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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
strongly 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
somewhat agree

Are there any other threats you think should be addressed?

Maximum 90 words

No

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 proposed priorities for change are purposefully high level, generic statements. It is reasonable to assume that the majority of action required to deliver the Strategy's visions can be categorised under one of these headings.

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 above.

Do you have any comments on the vision?

Maximum 90 words

The Winemakers' Federation of Australia supports the vision statement.

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 agree
- provides a good balance between marine and terrestrial issues?
somewhat agree
- provides the necessary national framework to produce innovative conservation action?
somewhat agree
- 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)?
somewhat disagree
- is applicable to urban and rural environments
somewhat disagree
- provides a clear framework for balancing conservation, social and economic issues?
somewhat agree
- adequately deals with the issue of climate change?
somewhat agree

Do you have any other comments on these issues?

Maximum 180 words

Although alluded to, the issue of biodiversity on private land appears to be inadequately dealt with. Scale-appropriate biodiversity conservation can be readily incorporated into productive landscapes - particularly soil flora and fauna, and yet apart from recognition in the definition of biodiversity, the focus of Strategy activities is around the usual macrofauna and -flora. Positive recognition for landholders actively managing soil biodiversity and aquatic biodiversity through the minimisation of nutrient- and sediment-laden runoff is one means of engaging a stakeholder group that are otherwise wary of acknowledging conventional biodiversity assets (eg threatened species) on farm for fear of attracting unnecessary scrutiny and activity restrictions.

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

Maximum 270 words

Yes.

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

It is highly unlikely that a jurisdiction would return a report to the NRMCC indicating that they had not adequately actioned the Strategy and the value of this type of reporting is questionable without

independent verification. Reporting needs to demonstrate tangible gains in biodiversity conservation, such as vegetation condition and extent, soil organic matter content, water quality improvement and fauna observation records. NRM monitoring reports in recent times have used rhetoric and 'dollars spent' to mask little, if any, NRM improvements being achieved. Biodiversity is a difficult concept to quantify, and must be made simple and definitive in order to engage industry and the general public.

Is there a precedent in the National Pollutant Inventory style of data collection and public reporting that could be applied to biodiversity? NRM bodies could report annually against selected biodiversity indicators, with information sought from remote sensing (eg vegetation extent), landholder feedback on adoption of biodiversity-friendly management practices and community surveys regarding biodiversity awareness. This could then be shown on a public website to provide geographically referenced biodiversity snapshots against selected simple parameters, and track trends over times. There needs to be a balance between physical biodiversity monitoring, and monitoring of indicators that infer biodiversity management, namely sympathetic land and water management practices. This could potentially mirror an approach being considered in agriculture's inclusion under the Carbon Pollution Reduction Scheme, and could value add to industry reporting.

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

As a framework, the Strategy is sound, however more detailed action planning is required before comment could be made on the potential effectiveness of the Strategy. Anecdotal evidence from Australian wine companies operating under strict licence conditions suggests that contradictions exist between state and federal legislation and local council guidelines, and further that contradictions exist between OH&S legislation and environmental legislation. If this is the case, alignment of legislation may be required to ensure compliance.

7. Is the Consultation Draft likely to encourage a good mix of public and private investment in biodiversity conservation?

somewhat agree

If not how can the Consultation Draft improve in this area?

Maximum 270 words

Private investment in biodiversity conservation would be more likely if a robust system of quantified ecosystem services was outlined and included in standard accounting practices. Henschke Wines in South Australia have been working on an ecosystem services project led by the CSIRO to build an accounting framework for ecosystem services. The Strategy provides little mention of the opportunity for individual landholders to contribute to biodiversity conservation, unless this is inferred in the Strategy's references to the 'industry' stakeholder group. As mentioned previously, where management practices are protecting soil health, landholders must be credited with biodiversity protection at the soil flora and fauna level, which although less 'sexy' than bushland and macrofauna, is an important biodiversity component. This also makes biodiversity conservation more approachable for landholders, who are often held responsible for widespread clearing of native vegetation.

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

Maximum 270 words

Yes.

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

Maximum 270 words

Unknown.

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

Maximum 270 words

It will be difficult to engage long-term private sector investment in biodiversity in the current economic climate, especially as this investment does not contribute to assets or profits in the absence of ecosystem service accounting frameworks. Investment is more likely if it can be shown to have multiple pay offs, such as value in carbon markets and consumer willingness to pay premiums for products produced using biodiversity-friendly practices. The Strategy's awareness-raising objective is essential in creating a value proposition around biodiversity.

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

Maximum 360 words

The Winemakers Federation supports the development of a new national Biodiversity Conservation Strategy, and has featured biodiversity conservation components in the industry's new environmental assurance scheme due for release in August 2009.