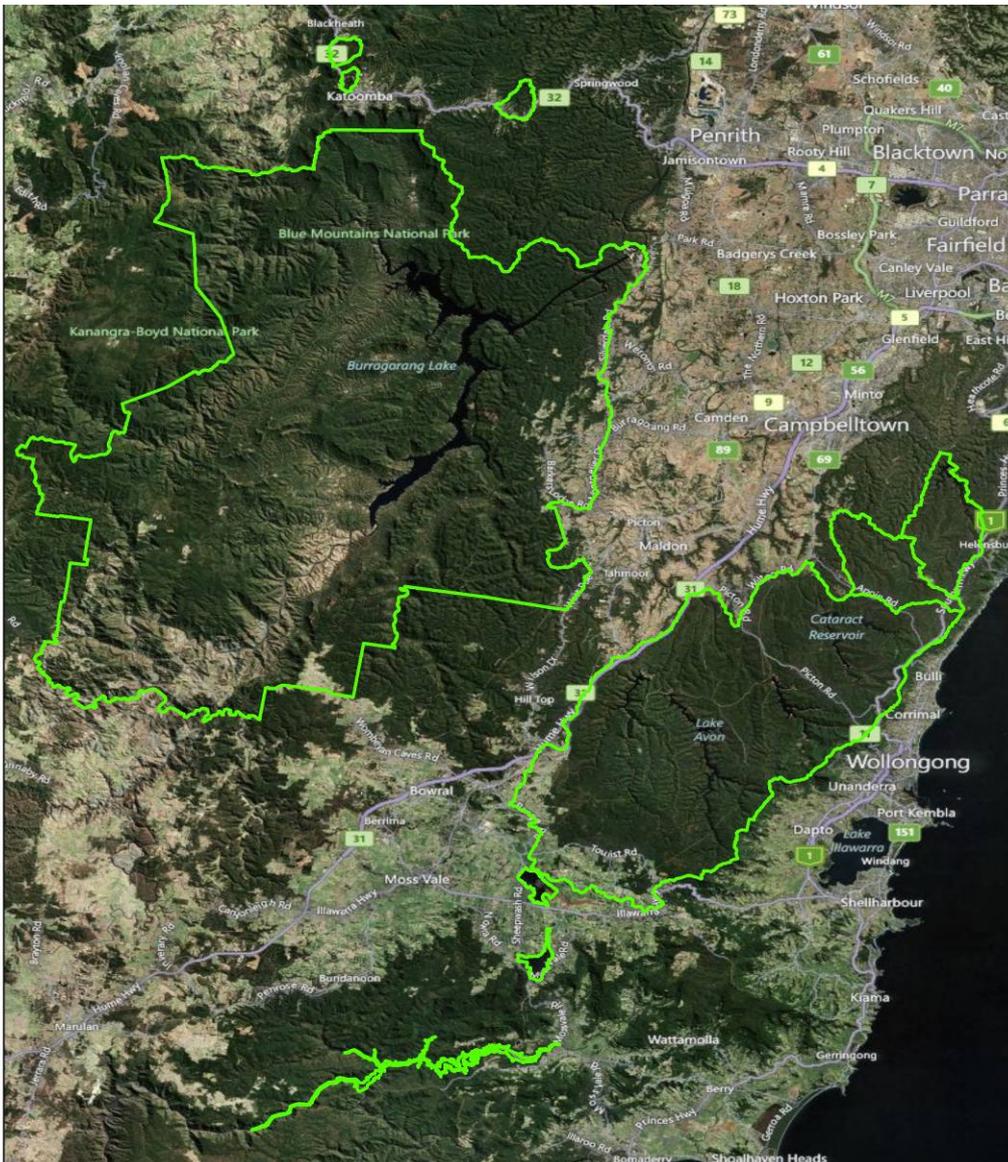


REVIEW OF THE WINGECARRIBEE SWAMP AND SPECIAL AREA PLAN OF MANAGEMENT 2007

Prepared for
Sydney Catchment Authority

30 May 2012



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1 Purpose of this report

Eco Logical Australia Pty Ltd (ELA) has been engaged by the Sydney Catchment Authority (SCA) to review the Wingecarribee Swamp and Special Area Plan of Management 2007 (WSSAPoM). This review:

- Outlines the legislative requirements and planning history of the WSSAPoM
- Reviews the implementation of actions from WSSAPoM
- Recommends the preparation of an operations plan for Wingecarribee Swamp rather than a Plan of Management

It is anticipated that information from this brief report will be used by the SCA and Office of Environment and Heritage (OEH) to advise relevant NSW Government Ministers about the WSSAPoM review, thus satisfying statutory obligations under the *Sydney Water Catchment Management Act 1998*, the SCA's current Operating Licence and the WSSAPoM itself.

