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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

The 1996 biodiversity strategy, the national approach to biodiversity decline, all recognise that the loss, degradation and fragmentation of habitat is a MAJOR threat to biodiversity. However all these reviews FAIL to consider the root cause of this loss of habitat which is unfettered and directly encouraged population growth and the unsustainable use of natural resources. Whilst a National Strategy for Weeds and Pests have been developed, there has been no such consideration of the impact on biodiversity of Federal Government policies such as extensive business and skilled worker immigration and the baby bonus encouraging population growth. Increasing populations increase demand for food production and water, energy and other resources, and increase demand for urban housing and infrastructure resulting in either urban sprawl or urban densification, both of which destroy, degrade and fragment native habitat resulting in loss of biodiversity. Whilst the strategy states that "we observe and note report after report of the downward trend in our biodiversity", there is nothing that addresses the pro-growth agenda of the Federal and State governments and its subsequent impact on biodiversity. Biologist Edward Wilson (E.O Wilson, The future of life, Knopf, New York 2002) claims that we must divide the world into 50% for humans and 50% for nature if there is to be sufficient habitat for the survival and evolution of nature. However there is little chance of this as the planet is being ruthlessly altered to supply the increasing per capita demands of increasing numbers of humans.



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The strategy also fails to address the increasing consumption of the increasing population. Everyday, more people need more space, consume more resources and generate more waste as world population continues to grow at an alarming rate.

By not addressing these fundamentals, the Strategy is tweaking the symptoms without addressing the root cause of the problem. Utilising a simple but effective problem solving analytical tool (e.g.the 5 Whys) on the loss of habitat will quickly show that the loss of habitat is a result of pro-growth population strategies and unfettered consumption. Until this is addressed we will continue to have "reports" that measure the continued decline in Australia's biodiversity.



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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

The 6 priority issues for change are welcomed. These priorities are worthy - however the proof will be in the actual action plans that are implemented to support these ideals. As such it is difficult to comment on the effectiveness of these priorities without the detail of the implementation plans, including their resourcing, to support these aspirations.

As stated in 1 above, it is essential that population growth and consumption issues are also considered and addressed as the priorities. The Building Ecosystem Resilience is essential, however to retain biodiversity values and ecological functions, the underlying reasons of habitat loss, and degradation must be addressed. The effectiveness of these strategies to deliver the vision is dependant upon how well they are resourced.

Funding for NRM Groups must be more certain and secure to enable them to plan and resource their activities, and there is a need for NRM activities to be planned, coordinated and implemented within overarching performance-based frameworks. The effectiveness of these priorities must also be addressed by each of the States and local regions and hence they must also be provided with adequate resourcing to ensure they contribute to overall national objectives.

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

Maximum 90 words

As stated in 1 above, the strategy fails to consider the root cause of many biodiversity issues - population growth and consumption growth. Appendix A9.3 identifies that loss and fragmentation of habitat due to land clearance and other human-related disturbances is a significant threat to the long term survival of Australia's biodiversity. The strategy FAILS to address the root causes for this land clearance and disturbance. As a major threat to biodiversity, the increasing population and the resultant DEMAND for land for urbanisation, infrastructure, waste disposal, extractive industry, mining, and expanded and more intensive primary industries MUST be addressed if we are to protect Australia's biodiversity.

The States and local and regional governments have primary responsibility for the latter matters, while the Commonwealth has responsibility for immigration policy and some aspects of industry policy and environmental and NRM regulation. If the Federal Government genuinely intends to tackle the root causes of biodiversity decline, it should do so by developing a national sustainable population and settlement pattern policy, a national sustainable NRM policy, national sustainable "low carbon" industry and energy policies - as well as working



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through COAG to develop national policies and programs to immediately end land clearing and promote revegetation, habitat restoration and improved habitat connectivity.

Do you have any comments on the vision?

