

29 March 2009



HEALTHY CATCHMENTS  
HEALTHY OCEANS

Dr Charlie Zammit  
Assistant Secretary  
Biodiversity Conservation Branch  
Land and Coast Division  
Department of Environment, Water, Heritage and the Arts

Via email: [charlie.zammit@environment.gov.au](mailto:charlie.zammit@environment.gov.au)

Dear Dr Zammit,

**Re: Comments on the recently released *Australia's Biodiversity Conservation Strategy 2010-2020 – Consultation draft***

OceanWatch Australia is pleased to be able to comment on the Australian Government's Consultation draft of *Australia's Biodiversity Conservation Strategy 2010-2020*. OceanWatch Australia (OWA) is a national, environmental, not-for-profit organisation that works to achieve sustainability in the Australian seafood industry. We do this by working to protect and enhance fish habitats, improve water quality, and advance the sustainability of fisheries through action-based partnerships across all stakeholder groups.

OWA would like to congratulate the Australian Government, and the States and Territories, on this initiative to provide a coordinated approach to protect and manage Australia's biodiversity over the long term.

Of the six threats to biodiversity outlined in the Strategy, OWA works to alleviate five of these threats as core activities to our business. These are:

- **Climate Change** – through OWA's public events we seek to highlight this issue, particularly sea-level rise and its effects on coastal aquatic habitats.
- **Invasive Species** – we are currently rolling out the National Biofouling Guidelines to the Australian Fishing Industry through our SeaNet program.
- **Loss and fragmentation of habitat** – through our Tide to Table program, we seek to rehabilitate aquatic habitats and assist landholders to modify their management through voluntary change mechanisms.
- **Unsustainable use of natural resources** – through our SeaNet and Tide to Table programs, and projects such as the TAngler Bin, we seek to improve



natural resource management from the ground-up, working with and in the relevant communities to make real changes. In addition, the SeaNet program seeks to integrate the fishing industry into the NRM process.

- **Changes to the aquatic environments and water flows – the Tide to Table program** works in five NRM coastal regions to reduce the effects of changes to aquatic habitats and water flows by working on-ground with councils, government and private landowners on works such as the removal of fish barriers and riparian weeds.

In view of the above, we have some initial feedback we seek to submit on the Consultation draft, as follows:

### General Comments

- Firstly, we applaud the ‘plain English’ used in the Consultation draft, and we hope that the jargon-less approach will lead to greater understanding and much discussion amongst the wider community.
- We acknowledge that the scholastic approach to this document (and most other such strategies) is primarily derived from terrestrially based principles. But, to quote from the Consultation draft, “*Australia is probably the world’s most important jurisdiction for marine biodiversity...*” (Beeton et al. 2006); and therefore, we at OWA would suggest that a sub-strategy aimed exclusively at the marine jurisdiction would be a most welcome addition (and fairly easy to collate) to the broader strategy. It would reassure the community that all Government jurisdictions take their marine biodiversity conservation responsibilities seriously.
- We would seek that this document might raise the game of some jurisdictions on their marine responsibilities. For instance, identifying coastal/marine water quality as an area for improvement in State Plans, rather than the poor aim of no-decline, would be a good start.
- As a consequence of the Strategy, OWA would very much welcome the announcement of the first comprehensive Australian Marine Biodiversity Assessment, along the lines of the terrestrial document referred to in the references to the draft Strategy. We believe that in order to assess the state of marine biodiversity this report must be only the starting point.
- It would assist the reader’s understanding of the complexities of the marine aspects of the biodiversity strategy to include additional case studies of projects that achieve the strategy’s aims. OWA is happy to submit and for use to be made of such a case study of the SeaNet Program’s fisheries by-catch reduction initiatives as an example of industry and government working together with the assistance of an NGO to achieve real marine biodiversity conservation improvements through voluntary action (see draft case study attached)

## Specific comments

We are concerned that the depth of commitment to marine biodiversity may be reflected in the omission of the words „marine, sea or ocean’, in numerous key sentences throughout the document.

