

**Martin Phillips - ARAZPA**

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

Are there any other threats you think should be addressed?

*Maximum 90 words*

Other threats that should be addressed include:

1. Possible lack of cooperation, consistency and differing priorities between governments particularly at a State level. [Solution: Responsibility to be with Federal Government to allow management at a national level]
2. Possibility of poor advice and decision making by departments and ministers respectfully. [Solution: the establishment of an Environmental Ombudsman, along similar lines of the International Ombudsman set up by the IUCN].
3. Disease should be listed in its own right as a threat. The effects of disease can be can have devastating effects on populations eg chytrid and phytophthora. The draft document uses the corroboree frog as a case study.
4. Barriers to change should be listed as a threat. Knowledge alone isn't enough to be able to avert the problem, there is a need to provide knowledge and remove barriers to change; incentives can improve uptake but if barriers are not removed incentives will not make the difference alone.

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*

General observations:

1. Action 1.1.2 needs to state involvement of stakeholder groups as stated in the last paragraph of the 'Call to Action section' .

2. The priorities do not address the precautionary approach advocated in the underlying principles of the Vision. ARAZPA believes Action 1.1.6 Maintain and enhance ex situ conservation.....should be a priority action.

ARAZPA strongly advocates for conservation insitu to be the priority. However if an adequate ex situ system is not in place as a precautionary approach then it is often too late to save a species and certainly becomes more expensive to rapidly build a captive population.

Furthermore as in the 1999 NB Strategy it is believed that appropriate organisations should be named for government resourcing. This is particularly the case for a priority action where deliverables are required within 2 years otherwise valuable time will be lost in determining which programs to resource. The ARAZPA Species Management Program and the Australian Botanical Gardens Association Network for Plant Conservation are the only national programs. The ARAZPA program is recognised by the the IUCN CBSG as a world leading program. This is reflected in the Save the Tasmanian Devil Program [funded by DEWHA] strategy for ex situ conservation.

3. Action 3.1.1 should ideally include a national exchange of information system to speed up information exchange to prevent duplication of efforts in research work.

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

*Maximum 90 words*

ARAZPA believes the highest prioty should be action 4.3.2. ..reform legislation to improve biodiversity conservation outcomes....[A possible concept is presented at question 6].

The current management of the environment between all levels of Government is ineffective. ARAZPA believes that the full responsibility for the conservation of biodiversity should reside with the Federal Government. This is founded on the following premis:

1. The Federal Government is a signatory of the CBD 1992 therefore the Federal Government needs to have control of meetings the nation's commitments.

2. The principles underlying the Strategy's Vision states that 'The state of biodiversity reflects the state of the nation'. Therefore it follows it's a national responsibility with the Federal Government.

3. The underlying principles also state 'No further degradation by the actions of the current generation'; there are many examples where State Government management has promoted further degradation in pursuit of state priorities over national biodiversity conservation for example the Murray-Darling Basin.

Do you have any comments on the vision?

*Maximum 90 words*

The underlying principles of the Vision should include a statement on 'Managed at a national level' a suitable statement should also be included to embrace the call to action statement that 'business as usual is not an option' to convey a philosophy of change is required by all.

3. Do you consider that the Consultation Draft:

- promotes a good balance between conservation on private and public lands?  
somewhat disagree
- 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?  
somewhat agree
- provides sufficient emphasis on improving community awareness of biodiversity?  
strongly agree
- addresses the need to implement conservation action at the appropriate scale(s)?  
strongly agree
- is applicable to urban and rural environments  
strongly agree
- provides a clear framework for balancing conservation, social and economic issues?  
somewhat agree
- adequately deals with the issue of climate change?  
somewhat disagree

Do you have any other comments on these issues?

*Maximum 180 words*

Following the comments made in question 2. The document has not really embraced its own stated philosophy of 'business as usual is no longer an option'. The priorities and actions in themselves are logical but convey a sense of ticking the boxes as the conservative bureaucratic wheel of government slowly turns whilst the issue at hand races on.

The value of ex situ conservation is poorly presented. Moreover, Australia needs to meet its international obligations for ex situ conservation as stated in the CBD 1992 which are not adequately addressed in the strategy. Ex situ conservation plays a vital role within the full range of conservation strategies that are currently underway, or need to be developed. Ex situ conservation is a cost effective method of preserving and conserving taxa of a high conservation value. It enables scientific research with an ecological outcome to be conducted. It provides a vehicle to engage communities and the people of Australia. Zoos and botanic gardens play a vital role in ex situ conservation and with their public profile and high levels of visitation, are best placed to support the mainstreaming of biodiversity.

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

*Maximum 270 words*

There have been substantial changes to parts of arid Australia since Aboriginal peoples have through circumstance, managed their lands differently. There needs to be recognition that biodiversity benefits through the management of lands by Aboriginal peoples, including especially the control or removal of introduced taxa. Simply, there needs to be an economic return to people, and thus an economic value ascribed to this work and the management of these lands. There needs to be recognition that some communities have a vastly different paradigm about the ownership of lands, and the ownership of property.

Intellectual property rights of for example, the medicinal properties of plants, or the traditional ecological knowledge of taxa, has not been adequately addressed.

