

Queensland Farmers' Federation

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
somewhat agree
- degradation of habitats
somewhat agree
- unsustainable use of natural resources
somewhat agree
- changes to the aquatic environment and water flows
somewhat agree
- inappropriate fire regimes
not sure

Are there any other threats you think should be addressed?

Maximum 90 words

Biodiversity is simply the variety of all life, the different plants, animals, micro-organisms, their genes, and the ecosystems they form. Loss of biodiversity is one of Australia's most serious environmental problems. Agriculture depends on healthy ecosystems to provide services that include nutrient and waste recycling, pollination from insects, sediment control, and clean water. Find a balance between a productive agricultural system and a healthy biodiversity is in the interests of all farmers. QFF agrees with the six priority actions for change as outlined in the consultation draft. QFF strongly supports the integration of climate change into Biodiversity as climate change is seen as one of the most important issues for intensive farming in the foreseeable future and QFF has previously provided numerous submissions to the Australian Government and Queensland State Government on this issue of integration of Climate Change into Biodiversity management strategies.

QFF supports and welcomes the broad thrust of priority 1. Building ecosystem resilience is imperative yet this requires greater levels of understanding which must be a key early priority for Governments. Industry cannot develop biodiversity strategies until Governments have provided enough up front investment in providing the information needed to support risk-based decision making when the risk to a loss of biodiversity can be measured and managed. QFF believes that greater coordination of dollars supporting climate related research and development is needed. Current research activity largely is dispersed and tends to be driven by available expertise rather than focussing on overall gaps and priorities. QFF suggests that greater priority needs to be given to the further development of regional climate change information that can be used by industry to develop adaptation responses.

The capacity to adapt and change requires the recognition of both threats and opportunities. Despite the challenges facing the agricultural sector when facing the impacts of climate change, rural industries have a longstanding record of adapting to threats and new opportunities. QFF calls on the new strategy to recognise the potential dramatic impacts a changing climate may have on our biodiversity from a regional landscape scale.

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

QFF acknowledges the priorities for change and considers it imperative that in order to measure their success an appropriate monitoring framework must be developed that involves regional land managers in assessing the biodiversity response. In this way QFF believes that priority 6 is critical but only if enough work is done "upfront" to establish an appropriate baseline for improving biodiversity.

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

Maximum 90 words

Biodiversity and climate change are closely linked, and each impacts upon the other: Biodiversity is threatened by human-induced climate change, but biodiversity resources can reduce the impacts of climate change on population and ecosystems. To ensure the priorities for change are implemented effectively an appropriate biodiversity baseline should be established at a regional scale and this baseline should be established by engaging with all regional stakeholders. QFF believes that to establish an achievable improvement in the biodiversity of our ecosystems we must acknowledge the current vastly modified landscapes and work within these frameworks towards and overall improvement. Priorities for action must not fall into the trap of working to deliver an unrealistic change in the ecosystem that attempts to wind back the clock with existing development in the landscape.

Do you have any comments on the vision?

Maximum 90 words

In addition to the state Vision QFF believes that the strategy should acknowledge the state of the existing landscape, and serve to engage all existing land managers in improving biodiversity in such a way as to protect the values, practices and communities that manage the natural resources in partnership with their enduring prosperity.

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?
strongly disagree/not sure
- has a sufficient focus on institutional arrangements and change?
not sure
- provides sufficient emphasis on improving community awareness of biodiversity?
somewhat agree
- addresses the need to implement conservation action at the appropriate scale(s)?
somewhat agree
- is applicable to urban and rural environments
somewhat disagree

- provides a clear framework for balancing conservation, social and economic issues?
somewhat disagree

- adequately deals with the issue of climate change?
somewhat agree

Do you have any other comments on these issues?

Maximum 180 words

NA

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

Maximum 270 words

QFF provides no additional comment on this issue.

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 agree

Do you have any suggestions for alternative reporting arrangements?

Maximum 270 words

QFF believes that any reporting structure must establish as a first order priority, a mechanism to report directly back to land managers who are in a position to make decisions on a daily basis that may serve to further improve biodiversity. This means that reporting structures must transcend simply reporting through traditional project based arrangements and involve communities, industry and interested private individuals whether they have been a part of any formal implementation plan or not.

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

QFF does not at this stage believe the strategy has adequately articulated how the Australian Government intends to bring the various jurisdictions along on a similar National biodiversity plan when it appears that State Governments are developing similar strategies in parallel to the national approach and a disconnection exists between planning for biodiversity management at the local Government and regional NRM bodies level.

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

not sure

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

Maximum 270 words

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

Maximum 270 words

QFF believes that further work is required to identify a clear, coordinated, inclusive and efficient implementation plan for the strategy.

