



Gecko - Gold Coast and Hinterland Environment Council Assn Inc.

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5 June 2009

Draft Consultation Document: National Biodiversity Conservation Strategy 2010-2020

Dear Sir/Madam

Re: Additional comments to online submission questionnaire, from Gecko – Gold Coast & Hinterland Environment Council

Gecko welcomes the National Biodiversity Conservation Strategy 2010-2020 and is grateful for the opportunity for community consultation and comment offered in the drafting process.

The National Biodiversity Conservation Strategy 2010-2020 is an important, long overdue and well-considered document, expressing sound principles and measures relating to biodiversity conservation. The document is a very valuable acknowledgement by high level, authoritative bodies in this country of the critical state of Australia's biodiversity, and is thus in itself a tool for conservation.

Gecko has supplied the following comments made in close perusal of the document as an addition to the online questionnaire submission, which was constrained by word limit and comment subject area.

The comments herein are intended as suggestions for strengthening the Strategy and ensuring effectiveness in achieving stated goals, upon which our organisation has long placed the utmost priority.

We look forward to further opportunities for consultation and input to this vital initiative and congratulate the Dept of Environment, Water, Heritage and the Arts for its publication.

Yours sincerely

Rose Adams
President

Additional comments to online submission questionnaire on National Biodiversity Strategy from Gecko – Gold Coast & Hinterland Environment Council:

Language:

1. Language of document does not adequately reflect the urgency of addressing decline; wording must be strengthened; for example through use of adjectives with more specificity or even with emotive connotations, or the inclusion of persuasive phrases.
2. Language should show much greater emphasis on recognition of climate change impacts on biodiversity – i.e.: nearly all efforts at conservation (even radical but necessary approaches such as the immediate halt of all forest and non-forest vegetation clearing) will be negated by full impacts of climate change. For this reason, the document should call for larger economic and social measures to immediately address the reversal of anthropogenic factors contributing to climate change
3. Language appears to show too great a tendency to emphasise climate change **adaptation** rather than dramatically prioritising climate change **avoidance** strategies. This is an important point since forest and non-forest vegetation plays an important active and passive role in the provision of carbon sinks. The NBS represents an opportunity for a strong voice in the call for recognition of the importance of deforestation avoidance as a strategy to prevent catastrophic climate change.
4. Language of Priorities statements is very global and thus vague.
5. Present Tense used in Results column of Priorities is misleading as these statements could be interpreted as current rather than desired status of actions. This ambiguity could easily be eliminated by employing Future and/or Conditional Tenses
6. Language attempts a positive assessment of current practices, instead of representing the reality of disturbingly negative impacts and contributory role of present legislation and decision-making. It is important that the NBS conveys the inadequacy of present community and governmental perspectives on biodiversity issues and to acknowledge that the complacency and uninformed perspectives of present decision-makers have led to the present state of rapid, perhaps irreversible decline. Unless this message is comprehensively communicated to society and bureaucrats, decline will continue unabated.

Call for greatly improved legislation:

- It is of great concern that the document makes no call for radical overhaul of existing environmental legislation which could be argued to be playing a causal role in loss of biodiversity. This document should call for an urgent Federal Review of all federal and state environmental legislation and an investigative report on the priorities, perspectives and values of law-makers and interpreters; the document should further call for revision of all environmental and planning legislation to reflect a changed prioritising of conservation and legitimate biodiversity protection in Australian law. (At present there is little or no correlation between planning legislation and environmental legislation; environmental legislation appears to be written from a perspective of ensuring conservation issues do not impede a development; environmental legislation presently appears to be written from a perspective that does not prioritise or recognise the intrinsic value of biodiversity in its own right, thus granting little or no protection to what is termed ‘common’ flora and fauna; further, present environmental legislation lacks recognition of the real danger of ‘piecemeal’

habitat loss, or the importance of connectivity for biodiversity. We are aware that there has been an independent review of the EPBC Act 1999, with opportunities for public comment. The interim report highlighting the key issues that have been raised through the review is due to be released in June 2009, with further public input to be sought. It is unclear how the Biodiversity Strategy will be re-framed once the review of the EPBC Act is completed or whether the NBS will influence changes to the Act to better protect biodiversity.