Maximum 90 words

"Australia's biodiversity is healthy" - under the definition of biodiversity (page 9) this would include ALL life forms in Australia - including different plants, animals and micro-organisms their genes and the terrestrial, marine and freshwater ecosystems of which they are apart. In order to have "healthy" biodiversity, it must be not just resilient to climate change but to all changes. Whilst the Glossary recognises the definition of ecosystem resilience to include adaption to changes and disturbances whilst retaining basic function and structures, the proposed Vision only recognises resilience to climate change. The Vision should include resilience to change including climate change.

This document continues the anthropocentric view of humans at the top of the food chain and not being a part of the ecosystem. As an example on Page 12 there is recognition that "we need to make long-term and enduring changes to our behaviour to better conserve our natural environments and to ensure that their ecosystem services continue to meet all of society's needs". However this does not appear to recognise that ecosystem services are required to support all life, not just human society.

The Vision should be reworded to ensure that it is resilient to all human-induced changes and that it is valued for its contribution to maintenance of the planet of which humans are part.



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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

Conservation on private and public lands:

The "actions" outlined throughout the Strategy are in fact "strategies" as they are aspirational statements of "what" to achieve and hence require details on "how" to achieve the outcomes with consideration of the specific actions to be undertaken, in what timeframe, by whom and with what resources. This needs to be meshed with strong measurable indicators for completing those actions and for holding those responsible to account should the actions not be completed within the required timeframe etc.

It is imperative that conservation programmes are implemented throughout public and private land. It is essential that the urban landscape is given due consideration by both public and private landowners. E.g. The iconic South Eastern Koala is at great risk of extinction due to loss of habitat due to urbanisation. The current Qld Vegetation Management Act fails to protect vegetation to be removed for development in an urban and rural residential designated area unless the vegetation is an Endangered Regional Ecosystem. Other remnant vegetation ecosystem and all regrowth vegetation have no protection whatsoever.

Over two-thirds of Queensland is state leasehold land for which the State Govt is the custodian and ultimately responsible for protecting the biodiversity in these areas. The roles and responsibilities of the Government and the lessee should be clearly defined with respect to the conservation of biodiversity on State leasehold land. As part of the National Biodiversity Conservation Strategy, the Queensland Government should be required to prepare an initial assessment of the extent and cost of rehabilitation of degraded land on the Queensland leasehold estate and through a rapid assessment process identify priority areas for rehabilitation including targeted incentives. The Government should use information about the costs of repair to motivate investment in preventing further environmental degradation of leasehold lands. In addition to incentives, lease renewal should be conditional on undertaking specific high priority actions to protect biodiversity values and rehabilitate degraded areas.

The substantial Queensland Govt leasehold landholdings also provide considerable scope for expanding the state's protected conservation area estate e.g. by converting all or parts of leaseholds coming up for lease renewal to conservation tenures where high biodiversity values exist or which improve the comprehensiveness, adequacy and representativeness of the Qld protected area estate. However, the State has failed to grasp these enormous opportunities.

The Commonwealth should address such matters through dialogue with the States and Territories.

Does the strategy facilitate a good mix of Regulation and Incentives?

The mix of incentives and regulation is welcomed. Whatever regulations are implemented, there must be sufficient resources to ensure that the regulations are consistent across the levels of government and are enforced. Too often responsibility for enforcement falls between the responsibilities of the different government departments resulting in an insufficient response to deter further destruction. With respect to incentives, they must ensure that there are greater benefits for landholders retaining and managing that vegetation than for clearing vegetation.

Does the Strategy provide a balance between marine and terrestrial issues ?

Again the effectiveness of the strategy will be dependant upon the detail. All programs that are developed need to ensure sufficient balance between marine and terrestrial conservation, and also their interdependence in many circumstances (e.g. minimising land based impacts on reefs, sea grass beds etc).



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Does the strategy provide the necessary national framework to produce innovative conservation action.?