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

Maximum 270 words

QFF has no comment on this issue

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

Maximum 270 words

QFF believes that engaging the private sector is critical to the success of the strategy. Further work is required to identify how this could actually occur outside of the existing networks of private sector stakeholders. Critical to improving this situation is the ability for a biodiversity strategy to clearly demonstrate the importance of a healthy ecosystem to the profitable and sustainable functions of a business involved in resource management.

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

Maximum 360 words

Implementation of the Strategy into Existing Industry and Government Mechanisms

For many years the QFF has advocated for the recognition of a property scale Farm Management System (FMS) approach to property management. The voluntary FMS approach allows a farmer to take a look at their own farming operation implement an appropriate risk management framework and work to deliver farming practices that mitigate risks to the natural environment while maintaining farm viability. A profitable farming business is one that can proactively invest in not only environmental stewardship but also environmental rehabilitation. Industry organisations and government both have a role in supporting a farmer to implement a FMS. This has been recognised through the QFF FMS Framework, QFF's policy position on farm level management, and the QFF- Queensland Government Memorandum of Understanding on progressing Farm Management Systems which was established in March 2005.

Implementation of an industry FMS is a detailed process, involving cultural change that requires intensive industry support.

With the loss of habitat values a key issue the consultation draft needs to further explore and emphasise the importance of the integration of biodiversity into natural resource management projects, QFF regards the development of this strategy as an opportunity for the federal government to develop biodiversity principles that can be delivered in parallel with all other farm management practices.

Development of such a process could assist in the reduction of the loss of habitat values in intensive agricultural areas, particularly in areas considered to be more fertile, coastal and highly populated areas as well as promoting sustainable farming practices.

Strong Focus on Incentives

Incentives can be seen as a vital tool in allowing farmers to implement biodiversity initiatives and hence there is a clear need for the strategy to focus on this concept. QFF has seen the success of various incentive programs rolled out to assist farmers in their acceptance of increasing biodiversity values in Queensland. Such initiatives include the Nature Refuge and Nature Assist program run by the former Queensland Environmental Protection Agency. The case study of Reef Rescue is noted and is wholeheartedly supported by QFF.

QFF is also keen to see the development of an “ecosystem services” environmental payments program. The strategy has shown the importance that biodiversity plays in maintaining ecosystem services in the community, a service that many farmers contribute greatly too. The federal government on numerous instances have deliberated the use of ecosystem services or environmental stewardship payments, QFF believes that this a perfect opportunity for the new strategy to focus on a similar platform to that of the Nature Refuge programs and also to further enhance other market based instruments.

The Need for Biodiversity Indicators

As previous papers have indicated there is distinct lack of biodiversity indicators across Australia. This issue makes it difficult for not only the strategy to be assessed, but for the assessment of the effectiveness of other NRM initiatives. QFF recommends a stronger link between government, research and development groups and industry organisations to establish what gaps currently exist in biodiversity assessment. QFF would also advocate a strong funding source to develop any tools that were identified in this process.

Comments on Ecosystem Services are as follows:

The ecosystem services debate has not advanced very far in Australia and the enormous complexity of issues raised in the various dot points reflect why. What is needed, and what could be the focus of the strategy, is developing the early steps needed for implementation of ecosystem services. These could be:

1. Audit of existing resource condition, collation of all existing known environmental audit material into a single national information resources, with priority then given to plugging the gaps.
2. Identification of industry good practice to define an acceptable level of practice. This could be reflected in industry BMP/FMS programs and minimum regulatory standards (e.g. duty of care) and would require further investment in such programs.
3. Identification of potential ‘buyers’ for ecosystem services. Using both the carbon trading and existing water examples and possibly the Green Offsets program in Queensland, Govt should take on a role as a broker between beneficiaries e.g. water users and service providers such as land holders.
4. Building on existing initiatives. Trying to invent a brand new wheel that the public (and hence the Government) is not yet prepared to pay for makes little sense while further research on its elements does add value. Adding to existing initiatives makes more sense such as building biodiversity offset as a possible add-on to carbon trading e.g. work in FNQ NRM, building on water quality initiatives and consumer pricing to provide incentives e.g. SEQ Healthy Waterways.
5. Broader recognition of good practices in the marketplace. There is no premium for ‘good practices’ for food producers. Maybe we need to build it, starting with an appropriate recognition system for Best Practice (as opposed to good practice) which could build on the new ‘Australian Grown’ labelling scheme, and promotion of that in the marketplace.

Government Regulation

QFF recommends that in moving forward the Australian and State Government’s should forget regulation and support systems that recognise and encourage proactive management of significant biodiversity areas and indeed reward subsequent improvement in regional biodiversity. The State Government should invest in bringing an industry perspective as well as the catchment wide perspective approaches together to deliver an industry and environmental outcome that encourages an improvement in biodiversity by supporting voluntary approaches that deliver enduring change and overall improvement in landscape health.