This report will also provide background information for a 'Future Directions for Wingecarribee Swamp' workshop in August 2012.

2 Legislative requirements & planning history

Under Sections 49 and 50 of the *Sydney Water Catchment Management Act 1998* (SWCMA), the SCA and OEH must prepare and implement plans of management for each special area. An overarching Special Areas Strategic Plan of Management (SASPoM) was prepared and adopted by the Minister for the Environment in February 2007. A subservient Wingecarribee Swamp and Special Area Plan of Management (WSSAPoM) was prepared and adopted by the Minister at the same time.

The SCA's current Operating Licence directs the SCA, in collaboration with OEH, to 'give effect' to the implementation of Plans of Management for Special Areas and to facilitate any reviews as required by the plan. The approved 2007 WSSAPoM stated that it would need to be reviewed 'at least every five years'. This requirement has triggered this review report.

The SASPoM is currently being updated and will set principles, programs and targets for all Special Areas, including the Wingecarribee Special Area. Statutory requirements under the SWCMA for preparing a plan of management will therefore be met by the revised SASPoM.

In recognition of the ecological importance of Wingecarribee Swamp, its protection by a range of state and federal legislation and its listing on the NSW heritage register, an Operations Plan will be developed to provide the framework for managing the Swamp. The content of the new Operations Plan will be sufficiently detailed to inform future work programming on the Wingecarribee Swamp and articulate the agencies' vision and land management priorities.

3 Review of actions

Key actions from the 2007 WSSAPoM were reviewed by the SCA and OEH in 2012. This chapter summarises the results of the review. **Appendix A** lists all actions from the 2007 WSSAPoM and an explanation of their status.

The majority of the actions in the 2007 WSSAPoM have been implemented. Of a total of 36 actions, 33 (92%) are complete. Of the remaining three actions, one is not due until 2011/12 but is on track for completion, one is considered partially complete (report available as draft), and the progress on the action to be led by OEH is uncompleted

Significant achievements associated with the 2007 WSSAPoM include:

- Implementation of a scientifically robust water quality management program
- Baseline assessment of current ecological condition
- Plant community and threatened species surveys
- Development of a GIS database
- Development of a groundwater model
- Rehabilitation options for the Swamp identified and trials of some options undertaken
- Fire management plan reviewed and updated
- Development and implementation of a pest and weed management plan including a multi-million dollar willow and blackberry control program
- Liaison with other state and federal agencies e.g. OEH and the Rural Fire Service
- Communication by SCA with adjoining landholders
- Regular workshops with stakeholders and experts
- Technical advice from OEH

4 Recommendation

An Operations Plan for Wingecarribee Swamp is recommended to replace the 2007 WSSAPoM because:

- Most of the actions in the 2007 WSSAPoM have now been completed and a solid understand of the swamp dynamics and ecology is now achieved
- An Operations Plan will be appropriate for the SCA to identify issues and actions specific to Wingecarribee Swamp and to program their implementation
- The revised SASPoM will address statutory obligations for Special Areas management planning under s49 and s50 of the SWCMA
- The revised SASPoM will provide the governance framework and reflect the application of each agency's strengths to the management of Special Areas and the Swamp

An operations plan has no statutory obligation for public exhibition. Opportunities for future involvement in the management of Wingecarribee Swamp by the community and experts would be determined as part of the discussions at a 'Future Directions for Wingecarribee Swamp' workshop, which is scheduled for August 2012. The workshop will also have a role in setting the agenda for future works, timing for completion of these works, as well as a review of the Management of Wingecarribee Swamp and Reservoir: Identification of Knowledge Gaps (1999)

The operations plan will be implemented over five years.

