



National Biodiversity Response
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RE: Australia's Biodiversity Conservation Strategy 2010-2020 Consultation draft

ORGANISATIONAL BACKGROUND

The Cairns and Far North Environment Centre (CAFNEC) is the peak regional non-government environment organisation for Far North Queensland. CAFNEC is incorporated as a not-for-profit organisation under the *Qld Associations Incorporation Legislation* (1981) and is one of nine regional conservation councils for Queensland. Our responsibility is for the area bounded roughly by the Torres Strait Islands in the north, to Cardwell in the south, the outer reef to the east and the Northern Gulf region to the west. This area includes the Wet Tropics World Heritage Area and the Great Barrier Reef World Heritage Area; both of which encompass significant parts of the Queensland State and Commonwealth protected area estate.

Operational since 1981, CAFNEC was established by concerned local and regional community members with an interest in nature conservation and environmental protection. CAFNEC played an instrumental role in the declaration of the Wet Tropics World Heritage Area for its exceptional natural attributes and globally significant biodiversity and landscapes; in the preservation of the remnant Daintree lowland rainforests and in the confirmation of comprehensive Marine Park zoning undertaken in recent years by the Great Barrier Reef Marine Park Authority. CAFNEC engages widely with stakeholders across community and industry to enhance nature conservation and environmental protection outcomes within the greater far north Queensland region, and to promote issues of sustainability in the context of anthropogenic climate change.

CAFNEC commends the Australian Government on their initiative in preparing the *Consultation Draft of Australia's Biodiversity Conservation Strategy 2010-2020* (herein referred to as the 'Consultation Draft'). We note that the Queensland Government has recently committed to the development and implementation of a meaningful Biodiversity Strategy for Queensland. We urge the Australian Government to work closely with the Queensland Government to ensure that this process will be rigorously informed by the national approach.

BACKGROUND ON QUEENSLAND'S BIODIVERSITY ISSUES

CAFNEC has major concerns with the ongoing serious decline in biodiversity in Queensland. Queensland's biodiversity management is clearly insufficient in the following areas.

- Queensland currently does not meet the accepted international standard for ensuring at least 15% of its land area is contained within the protected area estate (based on recommendations developed at sessions of the IUCN (International Union for Conservation of Nature) World Congress of National Parks. At any rate, such broad targets may be inadequate, as certain ecosystems may require much higher

representation for adequate functioning, particularly given the context of advancing anthropogenic climate change.

- Queensland has many threatened ecosystems and threatened species. For many of these species there has been a clear failure to establish or implement useful conservation programs, in particular a gross under-resourcing of Recovery Plans.
- Serious knowledge gaps exist in our collective understanding of Queensland's fauna, and in the mapping of vegetation at a relevant scale in key areas of the State.
- Current Queensland government policies for off-reserve biodiversity conservation are inadequate. It is widely recognised that biodiversity cannot be conserved on protected areas alone as significant biodiversity also occurs on privately managed lands. Biodiversity conservation cannot therefore be the sole responsibility of Government.
- Deficiencies in the management of bushland and reserves need to be addressed. To minimise threats to biodiversity, particularly to rare and threatened species and ecosystems, sound management of native bushland and other natural systems is fundamental. Bushland contains essential habitat and is a key component of local ecosystems.
- Comprehensive planning is required to conserve highly mobile species to ensure habitat protection over very large areas, between different/multiple jurisdictions, and to provide for free movement between areas of habitat.
- Existing reserve design is often highly inadequate to deal with expected climate change impacts. As the climate changes, existing habitat may become unfavourable requiring species migration to more suitable areas for species survival. Reserve design must permit such movement. This requires establishing very large reserves, establishing reserves with diverse habitats, adequate buffering of reserves and providing connectivity of habitat between reserves to permit wildlife movement. In addition, species living in off-reserve habitat require suitable habitat connectivity across the landscape to facilitate sustainable migration arising from a changing climate.

A SUCCESSFUL BIODIVERSITY STRATEGY

CAFNEC believes there are several basic components to a successful biodiversity conservation strategy. Critical components include:

- Establishing large core areas of protected estate. Protected areas must be very large, or have large effective areas (by means of connecting habitat) for effective conservation and for natural ecological functions to continue.
- Developing connecting areas between protected estate to permit movement of species and support adaptation to climate change over the long-term. Land uses in connecting areas must be compatible with both local and landscape scale nature conservation functions.
- Developing a strategy for identifying and conserving species, ecosystems or other elements of biodiversity not selected under the CAR (comprehensiveness, adequacy and representativeness) approach, particularly rare and threatened species, as broad scale reserve selection procedures often fail to detect these species and to adequately include these in protected areas.
- Restoration and rehabilitation of degraded areas.
- Resourcing and implementing appropriate ongoing management activities including biodiversity monitoring, fire management, predator control, visitor management and management of wild harvests and other permitted commercial use of wildlife.
- Ensuring the informed and meaningful involvement of Indigenous peoples.

- Providing incentives and disincentives to foster enhanced involvement by landholders and the broader community.

A multifaceted approach is needed for an effective biodiversity conservation strategy. CAFNEC believes that essential elements of biodiversity conservation exist in many places and human activities must be consistent with ecosystem functioning and biodiversity conservation as far as possible. Governments alone cannot achieve conservation of our biodiversity and the broader community must play their part. However Governments must provide the strategic framework, legislative requirements, incentives and disincentives if the present unacceptable decline in biodiversity loss is to be arrested.

