
Protected Species and Ecological Communities Branch
Department of Climate Change, Energy, the Environment and Water
Canberra ACT 2601
Via email: recoveryplans@dcceew.gov.au

19 November 2025

Dear Protected Species and Ecological Communities Branch,

RE: Submission to the draft National Recovery Plan for the Swamps of the Fleurieu Peninsula

The Conservation Council SA welcomes the opportunity to provide a submission to the Commonwealth Government's consultation on the draft National Recovery Plan for the Swamps of the Fleurieu Peninsula.

The Conservation Council SA is an independent, non-profit, and strictly non-party political organisation representing approximately 50 of South Australia's environment and conservation organisations and their 90,000 members. Our organisation has had a long history of advocating for the protection and recovery of South Australia's unique Fleurieu Swamps Threatened Ecological Community (TEC).

The Conservation Council SA is happy for its submission to be published.

Recommendations

The need to focus on private landholders

1. That, given the predominance of the Fleurieu Swamps on private land, that the focus on engagement with private landholders be retained and, where possible, even further enhanced.
2. Further to recommendation 1, that private protected areas and public protected areas be separately identified¹ in the map contained within Figure 4 of the draft Plan (see: page 14²), especially as there are currently only two significantly-sized, relevant public protected areas to the Fleurieu Swamps TEC.
3. That the actions in the Recovery Plan be designed with a view to them being an exemplar for public-private partnerships for ecological recovery and nature repair.
4. By necessity, the implementation of the Recovery Plan relies on active engagement with – and adoption of new management practices by – private landholders. On this basis, the Plan would be strengthened if it explored a modern understanding of how private actors and their social institutions can be engaged for change, recognising that recovery of the Fleurieu Swamps TEC is about human behavioural change as much as it is about conservation science.

¹ Both layers are available from the [SA Department of Environment and Water's Nature Maps](#).

² [Draft National Recovery Plan for the Swamps of the Fleurieu Peninsula, Department of Climate Change, Energy, Environment and Water](#)



Markets and funding

5. Noting that there is currently no avenue to utilise Government-regulated, market-based support for the recovery of the Fleurieu Swamps, that the recovery plan include an action for the Federal Government to formally investigate the addition of 'swamp recovery methods' for the carbon market³ (for example the Clean Energy Regulator's Soil Organic Carbon Sequestration Measurement and Modelling Method explicitly excludes organosols⁴). The Recovery Plan would be strengthened if it referenced the Enhancing Native Vegetation method currently being drafted under the Nature Repair Market, which explicitly includes swamps and wetlands – and would include the Fleurieu Swamps TEC.
6. The recovery plan should at least identify *existing* sources of Government, private and philanthropic funding available (and/or being utilised) for investment in Fleurieu Swamps' recovery.

Prioritisation

7. The Plan should identify priority sites for recovery, and priority recovery actions for those sites.
8. Given the extensive research already undertaken on the Fleurieu Swamps (including research supported and implemented by Conservation Council SA), Conservation Council SA is deeply concerned that the focus of the Recovery Plan is much too weighted towards additional research and planning, rather than simply partnering with landholders to co-finance on-ground restoration activities and the improved active management of the Swamps. Further, it should be noted that ecosystem benefits to landholders are insufficient to justify the full investment in Swamp recovery, which means that there is a clear role for public co-investment to catalyse land management behaviour change.

Facilitation

9. Conservation Council SA is happy to help facilitate engagement across its Fleurieu networks to assist the delivery of the Recovery Plan. We encourage the Department to be in contact with Conservation Council SA to discuss opportunities to be a partner in the recovery work.

As South Australia's peak body for the environment, we look forward to continuing to engage with the Branch as it finalises its Recovery Plan – and beyond.

If you require further information, please contact me at ChiefExecutive@conservationsa.org.au

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Kirsty Bevan'.

Kirsty Bevan

Chief Executive

³ There are existing international carbon markets swamp methods that could be draw upon, for example: [VM0036: Methodology for Rewetting Drained Temperate Peatlands](#); and: [VMD0042: Estimation of baseline soil carbon stock changes and greenhouse gas emissions in peatland rewetting and conservation project activities](#).

⁴ See: Part 3, Division 1, section 9(2)(c), *Carbon Credits (Carbon Farming Initiative—Estimation of Soil Organic Carbon Sequestration Using Measurement and Models) Methodology Determination 2021 (Cth)*; see: <https://www.legislation.gov.au/F2021L01696/latest/text>