Appendix A: Detailed review of actions

The following table has been prepared using the management targets and actions from the 2007 WSSAPoM with the results of a SCA and OEH review in 2012.

Acronyms used in the following table include OEH, DEC and DECCW. The NSW Office of Environment and Heritage (OEH) was formerly the Department of Environment and Conservation (DEC), the Department of Environment and Climate Change, or Department of Environment, Climate Change and Water (DECCW).

WSSAPoM ACTION	OUTCOME	STATUS
1. Water Quality		
<p>1.1 As part of the SCA's review of all catchment water monitoring, the SCA will develop a water monitoring framework including and expanding upon existing monitoring activities. The framework will include, where appropriate:</p> <p>a) An ability to monitor water quality within the Swamp, Reservoir and water received from transfers and the catchment;</p> <p>b) Responsive and representative monitoring (i.e.: to high and low flow events);</p> <p>c) Physiochemical attributes including nutrients, pesticides, algal counts and organic matter;</p> <p>d) Biological and ecological indicators with consideration given to indicators at multiple trophic levels;</p> <p>e) Analysis of the drivers for water quality in the swamp and reservoir, and.</p> <p>f) Links to other SCA programs such as the Healthy Catchments Program and <i>Water Quality Risk Management Framework</i></p>	<ul style="list-style-type: none"> A scientifically robust water quality monitoring (WQM) program was developed, with Wingecarribee Swamp monitoring included in the completed SCA wide water quality monitoring review The site managers had input to the Water Quality Review including liaison with SCA Science on pilot investigations Extra sampling was implemented to monitor potential impacts of the weed control program. The results of this sampling were used to determine longer term sampling requirements. Current water quality monitoring program continues and meets all current regulatory and environmental monitoring needs 	Completed
1.2 The SCA will continue existing water quality monitoring during the development of 1.1.	<ul style="list-style-type: none"> Monitoring has continued under a WQM contract and is reviewed when required 	Completed
1.3 Water quality incidents will be managed in accordance with the Water Quality Incident Response Plan including implementation of the catchment investigations procedure.	<ul style="list-style-type: none"> Incidents are managed in accordance with the Bulk Raw Water Quality Incident Response Plan (WQIRP) and catchment investigations procedure Separate incident response plan for triclopyr completed 01/12/07 D2007/02609 All water quality incidents have been managed in accordance with the WQIRP 	Completed

WSSAPoM ACTION	OUTCOME	STATUS
2. Ecosystem Management		
2.1 The SCA will collate a baseline assessment of the current ecological condition for each landform within the Swamp based on literature review. The first of these assessments will form the basis for performance evaluation.	<ul style="list-style-type: none"> Baseline assessment was completed by the SCA in 2008 (D2077/05314) and provided to DECC for review. . No comments were received from DECC. This assessment was then used as a basis for the plant community investigations undertaken for Action 2.5 	Completed
2.2 The results of monitoring and research programs will be compiled and reviewed by the SCA, in consultation with DEC and the working group referred to in action 8.1, to identify and implement priority actions as part of the annual works program.	<ul style="list-style-type: none"> SCA contracted Parson Brinkerhoff to undertake, threatened species surveys (D2011/58270), plant community surveys (2011/21930) and monitoring potential impact of the weed control program on the EEC and threatened species (2006/01204 and 2008/01378) The results of these studies have been discussed at each Annual Working Group (refer to action 8.1) and been provided in full to DEC 	Completed
2.3 The SCA will maintain a GIS database of spatial and temporal hydrogeological and ecological information from the above monitoring programs and research, in order to record, compare and measure the results of all monitoring and to inform annual works programs.	<ul style="list-style-type: none"> Wingecarribee Swamp database on SCAMAIN was developed Files have been established on the GIS database and are available for use when developing works programs and undertaking environmental impact assessment (stored on K: drive) 	Completed
<p>2.4 The SCA, in consultation with DEC and DEH, will determine SCA's obligations and establish a program in response to:</p> <p>a) Key threatening processes listed under the Threatened Species Conservation Act 1995 (e.g. invasion by pasture grasses, altered hydrological regimes, and frequent fire)</p> <p>b) Priority Action Statements prepared for individual species under the <i>Threatened Species Conservation Act 1995</i>,</p> <p>c) Endangered ecological communities; and</p> <p>d) Recommendations from research programs</p>	<ul style="list-style-type: none"> The SCA developed a practical strategy based on negotiation The SCA communicated with both state and federal threatened species departments, and letters were sent to (the former) DECC and DEWHA to confirm general requirements and the SCA's response to these matters via its operational programs. DEWHA responded positively, agreeing that the operational programs underway would meet any federal protection obligations. DECC recognised the work underway and suggested further controls be considered for managing pasture grasses. The SCA sought meetings to discuss the practical application of this feedback. It has also been discussed at the Annual Working Group (action 8.1). The SCA has undertaken a trial of rewetting and monitored pasture grasses response as well as direct control of pasture grasses within the intact arm of the Swamp. The SCA's operational programs are fulfilling the obligations whilst feedback continues to be sought from (now) OEH. 	Completed
<p>2.5 The SCA will undertake vegetation monitoring for each landform within the swamp using permanent monitoring plots, to assess:</p> <p>a) distribution and abundance of plant communities; and</p> <p>b) Spatial and temporal differences in composition.</p>	<ul style="list-style-type: none"> The SCA engaged Parson Brinkerhoff to undertake a plant community investigation report for the swamp (2011/21930). This investigation included three years of vegetation monitoring in permanent plots, vegetation community mapping, trend analysis of vegetation change over time including historical vegetation surveys and an assessment links between vegetation distribution and soil 	Completed

