

National Biodiversity Strategy Review Task Group  
c/o Conservation Policy Section  
Biodiversity Conservation Branch  
Department of the Environment, Water, Heritage and the Arts  
GPO Box 787  
Canberra ACT 2601

1 June 2009

### **Australia's Biodiversity Conservation Strategy 2010-2020 – consultation draft**

Dear Task Group

The Nature Conservancy (TNC) welcomes the opportunity to provide comment on the consultation draft of *Australia's Biodiversity Conservation Strategy 2010-2020*.

The Nature Conservancy is one of the world's largest science-based conservation organisations operating in 38 countries. In Australia, TNC has operated since 2000 and works with partners towards achieving a goal of effectively conserving 10% of each major habitat types by 2015. So far TNC has helped fund the acquisition and/or management of 27 properties protecting 3.6 million hectares in Australia. At a broader scale, TNC is involved with practical strategies to address altered fire regimes in northern Australia and to achieve more sustainable grazing practices in northern Australia and the rangelands. TNC also aims to create 'enabling conditions' for biodiversity conservation, such as through advice to governments on protected area network establishment and policy and tax reform.

National biodiversity strategies are important documents, setting the scene for conservation policies and programs. Unfortunately, this draft 2009 strategy appears to be a backward step from the original 1996 strategy.

As will no doubt be outlined in a number of other submissions, the usefulness of this draft strategy is severely limited by a lack 'SMART targets', i.e. targets that are Specific, Measurable, Attainable, Realistic and Timely. Even if the intention is not to have such targets embedded in the national strategy document (as suggested by a Task Group representative at one of the stakeholder meeting), there needs to be accompanying report, agreed to by all governments, that outlines the SMART targets, such as occurred with the *National Objectives and Targets for Biodiversity Conservation 2001–2005*.

The Nature Conservancy has a particular interest in Actions 1.1.4 and 1.1.5 and specific comments on these 'Actions' and related 'Results' are provided below.

Action 1.1.4 Continue to support, expand and manage the National Reserve System as a foundation for biodiversity conservation.

This is to be commended but the Action as currently worded refers only to the terrestrial National Reserve System, despite the intent apparently to include marine protected areas.

To resolve this alternative wording could include:

- Continue to support, expand and manage the National Reserve System and the National Representative System of Marine Protected Areas as a foundation for biodiversity conservation; or
- Continue to support, expand and manage nationally-coordinated terrestrial and marine reserve systems as a foundation for biodiversity conservation.

The Nature Conservancy provided detailed comments on *Australia's Strategy for the National Reserve System 2008-2030 Consultation Draft* in January 2009. As outlined in that submission, it is imperative that this NRS Strategy includes a scientifically defensible, explicit minimum percentage of current or pre-1750 regional ecosystems that needs to be reserved to meet 'comprehensiveness' and 'representativeness' targets for the reserve system. TNC considers this requirement also needs to be incorporated into the national biodiversity strategy. It is important to be clear exactly how 'CAR' is to be measured in the national biodiversity strategy as there are currently two different and not necessarily consistent national policies relating to these criteria and definitions (i.e. the JANIS criteria of the National Forest Policy Statement and the National Reserve System criteria).

Action 1.1.5 Establish a national framework for off-reserve conservation.

This Action requires much more detail, including a clear outline of why a national framework is required and what it realistically hopes to achieve. What form will the framework take and what exactly will be included? It should be noted that the term 'off-reserve' has changed somewhat since 1996, reflecting the evolution of the term 'reserve' in Australia. In 2009, some of these more secure 'off-reserve' mechanisms are now considered part of the National Reserve System, including conservation covenants, Indigenous Protected Areas, and private protected areas owned by conservation organisations. *Australia's Strategy for the National Reserve System 2008-2030* already outlines providing a national framework for those mechanisms mentioned above. Is the 'national framework for off-reserve conservation' of Action 1.1.5 also planning to include these mechanisms? On page 21 of the draft biodiversity strategy, conservation actions on land 'outside of the reserve system' are stated as 'improving habitat connectivity and sustainable natural resource management practices' which seem to encompass a very broad but ill-defined range of issues to be addressed in a national framework.

Other important subjects that require expansion or inclusion in the strategy include:

- Action 4.3.2: This action should not be restricted to just reviewing and reforming legislation to improve biodiversity conservation but include reviews and reforms of relevant policies, programs and institutional systems.
- As has been highlighted in numerous investigations into the state of the Australian environment, there is a need for a robust nationally-consistent long-term ecological monitoring to inform decision-making and identify spending priorities.
- Targets in international conventions of which Australia is signatory, such as those in the Convention on Biological Diversity and the Ramsar Convention, should also be explicitly recognised in the strategy.

The Nature Conservancy is more than willing to provide further details on any of the issues raised above. It is hoped the Task Group will take onboard these comments and suggestions by TNC and other submitters and produce a strong and progressive national biodiversity strategy for Australia.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'James Fitzsimons', written in a cursive style.

**Dr James Fitzsimons**  
**Conservation Manager (Australia Program)**