

20th October 2003

Gerard Crutch
Natural Resource Management Policy Branch
GPO Box 787
Canberra ACT 2601

**Re: Developing a National Biodiversity and Climate Change Action Plan
Comments on Consultation Paper**

Dear Mr Crutch,

Firstly, thank you for the opportunity to provide comments on these important initiatives towards remediation of biodiversity loss due to climate change in Australia.

As the original proponent of “*Loss of climatic habitat caused by anthropogenic emissions of greenhouse gases*” as a key threat under the *Environment Protection and Biodiversity Conservation Act 1999 (EPBCA)*, HSI has long regarded management actions to preserve biodiversity in response to human-induced climate change to be of great importance. We value the opportunity to contribute to the development of the National Plan.

We note that in their advice supporting listing of this process the Threatened Species Scientific Committee indicated that “*The proposed scope for a Threat Abatement Plan suggested by the nominator concentrates on the adaptation to climate change, rather than reducing the loss of climatic habitat, reducing climate change, or reducing the anthropogenic emissions of greenhouse gases. The threat abatement plan suggested in the nomination involves a habitat conservation planning regime to help facilitate adaptive responses to climate change for those affected species and communities listed under the ESP Act.*” Please find enclosed a copy of the original nomination for your reference. We are pleased that some of the initiatives suggested in the nomination have been picked up in the National Plan, however we ask that you re-assess:

- Section 2 *The Need for a Threat Abatement Plan (TAP)*
- Section 4 *Proposed Scope of Threat Abatement Plan*

in further development of a National Biodiversity and Climate Change Action Plan.

Although at the time of assessing HSI’s nomination the TSSC recommended against a TAP, HSI believes that the development of this National Action Plan represents a commendable reversal of opinion on the need for threat abatement actions for this process.

We remain of the opinion that a strong legislative basis for the National Biodiversity and Climate Change Action Plan is essential to ensure both ongoing reviews, as

required under the EBPCA, and allocation of funding for threat abatement actions. We recommend that in order to ensure ongoing commitment to climate change and biodiversity strategies, that the National Action Plan be recognised as a Threat Abatement Plan (TAP) for the already listed process of *“Loss of climatic habitat caused by anthropogenic emissions of greenhouse gases”*.

The TSSC’s final comments in their advice on the listing recommend that *“along with the issues of emissions reduction, the adaptation requirements of species and communities likely to be affected by climate change should be given greater priority”*.

HSI is pleased to see that the Consultation Paper gives consideration under Theme 1.1 to assessment of climate change in determining the conservation status of species and communities.

We ask that you ensure under Theme 1.2 that legal recognition and imperatives are further explored. In order to see effective integration with planning and management processes, we urge that the National Action Plan identify as one of its specific actions legal recognition of threatened ecological communities, threatened species and areas of important habitat. Such recognition would also fit well under Theme 2.1.

While Theme 2.1 makes mention of buffer zones, the importance of corridors between protected areas does not appear. In the National Greenhouse Response Strategy released in 1996, governments stated that they *“will seek to provide corridor systems that link reserves and refuges with a relatively large range of altitudinal and other geographical variation, to take account of possible impacts of climate change”* (as detailed on page 17 of the attached paper). We hope such an initiative is not overlooked in the development of the National Plan.

We look forward to working further to mitigate the serious threat climate change poses to Australia’s biodiversity, and thank you again for the opportunity to provide comment.

Yours Sincerely,

Averil Bones
Wildlife Campaigner