



Nature Conservation Society
of South Australia

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National Biodiversity Response
PO Box 1715
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To whom it may concern

Re: Australia's Biodiversity Conservation Strategy 2010 - 2020 (Consultation Draft)

The Nature Conservation Society of South Australia (NCSSA) is a community based, not for profit organisation with a diverse membership drawn from all parts of the State. The Society's primary objective is to "foster the conservation of the State's wildlife and natural habitats through effective scientific research and education".

Since its inception in 1963, the NCSSA has taken an active role in the protection of South Australia's natural resources and the Society continues to run a variety of highly regarded biodiversity conservation projects. These projects target critical gaps in knowledge and action and include: improving the understanding of biodiversity within the community; on-ground action towards the recovery of threatened flora; supporting land managers to restore habitat on private and public land; collecting and communicating high quality scientific and technical information; and contributing to the formation and review of natural resource management policy.

We welcome the opportunity to provide comment on the draft biodiversity strategy and wish to acknowledge the good intentions of the Australian Government, State and Territory Governments and the Natural Resource Management Ministerial Council in developing it. Although we enthusiastically support the purpose of the strategy, in our view, the strategy shies away from opportunities to improve the way biodiversity is protected and managed in Australia. Please refer to the following pages for further explanation of our response.

For further information please contact the Society's Conservation Ecologists, Annie Bond and Tim Milne on (08) 7127 4630 or via email at anthelia.bond@ncssa.asn.au or tim.milne@ncssa.asn.au.

Yours sincerely,

Annie Bond
Scientific Officer

The Strategy's purpose is commendable

We wish to offer our support for the aims of the strategy, these being to set the directions for conservation at the national level; to identify the activities and capabilities needed; and to provide a framework under which stakeholders are effectively engaged. A national biodiversity strategy with this purpose has the potential to greatly improve the way biodiversity is protected and managed and the outcomes of our investment in biodiversity conservation. In the current climate of declining resources for conservation and ever increasing pressures and threats to biodiversity, a strategy which promotes effective prioritisation, engagement and collaboration is urgently needed.

Unfortunately the great potential of the Strategy is undermined by the language and tone it uses, by several significant omissions and by a lack of clarity in the objectives, actions and results. Ambiguous or poorly defined objectives and actions prevent the clear communication of national conservation directions and therefore do not promote alignment of conservation efforts. Both the tone of the report and the omission of important information are set to alienate key stakeholders rather than facilitating collaboration and partnerships.

Guiding principles need better definition and articulation

The following discussion refers to the principles listed on page 8

The statement: *'We should apply the precautionary approach to biodiversity conservation'* could be interpreted in a way that contradicts its assumed intention. It is assumed that the intention of this statement is to adopt a precautionary approach where there is scientific uncertainty about the impact of actions on biodiversity. However the statement as it stands could easily be misinterpreted to mean 'we'll only invest in biodiversity conservation when success is guaranteed.'

The statement: *'An ecosystem approach to biodiversity conservation should be used to maximize conservation outcomes.'* excludes other equally valid approaches and precludes innovation and development of new approaches. This principle could be seen as contradictory to Objective 4.2: 'delivery is targeted and integrated at the appropriate geographic scale'.

The statement: *'Biodiversity should not be further degraded by the actions of the current generation.'* is a worthy ideal to express. However it is extremely unrealistic to expect that this could be achieved without radical changes at every level from legislation through to everyday choices of the population. It is certain that without these changes we would immediately fail to meet the expectation implied by this principle. In which case, the credibility of the strategy would be greatly compromised. This principle also implies that stopping current degradation is sufficient for biodiversity conservation and therefore fails to acknowledge the need for restoration.

Reality is the best foundation

The call to action in section 1 doesn't accurately describe the severity of threats to biodiversity or the ongoing and rapid decline in biodiversity. For the call to action to be inspiring, it needs to be based on an accurate description of the situation. Glossing over the 'bad news' will underestimate the magnitude of the challenge and disengage stakeholders.

Six priorities for change

The NCSSA support the intent of the six priorities for change. However better articulation is need to improve their clarity and avoid misunderstanding.

The term 'ecosystem resilience', used in Priority 1 means different things to different stakeholders and is not well understood in the wider community. If this term is to be used a detailed explanation and definition is required.

Priority 2 'Mainstreaming biodiversity' implies that improving awareness and understanding of biodiversity in the wider community will be sufficient to change behaviour. In our view this is a mistaken assumption, and the additional effort, resources and actions needed to change behaviour must not be ignored.

Improve the strength of the framework

The strategy should, but currently does not provide clear and measurable targets. The objectives are not quantified and relate to what we hope to do rather than what we hope to achieve with respect to the state of biodiversity. For example Objective 1.1 states that: 'Biodiversity is actively managed...' and Objective 1.2 states that 'Threats to biodiversity are reduced and managed on a long-term basis'. As such these objectives are open to a large range of possible interpretations and will therefore fail to align biodiversity conservation efforts. In addition to this, their focus on activity rather than the state of the resource means that these objectives may be met without achieving any improvement in biodiversity.

There are disconnects between the actions and their corresponding results and between these and the priority areas for change. For example, Action 1.1.4 'Continue to support, expand and manage the National Reserve System...' will not necessarily lead to the result: 'A comprehensive, adequate, representative and resilient marine and terrestrial protected area system...'. These disconnects could be partially solved by presenting the results as intermediate targets. Ensuring that the actions describe realistic actions (unlike 4.4.1 Cause industry to...) and that the targets/results describe outcomes, will also contribute to resolving this issue.

The absence of measurable targets and the gaps in the consequence chain between actions, results, objectives and priority areas will make evaluation of the strategy's implementation difficult. The issues described above with respect to actions results and objectives need to be resolved to facilitate effective monitoring and evaluation of the strategy and to achieve Priority 6: 'Measuring success'.

Several of the actions promote mechanisms for biodiversity conservation such as Stewardship/Market Based Instruments and Continental Scale Conservation Linkages. While these mechanisms are enjoying current popularity, and are valid conservation tools, they should not be promoted to the exclusion of other existing and potential techniques and mechanisms. The strategy does not need to prescribe how actions should be undertaken at this level, it should describe what we want to achieve.

The minimal profile given to legislation in this strategy understates its importance for biodiversity conservation.

Role of the Community/NGO sector

The important role of the Community/NGO sector in implementing the strategy is not well recognized or acknowledged. Biodiversity Conservation NGOs, such as the NCSSA, play a critical role at all levels of biodiversity conservation and contribute to implementing the majority of actions identified in the strategy. Currently, the strategy identifies the 'community sector' as having shared responsibility for some of the actions. However it is unclear whether 'community sector' refers to NGOs, the general community or both. The actions against which the 'community sector' is identified do not cover the full range of actions that the NGO sector contributes to.

We therefore ask that the term 'community sector' be defined and that the recognition for the role of NGOs and community organisations is improved by identifying their role in all actions under the strategy.

On page 49, Non-government organizations, Indigenous and industry groups are credited with having considerable local knowledge and expertise in conservation management and useful informal and formal information networks. This underestimates the past and potential contribution and role of these groups. For example there are several NGOs in South Australia that contribute to biodiversity conservation policy and planning at the national level, and that are involved in research and in bridging the research and policy divide. NGOs and community groups also make a substantial contribution to the cost-effective implementation of practical conservation actions.