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Comments on the Discussion Paper prepared by National Task Group on the development of a National Biodiversity and Climate Change Action Plan. October 2003

Overall the need for a National Action Plan is timely and needed. The recognition that biodiversity and ecosystems are key assets most vulnerable under Greenhouse induced Climate change is a welcome development. Although all measures to ameliorate the causes of increased greenhouse gases must remain the first priority (eg the national disgrace of continued large scale land clearing), adaptation to the inevitable is a wise move.

This is a long-term, slowly developing "emergency" and the responses to adaptation should be well in-train over the next decade or so as some of the biodiversity assets take decades to express themselves (eg tree hollows, re-establishment of riparian vegetation etc).

We generally support the Action Plan and its 4 strategic goals:

- Incorporate adaptation to climate change as a key component of core business for all natural resource planning and management.
- Maintenance of ecosystem processes and functional resilience.
- Improve our understanding of future climates, climate change scenarios and likely impact on biodiversity through targeted monitoring, evaluation and research.
- Communication: building awareness, understanding and capacity.

Some specific comments:

The text remains very general in nature and should be improved by providing specific examples across a range of scales. The reader should be able to "visualise" what some of the actions may mean in the landscape.

One implication is that our National Parks system may not be capable of providing the biodiversity conservation that it was set aside to accomplish. Here the Commonwealth government, through NAP / NHT has a vital role to play. More effort needs to be placed in restoration of the landscape outside parks but complementary to them. For instance in Victoria the vision for Agriculture 2020 is to produce more out put using "30% less land and 20% less water" thus there is opportunity for this land to be incorporated into a vision for "greenhouse proofing" Victoria's environmental assets. The 'biolink zones' proposed in the Draft Flora and Fauna Strategy (DCE 1992, pages 13-17) are a possible template that could be used for this revegetation. This action should be similar in other states and the Commonwealth can and must provide leadership.

The effects of Greenhouse on water quality and quantity (and our rivers and streams) are not well covered and deserve emphasis particularly as the national debate on this issue is evolving and decisions may be taken over the next few years. Any allocations (and mechanisms) for water must take account of long-term, climate change trends.

The role of NGOs particularly, in strategy 4, is important and could get more emphasis.

The specific actions listed under each of the strategies must have some tangible criteria and time frames to judge whether they have been effective and that sufficient progress is being made. In addition there should be more 'on-the-ground' and specific actions. At present there is much research and policy development but little concrete implementation.

There also needs to be adequate resourcing to make it happen.

We hope these brief comments in the short time frame available are useful.