WSSAPoM ACTION	OUTCOME	STATUS
<p>Historical data and sites will be examined to assist in determining monitoring locations.</p>	<p>moisture/groundwater levels.</p> <ul style="list-style-type: none"> The consultants were also engaged to monitor the performance of the weed control program and potential impacts on the EEC and threatened species. The results have been discussed at each Annual Workshop (action 8.1) and provided directly to DECC 	
<p>2.6 The SCA will assess the water balance of the Wingecarribee Swamp to provide an understanding of the water recharge and discharge mechanisms through the Swamp to inform ecological management. The assessment will at a minimum consider:</p> <p>a) Groundwater quality and dynamics including the installation of multilevel piezometers (see Coffey Geosciences (2004) <i>Hydrological and Geophysical Investigations of the Wingecarribee Swamp</i>);</p> <p>b) Spring ranking and flow measurement; and</p> <p>c) Results of the current and future University of Wollongong studies.</p> <p>A report with detailed interpretation and modelling will be prepared.</p>	<ul style="list-style-type: none"> Comprehensive groundwater research program has been completed. This included installation of new piezometers, upgrading existing piezometers (UOW standpipes) in strategic locations, installation of data loggers, plus ongoing monitoring of piezometers network P2008/00058 and P2008/00061). The work was peer reviewed by Dr Noel Merrick who generally supported the work and conclusions (D2008/04698). A model was developed which was also considered in the peer review. 	<p>Complete</p> <p>The question regarding the expansion of this work will be subject to consideration under the Future Directions Workshop in August 2012</p>
<p>2.7 The SCA will develop an integrated groundwater – surface water model to investigate:</p> <p>a) Linkages and changes in water levels, climate trends, and groundwater flows; and</p> <p>The influence of moisture conditions on spatial and temporal variances in the distribution and abundance of ecological communities across the swamp.</p>	<ul style="list-style-type: none"> See above Peer review of initial model was developed by consultant Further peer review was done when new model finalised Whilst the two models exist, the integration of surface and groundwater models has not occurred whilst agreement is being sought on the appropriate integration model 	<p>Completed as part of action 2.6</p> <p>The specific integration needs to be discussed at the Future Directions Workshop</p>
<p>2.8 The SCA, in consultation with DEC and the working group referred to in action 8.1, will develop and review options for the rehabilitation of Wingecarribee Swamp including ecological, hydrological, operational, financial and engineering implications, and determine appropriate rehabilitation strategies.</p>	<ul style="list-style-type: none"> A broad Options Paper has been reviewed by the SCA Executive (D2007/00624) Some options are considered unsuitable due to dam safety concerns “Soft engineering” trials have been conducted with limited success. The specific Key Action is not due until the end 2011/12 period 	<p>Not due until 2011/2012 but on track as options have been developed and workshop planning is underway</p> <p>This action to be discussed at the Future Directions workshop</p>