Missing pieces:

1. While 'all Australian governments' are stated to 'recognise the urgency of this task', there is no overt strategy within the document which would oblige the range of Departments at Federal and State levels, and the disparate Local Governments to adhere to the spirit of the task rather than continue to pay lip service, often solely at a bureaucratic level, to complex conservation issues
2. Recognition of significance to overall biodiversity decline of piecemeal loss as smaller areas of habitat are continually destroyed for urban/commercial/agricultural/mining expansion
3. Declaration or overt statement that Australia has reached the point of no further expansion into natural environments and in fact has long ago crossed this point thus necessitating the rescinding and regeneration of spaces already committed to development
4. While mention is made of the impacts of population growth as a major contributing factor in biodiversity loss, no recommendation is made in regard to arresting population growth and/or expansion as a strategy for biodiversity protection
5. Recognition of forest and non-forest vegetation as carbon sinks and the importance of deforestation avoidance, particularly in relation to climate change avoidance.
6. Call for urgent, best-practice, universal climate change avoidance strategies
7. True cost benefits of environmental integrity and costs of loss of environmental integrity
8. Clean-up costs of environment should be acknowledged and recognition of same called for in this document
9. Statement of funding amounts and priority for biodiversity conservation, including for identification of assumed larger proportion of undocumented species and for identification of presence of known, high conservation value species within any given area, for re-constitution of degenerated areas, for purchase of necessary, privately owned areas, for reclassification of regional/continental conservation status of species, and so on, must be included
10. For both biodiversity protection and climate change avoidance, call for immediate halt to all urban vegetation clearing

Measuring success:

1. Case studies are all intended to be indicative of successful programs; yet the decline continues; therefore, it is important, given the acknowledgement of continued if not accelerated decline under present management processes, to measure failure
2. Case studies should include the much greater proportion of failures brought about by population driven impacts from sectors such as agriculture, commerce and industry, mining and residential. (Gecko willing to supply sample case studies where environmental/planning legislation fail to protect biodiversity)
3. Actions, Results and Responsibilities are mostly bureaucratic and vague, and thus open to loose and irresponsible interpretation in practice at both community and government levels; this has been the status quo for development approval for many decades and a significant factor in the ongoing loss of biodiversity

Measuring Success should be framed around quantifiable, specific, concrete outcomes and key goals

4. Timeframes and deadlines should be established for key goals and outcomes
5. Key goals and outcomes should be stated in specific terms by which success can be measured; for example:
 - a. meaningful percentages of preserved vegetation/habitat for each federal, state and local area by X date
 - b. meaningful funding of ongoing, comprehensive species identification and location mapping by X date
6. Key goals and outcomes as well as timeframes may be supplied for each governmental area by calling for input from concerned community groups and individuals, as well as from each local government body; criteria and dates for same should be published in the final draft of the NBS
7. Measuring Failure should also be framed around quantifiable (negative) achievements, such as the loss of further habitat within an area, or particular species already identified as under threat both officially and unofficially by concerned community groups. Again, input may be called for from community groups and individuals.
8. Five year intervals for monitoring and reporting on effectiveness of strategy are too long, given the eight year window (in 2009) in which to undertake actions to forestall the worst, irreversible effects of climate change.

Knowledge for all:

1. There appears to be a primary school focus in this important strategy
2. Education programs should be recommended for incorporation at all levels of society and throughout the public domain
3. Genuine approaches to conserving biodiversity will require sometimes extremely contentious actions at both government and community level; for this reason, it is important that all Australians of all age groups and occupations are informed of the importance and intrinsic value of biodiversity in order to garner vital community/electoral cooperation
4. The contentiousness and controversy of conserving biodiversity should be acknowledged by all education programs
5. Input on educational strategies and program content should be invited from concerned community groups and individuals
6. Meaningful funding targets for education programs should be identified by this Strategy (or called for from all levels of government)

Executive Summary:

- a. The gravity expressed in usage such as ‘call to action’, ‘urgent’, ‘decline’ and ‘immediate’, is undermined by the statement, ‘Despite efforts to manage threats...’ as this statement implies that current practices, perspectives and legislation at all levels of government, and thus within the community, represent sound practice. This document should unequivocally denounce current processes as ineffective at best in protecting biodiversity and actively destructive at worst as a causal factor in the present apprehension of decline.(See Section 1, Language, Item 6)
- b. ‘All governments recognise the urgency of this task’: this statement is questionable; Gecko can furnish several instances which illustrate that such is not the case.
- c. It is commendable that the word ‘reverse’ is used rather than ‘halt’ or ‘slow’; this principle of reversing biodiversity decline has highly significant

implications in practice and should be more overtly emphasised within the document; strategies and processes which may bring about decline reversal should be identified and broadly outlined.

