



HUMANE SOCIETY INTERNATIONAL

COMMENTS ON AUSTRALIA'S CONSERVATION STRATEGY 2010 – 2020: CONSULTATION DRAFT

Overview

Humane Society International strongly supports the desirability of a national approach to biodiversity conservation through a national strategy which sets out clear targets and actions to be achieved within set time frames. Unfortunately, the draft Australia's Biodiversity Conservation Strategy 2010-2020 is not such a Strategy and its lack of specificity and detail leaves Humane Society International (HSI) seriously concerned that Australian governments will continue to be unsuccessful in turning around the decline in biological diversity the continent is suffering.

We are concerned the draft Strategy is a lowest common denominator document negotiated through the Natural Resource Management Ministerial Council. As has been the failure of the previous National Strategy for the Conservation of Australia's Biological Diversity and the National Objectives and Targets for Biodiversity Conservation, this draft Strategy expresses aspirational goals that are general in nature but lacks an action plan or implementation document setting out precisely how those goals will be achieved with clear, time-specific commitments and assignments of responsibilities.

HSI accepts that national goals need a degree of generality but, as national top down, aspirational targets go, this draft Strategy is weaker in ambition and detail than both the *National Strategy for the Conservation of Australia's Biodiversity 1996* and the *National Objectives and Targets for Biodiversity Conservation 2001-2006*.

To give confidence that the goals of a national biodiversity strategy will be translated to results on the ground, HSI repeats our long espoused recommendation that the Commonwealth take the lead to initiate and fund systematic bioregional biodiversity planning to achieve cooperation and better integrated planning between the different tiers of government for the conservation of national biodiversity priorities.

We also strongly recommend the Commonwealth Government develop its own robust and detailed Biodiversity Conservation Strategy, to fulfil its own obligations to conserve biological diversity under various multi lateral environment agreements such as the Convention on Biological Diversity, to set out its international biodiversity conservation agenda and to guide its own efforts and financial investments in domestic biodiversity conservation in a strategic, timely and transparent manner.

Comments

Generally, the draft Strategy has an air of complacency regarding the state of Australia's biodiversity with the seriousness of the situation not properly conveyed.

While celebrating progress is appropriate, the Strategy lacks an honest and thorough assessment of the various downward trends in biodiversity conservation and the short comings of government efforts to date arrest them. The introduction mentions a number of actions that have taken place since 1996, but it would have to be said that not a lot of confidence could be placed in some of these actions. For example: "development of new markets for protecting native habitat on private land" – the reality is that such new markets are either small or non – existent. Neither can it be said that Regional Forest Agreements are delivering biodiversity conservation.

While the Strategy does refer to the worsening state of Australia's biodiversity, it fails to establish the depth of the crisis. Many scientists are now saying that human induced stresses on the planet are causing the 6th wave of mass extinctions. In some places the threats are downplayed. For example, in reference to climate change the draft states: "Climate change (resulting in conditions such as the prolonged drought)". However, all climate change predictions for southern Australia suggest permanent lower rainfall and increasing temperatures – the expression 'prolonged drought' suggests an eventual cessation of drought conditions which will not be the case.

Vision, objectives and actions

The overall vision for the Strategy for Australia's biodiversity to be 'healthy and resilient to climate change valued for its essential contribution to our existence' lacks a commitment to specifically *protect* biological diversity, maintain ecological processes and systems. This was a clearly articulated goal of the 1996 National Biodiversity Strategy.

The proposed actions are very vague and general with no real commitments either in time or funding allocation. At least the 1996 National Biodiversity Strategy included some detailed actions and some that were measurable. This Strategy lacks specific measurable targets which will make it difficult to judge performance in implementation. It is good there is an intent to monitor the implementation of the strategy, but because the proposed actions are vague and lacking measurable targets, performance reports under the auspices of the Natural Resource Management Ministerial Council will also be of a vague and general nature.

Given that the Strategy is for a 10 year time period and given the impacts on biodiversity of climate change and habitat degradation are likely to intensify earlier rather than later, the vagueness of the actions and long time horizon suggests no sense of urgency.

An example is Action 1.1.5: "Establish a national framework for off – reserve conservation" – This is long overdue and for the period of 2010 – 2020 we would expect the Strategy to be identifying specific, concrete off –reserve actions and commitments.