The following are key examples, where the marine domain has not been included. Our suggested changes are in brackets, as follows:

Section 1 - Call to action

Paragraph 3; *“We are the custodians of our ancient continent (and its surrounding seas) with its unique animals and plants that make up its unique biodiversity.”*

The above is also repeated in Paragraph 4.

Paragraph 5; *“We have a lot to learn from the experience and actions of past stewards of our land (and sea).”* This paragraph continues by illuminating how past experience can inform future management. A marine example here would be useful and inclusive. For example, estuary fishermen often have a wealth of knowledge about fish habitats which may assist marine managers plan for ecosystem resilience.

Paragraph 8; In recent years we have also learnt the importance of considering management activity at landscape (,seascape) and catchment scale.

Section 1.3 – Implementation.

Paragraph 4, point 2; *“restore ecological function to critically degraded landscapes (and seascapes) through sustainable practices that manage our soil and water resources.”*

Paragraph 4, point 3; *“increase the cover of native vegetation wherever feasible to enhance ecological connectivity across fragmented landscapes (and seascapes) over time.”*

The above examples are by no means an exhaustive list of the additions along these lines that we would desire to see in this document, but are indicative of our concerns.

Appendix 1 - Roles and responsibilities for implementing the strategy

A1.8 Australian Government

Paragraph 3; The Caring for our Country initiative, which is the Australian Government’s primary investment strategy, omits marine as a target for investment for the next 5 years. We fail to see how this strategy can guide and inform the CFOC if that is the case, and wish to seek clarification.

Paragraph 2; The long-term protection of biodiversity in these waters is being secured through the establishment and management of Marine Protected Areas. International Marine Protected Area Congress 1 in 2004 (Geelong, Vic) resolved that MPAs were one way of managing biodiversity in the marine environment, but should not be the exclusive management tool.

#### Appendix 2 – Foundation for the Strategy

##### A2.3 Second five-year review of the strategy – State of the Environment Reporting

We welcome these benchmark reports, but are concerned that much reporting about the marine domain is data deficient, and therefore misleading.

#### Appendix 7 – Snapshots of Australia's biodiversity

A7.5 Oceans – Paragraph 5 (P.70); The amount of effort from recreational fishing throughout Australia is unknown but thought to be high. Research is urgently needed to assess how this effort affects marine biodiversity.

#### Appendix 9 – Threats to biodiversity

In Figure A9.1 the inclusion of Agro-climatic zones within key issues for biodiversity resulting from likely effects of climate change, was a useful table for landholders to see the expected changes. OWA suggests that it would be helpful as an educational tool to produce an equivalent figure for marine zones and the likely impacts on marine industries such as shipping, fishing and recreational use.

##### A9.4 Unsustainable use of natural resources – Marine issues

Paragraph 6; OWA is very concerned about the inclusion of "*poisoning*" and "*use of explosives*" as "destructive fishing practices" in Australian waters. This is simply not the case and we find these comments very misleading. These practices of poisoning and use of explosives are widespread in other parts of the world, but their inclusion here unfairly associates the Australian fishing industry with these detrimental practices.

Paragraph 8; OWA strongly supports the need to develop and expand plans that address the impacts of the fishing industry on marine biodiversity. OWA would be keen to assist all governments reach a balanced approach which does not negatively affect Australia's food security, but improves the sustainability of the Australian seafood sector through our SeaNet Program, which in turn works on the ground with fishers for voluntary change in their practices.

## **Conclusion**

We would conclude from reading this document that the Australian, State and Territory Governments seek to produce a detailed and comprehensive Biodiversity Conservation Strategy, but this draft currently lacks adequate marine and estuarine detail. OWA has expertise to help in addressing some of the important gaps identified, which should be covered by such a strategy.

Please do not hesitate to contact me on (02) 9660 2262 should you require further information.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lowri Pryce'.

**Lowri Pryce**  
**Executive Officer**  
OceanWatch Australia Ltd