Innovative conservation action will result from strong leadership and actions which are providing positive results to achieve the Vision. Leadership from the State and Federal Governments to tackle the root cause of population and economic growth from the stimulus of greater consumption which puts even greater pressure on natural resources is required. In addition, it is essential to have regular and open communication with on-the-ground NRM managers to understand the structural and resource constraints which present barriers to achieving their results. Improvements in community engagement are welcomed - however further detail of the actions is required to assess its effectiveness. Programs to make biodiversity conservation "mainstream" is a positive move - however the connection between population growth and every increasing consumer lifestyles must be part of the engagement processes.

Does the Strategy have sufficient focus on institutional arrangements and change

The report "A National Approach to Biodiversity Decline July 2005" has recognised that a number of impediments exist to achieving biodiversity conservation with the existing institutional arrangements. Whilst Action 2.2.1 will ensure complementary legislative frameworks and approaches across the three tiers of government, there is not a legally enforceable plan. Mechanisms such as bilateral agreements between the Federal and State/Territory Governments should form the basis for ensuring the implementation of these complementary frameworks, however targeted and measurable outcomes should be included in the agreements as noted in the ITS 2005 Report on the Evaluation of the Bilateral Agreements for the Regional Component of the National Heritage Trust of Australia. Action 4.3.2 advises of the review and reform of current legislation to improve biodiversity conservation. In this reform it is essential that lists of endangered, vulnerable and rare species are aligned across the jurisdictions - currently they are not, e.g. the Koala is critically endangered in SEQ yet is only categorised as vulnerable under the current Federal legislation.

The review and any remedial action associated with the Draft Strategy must be undertaken in a timely manner. Unfortunately too much of our biodiversity is being lost whilst reports and reviews are being conducted. The National Strategy for the Conservation of Australia's Biological Diversity and the National Objectives and Targets for Biodiversity Conservation 2001-2005 was reviewed in 2006. Which identified numerous issues, however it has taken another 3 years to have even the draft Biodiversity Strategy to be available for consultation.

Is the strategy applicable to urban and rural environments?

The strategy could be more explicit with respect to the inclusion of the urban and rural residential environment as discussed above.

Does the Strategy provide a clear framework for balancing conservation, social and economic issues?

The Strategy fails to consider the impact of development on biodiversity, in particular the pro-growth policy agenda in terms of population and consumption. Whilst Action 2.2.2 requires the development of tools and processes to ensure that biodiversity is considered in all decision making alongside economic and social considerations. As noted by Marsden and Dover (2002) SEA remains the poor relation to project related environmental impact assessment (EIA) with the result that project related EIA still commonly takes place in a vacuum of strategic and cumulative environmental assessments. There is little guidance within Australia on how to include biodiversity considerations in decision making.

Does the Strategy adequately address Climate Change?

The recognition of the impacts of climate change on Australia's biodiversity is welcomed. However the Strategy fails to recognise the sequestration ability of natural biodiverse forests and the need to retain them intact as part of the programme to fight climate change. The Federal Government's CPRS scheme provides only one small



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strategy for addressing climate change, which is seen as too little too late, and with too many concessions to the major polluters. The Strategy does not give enough coverage of natural forest and woodland capacity to sequester carbon and hence the need to conserve and protect our remaining forests and woodlands. Natural forests are more resilient to climate change and disturbances than plantations because of their genetic, taxonomic and functional biodiversity. Analysis reported by Mackey et al (2008) shows that in the 14.5 million ha of eucalypt forests in south-eastern Australia, the effect of retaining the current carbon stock (equivalent to 25.5 Gt CO₂ (carbon dioxide)) is equivalent to avoided emissions of 460 Mt(2) CO₂ yr⁻¹ for the next 100 years. Allowing logged forests to realize their sequestration potential to store 7.5 Gt CO₂ is equivalent to avoiding emissions of 136 Mt CO₂ yr⁻¹ for the next 100 years. This is equal to 24 per cent of the 2005 Australian net greenhouse gas emissions across all sectors; which were 559 Mt CO₂ in that year.