Cross-portfolio response

There is little recognition in the draft Strategy of the range of forces affecting biodiversity and hence which require a 'cross- portfolio' effort by governments. For example, biodiversity conservation should be a core consideration of policy development ranging from Australia's climate change response, drought assistance and the role of the taxation system. Thus the draft under a 'Mainstreaming biodiversity' priority action states: "Ensure emerging markets for carbon and water take into account biodiversity risks and benefits". Yet, there is no recognition of the potential large positive biodiversity and climate benefits that could result from a properly designed carbon market that includes incentives to conserve terrestrial carbon stores and avoid their degradation.

Bioregional planning

While the Strategy does call for delivery to be targeted and integrated at the appropriate geographic scale (Objective 4.2) and for investments to be aligned on priority issues (Objective 4.1), the lack of detail to achieve this in any comprehensive manner does not give us great confidence that there will be improved vertical planning between the different levels of government in Australia. Indeed, Action 1.1.2 calls for plans to be prepared at all levels of government to maintain ecosystem health and protect threatened and endangered species. While this is essential, without being coupled with better integrated planning between federal, state and local governments, it risks a lack of coordination and duplication of efforts.

HSI is among several policy experts that have called for systematic bioregional planning to better integrate and coordinate expertise and efforts between the different tiers of government. See attached *Proposal for a New National Biodiversity Initiative* from the National Biodiversity Alliance (2004) and *Future Proofing Australia: Bioregional Strategies Component* Sattler (2008). It is far to better share information and expertise and to coordinate planning and resources expenditure.

Systematic bioregional planning would also be a means to translate the more general aspirational goals expressed in national biodiversity strategies (and other such documents) into concrete actions that can be undertaken to actually achieve them on the ground at a more local level.

In order to effectively undertake a national approach to biodiversity conservation there is a critical need for determining Australia's biodiversity priorities for each bioregion. This would not be a case of 'more monitoring' but would enable all levels of government to work from the 'one page' in a coordinated approach to tackling our most critical biodiversity issues.

A national program to develop bioregional biodiversity plans that translate national goals into bioregional priorities and actions would provide the basis for effective implementation of the national Strategy.

HSI and other NGOs have been calling for such an approach for many years. Sattler (2008) estimated at least \$30 million would be required over 5 years for the

systematic development of biodiversity action plans for all Australia's 85 bioregions. They would be a joint technical undertaking between the Australian and State/Territory conservation jurisdictions, and draw upon other expertise, with at least 15 bioregions completed per year commencing with priority threatened bioregions.

The strategies for each bioregion and component subregions would include:

- assessment of biodiversity values, condition and trend, threatening processes and identification of conservation measures and opportunities
- assessment of the cost effectiveness of conservation measures to ensure each package of measures is tailored to regional needs
- identification of conservation measures needed to adapt to climate change
- assessment of financial needs and responsibilities of all relevant parties to implement each strategy
- effective long-term monitoring

As an example of what we feel is required for each bioregion (or other regional scale) see the attached *Bioregional Case Study for the Mitchell Grass Downs* Fisher *et al* (2002) for the Biodiversity Audit, National Land and Water Audit. The case study sets out cost effective actions that can be undertaken to achieve national level biodiversity targets at the local level (pages 39/40) with costs estimated, timeframes established and priorities and constraints identified (pages 41- 43). (We note other case studies are show-cased in the draft Strategy). A commitment to systematically implement bioregional plans similar to this right across Australia is required if we are to start to see genuine and sustained on the ground improvements in the condition of biodiversity comprehensively across the continent. If Australia's Biodiversity Conservation Strategy is to be successful, substantial funding to undertake this level of concerted action is required.

Legislation

HSI welcomes the commitment to review and reform legislation to improve biodiversity conservation across all sectors. However, we recommend more guidance is given as to how legislation needs to be improved to address cumulative impacts, be responsive to climate change, develop strategic planning, protect critical habitats and achieve species recovery, etc

International biodiversity objectives

The draft Strategy completely overlooks the biodiversity crisis facing our region and fails to set out actions Australia could take on the international stage to further regional and international biodiversity protection, for example through the various multi lateral environment agreements to which Australia is a signatory, including the UNFCCC, and through our overseas aid programs. The draft is silent on what Australia could be doing to assist poorer neighbours in the region that have high

levels of biodiversity such as Papua New Guinea and Indonesia. HSI is recommending a resurrection of the successful Regional Natural Heritage Program which delivered grants for biodiversity conservation projects in Asia Pacific. We recommend a section on international biodiversity goals be included in the National Strategy and, certainly, included in a Commonwealth strategy for biodiversity conservation.

