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5th June 2009

**Re: Conservation Council of SA (CCSA) response to the Australia's Biodiversity
Conservation Strategy 2010-2020 - Consultation Draft**

Dear Sir/madam,

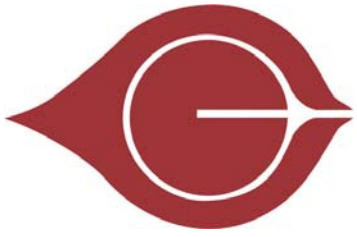
Please find attached a copy of CCSA's submission to Australia's Biodiversity
Conservation Strategy 2010-2020 - Consultation Draft.

CCSA has considered the Strategy and would like to submit the following
general comments followed by discussion around some specific areas
highlighted in the draft document. CCSA also supports the comments
provided by one of its member groups, the **Nature Conservation Society of SA**
(NCSSA) in their independent submission.

CCSA appreciates the opportunity to comment on this matter.

Yours Sincerely

Julie Pettett
CEO
Conservation Council of South Australia



**Conservation Council
of South Australia Inc**

**National Biodiversity Strategy
Submission.**

5th June 2009

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The **Conservation Council of South Australia Inc (CCSA)** is the peak conservation body for South Australia, representing over 55 of the State's environment and conservation organisations.

CCSA is an independent non-profit, non party-political, community based organisation which provides resources, advice and representation for the SA environment movement, and which leads many of the key conservation campaigns in SA.

CCSA is known for its success in developing long term community development, education, and on-ground environmental restoration programs.

CCSA regularly liaises with Local, State and Federal Governments, Government agencies, media, educational institutions, NGOs, unions, industry, business and other groups on matters relating to the environment and social justice.

As a community organization, much of what CCSA achieves is through a large network of skilled volunteers from all walks of life – for its office, on-ground, governance and campaign activities.

CCSA is committed to a healthy environment for South Australia.

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Introduction

The **Conservation Council of South Australia Inc (CCSA)** is the peak conservation body for South Australia, representing over 55 of the State's environment and conservation organisations.

CCSA has considered the Strategy and would like to make the following general comments followed by discussion around some specific areas highlighted in the draft document. CCSA also supports the comments provided by one of its member groups, the **Nature Conservation Society of SA**, in their independent submission.

General Comments:

The Conservation Council of SA (CCSA) supports the Australian government for reviewing and updating the National Strategy for the Conservation of Australia's Biological Diversity (1996) and for the subsequent release of the Australia's Biodiversity Conservation Strategy 2010-2020 Consultation Draft as timely.

The 2010 draft Strategy should be applauded for highlighting the role all Australians must play in the national effort to conserve biodiversity with particular attention to the critical role and interests of Indigenous Australians. However given that, the essential role of stakeholder partnerships and the potential role of the Commonwealth Government in facilitating and supporting these partnerships is understated in the document and requires greater consideration.

As a key national Strategy the document fails to establish clear goals, set priorities based on transparent process and criteria, determine measurable targets, timelines and necessary resources, establish necessary relationships or commitment between key deliverers or determine specific responsibilities. It therefore reads as a loose framework rather than a national plan of action and progress will be challenging to assess.

The Strategy fails to establish cohesion of direction, effort, communication and evaluation or outline mechanisms for achieving national coordination beyond the reporting framework established with State agencies. Nor does it illustrate the context in which the Strategy sits demonstrating how Commonwealth and State natural resource management and biodiversity initiatives will be guided, supported and hence improved.

The Strategy's call to action does not sufficiently stress the urgency of the situation, which is in fact a national crisis that could undermine every aspect of Australian life as we know it. The tone of the document understates in our view the seriousness of the threat, what is at stake, how difficult the challenge will be and how this challenge becomes harder and more expensive with every year. There is simply not enough by way of explanation or tone to justify why 'business as usual is no longer an option'.

The document does not demonstrate how it will accelerate activity (see general comments). The current mechanisms in place only create formal links with state government and this is mostly through reporting. Without targets, greater commitment, agreed processes and increased resources, akin to the National Water Initiative, it is likely that much of the reporting will reflect the activities of existing and ongoing initiatives rather than accelerate a national response.

The Strategy does not identify where the Commonwealth intends to show leadership which in the face of this great threat to our nation must not rely on the community agenda. The document also fails to present biodiversity and climate change mitigation recognising its critical importance as a permanent carbon store.

In addition to an increase in understanding and awareness in Australians the Strategy must seek also to lead to demonstrated behaviour change. There must also continue to be a strong push to integrate biodiversity considerations across national and state decision making beyond those instruments with a prime focus on biodiversity.

Much of the nation's investment in biodiversity conservation and associated community engagement is driven by local communities groups affiliated to NRM Boards, NGOs and local government with no direct links to state government. It is unclear how the Strategy's review driven by the Natural Resource Management Ministerial Council will be informed of these efforts or how these efforts will be supported.

