



15 February 2025

Submission to the draft Biodiversity Act consultation

Contribution from [REDACTED], resident of Cape Jervis and chair of Cape Jervis Coastal Community Group (CJCCG), based on my experiences since I became a property owner at Cape Jervis in July 2001.

- I have volunteered with COOTS group (Conservation of Our Threatened Species) since 2002
 - COOTS main work area is Cell F19 (South Fleurieu Coastal Action Plan (SFCAP), Caton et al, 2007, see Appendix 1)
- I formed Cape Jervis Coastal Community Group (CJCCG), with Liz Cousins and family in 2012
 - CJCCG main work area is Cell F20 (sub-cells 52, 53) of the Southern Fleurieu Coastal Action Plan (SFCAP, Caton et al 2007)

Cape Jervis has remnant, **biodiverse coastal heathlands recommended for protection in the Southern Fleurieu Coastal Action Plan** (SFCAP, Caton et al 2007)

<https://cdn.environment.sa.gov.au/landscape/docs/hf/southern-fleurieu-coastal-action-vol-1-plan.pdf>).

CJCCG is protecting these remnant cells and linking them through biodiverse revegetation (over 130 species), appropriate for coastal heathlands from locally source material, predominantly from seed. The adjacent remnant coastal vegetation includes over 350 species of plants (including 70 threatened plants) and 16 fauna species. It is part of the **Kanmantoo Bioregion (Kan02)**, and is a 'biodiversity hotspot' because of the range of habitats and species found there. Many of these species are threatened (Ref 2.

<https://cdn.environment.sa.gov.au/landscape/docs/hf/kanmantoo-bio-region-plus-bioicons-fact.pdf>)

A major threat to the region is the continual germination of weeds in the seedbank including woody weeds, including **Western Australian weedy acacias** (e.g. *A. saligna* and *A. cyclops*), olives, perennial weeds (scabiosa/gazania) and annual weeds such as wild oats.

I am thankful to the **Conservation Council of South Australia** for facilitating a workshop and sharing their thoughts on considerations for each questions relating to the proposed **Biodiversity Act**. I have supported many of their suggestions in my online responses to the questionnaire.

In addition, I provide suggestions based on my experiences in habitat restoration at Cape Jervis. This **biodiversity hotspot** that is under **imminent threat from development** as part of the **Cape Jervis Harbour Precinct Master Plan**, as well as residential and rural developments in the growing township. Stronger regulation and appropriate funding are needed **to link, not fragment**, our native vegetation (see **Appendices 1 and 2**).

Key points

I strongly support **protecting and recovering South Australia's biodiversity** - elements of this Bill that will deter wrongdoing, such as tougher penalties for breaches.

However, I believe, the Bill is not strong enough as currently drafted to adequately achieve its intended Object of improving the state of South Australia's biodiversity, and needs to be strengthened. We provide the following suggestions, of where we believe the Act can better "strengthen protections for threatened species and critical habitats and facilitate ecosystem restoration across the state", focussing on a few key areas.

For each of these I provide more information or data to support our position. Separately I have answered the questionnaire, and will upload this submission as part of my on-line response.

Re: Question 2. “Do you support adopting the definition for ‘native plant’ from the National Parks and Wildlife Act 1972, meaning any plant indigenous to Australia can be protected?”

- **I strongly disagree.** I believe there is more potential for harm than good with this definition based on my experience with weedy *Acacia* species from Western Australia.

Re: Question 11. “Do you support the new measure aimed at protecting planted native plants more than 20 years old, excluding those in people’s gardens or commercial forests?”

- I agree that protecting planted native plant should occur, but the **proposed 20 year timeframe** is too long, and **should be reduced to 5 years**
 - see Appendix 3: **Yellow-tailed black cockatoo** (YTBC), “Bioicons” of the Kanmantoo Bioregion, **feeding on 5-6 year old *Hakea vittata*** in CJCCG’s revegetation projects.

Re: Threatened species and Critical Habitat.

- Strengthen wording to **compel** the Minister to make key decisions in this space.
- Extend protection to the state’s Bioregions: The draft Act proposes to provide better protection for Threatened species at the State and Australia-wide levels. This same protection should be extended to **all bioregions**, to better protect the Biodiversity Hotspots in the state such at the Kanmantoo Bioregion.

Re: Mitigation hierarchy.

- We propose the addition of an element within the guidelines to include a **Biodiversity Rescue Program** for use in instances where clearance **cannot be avoided**. The rescue program **would require Developers to contact “registered” local landcare groups / community nurseries** to give them an opportunity to translocate species for use in local revegetation projects. For example, **a short window of 4-6 weeks** would allow key **difficult to propagate or slow growing species** to be rescued (potted on) for translocation in appropriate locations nearby, after recovery and at a time suitable for planting.

Re: Commitment to funding.

- “This Bill must also be accompanied by a commitment to fund both its implementation, including in relation to its administration as well as funds for the large-scale ecological restoration that will be required to build the resilience of our biodiversity into the future, particularly given the impacts of climate change. This includes the specific establishment of an independent statutory conservation trust, provisions for which need to be set out in the Bill itself.”

Best regards

[Redacted signature block]

Appendices: 1 to 3 (pages 3 – 5)

Appendix 1. Map of key native vegetation at Cape Jervis (from SFCAP, Caton et al 2007).