http://epress.anu.edu.au/green_carbon/pdf/exec_summary.pdf

The current Commonwealth policies on GHG emission reductions and other climate change responses (e.g. as expressed through the proposed CPRS and recent generous and unjustifiable budget allocations to the fossil fuel sector compared with inadequate allocations to promote renewable energy) are totally at odds with biodiversity protection and management. Several studies indicate cascading species extinctions on a massive scale will occur in Australia as a result of predicted climate change. Climate change is arguably the single greatest threat to biodiversity and far stronger policies and measures by the Federal and State Governments to avoid and minimise GHG emissions and return global atmospheric levels of CO₂ to pre-industrial levels asap will make the single greatest contribution to averting such an extinction catastrophe.

Climate change is an area in which the Commonwealth should urgently work through COAG to ensure that strong effective policies and measures to combat climate change domestically and internationally are adopted.

We reiterate earlier comment about the need to address the links between biodiversity , climate change, and increasing population and increasing consumption by a growing population. Per capita emissions in Australia are the world's second highest and our rapidly growing population and levels of consumption inevitably lead to a rapid growth in national emissions. As Australia is predicted to be heavily impacted by climate change, including biodiversity impacts, addressing population and consumption growth are key strategies that must be pursued.

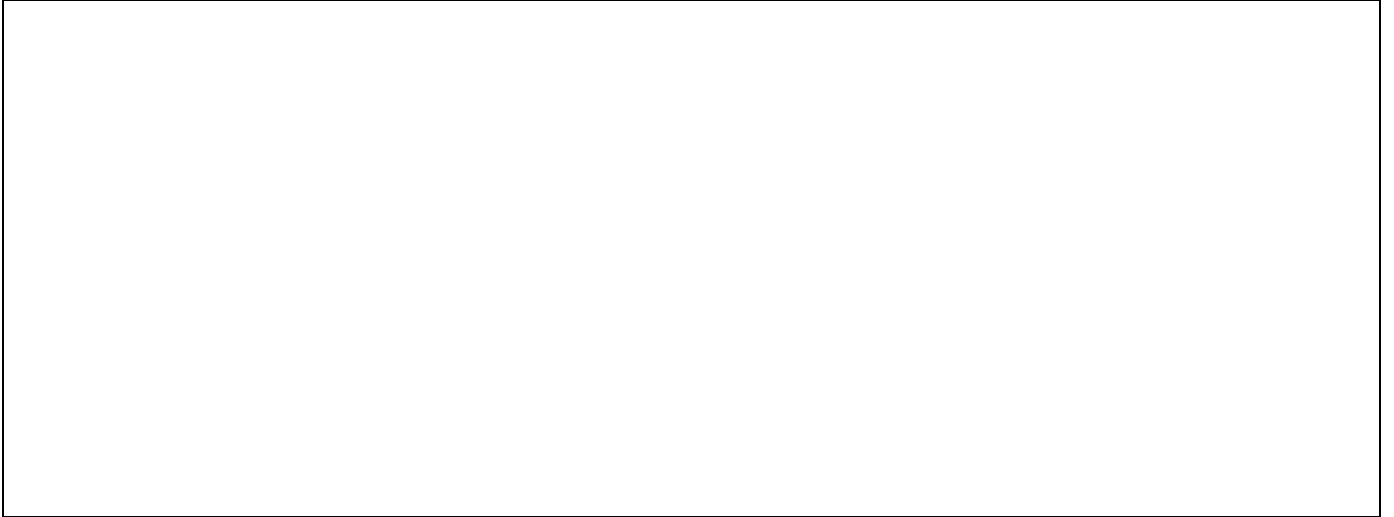
The Commonwealth can also work through COAG to address a host of other matters within State and Local Government jurisdictions that contribute to GHG emissions, climate change and biodiversity loss, fragmentation and degradation. E.g. legislation, codes and policies in the fields of vegetation clearing for all types of land use change (including urban development) , urban and regional planning and development assessment, mining development, industrial development, agricultural land and livestock management, water quality and catchment management, waste management, forestry management - even the state nature conservation legislation, policies and strategies themselves.