Mechanisms to engage stakeholders, beyond government agencies, in the implementation and reporting against the Strategy are unclear. The vital role played by NGOs, community groups and NRM bodies are greatly understated. There are already deep networks and efforts in place and opportunities to add value and avoid duplication should be sought.

The Strategy does not speak to the links between the proposed reporting and evaluation framework and the existing reporting tools such as State of the Environment. It is also unclear if the Terrestrial Biodiversity Audit 2008, yet to be released, was considered in the formation of the document.

Specific Comments:

Executive Summary (page 5)

The Natural Resource Management Ministerial Council link established to monitor the Strategy's implementation; the proposed five-year review and the development of a long-term monitoring and evaluation framework are all useful aspects of the draft Strategy.

However the Strategy fails to demonstrate the context in which the Strategy sits or how Commonwealth and State natural resource management and biodiversity initiatives such as the Caring for our Country program, State of the Environment or EPBC Act 1999 will be guided or supported.

The opportunity of a national framework is to establish cohesion of direction, effort, communication and evaluation – this document does not speak to any these comprehensively nor outline the mechanisms for achieving such cohesion or national coordination beyond the reporting framework established with State agencies.

While the Executive Summary stresses the need for all Australians to contribute to the implementation of the Strategy it fails to outline where the Commonwealth itself intends to show leadership.

The Strategy recognises efforts over the last decade to better integrate biodiversity considerations into other natural resource management processes but beyond institutional arrangements very little has changed and there must continue to be a strong push to further integrate across national and state legislation, policy, planning and program development such as development planning that requires further attention in the Strategy.

Vision and Principles (page 8)

CCSA supports in principle the Strategy's vision with its strong focus on outcomes however the terms 'healthy' and 'resilient' both require definition.

The link between Australians valuing their biodiversity and making the necessary changes to behaviour is not clear-cut. Given the 'call to action' identified strongly in some sections the Strategy's vision should take the opportunity to emphasise behavioural change not just attitudinal.

Acknowledging the importance of gathering, accessing and sharing knowledge is an important principle to recognise, currently missing; given it is one of the six priorities for change. (new)

It is unclear how the precautionary approach is to be applied as currently worded. (6th principle)

Much of the agricultural areas of Australia are highly degraded and require repair to ensure landscapes continue to provide ecosystem services into the future. The extent of past degradation and the need to address this is understated in the Strategy – halting further degradation will not be enough to achieve the Strategy's vision. (9th principle)

What is meant by an 'ecosystem approach' requires definition and the ecosystem is not the right scale to target in every instance given the three levels of biodiversity. There is no scientific evidence that we are aware of that confirms that the ecosystem approach maximises conservation outcomes above and beyond other approaches, in fact there is some evidence to the contrary for genetic and species conservation. What is more important is to be working at the right biological, spatial and temporal scale for the target asset – supported by the Strategy itself on page 14. The principle should state the importance of working at a variety of scales and the right scale and that where appropriate an ecosystem approach should be applied. (10th principle).

Wherever possible we must seek to address the root cause of decline not just the symptoms to improve efficacy and reduce costs. (new)

Section 1 (page 9)

The section though titled a call to action does not sufficiently stress the urgency of the situation, which is in fact a national crisis that could undermine every aspect of Australian life as we know it. The tone of the document, much of which is set in this section, understates in our view the seriousness of the threat, what is at stake, how difficult the challenge will be and how this challenge becomes harder and more expensive with every year. It is a tone much more befitting a document written fifteen years ago. Without wanting to turn this document in to a technical paper there is simply not enough by way of explanation or tone to justify why 'business as usual is no longer an option'.

1.1 (page 11)

Given there has been no formal review of the achievements of the first national biodiversity strategy, this section should have sought to have given a more comprehensive reflection, as context for the new Strategy.

The establishment of the Commonwealth's EPBC Act 1999 warrants a mention.

The Commonwealth government has not legislated to protect native vegetation from broadscale clearance, with a broadscale native vegetation clearance trigger yet to be adopted. This achievement should read as all state and territory governments. (7th dot point)

Establishment of conservation linkages that provide connectivity across bioregions has also been invested in since 1996, with at least one in most states and territories.

The contribution that community has made to biodiversity conservation since 1996 was not given sufficient emphasis in this section in our view.

1.2.1 (page 12)

In principle CCSA supports the six priorities for change.