SPECIFIC COMMENTS ON THE CONSULTATION DRAFT

The Consultation Draft is clear, readable and well presented. The summary is a very sound and true reflection of the contents. CAFNEC acknowledges that the detailed content reflects current and existing knowledge. The strategy outlines what has to be done, by whom and reveals useful insights. Above all the strategy recognizes and acclaims “Business as usual is no longer an option”. It acknowledges that the current approach has failed while noting achievements since the release of the *1996 National Strategy for the Conservation of Australia’s Biological Diversity* (DEST 1996).

While the Consultation Draft states that the current approach is not working it appears that many ongoing actions will continue with a change of emphasis.

CAFNEC is concerned that there does not appear to be a defined legally-enforceable plan to ensure the objectives of this strategy will be achieved. Institutional arrangements, differing priorities between the various jurisdictions, allocation of resources all combine to undermine the conservation of our biodiversity. The strategy fails to address adequately the institutional and practical obstacles that have caused difficulties in the past. A simple example of this is the fact that under the differing legislation of the Commonwealth, States and Territories, lists of endangered, vulnerable and rare species do not align. Flora and fauna species do not recognise state boundaries. If this issue cannot be resolved there is little hope for the more complex issues that stand in the way of a successful outcome for halting the decline in our biodiversity.

- **In order to better manage Australia’s biodiversity holistically, CAFNEC recommends that legislation be aligned across jurisdictions.**
- **CAFNEC urges the Australian Government to rapidly address knowledge gaps about flora and fauna, to develop uniform conservation status species lists across all jurisdictions and to maximise free public access to all species related information.**

CAFNEC has little confidence that the ongoing NRM Ministerial Council will achieve what needs to be done. A strategic approach is urgently required throughout Australia. However, various Ministerial Councils charged with over-viewing conservation and natural resource management have been in existence for years but our biodiversity is still in decline.

- **CAFNEC recommends the urgent establishment of a statutory forum with the necessary power to address institutional and practical obstacles undermining robust cross-jurisdictional biodiversity conservation and to oversee the implementation of the strategy.**

CAFNEC is concerned to note that the level of community and stakeholder engagement undertaken to prepare the Consultation Draft has been minimal with only two meetings held in some States. In order for the Strategy to have broad acceptance and be successfully implemented, CAFNEC believes it must be ‘owned’ by stakeholders and the broader community.

- **CAFNEC recommends a proper consultation process be undertaken which involves adequate stakeholder participation including but not limited, to private landholders, community groups, Indigenous people and non-government organisations. The Department should then circulate a new draft of the Strategy within three months of this additional consultation.**

The emphasis within the Consultation Draft of involving Indigenous peoples is to be commended. However such actions must be fully consultative with the appropriate peoples concerned and highly collaborative.

- **CAFNEC urges the Australian Government to ensure that there is a meaningful role for the active and informed involvement of Aboriginal and Torres Strait Islander peoples in biodiversity conservation at all levels.**

The Consultation Draft emphasises educating the broader public and school children about biodiversity. While this has merit and is to be encouraged it does raise serious questions. The conservation sector has been advocating the education of children for many years. However, the benefits of such education do not appear to be surfacing in generational change at the broader population level.

- **CAFNEC believes education must be focused at all levels of education not just primary school with the aim of effecting cultural change that ensures biodiversity is valued by the broader community.**

We consider that the Consultation Draft is a call to action but lacks objectives, timelines or priorities. Section 3.2.3 'Priority for change 3: Knowledge for all' recognises that the identification of existing species and their location is essential to effective management. CAFNEC believes that the objectives and responsible parties listed in this section are sound.

- **CAFNEC urges the implementation of prioritised implementation plans with clearly articulated time-bound targets to monitor performance.**
- **Given that the Strategy as currently proposed does not provide adequate detail in this respect CAFNEC is not in a position to give unqualified support to the Strategy.**

Adequate resourcing is required to ensure that time-bound targets are achieved. The percentage of Commonwealth, State and Territories budgets allocated to the environment and conservation issues have diminished over time and continue to do so. This occurred in the buoyant financial days prior to the current global financial crisis. However, there is no mention in the Consultation Draft of how the Federal Government will align their funding and work priorities over the next few years to the document. Given the limited resources available and no indication that those funds are likely to increase in the immediate future, priorities must be set to strategically focus effort.

- **CAFNEC recommends priority is given to the role of off-protected estate conservation and the role landholders must play if the decline in biodiversity is to be reversed.**
- **CAFNEC urges the application of the precautionary principle as a key tool in the assessment of such priorities.**

Case studies cited in the Consultation Draft are currently relevant, but we do not believe they will be relevant for the life of the document. Key cited case studies are not yet proved (such as Reef Rescue).

- **CAFNEC recommends all references to case studies be removed from the final Strategy.**

CAFNEC acknowledges that there has been some progress towards enhanced management of fisheries. However we question the statement that all of Australia's major fisheries are

sustainable. We similarly have doubts about the implied sustainability of the native forest industry. Legislation banning broad scale clearance in Queensland has a broad range of exemptions. The clearing rate in Queensland in 2006 (latest figures publicly available) still exceeds 207,000 ha. This rate of clearing must be stopped.

Managing biodiversity must become an integral part of all major developments and similar activities. There is a clear need to recognise that resource demand is a major threat to biodiversity. Governments rarely address resource demand issues until a crisis erupts. What ecologically sustainable population can Australia support? No State Government and only a handful of local authorities are addressing this issue that severely impacts on our biodiversity.

In summary, CAFNEC strongly believes that conservation strategies based mainly on the provision of large reserves in key locations are likely to be inadequate for wildlife conservation in the face of rapid climate change. Models are required for the design of wildlife conservation systems on a continental scale across millions of hectares. Such mechanisms should not only address the CAR factors (comprehensiveness, adequacy and representativeness), but also include connectivity and resilience to facilitate continuation of ecological processes and adaptation to climate change.

Yours sincerely,



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