

Tasmanian Land Conservancy

1. Do you consider the main biodiversity threats identified in the Consultation Draft (see below) to be the most important in reversing the decline in Australia's biodiversity?

- climate change
 somewhat agree
- invasive species
 somewhat agree
- loss and fragmentation of habitats
 strongly agree
- degradation of habitats
 strongly agree
- unsustainable use of natural resources
 somewhat agree
- changes to the aquatic environment and water flows
 somewhat agree
- inappropriate fire regimes
 somewhat agree

Are there any other threats you think should be addressed?

Maximum 90 words

The key threat to biodiversity is economic growth and development that does not adequately reflect sustainability issues: excessive consumption of resources putting pressure on water, land, the atmosphere and renewable and non-renewable resources, and these pressures resulting in loss of ecological resilience, functionality, connectivity and suitable habitat. The broad directions in the strategy recognise this, but the objectives, actions and results provide only a vague indication of how these directions will be implemented.

2. Do you think that the proposed 'priorities for change' (outlined in the 'Making Enduring Changes' section) will be effective at delivering the Strategy's vision to ensure Australia's biodiversity 'is healthy, resilient to climate change and valued for its essential contribution to our existence'?

Maximum 90 words

The broad directions are fine. It is unclear how these priorities for change will be implemented, thus it is difficult to assess how effective they will be in delivering the vision.

Do you think the six 'priorities for change' identified are the most important ones? If not what others would you suggest?

Maximum 90 words

Do you have any comments on the vision?

Maximum 90 words

Biodiversity cannot be resilient - ecosystems can.

3. Do you consider that the Consultation Draft:

- promotes a good balance between conservation on private and public lands?
somewhat agree
- will facilitate a good mix of regulation and incentives?
somewhat disagree
- provides a good balance between marine and terrestrial issues?
somewhat agree
- provides the necessary national framework to produce innovative conservation action?
strongly disagree
- has a sufficient focus on institutional arrangements and change?
strongly disagree
- provides sufficient emphasis on improving community awareness of biodiversity?
somewhat agree
- addresses the need to implement conservation action at the appropriate scale(s)?
somewhat agree
- is applicable to urban and rural environments
somewhat disagree
- provides a clear framework for balancing conservation, social and economic issues?
somewhat disagree
- adequately deals with the issue of climate change?
strongly disagree

Do you have any other comments on these issues?

Maximum 180 words

There are few specifics in the document:

There is no real doable actions, clear or measurable objectives, nor targets.

This makes it difficult see how the proposed priorities for change can be delivered and implemented. For instance, Table 1.1 lists priority actions for the first two years, and the first action (1.1.2) is to prepare and implement a range of plans over the next two years. Previous plans were developed for similar purposes, including previous national strategies, yet it is acknowledged that 'business as usual' is not an option.

It begs the question as to what is different in this approach.

4. Do you think the Consultation Draft adequately covers the roles of Indigenous peoples in biodiversity management?

Maximum 270 words

5. Do you consider that the proposed arrangements for reporting on implementation will be effective in the monitoring and evaluation of the expected outcomes (results) of the Consultation Draft?

NULL

Do you have any suggestions for alternative reporting arrangements?

Maximum 270 words

6. To what extent is the Consultation Draft an appropriate national framework to achieve biodiversity conservation benefits, considering the different responsibilities, legislation and funding arrangements between governments.

Maximum 270 words

7. Is the Consultation Draft likely to encourage a good mix of public and private investment in biodiversity conservation?

somewhat disagree

If not how can the Consultation Draft improve in this area?

Maximum 270 words

There are no clear directions in the Strategy that encourage private investment.

The NRS is developed on both public and private land, and the key driver for private land conservation is the non-for-profit sector. We question what the term 'off-reserve' means and encourage recognition of the role of private land in biodiversity conservation.

We support the concept of a national program for private land conservation and recognise that this has 'reserve' and 'off-reserve' dimensions.

Continued investment in reserves on private land, targeted at ecosystem resilience, function and connectivity is required.

A key way to encourage both reserves and conservation management generally is to ensure that ecosystem services can be commodified and be part of the marketplace. This may involve changes to taxation and regulatory systems. Establishing a vibrant carbon market may be seen as a first step towards this goal.

8. Is the Consultation Draft sufficiently clear about its role and how it will be implemented?

Maximum 270 words

The draft seems to see its role as setting broad directions only. There are no measureables anywhere in the document. Implementation seems to be left entirely to the discretion of the various governments and sectors.

9. Does the Consultation Draft reflect the best practice on biodiversity conservation?

Maximum 270 words

Recognition that conservation needs to be mainstreamed is very welcome, as is recognition of that biodiversity conservation is more than just threatened biota and systems. We also welcome that the draft recognises scale issues. Specifics on how these issues will be addressed would also be welcomed.

10. Will the Consultation Draft effectively engage private sector interests in long-term biodiversity conservation?

Maximum 270 words

Action 4.3.1 seeks to clarification of roles and responsibilities and partnership development with industry, NGOs and community organisations to deliver the strategy. It provides no direction on how this may be done. It would seem appropriate that the strategy gives this clarity, rather than saying it must happen some time in the future. Without anything specific, it is difficult to see how the draft can effectively engage the private sector.

Do you have any other comments you wish to make on the Consultation Draft?

Maximum 360 words

Reserves are acknowledged in the draft as a core approach to biodiversity conservation. Greater linkages between this strategy and Australia's Strategy for the National Reserve System 2009 - 2030 would be appropriate.