



Comments on the consultation draft of

Australia's Biodiversity Conservation Strategy 2010-2020

Thank you for the opportunity to comment on the draft Biodiversity Conservation Strategy. The National Parks Australia Council (NPAC) is a peak national body whose member organisations are the National Parks Association of NSW, Victoria, Queensland, ACT, Tasmania and the Nature Conservation Society of South Australia. Our common purpose is to protect, promote and extend national park systems within Australia. All our members are non-profit, voluntary and largely self funding.

NPAC and its various state and territory members have been working for over fifty years to protect biodiversity through the establishment of national parks and reserves for which conservation and protection of biodiversity is the primary goal. Our member organisations conduct a wide range of activities to promote awareness of our unique species and ecosystems and to educate the public and land managers, by organising bushwalks and landcare work parties to publishing books and maps, holding scientific seminars, preparing submissions and generally promoting sound, scientifically-based management of our parks and reserves. Underlying all our activities is a commitment to our national parks and reserves as places of conservation where human activities – however pleasurable - must take second place to conservation of the area's natural values.

We recognise that Australia's Biodiversity Conservation Strategy 2010-2020 is a valuable attempt to bring some sort of national coherence to the complex and controversial issue of protecting biodiversity. It should provide a nationally consistent integrated vision for protection and enhancement of Australia's unique biodiversity. We accept that this strategy can only state what is agreed on by all jurisdictions and so must tread carefully to gain as much ground as possible. Against this background, the strategy is as good as could be expected, setting out the threats to biodiversity and a broad overview of a suite of actions which could be put in place.

However, we need to clearly recognise the weaknesses of this document if it is not to provide a 'lowest common denominator' in national efforts to protect biodiversity. There is a real danger that unsympathetic governments could merely tick the boxes in the strategy as it stands and claim to be meeting their commitments. In particular the strategy fails to address the fact that the greatest threats to biodiversity come from human modification of the landscape, climate and waterways. Further, despite the fact that these changes are motivated by commercial activity for the most part, the strategy does not identify effective strategies to address the current lack of corporate interest in doing no more than required by specific legislation.

Despite its clear exposition of the dangers facing Australia over loss of biodiversity, the strategy remains only a statement of intent and lacks specific actions, targets and accountability measures. The actions as set out in the strategy are vaguely worded and often passive in nature, eg 2.3.1 “promote participation and provide opportunities ...”; 2.3.2 “... make biodiversity conservation a mainstream consideration or integral to decision making”; and 2.3.3 “... emerging markets for carbon and water take account of biodiversity risks and benefits.”

Presumably having taken account of biodiversity risks and benefits, noted the opportunities provided and considered biodiversity conservation, most decision makers will continue to act as they currently do: placing profits, commercial activity, recreational amenity and political advantage ahead of protecting our biodiversity.

Specific issues

- The strategy fails to include local governments’ role in land management or to address their planning and decision-making roles which are critical to the protection of biodiversity at a local level. We accept that this is difficult in the context of the role of the NRMCC but this is a long-standing problem in issues of national significance and has been addressed in many different and innovative ways in the past. At the least, the strategy should refer to the role of state governments in giving direction to local governments in planning decisions affecting biodiversity.
- The strategy recognises six main threats to biodiversity on p.10 but examination of the objectives and actions reveal that these are not addressed in the strategy. There is no strategy to reduce unsustainable use of natural resources; nor are any changes to the aquatic environment and water flows proposed; nor do strategies address inappropriate fire regimes. A broad reading of some strategies could point to some work on addressing invasive species but there are no strategies to prevent further invasions, despite this being a Federal government responsibility and hence not subject to inter-jurisdictional agreement. It seems more likely that the strategy contains actions and objectives which can be agreed on, rather than strategies and actions which would actually work.
- The proposed measurement and evaluation of the strategy is crippled from the outset by a lack of specific targets, deadlines and quantitative and qualitative indicators. The text notes that the strategy will be monitored and evaluated, may even request interim independent reviews but examination of the actual results specified in the priorities themselves reveal that there are no actual targets against which an effective evaluation could be conducted. (At risk of being seen as flippant, some of our more experienced members could write the evaluation report already, based on prior acquaintance with such processes.)
 - It is worth noting that only one priority for change actually has an objective of measuring the success of the objectives and results within that priority. Priority 5, “Involving indigenous peoples” has an internal objective of developing appropriate measures and reporting against those measures. A question which looms very large for us is: why in this area only and not the other five priorities?
- Self-regulation, education and awareness are the major strategies for curbing existing abuses of the natural environment. If these have not worked so far, why does the strategy continue to rely on them? There is very little doubt left among our members that the commercial sector, particularly mining, forestry, tourism development, building and agriculture have very little capacity to self-regulate or be influenced in any major decisions by education or awareness. Profit is the only

driver for the private sector which is understandable but not acceptable if we wish to have sustainable growth and biodiversity protection. After decades of activism and negotiation with such businesses, there is very little faith left in the community with this approach.

- The lack of any enforcement provisions undermines the strategy. Federal/State funding arrangements in health and education are dependent on certain conditions being met so there are good precedents for bringing the same sort of arrangements into the conservation sector. It is hard to imagine even a 'naming and shaming' element in the evaluation strategy as the overarching goal appears to be placating member jurisdictions rather than achieving the outcomes of the strategy.
- On the other hand, there are no provisions to reward achievement or success of a particular State or Territory in any of the priorities or objectives. Again this is a key element of other areas of Federal/State relations and there must be some agreement among jurisdictions that additional funding is appropriate where success is demonstrable. Previous Federal funding programs like NRM became the backbone of some jurisdictions' spending on the environment. Caring for Country now carries this role and provides a good opportunity to draw a link between achieving success in protecting biodiversity and receiving Federal funding for the environment.
- On page 8 we read that "Biodiversity is of value in its own right" but this is never mentioned again nor are their guidelines by which it might be measured. The focus for undertaking action in the strategy is on the role biodiversity plays in supporting human activities. NPAC members believe that this focus on looking only to what biodiversity can do for us is at the heart of our abuse of the natural world and leads to a belief that it is our right to choose our needs over those of the natural world. If all we ever consider is our own gain, then we are incapable of seeing - or addressing - the whole problem.
 - We have watched in recent months as the debate about addressing climate change has become completely subverted by the global economic crisis. In good economic times we are told action on protecting biodiversity will undermine a profitable economy and then in bad times we are told we can't afford sound environmental policies because they will destroy the economy. The time is never right to make the hard decisions if all we ever consider is economic growth.
 - A national strategy to protect biodiversity cannot work unless it has a clear and unequivocal commitment to protecting biodiversity for its own sake.
- The strategy fails to show leadership to the rest of the government sector. Given that ministers who have responsibility for environmental matters are often confronted with scepticism amounting to open hostility even among their own Cabinet colleagues, the vagueness of this document serves only to prove to the wider community that environmental issues can be dismissed easily in current government circles. Departments which manage natural resource use have nothing to fear from this strategy and can meet its vague feel-good actions with little trouble to their current destructive activities.

We do accept the limitations under which this document has been developed and accepted by the various jurisdictions. However, the issue of our disappearing biodiversity and the damage being done to whole ecosystems require us, as a nation, to set clear, accountable goals which deliver nothing less than the re-invigoration and recovery of our unique biodiversity. This strategy is good as far as it goes but it fails

the test at the first difficult hurdle of making protection of our biodiversity central to each and every level of Australian government policy and practice.