- d. The 'six priorities' referred to should include comments and recommendations in regard to the failings of present legislation.
- e. The lead-in statement to the subsequent bullet points, "The main threats to our biodiversity are:", should read "The main threats to our biodiversity are destructive human practices which have contributed to:" or words to the effect that present human activity plays a causal role in the listed factors which are the immediate causes of decline; otherwise the listed threats appear to be randomly generated, rather than through the negligence of society and human lack of knowledge about biodiversity processes.
- f. At what level will the 'main threats' within each area be identified? That is, will local shires be required/allowed to establish threats? It would be wise to allow/require input from concerned community members.
- g. The requirement that all Australians must play an 'active role' is commendable and must be further defined and then emphasised through specifically stated strategies.

Call to Action:

- a. Para 3: 'still' – implies that some past effort has been made to arrest decline. Suggest this sentence read, "However, the record...biodiversity is rapidly declining." A statement expressing failure of present practices would further strengthen this paragraph.
- b. For both biodiversity protection and climate change avoidance, call for immediate halt to all urban vegetation clearing and habitat destruction
- c. Para 7: claims about existing legislation to protect environment should be qualified by acknowledging failure and weakness of present legislation as well as the limitation inherent in planning legislation being discrete from environmental legislation.
- d. Statement 'we have learnt' is not reflected in practice of laws, law makers or law interpreters
- e. Must overtly call for improved legislation rather than policy

Building on current work:

- a. Bullet 1: 'a significant increase ...reserve systems...': To what is this significance compared? It is important to establish a benchmark for ideal biodiversity conservation, particularly in relation to the previous statement in the Executive Summary that 'Business as usual is no longer an option'.
- b. Bullet 7: reference should be made to impacts of clearing in designated urban areas where considerable loss is occurring
- c. Bullet 8: Quality of water should be defined and emphasised
- d. Bullet 10: This is an important strategy which should be reflected as a discrete Priority; equal importance as improving legislation in achieving outcomes
- e. Bullet 11: Should also recommend higher emissions reduction targets, a 300ppm atmospheric carbon goal, and better Emissions Trading Scheme legislation
- f. The statement in paragraph 3, "Now we must improve...consequences of human activity, including climate change" demonstrates a number of flawed philosophies inherent in this document. Implicit are (flawed) assumptions that humans are capable of fully 'understanding' and 'managing', as well as a conviction of the legitimacy of untrammelled 'human activity', and an arguably unethical willingness to recommend climate change adaptation before properly addressing climate change avoidance.

- g. The notion of climate change adaptation, expressed in the term ‘resilience’ represents poor comprehension of scientists’ predictions about the full effects of climate change upon habitats and species, and the promotion of a false sense of security for Australians. It should further be noted in this document that climate scientists estimate we have only eight years (from 2009) to take action to reverse catastrophic climate change.

Priority actions for the first two years of the strategy:

- a. If biodiversity integrity is to be advocated as important in relation to human needs, those ‘benefits to our wellbeing’ should be clearly stated and open to review
- b. The implementation date of the Strategy should be brought forward to reflect crisis; since an urgent need for such a Strategy has been identified, immediate moratoria should be set in place regarding all harmful human practices
- c. Community input should be called for in all Priority areas and a measure of authority granted to same in order to ensure transparency, comprehensive information base, and sincerity of ecologism philosophy
- d. That funding should be high priority should be expressed here; (notable has been CSIRO funding cuts in 07/08 Budget, somewhat ameliorated by 6.4% increase in funding in the 2009 budget.)

Timeframe:

- a. It is noted that this draft Strategy is emerging three years after the *Australia State of the Environment 2006* report; such a lag between report and the very first stages of action is incompatible with the need for urgency indicated in this document.

Background:

a. Para 2: The statement, “There have been many achievements... is required”, is an example of how the language of this document alters in tone and is reflective of flawed fundamental philosophy. The Strategy elsewhere points to the critical nature of national biodiversity due to human practices, yet also attempts to retain the public perception of our governments having taken a responsible approach to conservation. The impression given is as though decline is occurring despite best-practice standards, when it is clearly not the case that Australia properly appreciates, prioritises or is a responsible custodian of conservation. A more accurate and effective (given the stated aims of this document) re-statement here would be, “The continuing biodiversity decline demonstrates that previous and existing measures are largely inadequate and a comprehensive, radical approach is required.”

The gist of the above critique is apparent in other statements throughout the remainder of the Strategy. Gecko will be happy to supply further detailed critique upon request.