To build ecosystem resilience we must invest in repair as many ecosystems have failing ecological function. It is not enough to say that we need to retain what they have. (priority 1)

Mainstreaming biodiversity must not only lead to an increase in the understanding and awareness of Australian of the value of biodiversity but also begin to demonstrate changed behaviour. There must also continue to be a strong push to further integrate across national and state legislation, policy, planning and program development such as development planning that requires further attention under this priority. (priority 2)

Knowledge must be improved, shared and used - to what end, the outcome needs to be clarified. (priority 3)

Getting results will rely on greater stakeholder collaboration. Not only does Australia need to develop best practice ecological management but also stakeholder and partner management. This priority though acknowledging the need for a greater level of joint direction and new stakeholder engagement, such as industry, fails to address the work that needs to be done to foster innovative and effective partnerships to deliver results. (priority 4)

Table 1.1 (page 13)

CCSA is disappointed to note that the majority of priority actions identified in Table 1.1 are desk top exercises, we know enough to act on ground as well, and though we agree that many of the actions stated are priorities around half are simply a continuation of existing initiatives – with actions 1.1.2, 1.1.5, 2.1.2, 2.3.3, 4.3.2, 6.1.3 and 6.2.2 as exceptions.

It is difficult to comment on these actions as short-term priorities without a transparent prioritisation process and criteria provided – some appear to be important as important first steps.

1.3 (page 14)

CCSA was not consulted on the development of the draft strategy and we were not informed of community representatives involved in the process. This is disappointing given CCSA is the State's peak conservation body representing over 55 of the State's environment and conservation organisations.

Necessary actions, though not meant to be comprehensive, should recognise the need to manage fire for biodiversity outcomes across the landscape, as fire is the one key threat recognised in the Strategy not listed in this section.

The Strategy should recognise the need to protect our most 'threatened' species and ecological communities, or nationally listed species or equivalent. By recognising only the most endangered the Strategy excludes other species recognised as matters of national environmental significance under EPBC Act 1999.

1.3.1 (page 15)

It would be useful to mention the proposed five-yearly reviews to provide clarity.

1.3.2 (page 15)

Much of the nation's investment in biodiversity conservation and associated community engagement is driven by local communities groups affiliated to NRM Boards, NGOs and local government with no direct links to state government. It is unclear how the Strategy's review driven by the Natural Resource Management Ministerial Council will be informed of these efforts.

Mechanisms to engage stakeholders, beyond government agencies, in the implementation of the Strategy are unclear. NGOs, research institutions, industry and NRM bodies without formal links to state government are vital and yet may find it difficult to see their role in the Strategy.

The document does not demonstrate how it will accelerate activity (see general comments).

The Natural Resource Management Ministerial Council link established to monitor the Strategy's implementation; the proposed five-year review and the development of a long-term monitoring and evaluation framework are all useful aspects of the draft Strategy.

It would be useful to provide clarity around the role and skills base of the proposed independent panel.

Section 3 (page 19)

NGOs and community groups also have a vital role to play that deserves recognition. All stakeholders recognised in Appendix 1 should be acknowledged in this section.

It is important to note not only the obligation to involve Indigenous peoples but the opportunities. Indigenous Australia offers a wealth of information on species and ecosystems and land management practices and the nation will be more effective for their involvement – it requires a shift in tone. Further to this Indigenous Australian are significant landowners and opportunities to support them to achieve multiple natural resource management outcomes are critical.

3.2 (page 20)

As a key national Strategy the document fails to establish clear goals, set priorities based on transparent process and criteria, determine measurable targets, timelines and necessary resources, establish necessary relationships or commitment between key deliverers or determine specific responsibilities.

At times it is not clear how the Strategy intends to add value to the national effort.

3.2.1 (page 21)

To build ecosystem resilience we must invest in repair as many ecosystems have failing ecological function. It is not enough to say that we need to retain what they have

The national reserve system is a critical platform for biodiversity conservation in Australia but the reserve system model provides most benefit to species, ecosystems and other assets affected by threats acting at a local scale. The Strategy should strengthen the importance of accelerating private land conservation efforts and integrating these with the protected area system to address landscape management threats. The current draft provides little guidance or impetus to this.

Table 3.1 Actions	
1.1.1	Action requires greater definition to be able to account against.
1.1.2	<p>The term 'nationally threatened' encompasses all listed species and hence is most appropriate. Declining species not yet listed could be referred to as species at risk and those with a naturally small or sparse population/distribution could be referred to as rare if the action is intended to give regard to these species also. By referring to endangered species it is unclear why the Strategy appears to exclude nationally vulnerable species.</p> <p>Biodiversity conservation plans should also have regard for other species listed under EPBC as matters of national environment significance, for instance migratory species.</p> <p>Fire as a potential impact should be referred to as 'inappropriate fire regimes' because fire in itself is not a threat to many biodiversity assets including species.</p>
1.1.4	The community has a role to recognise in this also as owners of privately owned reserves e.g. NGO's and private landholders under the emerging private areas on public land (PAPL) schemes.
1.1.5	<p>Clarify what 'local communities' are supported to adapt to climate change, given this action talks about off reserve conservation the wording is not entirely clear, is it ecological, social or both?</p> <p>The document would be strengthened by providing greater guidance to what is intended by a 'national program'.</p>
1.2.1	Many of the solutions and technologies are available, it is the will, resources, and coordination to implement that is missing. This summary of results would be more effective if it focused more on the intended outcomes.

