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Natural Resources Eyre Peninsula
PO Box 22
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25 January 2018

Dear Mr Lomman,

Re: Draft Roadside Vegetation Management Plan for the Eyre Peninsula

The Nature Conservation Society of South Australia (NCSSA) welcomes the opportunity to provide comment on the draft Roadside Vegetation Management Plan (RVMP) for the Eyre Peninsula. NCSSA is a community-based, not-for-profit organisation with a diverse membership drawn from all parts of the State. As South Australia's primary nature conservation advocacy organisation, NCSSA has an active interest in the protection and conservation of South Australia's natural resource assets in particular nationally and state listed threatened plants, animals and ecological communities, management of protected areas and remnant native vegetation.

NCSSA supports the development of a regional RVMP by Natural Resources Eyre Peninsula (NREP) in conjunction with the Eyre Peninsula Local Government Association and local Eyre Peninsula Councils. We commend that information relating to the high conservation significance of roadside native vegetation has been included in the plan, noting that this is particularly the case on the Eyre Peninsula where extensive clearance of native vegetation has taken place. We understand that the conservation of roadside native vegetation must be balanced with the issues of safety for road users and the use of the road network by oversized vehicles as required for agricultural production, and that there are finite resources available to Councils to achieve these outcomes.

We are concerned, however, that the plan does not reference all currently available information about the conservation value of roadside native vegetation on the Eyre Peninsula. Particularly, it should reference previous survey work and the maps produced therefrom (for example Attachment A) as well as the program for the identification of Roadside Significant Sites, developed by the Department of Planning, Transport and Infrastructure¹. We are also concerned that the Plan seeks a 'generic' approval for a large clearance envelope (to a width of at least 2m from the road verge, in addition to 6m in height) using high rather than low impact clearance methods, which is not consistent with the Native Vegetation Council's Guidelines for the Management of Roadside Vegetation and is likely to lead to a loss and degradation of native

vegetation over time. The approval sought appears to be based more on the machinery available to undertake clearance and Council budgetary constraints than on the issues of road safety, access for large vehicles or conservation. We also believe it is inconsistent with the statement on page 13 of the Native Vegetation Council's 'Preparing Roadside Vegetation Management Plans' Guide which states such plans are not intended to be "an approval for all roadside vegetation clearing".

We acknowledge that the proposed Annual Works Risk Management Program mitigates to a degree the risk of native vegetation of conservation significance being cleared, however, this will only be the case if all currently available information on the conservation values of roadside native vegetation on the Eyre Peninsula is included in the assessment. Additionally, the plan should acknowledge the significant gaps in mapping of roadside vegetation and make a commitment to allocate adequate resources to complete this mapping. We support the review of the plan within 12 months with a view to improving and updating it, particularly if this includes the outputs of the "Eyre Peninsula wide assessment of likely locations of listed species and communities or other plants of conservation significance" (page 38).

We have provided our specific comments on the template, as requested in your email of 13 December 2017. We trust that our comments will be taken into account in the finalisation of this plan which, as the first of its type, will set a benchmark for other such regional plans.

If you have any queries about any of the points raised please feel free to contact me on (08) 7127 4633 or via email at julia.peacock@ncssa.asn.au.

Yours sincerely,



Julia Peacock

Nature Advocate
Nature Conservation Society of South Australia

ⁱ <https://www.dpti.sa.gov.au/standards/rssd>