



NORTH CENTRAL

Catchment Management Authority

Connecting Rivers, Landscapes, People



5 June 2009

Charlie Zammit
Assistant Secretary
Biodiversity Conservation Branch
Department of the Environment, Water, Heritage and the Arts

Dear Mr Zammit,

Australia's Biodiversity Conservation Strategy 2010-2020 - Consultation draft

As the primary natural resource management body in north central Victoria, the North Central Catchment Management Authority (CMA) welcomes the opportunity to provide comment on Australia's Biodiversity Conservation Strategy 2010-2020 - Consultation draft.

The North Central CMA recognises and supports the Strategy's vision and the principles underlying its development and implementation. The urgency expressed in the opening chapter '*Call to action*' is appreciated, and offers support to the concept that '*Business as usual is no longer an option*'. In addition, the six short-term priorities for change in Table 1.1 are well selected and will contribute significantly to the sustainability of Australia's biodiversity, if fully implemented. More detailed comments on the Strategy are provided below.

The North Central CMA recognises the need for urgent action and suggests that Action 1.1.2 '*Prepare and implement plans*', includes implementation of the many national recovery plans and state-based action plans for threatened species and communities that have already been written, along with the provision of dedicated funding.

Action 1.1.3 '*Establish conservation linkages*' is fully supported, but the time-frame of two years is considered insufficient, unless a significant amount of coordinated direction, effort and funding is provided. The Strategy also needs to consider existing linkages and cover/habitat provided by woody weeds. In many cases, removal of long-established vegetation cover is contributing to fragmentation and loss of habitat. Ironically, some of these woody weed species might prove to be extremely hardy and resistant to climate change.

The North Central CMA supports mainstreaming biodiversity by undertaking to '*Teach all primary school children about biodiversity*' (Action 2.1.1). It is recommended that existing successful educational programs such as Waterwatch should be encouraged and expanded upon to facilitate the implementation of this action. These existing programs provide education to hundreds of young children from numerous schools across the regions.

The intent to '*Review and reform legislation*' (Action 4.3.2) is timely, given the state of decline in biodiversity as well as the shifting conditions regarding climate change. It is recommended that any amendments are clear and precise, and not open to interpretation. The two year time-frame to undertake this action however, is considered optimistic.

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The North Central CMA considers the actions listed under Section 1.3 '*Implementation*' as being urgent. However, these actions are not new, and past experience has shown that unless adequate funding is provided to acquire land, manage habitat and provide incentives for revegetation and habitat management, successful implementation is unlikely. Actions such as these are recommended in the *Victorian State of the Environment Report 2008*.

As previously mentioned, legislative reform is required to facilitate the Strategy's longer-term aims. The terms 'critical habitat', 'ecological function' and 'ecological connectivity' need to be described (or reviewed) so that there is a common understanding of these terms and the actions required. It is also noted that there are many existing mechanisms that protect biodiversity, but they are currently not being applied to their full extent.

Remedial actions (Section 1.3.1) can take many decades to have positive impacts. However, there are actions that could be undertaken immediately to halt, or severely slow decline, such as the compulsory acquisition of habitat (e.g. critical habitat for critically endangered and endangered species and communities on freehold land) and prevention or vetoing of proposals that impact on the habitats of threatened species or communities, fragment 'ecological connectivity' or reduce 'ecological function'. These actions could be embedded in legislation and local government planning mechanisms.

The North Central CMA fully supports the '*Getting results*' (Section 3.2.4) and its associated actions. However, the phrase "To maximise biodiversity outcomes with limited resources..." is concerning. It is recognised that strategic and cost effective investment is essential. However, significantly increased funding will be necessary for successful implementation of the Strategy.

The introductory text and associated actions for '*Measuring success*' (Section 3.2.6) are fully supported. In particular, there is a need for measurable key indicators and monitoring protocols, and these would guide the development of similar monitoring and evaluation tools at the state (and CMA region) level. Development of tools and techniques to account for the value of biodiversity and ecosystem services is also essential. Consistency and compatibility in monitoring and evaluation, and the ability to aggregate up through state and federal level, would be ideal.

Thank you for the opportunity to provide feedback on the consultation draft of Australia's Biodiversity Conservation Strategy 2010-2020. We look forward to working with the Victorian and Australian governments in protecting Australia's unique and fragile biodiversity.

Yours sincerely,

Damian Wells
Chief Executive Officer