WSSAPoM ACTION	OUTCOME	STATUS
3. Pest and Weeds		
3.1 The SCA will continue to implement the Draft <i>Pest and Weed Management Plan for the Wingecarribee Swamp</i> (WSPWMP).	<ul style="list-style-type: none"> The SCA continued to implement the draft strategy until the WSPWMP strategy in action 3.2 was finalised. Actions within the plan are being implemented and form the basis of these operational programs on the swamp 	Completed
3.2 The SCA in consultation with DEC will finalise and implement a <i>Pest and Weed Management Plan for the Wingecarribee Swamp</i> and as a minimum include: <ol style="list-style-type: none"> A proactive, integrated and holistic approach to pest and weed management; Terrestrial and aquatic weeds and pests; Priority weeds and pests impacting on water quality and threatened species; Methods to achieve sustainable management of willows (<i>Salix cinerea</i>) and blackberry (<i>Rubus spp.</i>) within the five year target; Assessment of the impact and threats to ecological integrity from pasture grasses and identification and development of control measures; Monitoring of emergent species, Appropriate use of herbicides Monitoring and assessment of the impacts of weed control measures on native communities and threatened species in the Swamp; Work cooperatively with neighbours in pest and weed management programs. 	<ul style="list-style-type: none"> WSPWMP (D2009/00126) was signed off by the Executive and continues to inform the development of pest and weed programs on the swamp including the ongoing maintenance program. During the five years of this plan the SCA has undertaken significant weed control work targeting Willow and Blackberry. The SCA has also participated in fox and rabbit control in co-operation with neighbours. 	Completed The ongoing role of the WSPWMP will be discussed at the Future Directions Workshop
3.3 The SCA will investigate options to re-establish the water table in different landform components of the Swamp to assist in the control of weeds.	<ul style="list-style-type: none"> This is linked to the delivery of Actions 2.5, 2.6 and 2.8. All these actions seek to derive knowledge about the swamp's behaviour and interactions between the water movements and the ecology After multiple years of research, the SCA is planning a Future Directions Workshop where all relevant stakeholders and experts can meet to discuss what feasible and pragmatic options are available 	Completed Whilst this action is not technically completed, it is covered by Actions 2.5, 2.6 and 2.8
4. Heritage Works		
4.1 The SCA will support the ongoing inclusion of Tharawal, Illawarra and Gundungarra Aboriginal people in Aboriginal cultural heritage decision making processes in the Wingecarribee Swamp and Special Area.	<ul style="list-style-type: none"> AHIMS search completed on recorded Aboriginal heritage sites located in close proximity to Wingecarribee Swamp A list of known sites kept in TRIM (records management) for future reference in planning works (D2011/2465) Cultural access is supported when requested No active cultural investigations underway or planned that would 	Completed

