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Department of the Environment, Water, Heritage and the Arts

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
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- invasive species
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- loss and fragmentation of habitats
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- degradation of habitats
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- unsustainable use of natural resources
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- changes to the aquatic environment and water flows
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- inappropriate fire regimes
strongly agree somewhat agree somewhat disagree strongly disagree not sure

Are there any other threats you think should be addressed?

Maximum 90 words

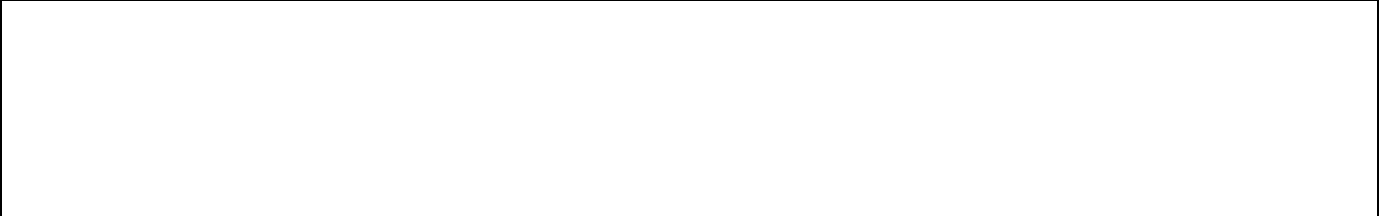
A significant impact on biodiversity is the effective of chemical impacts from runoff containing pesticides, fungicides and household chemicals. While this can be considered under the heading of aquatic environment, we feel that the issue is of significant importance to warrant consideration in its own right. Many of the impacts of these chemicals are sub-lethal but they have lasting impacts on reproductive viability of aquatic organisms and trans generational effects as well.

Genetic impacts through stocking of captive-bred fish and other Australian wildlife can pose a significant impact on genetic diversity and it is vital that stocking programs take full account of genetic considerations in a risk - based framework.



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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

We have no problem with Priority 1 except to comment that there is no evidence presented that marine protected areas are the best method of ensuring ecosystem resilience. Certainly there is no compelling evidence that banning fishing from an area substantially improves overall biodiversity.

Priority 2 seems a difficult and possibly unrealistic task. For the concept of biodiversity to become mainstream, it needs to be communicated in a way that communities will understand. Already there exists a range of interpretations of what biodiversity is and this will be difficult to address at significant cost. Perhaps the money could focus elsewhere. The development of appropriate, comparable indices for biodiversity on a national scale is a good idea.

Priority 3 makes mention of Indigenous knowledge, with no disrespect of this, we feel that the Local Ecological Knowledge of fishers also deserves special significance and recognition. To date, we have been marginalised in consideration of our opinions and knowledge of ecological processes.

Priority 4 - fully supported and will improve recognition of fishers as environmental stewards.

Priority 5 - fully respect and understand the significance of Indigenous involvement but would argue that other members of the community are also fundamentally connected and in tune with natural processes.

Priority 6 - Measuring the success of the strategy and actions is perhaps one of the highest priorities. We fully support this priority but are yet to see real evidence of this occurring in the marine environment.

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

Maximum 90 words

An additional priority would be to ensure that the social and economic well being of all Australians is enhanced through conservation of biodiversity. While we can accept that some activities directly contribute to biodiversity decline, there needs to be a pragmatic approach such that the needs of society are also recognised. Communities and their heritage are as much a part of Australian biodiversity as the natural systems that we rely on and the economic and social health of communities should not suffer as a result of environmental and natural resource management.



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Department of the Environment, Water, Heritage and the Arts

Do you have any comments on the vision?

Maximum 90 words



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3. Do you consider that the Consultation Draft:

- promotes a good balance between conservation on private and public lands?
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- will facilitate a good mix of regulation and incentives?
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- provides a good balance between marine and terrestrial issues?
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- provides the necessary national framework to produce innovative conservation action?
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- has a sufficient focus on institutional arrangements and change?
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- provides sufficient emphasis on improving community awareness of biodiversity?
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- addresses the need to implement conservation action at the appropriate scale(s)?
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- is applicable to urban and rural environments
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- provides a clear framework for balancing conservation, social and economic issues?
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- adequately deals with the issue of climate change?
strongly agree somewhat agree somewhat disagree strongly disagree not sure



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Do you have any other comments on these issues?

Maximum 180 words

There is an overdominance of government in most of the priority actions with not enough evidence of partnerships and co-management arrangements with industry. A classic example relates to the marine environment and the ongoing need to create more marine protected areas. It appears to be with some pride that page 11 of the document declares that Australia's Great Barrier Reef Marine Park has the world's largest network of no-take areas. The document relies on State of the Environment Reporting and "a National Framework to Addressing Marine Biodiversity Decline" yet does not reference any document that portrays the current measures taken by state and federal government agencies and fishers to address sustainability concerns in their fisheries. Marine Protected Areas are not the only way to address impacts of fishing and may not be the best method. Instead of working with industry, this strategy continues to pursue actions that will negatively impact on the fishing industry.

We are fully supportive of education campaigns but need to be involved to ensure that appropriate messages about the threats to biodiversity are accurately portrayed. The image of all forms of fishing as environmental degradation is morally abhorrent.

