i>Caladenia porphyrea</i> is currently in the Keep watch management stream. OEH, with support of a scientific panel, intend to review all species in the six management streams to ensure the allocation criteria have been consistently applied (see Theme 2, Issue 10).
<i>Caladenia tessellata</i>	
Recommend development of a fire regime to manage species at Morton National Park site	OEH to consider a planned burn for the site and include in project for the species.
<i>Calochilus pulchellus</i>	
Additional information on populations provided	OEH is monitoring populations discussed. No changes required.
<i>Cryptostylis hunteriana</i>	
Consider reviewing the process of site selection, particularly with regard to this species	Site selection was based on a number of factors including population size, habitat condition, threats and feasibility of management (see OEH 2013b for further information).
<i>Dasyurus maculatus</i>	
No up-dated strategies	<i>Dasyurus maculatus</i> is currently allocated to the landscape species management stream. The strategy to manage this species is under development and will be released for public consultation when complete.
<i>Diuris aequalis</i>	
Mount Rae population threatened by Private Native Forestry (PNF) Operations.	OEH have provided a PNF licence for one property in this area. The licence requires a buffer around any populations of the threatened species located at the site. There are some individuals of the species protected in adjoining Conservation Agreement land.

Issue raised	OEH response/action taken
<i>Diuris bracteata</i>	
The species is not listed in the PAS	<i>Diuris bracteata</i> is allocated to the data deficient management stream in SoS.
<i>Diuris praecox</i>	
The population at Bateau Bay should be considered	OEH will consider, via scientific review, the site for inclusion in the PAS project.
<i>Eucalyptus benthamii</i>	
Consideration be given to the threat to populations of this species presented by increases in Warragamba / Burragorang dam storage	Comments are noted.
<i>Genoplesium baueri</i>	
The population at Vincentia should be considered	OEH will consider, via scientific review, the site for inclusion in the PAS project.
<i>Genoplesium plumosum</i>	
Additional information on populations provided	Comments are noted.
<i>Genoplesium superbum</i>	
Action taken to remediate the Morton National Park population damaged by road construction equipment.	Barriers have been erected at the site to protect the site. Unfavourable environmental conditions have slowed restoration of the species at the site.
Populations at Mongarlowe are threatened by vehicle access	OEH is working with Palerang Council to reduce this threat.
<i>Grevillea parviflora subsp parviflora</i>	
Note a large population of this species has been located in the Wedderburn area	The Wedderburn population is noted.
<i>Phascolactros cinereus</i>	
Increased stakeholder communication	Comments are noted.
<i>Pteropus poliocephalus</i>	
No up-dated strategies	<i>Pteropus poliocephalus</i> is currently allocated to the landscape species management stream. The strategy to manage this species is under development and will be released for public consultation in late 2014.

Issue raised	OEH response/action taken
<i>Pterostylis gibbosa</i>	
The Yallah site requires environmental burns and weed management.	Information provided is appreciated. OEH will continue to work with stakeholders to seek protection of the species at these sites, as resources allow.
The Milbrodale site is threatened by off-road racing and management of associated park area (e.g. cultivation, fertiliser).	OEH is working with private landholders, Local Land Services and the lessee of the Travelling Stock Route to mitigate the threats at the site, given existing permissible uses at the site.
<i>Pterostylis pulchella</i>	
Recommend an occasional site inspection at the Cambewarra site.	Comments are noted.
<i>Pultenaea pedunculata</i>	
Correct land ownership information	Site polygon and land ownership information up-dated.
Note the proposed development application over part of this management site	Comments are noted.
<i>Pterostylis saxicola</i>	
Correct name of management site	Changed to more appropriate title and site description ('Georges River Corridor').
Clarification of Campbelltown Council's role in monitoring the population of the species on Council reserve	Council has no monitoring obligations at this site for this species. However, any monitoring data can be provided to the OEH SoS program email address to be recorded with the project data. Council actions are listed in the PAS project
<i>Pterostylis ventricosa</i>	
Additional information on several populations provided	Comments are noted.
<i>Pterostylis vernalis</i>	
Additional information on populations provided	Comments are noted.
<i>Prasophyllum affine</i>	
Consideration be given to additional threats to two populations in the Shoalhaven Local Government Area	Comments are noted.

Issue raised	OEH response/action taken
<i>Rhizathella slateri</i>	
Additional information on a population provided	Comments are noted.
<i>Thelymitra adorata</i>	
Consideration be given to the threat to the population at Warnervale presented by proposed development	Comments are noted.