Only by deliberately engaging the states, territories and local government in robust debate about these matters can there be any real prospect of comprehensive approaches to tackling climate change and protecting and sustainably managing Australia's biodiversity.



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

Maximum 270 words

The inclusion of indigeneous people in the conservation of biodiversity is vital. For thousands of year traditional custodians have developed sustainable NRM practices which have utilised the land but without reducing its biodiversity and its resiliance to change.



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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

We welcome the recognition of the need for baseline datasets which include key indicators. These indicators must be quantitative and provide stretch targets. The recent draft S. E. Queensland NRM Plan had numerous targets, however the baseline data was very recent and many of the indicators were to "maintain or improve" on the baseline indicators, yet there was no quantification of the improvement to be achieved. It is essential that the indicators are relevant to illustrating the trends in biodiversity and that resultant targets are appropriate to achieve the Vision. Action 6.1.2 recognises the need for well resourced information infrastructure for the sharing of data across jurisdictions. This is a good strategy however in difficult economic times such as the GFC we are now experiencing, it is essential that this resourcing continues within and across all jurisdictions. Long term monitoring (action 6.1.3) must be at a scale which is useful to ensure the conservation of biodiversity at all levels. Ecosystems do not heed man-made borders. Appropriate datasets must be determined at the most appropriate system level of the ecosystem under consideration. Recently we have witnessed the degradation of the Murray Darling and slow evolution of a recovery plan due to state bickering over water rights buy back. Similarly reporting must be at the appropriate level of the biological system to ensure the appropriate variables are monitored and that any changes to the strategies and action plans are based on sound science.



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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

While we believe the Consultation Draft provides a substantial national framework, it does not propose a sufficiently comprehensive framework to be regarded as appropriate and acceptable in its current form. Please refer to our extensive comments in sections 3 and 5 above concerning the scope of the strategies.

In addition, the effectiveness of such a Framework ultimately relies upon the resourcing - both financial and human resources to implement the actions identified in the Strategy. Whilst NRM and biodiversity are primarily regarded as a State function, the Federal Government must put in place appropriate mechanisms to oversee the NRM Plans and biodiversity strategies of each State to ensure they are adequately resourced and will meet the objectives of the national strategy framework.



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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 Howard Government preoccupation with encouraging private investment in biodiversity has NOT resulted in conservation biodiversity as shown by the recent reports. Whilst the draft strategy encourages a mix of public and private investment however the success of such a strategy until the details of the funding arrangements are provided. Private investment in biodiversity conservation will only occur if the economic incentives for conservation are greater than the economic rewards for destroying biodiversity. There need to put substantial funding programs in place as incentives for other levels of government, community-based NRM groups and individual landholders. The funding programs MUST be backed up with measurable targets and accountabilities for achieving the outcomes. There is a need for a massive increase in Federal funding to support NRM and specific biodiversity strategies at state and regional level, as well as funding for substantial increases in the protected area estate (directly such as the National Reserves System, but also , say, \$ for \$ Fed funding for State protected area acquisition programs). . Investment incentive programs must also consider and be strengthened so that the incentives that are available to landholders for a range of ecosystem services, not just biodiversity, because of the interdependence of a range of NRM activities that can contribute to biodiversity outcomes.



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

Maximum 270 words

Absolutely NOT! The strategy is primarily aspirational actions without adequate detail on how these will be achieved, the timeframes fro when they will be implemeted, how they will be measured and who is accountable for such strategies.