WSSAPoM ACTION	OUTCOME	STATUS
	require the community's specific inclusion. Earlier archaeological investigations included the community (2007/00074). <ul style="list-style-type: none"> The SCA has sought involvement of Aboriginal community through the CMA Aboriginal representative. The Working Group (action 8.1) includes representatives from OEHL who have sought to assist with strategies for aboriginal inclusion 	
4.2 Environmental assessment of management operations in the Swamp and its margins should consider the significant sub-surface archaeological assemblages adjacent to areas of intact peat.	<ul style="list-style-type: none"> Mapping completed and on GIS database All activities on the swamp require a form of EIA as per the EP&A Act. SCA consider environmental and cultural values when undertaking its EIA 	Completed
4.3 The SCA will seek endorsement by the NSW Heritage Council to adopt this plan as a Conservation Management Plan for the purposes of the NSW <i>Heritage Act 1977</i> .	<ul style="list-style-type: none"> Consultations with Heritage Office led to completed approval for 10 years or life of the WSSAPOM 	Completed
4.4 The SCA, in consultation with DEC and other relevant stakeholders, will develop and implement a Cultural Heritage Strategy for the ongoing identification, protection and conservation of Aboriginal and historic cultural sites in the Wingecarribee Swamp. This strategy will include: <ol style="list-style-type: none"> Implementation of a focused data acquisition strategy to identify archaeological sites and landscapes at risk; Further investigation of the intact peat lithic material and Swamp margins; Authorised access to the Swamp for maintenance of cultural heritage values; Potential sources of funding for cultural heritage investigations; and Development of specific management measures for the protection of cultural heritage in each landform type. 	<ul style="list-style-type: none"> Through Working Group (action 8.1), support was requested from OEHL for guidance on strategy development and community engagement Some additional inputs were received which saw a guideline developed but the strategy is still outstanding Under the SASPoM, a draft strategy has been developed which includes the Wingecarribee Special Area (and swamp) – the document is currently under review by the agencies Heritage Branch was also consulted regarding the strategy and they provided advice considered in developing the guideline. Work program was developed based on findings from Jo McDonald's subsurface archaeological investigation report (D2007/0074) The area is a boundary between three indigenous communities and none have expressed a specific cultural interest in the area It's understood that the area was a useful food resource and easy navigation route to move to other priority areas 	Draft completed
5. Fire Management		
5.1 The SCA will maintain and enforce a 'no fire' policy for the Wingecarribee Swamp and Special Area including: <ol style="list-style-type: none"> a 'no fire' and 'no smoking' policy for SCA and contractors; implementation of fire response strategies under the <i>Fire Management Plan for the Wingecarribee Swamp and Special Area</i> 	<ul style="list-style-type: none"> "No fire clause" is included in all Contracts and Project Safety Plans for work on the swamp The Type 2 Fire Management Plan is complete and will be reviewed in 2011/2012 with a new plan finalised in 2012/2013 	Completed
5.2 The SCA will continue to participate in the Local Bushfire Management Committee.	<ul style="list-style-type: none"> SCA staff continue to be represented at Wingecarribee Bushfire Management Committee meetings 	Completed

WSSAPoM ACTION	OUTCOME	STATUS
	<ul style="list-style-type: none"> • SCA input to DBFRMP identified swamp as a fire risk and strategy adopted by RFS is that the swamp is declared a fire exclusion area (this also fulfils actions under PAS) • This means that at all times of the year, RFS will need to issue permits for any burning within the Zone around the swamp 	
5.3 The SCA will update and implement the <i>Fire Management Plan for the Wingecarribee Swamp and Special Area (1999)</i> including emergency response procedures and consideration of the use and implications of fire management methods and infrastructure on both water quality and ecological integrity.	<ul style="list-style-type: none"> • The Type 2 Fire Management Plan is complete and will be reviewed in 2011/2012 with a new plan finalised in 2012/2013 	Completed
5.4 The DEC, in collaboration with the SCA, will lead research into the likely impact of the fire exclusion policy on floristic composition and structure of the Swamp.	<ul style="list-style-type: none"> • This action has been raised in the Working Group (action 8.1) and via formal correspondence with no action from OEH 	Not completed
6. Reservoir Operations		
6.1 The SCA will finalise current 'Interim Guidelines' for reservoir operations following an assessment of potential hydrological, geomorphological and ecological impacts to the Swamp under proposed operational scenarios.	<ul style="list-style-type: none"> • The guidelines have been utilised throughout the life of this plan and there has been no water supply operational conflicts as a result • The Peat Options Study required from a dam safety perspective has been completed and forms the basis of the remedial works being undertaken on the Wingecarribee Dam during 2011/2012 and 2012/2013 • The works will potentially allow a larger "operating window" for reservoir management • New operating guidelines are being developed for implementation after the remedial works are completed • Hydrogeological research indicates the reservoir height influences water levels in the swamp only within 200 m of the reservoir. The water levels in the remainder of the swamp are independent of the reservoir level 	Completed
6.2 The SCA will manage the transfer regime and reservoir levels to minimise adverse impacts on the ecosystems of the Wingecarribee Swamp during water transfers.	<ul style="list-style-type: none"> • The Guidelines for Reservoir Management have been utilised. • Good internal communications exist within the planning and operational areas of the SCA to ensure that reservoir level management is discussed • SCA System Planners have been able to support weed control programs by varying levels that improve access at times. 	Completed
6.3 The SCA will investigate events with the potential to cause peat instability (e.g. storm events, floods, earthquakes and mining) and develop appropriate options for managing the stability of the peat.	<ul style="list-style-type: none"> • Peat Options Study addressed this issue. 	Completed
6.4 The SCA and DEC will provide advice to NSW Government as required on the implications of initiatives proposed under the Metropolitan Water Plan in order to minimise any potential impacts on	<ul style="list-style-type: none"> • Collaborative meetings held • All relevant correspondence placed on a file • Advice provided as required during the development of the 	Completed