Case Study 2 (page 24)

The state agency driving this project appears to have been omitted from this case study; it should be recognised, and is the South Australian Department for Environment and Heritage.

3.2.2 (page 25)

NGOs have a significant role to add value to this priority.

Table 3.2 Actions	
2.1.1	Why exclude secondary and tertiary education institutions. Incentives available to universities to introduce the fundamental principles of biodiversity and the impacts and opportunities that other vocations can make to biodiversity conservation is likely to have fast and long term impacts.
2.1.2	The document would be strengthened by providing greater guidance to what is intended by a 'national campaign'. To run an effective national campaign for biodiversity conservation in the face of competing and at times conflicting messages is a significant challenge and will be most effective if targeted at a range of levels with an extensive network of partners.
2.1.3	This action is one of the new approaches introduced by the Strategy and CCSA supports it.
2.2.1	This action requires greater clarity - complementary legislative frameworks to what, to each other, how broad is the scope of legislation, to achieve what outcomes? The action should also include relevant policies and programs.
2.2.2	This summary of results would be more effective if it focused on the intended outcomes. In our experience it is the availability of facilitators that makes the difference rather than the model for distributing incentives.
2.2.3	It will also be important to support the ongoing development of decision making tools.
2.3.1	Inadequate resources to professionally manage volunteers and support skills development are likely to be more significant barriers to volunteerism than cultural cringe (1 st dot point).
2.3.3	CCSA supports the important risk mitigation proposed in this action, but we would encourage the Commonwealth to also seek to create benefits for biodiversity from carbon and water markets also as a vital opportunity.

3.2.3 (page 29)

Community groups and NGOs also collect and stores valuable data and access needs to be two-way, this is not recognised in the document with the exception of Indigenous communities.

Table 3.3 Actions	
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3.1.1	National research institutions also have a role to play in this action that could be facilitated by the Commonwealth.
3.1.2	The links between biodiversity, ecosystem services and sustainable production are also a priority to explore further.

3.2.4 (page 33)

There is no scientific evidence that we are aware of that confirms that targeting effort at a landscape or seascape scale maximises conservation outcomes above and beyond other approaches. In fact there is some evidence to the contrary that suggests landscape approaches fail to conserve genetic or species diversity effectively or consistently. What is more important is to be working at the right biological, spatial and temporal scale for the target asset - described well in Action 4.2.1. Best practice species conservation tackles threats at both site and landscape scales and provides a point for tangible engagement by community. By providing species conservation as a 'simple' less strategic example the Strategy could be perceived to undermine many community achievements and the EPBC Act.

Table 3.4 Actions	
4.1.1	This is critical and timely to maintain the national momentum of funding commitments.
4.3.2	This action requires greater clarity and should also include the review and reform of relevant policies and programs.

3.2.5 (page 38)

In addition to resourcing capacity the development of protocols for engagement would be a significant mechanism to foster greater partnerships between Indigenous Australians and other stakeholders.

Table 3.6 Actions	
6.2.1	These tools will be valuable but there will always be significant components of biodiversity that cannot be easily accounted for and given that we must not let such a tool justify very poor decision making by reducing decisions to the bottom line.
6.2.2	It would be useful to integrate monitoring and evaluation conducted by industry that explores the value of biodiversity to production value.
6.3.1	What will be crucial to determine through surveys are the main barriers to understanding and behaviour change not just the levels of awareness and understanding. Surveys of this nature have been done before and do not provide a sufficient basis to design better programs.

	Suggest the Commonwealth continue its support of performance story evaluations for projects including those generated under the Strategy to collect valuable information on stakeholder engagement.
6.4.2	Tools, case studies and capacity building to promote integration of adaptive management at a practical scale is required.

Appendix 1 (page 48)

A1.4 Non-government organisations

Non-government organisations also have considerable community outreach and innovative partnerships which can serve as a platform for changing values and behaviour. This attribute would be useful to recognise in the Strategy.

Appendix 4 (page 57)

The Strategy lists but does not demonstrate how Commonwealth and State natural resource management and biodiversity policy and initiatives will be guided, supported and hence improved by the Strategy.

Appendix 9 (page 83)

A9.2 Invasive species

In addition to introduced species the Strategy must give some regard for invasive and/or abundant native species and their potential impacts.

Overall the attention afforded to threats and their management could be strengthened within the Strategy, in particular in relation to the Commonwealth's biosecurity roles and opportunities.