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

Maximum 270 words

The Consultation Draft does NOT reflect best practice on biodiversity conservation. It has aspirational targets and actions. It is all rhetorical motherhood statements. However it does not contain any detail of the resources to be provided, nor the timelines nor the allocation of accountabilities and responsibilities to achieve these actions. The loss of biodiversity - the rate and continuing decline calls for strong decisive actions, specific targets and timeframes which are supported by adequate financial and personnel resources. We must recognise that the loss of biodiversity is a crisis and must be responded to as such with rapid responses.



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

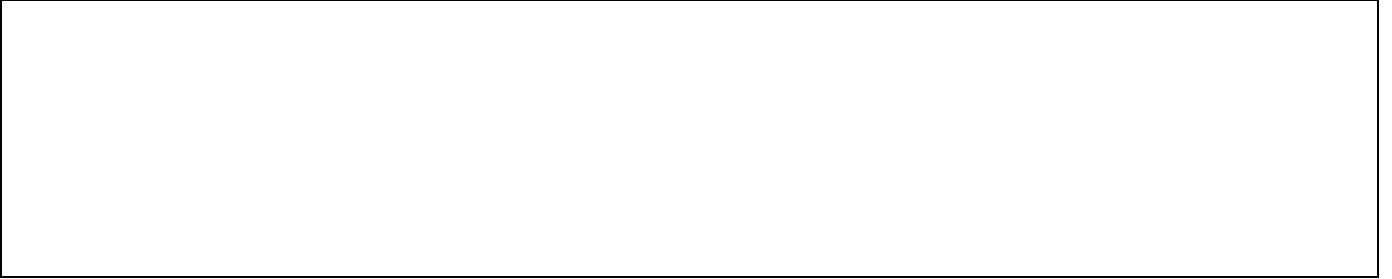
Maximum 270 words

NO because there is NO specific information on HOW the private sector will be engaged and the incentives that will be provided to encourage the private sector. Whilst the strategy states that programs will be developed that make conservation a mainstream consideration and integral to decision making (action 2.3.2), there is no detail on the range and attractiveness of incentives that will be provided to Australians to "pursue ecologically sustainable lifestyles". Whilst the Action 2.2.1 commits to ensuring complementary legislative frameworks across all three tiers of Government, the recent SEQ Regional Plan has highlighted that conservation of biodiversity has not been considered in the overarching pursuit for economic growth through exponential population growth. Priority for Change 3 - Knowledge for all recognises the need to improve knowledge on biodiversity conservation, the strategy lacks detail on how this will be achieved and does not provide for the incentives for the private sector to be involved in obtaining and disseminating the necessary knowledge. Priority for Change 4 recognises the need for investment which is long term, strategic and cost effective. Yet there is no detail on the investment that will be required to reverse the decline in Australia's biodiversity.



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

Maximum 360 words

The draft consultation document is a disappointing set of aspirational goals which lacks the detail on what resources will be provided to achieve the goals. Conservation of biodiversity is a major strategy in the fight against climate change. Yet this document fails to recognise the urgency for action as it does not provide any time-bound commitments which can be measured and by which those responsible can be held accountable. The numerous reports show Australia's biodiversity is in serious decline and we are at great risk of losing iconic species such as the SEQ Koala due to increasing pressure on its habitat. The Koala is basically the "canary in the coal mine" and protection of its habitat will be essential for over 500 other species. This document will not deliver the necessary actions required to conserve the habitat. As stated in previous section, the document fails to address the fundamental cause of biodiversity loss which is due to increasing pressure for urbanisation, food production and infrastructure requirements of an increasing population which continues to be encouraged to grow far in excess of Australia's carrying capacity.

The Strategy must be re-written which incorporates a National Population Strategy in line with the carrying capacity. The actions to reverse the decline in Australia's biodiversity must be detailed with clearly defined accountabilities, targets, reporting requirements and resources provided to achieve the results. Continuing with toothless aspirational statements as outlined in the Current Draft Strategy will only continue the decline in biodiversity.

Thank you for considering our submission



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