WSSAPoM ACTION	OUTCOME	STATUS
the water quality and ecological values of Wingecarribee Swamp, including recommendations for alternative water transfer strategies where appropriate.	Kangaloon Borefield proposal but currently no further action on that matter	
7. Regulation of Human Activity		
7.1 The SCA will seek and/or update access agreements with neighbouring landholders for SCA management access to Wingecarribee Swamp and Special Area.	<ul style="list-style-type: none"> All existing access agreements (3) have been updated and have been in place continuously since inception of the plan 	Completed
7.2 The SCA will maintain and enforce the policy of no public access to Wingecarribee Swamp, Special Area and Reservoir.	<ul style="list-style-type: none"> 'No Access' Policy is enforced – all access requests are managed through the SCA Access Policy and Procedure which includes application through the website and assessment against criteria 	Completed
7.3 The SCA will continue to manage all access to the Wingecarribee Swamp and special area in accordance with the SCA's Human Access Management Policy.	<ul style="list-style-type: none"> As above 	Completed
7.4 The SCA will minimise unauthorised access by reviewing and where necessary upgrading signage, maintaining gates, fences and barriers in cooperation with neighbours.	<ul style="list-style-type: none"> Maintenance and installation of signage and fencing represent a standard activity within the Operations Group The swamp is fenced to prevent illegal access and cattle grazing. A project currently exists to progressively upgrade fencing and undertake associated survey work to determine accurate boundaries and maintain stock proof fencing 	Completed
8. Operational Planning		
8.1 The SCA will convene a working group which will meet at least annually to: <ol style="list-style-type: none"> identify research requirements and priorities for the Wingecarribee Swamp, facilitate the exchange of institutional knowledge and research findings, and provide input into SCA annual works program 	<ul style="list-style-type: none"> Intergovernmental working group meets annually to discuss progress on the plan. Advice has been sought on a range of issues from key contacts outside of the working group forum. 	Completed
8.2 The SCA will hold at least one cross divisional consultative workshop each year to determine management options taking into account water supply, reservoir management, dam safety and land management.	<ul style="list-style-type: none"> The cross divisional consultative workshop has been held either individually or in combination with the working group from action 8.1. 	Completed
8.3 The SCA will consult with DEC on areas of DEC expertise relevant to the implementation of this Plan including the management and regulation of threatened species, endangered ecological communities and Aboriginal cultural heritage.	<ul style="list-style-type: none"> The SCA continues to consult with OEH on areas of expertise such as ecological planning, environmental impacts monitoring, trails and site rehabilitation 	Completed
8.4 DEC will make staff available to provide technical advice to the SCA on areas of DEC expertise relevant to the implementation of this	<ul style="list-style-type: none"> OEH have made staff available when requested for technical review of issues. 	Completed

WSSAPoM ACTION	OUTCOME	STATUS
plan or as new issues arise.		
8.5 The SCA will continue its policy of obtaining expert and independent advice for the management of the Swamp through consultancies and peer review.	<ul style="list-style-type: none"> • WSSAPoM itself was peer reviewed. • Ground Water Model peer review by Dr Noel Merrick. • WSPWMP reviewed by CLPHA and DECC • Fire Management Plan developed in consultation with RFS and DECC • APVMA consulted on pesticide usage and monitoring. • Scope of ecological monitoring, threatened species surveys and plant community investigations were reviewed by OEH. Final reports from all ecological work have been provided to OEH 	Completed
8.6 The SCA will communicate with other land management agencies, Wingecarribee Shire Council, environmental regulation agencies and the local community to a) promote the goals, targets and actions of this plan; and b) Communicate emerging issues and information about the swamp.	<ul style="list-style-type: none"> • The SCA communicates regularly “over the fence” with adjoining landholders • Key agencies as stakeholders consulted and engaged through actions 8.1 and 8.5 • Council invited annually to Working Group (action 8.1) • The WSSAPoM is referenced in formal correspondence when required 	Completed



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