Map - right – is annotated to show

- **COOTS** site (Cell F19) and
- the reserve south of the **“Ferry Terminal”** is the area where Cape Jervis Coastal Community Group (**CJCCG**) focuses much of its works

There is also a parcel of **private land with high remnant native vegetation value** (including at least 9 species of orchids) in the centre of the township that is at **“risk”** from future **development (residential + commercial), rabbits and weeds**. This undeveloped private land, near Darkana Way, is not shown on this map, but is clearly visible in google maps as good vegetation.

It is this, and other residential blocks around the township, that have sparked the **“Biodiversity Rescue”** idea.



Appendix 2. Major Infrastructure Projects - a threat to Biodiversity at Cape Jervis

The **proposed Link Road**, Option 2 of the **Draft Cape Jervis Harbour Precinct Master Plan**, goes through the **Conservation Zone** (green shading, P&D Code Zones (right)) north of Flinders Drive. This Conservation zones at Cape Jervis are already fragmented, by Flinders Drive, and is NOT connected at Sorata St, due to **farmland** (brown) and the **Infrastructure Zone** (Ferry and Marine Services) (grey).

https://www.dit.sa.gov.au/data/assets/pdf_file/0015/1342032/Draft-Cape_Jervis_Masterplan_Summary.pdf

Link Road (R). This option will have a negative impact on the environmental resilience of this already threatened coastal biodiversity at the tip of the Adelaide Mount Lofty Ranges. **Habitat fragmentation by roads has negative impacts** well beyond the area used by the road,

- **by providing corridors for weed entry**, and
- **the noise** created by traffic further **reducing habitat area**.

Option 2: Draft Cape Jervis Harbour Precinct Master Plan – for feedback overview. February 2024

Two unique elements – the option supported by District Council of Yankalilla),

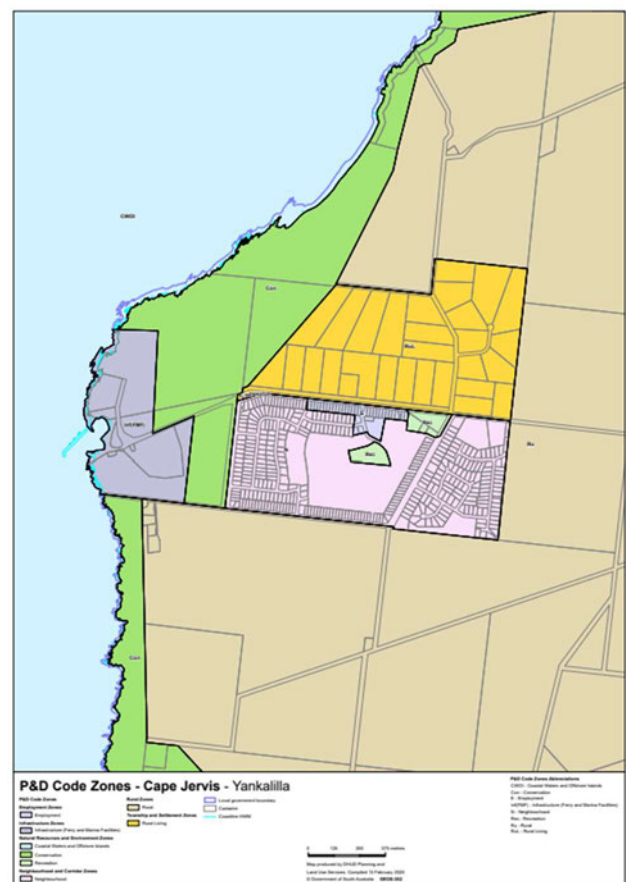
- Q. Visitor Hospitality, and
- R. Link Road

The proposed Link Road goes through the Conservation Zone (green shading, P&D Code Zones (right)), north of Flinders Drive. This Conservation zone is fragmented (discontinuous at Sorata St) due to farmland (brown) and the Infrastructure Zone (Ferry and Marine Services) (grey).



https://www.dit.sa.gov.au/data/assets/pdf_file/0015/1342032/Draft-Cape_Jervis_Masterplan_Summary.pdf

Planning & Development Code Zones – Cape Jervis



https://prod-static.api.plan.sa.gov.au/CouncilZoningMaps%2FYankalilla%2FLGA_PDCodes_Zones_A3_YA%20-%20Cape%20Jervis.pdf

Appendix 3: Six-year old revegetation provides important habitat and should be protected

- *Hakea vittata* is an important food source of the **yellow-tailed black cockatoo**, one of the “Bioicons” of the Kanmantoo Bioregion (<https://cdn.environment.sa.gov.au/landscape/docs/hf/kanmantoo-bio-region-plus-bioicons-fact.pdf>)
- CJCCG planted our first *Hakea vittata* plants in 2013.
 - **Within 6 years** (if not earlier), they were feeding yellow-tailed black cockatoos, as evidenced by the savage pruning (see Facebook post May 12, 2019).
 - The plants recovered well within a year or two, and the cycle continues
- The Jan 31, 2021 Facebook post shows the **yellow-tailed black cockatoos** feasting in a different revegetation area on 6 to 7 year old plants,
- The **biodiverse revegetation plantings**, of all landcarers, need to be **protected from 5 years of age**, to continue to provide habitat, food and shelter, for a wide range of birds, lizards, and insects
 - see our Facebook posts for further evidence, <https://www.facebook.com/CJCCG.CoastCare/>