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?

somewhat disagree

Do you have any suggestions for alternative reporting arrangements?

*Maximum 270 words*

ARAZPA believes the proposed arrangements for reporting on implementation may be effective in monitoring and evaluation of actions. However, if the implementation mechanisms are fundamentally flawed and ineffective no amount of monitoring and evaluation will ensure the success of any plan. ARAZPA reiterates the need for the conservation of biodiversity to be fully managed at a national level and proposed a possible solution for implementation of the plan is at question 6 below.

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*

ARAZPA does not believe the Strategy provides an appropriate national framework to achieve biodiversity conservation benefits. ARAZPA proposes a radical shift in thinking is needed towards an appropriate framework.

In order to reflect the magnitude and importance of biodiversity conservation as stated in the underlying principles of the Vision that 'Biodiversity reflects the state of the nation, that is of value in its own right and most importantly essential for our existence' ARAZPA advocates a framework based on a Federal Minister, a Federal Department and a new national operational service be established.

This would be based on the Minister for the Environment, DEWHA and a new service, 'The Environment Service' established as the operational arm to deliver the action plans stemming from the National Biodiversity Strategy. The service would most probably be based on the current state agencies but moved under the management of DEWHA. Community groups and NGOs would partner with the Service as appropriate in the delivery of the plans.

As an analogy the Defence Force is administered by the Department of Defence which is responsible to the Minister for the implementation of the National Defence Strategy. The Services are tasked to address issues of national importance. Intelligence is collected, analysis conducted, plans developed and then implemented based on a accepted doctrine and established procedures to which all parties are trained. Aid agencies and NGOs work along side the defence force where appropriate.

The Environment Service would operate in a similar way to conserve and restore the nations biodiversity assets. As the defence force collects intelligence to make informed decisions so would the National Environment Service. It would develop plans based on a national doctrine and recognised procedures open and understood by stakeholder groups. Most importantly it would take command of implementing those plans to address the issues at hand regardless of internal boundaries. The Environment Service would also oversee training to staff and stakeholders to provide the foundation to its operations.

ARAZPA believes such an approach would deliver on the Strategies Vision.

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*

ARAZPA does not see how the Strategy encourages private investment. The Strategy will rely on the motivation of individuals within organisations who are in positions of authority and willing to make a difference.

There needs to be investigation of the economic advantages to the private sector particularly to invest in biodiversity conservation. For the most part, investment is limited to those in the private sector who have a public good approach. Particularly in a country such as Australia, such an approach is limiting, given the relatively low human population density.

Moreover, there will continue to be conflicting approaches between the various levels of government in Australia over the life of the strategy given the ever changing political landscape.

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

*Maximum 270 words*

The Visions underlying principles and call to action are clear. The 'how' of implementation is not so clear. Whilst there are action statements and associated responsibilities the action statements are rather loose. The action statements need to state more precise 'measures of success' with clear deadlines.

Another observation is that the Consultation Draft is written for practitioners. In spite of the increasing use of such terms such as biodiversity in the media, such terms are poorly understood by many, and continue to be jargon to most. As this draft is about Australia's future, it needs to be owned by Australians and thus needs to be written and presented in a manner more appropriate. There need not be loss of rigour, but there does need to be clear understanding by all Australians of the consequences of some of their individual and collective behaviours. The strategy does not go far enough in describing the mechanisms of mainstreaming biodiversity.

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

*Maximum 270 words*

ARAZPA does not believe the Consultation Draft reflects best practice on biodiversity conservation. The strategy's governance model based on State and Territory Government implementation will lead to incorrect 'units of management' being targeted. State and Territory boundaries are irrelevant to the nation's biodiversity yet these will govern 'on ground' actions resulting in best practice not being followed.

The Draft does not reflect the accepted best practice use of ex situ. There needs to be more attention devoted to the value and role of those institutions involved with ex situ conservation and their significant role in education for sustainability.

There needs to be greater tie-in with international groups such as the Captive Breeding Specialist Group through the IUCN.

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

*Maximum 270 words*

The Consultation Draft as a document will not effectively engage private sector interests. However, the right people backed by credible Government action will. Private sector needs to gain economic advantage through its input into biodiversity conservation, and the strategy has not addressed this.

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

*Maximum 360 words*

The Consultation Draft does not appear to relate to other relevant Government plans. For example the business plan for Caring for Country is already defined for the next 5 years specifying targets against which funding will be allocated. It would seem appropriate the CFC business plan demonstrates how it will contribute to the NBS. Furthermore DEWHA recently released its 'Living Sustainably: the Australian Government's National Action Plan for Education for Sustainability' yet the Consultation Draft also addresses this issue in Priority 3 for change: Knowledge for all. It would be good practice and beneficial to assist groups wishing to assist Governemnt in these matters bring these strategies and plans together.

In order for the Strategy to achieve its stated vision it needs to be costed and supported by a funding commitment from Government(s). There will need to be a reassessment of economic models that accords wildlife and habitat a different value such that protection and conservation becomes an imperative rather than a nice thing to do. Moreover, the final strategy needs to be written in such language that all Australians own the process and outcomes, and realise they are part of the solution and a participant rather than an observer. The current language is not inclusive.