Balancing conservation against social and economic needs of society remains a challenge, especially for fishers and this strategy does not do enough to address the issue. There will be high costs on industry to adopt carbon neutral activities, loss of access to fisheries resources will also cost and there is no mechanism to address those costs.



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Department of the Environment, Water, Heritage and the Arts

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

Maximum 270 words

While the strategy speaks at length about the role of Indigenous peoples, it makes no mention of the roles of industry participants and other members of the community who arguably have a similar close linkage to natural processes and systems.

Fishers spend a significant part of their lives on and in the aquatic environment and develop knowledge of natural systems that cannot be substituted through scientific study or literature reviews. Many communities have a strong fishing heritage and culture. This needs to be respected and acknowledged in the same way that Indigenous peoples are.

This is a document for all Australians and should reflect that.



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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?

strongly agree somewhat agree somewhat disagree strongly disagree not sure

Do you have any suggestions for alternative reporting arrangements?

Maximum 270 words

The reporting arrangements outline a top down approach whereby NRM MC review progress and publish a report. A different approach would see key industry stakeholders judging the performance of the strategy against agreed indicators and then providing a report to NRMMC. This would be a more transparent process and would truly reflect the views of the community.



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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

Again, the strategy will miss the point by concentrating on the role of government. If biodiversity conservation is truly the role of all Australians, government will consider ways in which communities and industry stakeholders can be empowered and supported to implement biodiversity conservation initiatives.

It is impossible for anyone but government executives to comment on the above the statement. The real issues impacting on this strategy relate to the ability of industry to adapt and implement the measures outlined. Substantial investment in capacity and knowledge are needed, the level of which will vary depending on scale.



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

- strongly agree somewhat agree somewhat disagree strongly disagree not sure

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

Maximum 270 words

The Strategy could significantly alter its approach to industry, particularly those most affected by current biodiversity conservation measures. Many of the current measures stated as protecting biodiversity, particularly in the marine environment, have strong, negative impacts on the fishing industry - recreational, commercial, Indigenous and aquaculture.

The proposals in this draft document seem to be more of the same - "industry must do this...", "Industry needs to change...". There is very little recognition of the role that industry stakeholders and industry associations have played in biodiversity conservation to date. Appendix A9.4 speaks about the unsustainable use of natural resources. The section is quick to point out that 19 out of 97 Commonwealth fisheries are overfished or overfishing is occurring (BRS 2007) but no mention is made of the number of state fisheries that have been declared sustainable by DEWHA or the measures being taken to address the negative impacts of fishing. Additionally no definition of overfished or overfishing is provided (as per BRS 2008). In the report on 2007 status of Commonwealth Fisheries, 16 are overfished or overfishing is occurred (already improved since 2006) and of those, 10 are overfished only, 5 are subject to overfishing and only one is overfished with overfishing occurring. Without providing the appropriate definitions for these terms, members of the public reading this draft can only conclude that fisheries are a major threat to biodiversity.

To encourage industry investment and partnerships, the approach to industry will need to change.



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

Maximum 270 words

No, plenty of "motherhood" statements but no indication of how this will impact on industry, how the strategy will be funded and how the strategy relates to other initiatives including:

The Review of the EPBC Act 1999

The Climate Change Action Plan

Various other initiatives for marine and terrestrial research



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

Maximum 270 words

Not sure, while international conventions are mentioned, there does not appear to be many case studies of how other nations are addressing the issues, thus it is difficult to comment on whether the strategy reflects world's best practice.



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

Maximum 270 words

Not likely unless there are firmer linkages and co-management agreements in place. So far there is no estimate of what the strategy would cost or how it ties into other initiatives and legislative requirements that industry must pay for.

There is no denying that the recreational fishing sector have significant long-term interest in biodiversity conservation but there needs to be recognition and acknowledgement of the measures already taken to improve biodiversity conservation.

Policies and actions of Recfish Australia and its member organisations need to be formally recognised and endorsed by government and the community.

Instead of a top down approach, there needs to be a more inclusive approach with industry and communities taking a stronger lead.



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

Maximum 360 words

Significant time and effort is spent on submissions on a variety of government initiatives to protect biodiversity. It would be useful if there was some coordination of these activities and single process initiated.

The only way to successfully deal with the challenges of sustainable resource use is to form partnerships with industry and stakeholders. Government needs to relinquish its hold on process and its power over management plans. Top down approaches tend to be easier to administer but a lot less effective. The sources of information on which decisions are based need to be broadened to include the information collected and stored by key stakeholders. Time needs to be dedicated to fully understanding an industry's activities, motivations and impacts before any decisions can be reached.

In Australia, the protection of biodiversity has become a political weapon for special interest groups to achieve their own agendas. In the case of marine protected areas, groups that are patently anti-fishing are using well-intentioned consultation processes to achieve their ultimate goal of destroying fishing industries.

In the long term, this will prove to be to Australia's detriment as we struggle with issues of food security, rural depopulation and a loss of our unique fishing heritage and culture. Fishing can be sustainably managed but locking fishers out of areas is not always the most effective long term solution or even the only solution.



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