Funding

If Australia's Biodiversity Conservation Strategy is to have any chance of success in addressing the relentless threats to our biodiversity, governments need to commit large amounts of funding and implement innovative market based measures to conserve biodiversity. To date however government performance in these areas has not been good. For example, while the Federal Government's Caring for Our Country has increased funding for the national reserve system, (which is very welcome although more funding is still required), funding for off reserve conservation is far from the quantum required, the Commonwealth Government's endangered species programs appears to have decreased and it is unclear whether funding for many Commonwealth marine biodiversity related activities is continuing. Any announcement of a final Strategy needs to be accompanied by a substantially increased financial commitment for terrestrial and marine biodiversity conservation.

Reporting and monitoring

To date progress in measuring success of biodiversity conservation programs has been poor and we recommend the establishment of a statutory national independent state of the environment and reporting body would better ensure continuity and sustained funding for monitoring.

Recommendations

HSI recommends the objectives and actions in the draft Strategy be substantially re-written to a greater level of detail with the inclusion of time specific and measurable targets, and a commitment to use systematic and comprehensive bioregional planning as a key delivery mechanism.

Generally, we would like to see measurable targets included in the Strategy for the following:

- More protected areas, including no-take marine protected areas;
- Systematic bioregional planning to integrate reserve and off reserve conservation and coordinate conservation efforts between different tiers of government;
- Incentives for biodiversity conservation on private land to conserve national identified biodiversity priorities and in identified corridor zones between protected areas;

- Comprehensive protection for known threatened species and ecological communities under Commonwealth and state legislation with recovery plans developed, conservation agreements and covenants secured – supported by financial incentive schemes;
- Greater investment in and regulation of threat reduction, most particularly invasive species, climate change and vegetation clearing, including commitments for the development of Threat Abatement Plans;
- Specified targets, timeframes for species and ecosystem recovery, and identification of agencies and levels of government responsible for achieving them;
- Commitments for the protection of critical habitats for threatened species and ecological communities using a range of conservation tools;
- Commitment for the protection of climate refugia for threatened species using a range of conservation tools (DEWHA committed funds for their identification last year);
- Establishment of a national network of whale and dolphin sanctuaries (as per ALP election commitment);
- Robust nationally-consistent long-term ecological monitoring to inform decision-making and identify spending priorities;
- Clear commitments for all jurisdictions to improve legislation to protect biodiversity and address cumulative impacts and other systemic failures of current environment legislation;
- Initiatives to achieve Australia's biodiversity interests internationally (for example: to achieve CITES protection for all qualifying shark species; to see an effective instrument for shark conservation negotiated under the CMS; to see an end to all commercial whaling in all its guises and the establishment of effective conservation a management plans for all threatened cetacean species at the IWC);
- Establishment of a Regional Biodiversity Conservation Fund to provide financial support for biodiversity conservation projects in the Asia Pacific region;

(We note that these recommendations for specific actions are not intended to be comprehensive but rather recommendations for the policy areas in which HSI specialises).

We recommend the Commonwealth develop its own Biodiversity Conservation Strategy for Australia, which should include commitments for achieving Australia's

biodiversity conservation goals internationally and for leading and coordinating domestic biodiversity conservation efforts.

We recommend the Strategy include more specific recommendations for improving the laws to protect biodiversity across all jurisdictions and that the announcement of a final Strategy be accompanied by a major boost in funds for biodiversity conservation.

We recommend the establishment of a statutory national independent state of the environment and reporting body.

Attachments:

Proposal for a New National Biodiversity Initiative (2004) The National Biodiversity Alliance

Future Proofing Australia (through the development of National Priorities and Bioregional Conservation Strategies) Bioregional Conservation Strategies Component: Paper presented to the Department of Environment Spatial Optimisation workshop, December, 2006 Paul Sattler OAM for Humane Society International

Bioregional Case Study for the Mitchell Grass Downs (2002) Alaric Fisher, Bryan Baker & John Woinarski for the Biodiversity Audit, National Land and Water Audit.

Contact:

Nicola Beynon
Senior Program Manager
Humane Society International
PO Box 439 Avalon NSW 2107
Nicola@hsi.org.au
02 9973 1728