



16 May 2009

National Biodiversity Response
PO Box 1715
Tamworth NSW 2340

Submission : *Australia's Biodiversity Conservation Strategy 2010-2020.*

The Urban Bushland Council welcomes the opportunity to comment on the Consultation Draft of the document *Australia's Biodiversity Conservation Strategy 2010- 2020.*

The Urban Bushland Council (UBC) is a peak community conservation body with over fifty member groups. The UBC promotes and encourages the conservation and appropriate environmental management of bushland areas remaining in, or on the fringes of, urban centres in Western Australia. Most of the Council's member groups are based in metropolitan Perth. The UBC has participated in community education activities and scientific research projects pertaining to the conservation of biodiversity in urban areas and many of our member groups have extensive experience in environmental management.

The Urban Bushland Council has a very particular interest in the conservation and enhancement of Australia's natural biodiversity and therefore a very keen interest in any over-arching biodiversity conservation initiative emanating from the Commonwealth Government. The UBC's interests and activities are centred on the Perth metropolitan region and it must be understood that this area covers a massive swathe of the remarkable and unique bioregion known as the Swan Coastal Plain. This region contains many threatened or vulnerable indigenous flora and fauna species and communities and urban development is a direct threat to the maintenance and recovery of these species and communities. In working to conserve urban bushland the UBC is really about striving to protect an internationally significant bioregion from ecological desertification.

The Urban Bushland Council was greatly encouraged by the release of *The National Strategy for the Conservation of Australia's Biological Diversity (1996)* more than a decade ago, and generally took the view at the time that it represented the beginning of new era in the approach taken to the protection of the nation's biodiversity which would pervade every level of government. But despite the *Strategy's* success in identifying key issues, outlining worthwhile strategies, and establishing some important goals it has been, by enlarge, a failure because government has simply failed to bring its promise to fruition.

In our view there has been a disgraceful retreat from responsibility on the part of governments at every level just as the need to protect our biodiversity has entered a critical period. Let us be clear, we deplore the hopeless inactivity and irresponsibility of governments at every level when it comes to taking appropriate actions to reverse the process of ecological impoverishment that commenced in 1788 and which only seems to have intensified over the past few decades. Despite all the scientific evidence now available to show that we risk losing very large numbers of native flora and fauna species and communities to threatening processes- some of which we have, or could have, the

capacity to counter effectively - many of these problems are not being addressed with any seriousness at all.

We see our natural heritage as part and parcel of the nation's identity and cannot see why governments consistently fail to protect the national interest by securing the nation's wonderful endowment with respect to the natural environment and its diversity of living things. We see good legislation replaced with bad legislation, ecologically destructive urban planning, approvals given to projects that are hideously inappropriate, failure to prosecute transgressors of environmental regulations, and both government and corporate environmental propaganda generally running counter to the parlous situation observable on the ground.

We were strong supporters of the *National Objectives and Targets for Biodiversity Conservation 2001-2005* and frequently referred to the document in submissions on a wide variety of matters relating to the protection of biodiversity in urban bushland. It is regrettable that the council often found government agencies claiming the objectives and targets in the document were not pertinent to their programmes, or to particular developments in question, or that they were merely "aspirational" in nature. This avoidance of responsibility has a corrosive effect on public confidence in environmental protection regimes and the solution is get serious about holding stakeholders to worthwhile commitments.

The new document *Australia's Biodiversity Conservation Strategy 2010-2020* is a major disappointment. It does not acknowledge the urgency of the problems facing our biodiversity and it does not present any clear picture of what the Commonwealth proposes to do to ensure these problems are addressed effectively and in a timely manner. **Where are the clearly defined objectives linked with specific, quantifiable goals set out in a time line?** That is the least of what we would expect of a *Biodiversity Conservation Strategy* produced by a wealthy nation with an appalling record of causing species extinctions and bringing many more to the brink of such a fate. But the Council does not accept that a goal of merely preventing the extinction of various vulnerable species goes anywhere near far enough towards protecting the unique character and makeup of the Australia's natural environment. Ecosystem decline is a major problem in the Australian landscape and that is what really needs to be addressed.

The Urban Bushland Council seeks to preserve and enhance bushland habitat areas and encourages and supports their appropriate management. In conserving habitat areas and managing them for ecosystem enhancement, the goal of maintaining and then improving local and regional biodiversity takes one of its most important steps. The *2010-2020 Strategy* refers to 6 main threats to biodiversity and although they may not be listed in order of priority, we regard

"*loss, fragmentation and degradation of habitat*" as the most critical threat facing Australia's biodiversity as a whole. Native species can largely withstand floods and droughts, and, to a greater or lesser extent, the impact of invasive species. But habitat destruction, whether it is carried out on a large scale or by a thousand cuts, is the permanent expunction of functional ecosystems – the withdrawal of the basic life support required for the survival of native species.

There is a myth promoted by government, bureaucracy and some industry sectors that Australia no longer clears native vegetation. This is misleading rubbish and we see irreplaceable habitat being destroyed around Perth on an on-going basis. Where is the national leadership on this problem? The *2010-2020 Strategy* contains a plethora of motherhood statements and refers to any number of "actions" that might be undertaken in various jurisdictions in its "Priority for Change" format but it does not propose that the Commonwealth should assume any responsibility for ensuring goals are attained and does not even specify or quantify essential targets that must be met if genuine progress is to be achieved within an appropriate time frame.

In the “Priority for Change” format we do not even see a “priority” dedicated to halting land clearing i.e., habitat destruction. This practice may have ceased on the enormous and unconscionable scale that has occurred for agricultural purposes in the past but it continues to contribute to ecological degradation of the Swan Coastal Plain, for example, and the further imperilment of endangered species such as Carnaby’s Cockatoo - which is left with less and less Banksia Woodland in which to feed every year. In the disgustingly hypocritical fashion of the day 20 percent of an area may be set aside while the rest is developed and this is advertised as a conservation victory. The fact that 80 percent of a habitat area has been lost is somehow compensated for by the erection of a sign saying 20 percent has been protected. This logic of the environmental brochure may have currency with the public relations industry but it is not going to save our endangered species and it will not save Australia from the ignominy of contributing further to global extinctions.

The Urban Bushland Council, like most other community environmental groups, does not just want to see threatened species brought back from the brink, we want to see common native species remaining common and remaining part of our everyday experience. This will not be achieved while wishy-washy, insubstantial and unbinding documents like *Australia’s Biodiversity Conservation Strategy 2010-2020* fail to take the lead in driving the changes needed to get governments at every level to wake up to their responsibilities to protect our local, regional, and national biodiversity. The community already contributes substantially to the task of protecting Australia’s biodiversity – what it needs is more legislation to prevent this work being undone by destructive and inappropriate development and more effort on the part of government to generate answers as to how some of the vexing problems we face – such as invasive species and fire – can be more effectively addressed.

CONCLUSION

It is our strong view that *Australia’s Biodiversity Conservation Strategy 2010-2020* is inadequate in its present form and needs revision. It must set out worthwhile targets and goals and appropriate time frames. It should be more prescriptive in identifying the responsibilities of the various jurisdictions (including legal protection for all native biota) and should require them to produce measurable outcomes in terms of improving the protection of biodiversity. The jurisdictions must be dissuaded from permitting or sanctioning actions that they know are leading to the degradation of local or regional biodiversity. The Commonwealth should use the provision or withholding of funds for more general purposes as an incentive or disincentive where appropriate for jurisdictions to enhance their cooperation with the Commonwealth in striving towards the larger national goal of safeguarding Australia’s biodiversity.

Yours faithfully

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