



Environment  
Institute of  
Australia and  
New Zealand

29 May 2009

Allan Holmes  
Chair, National Biodiversity Strategy Review Task Group  
National Biodiversity Response  
PO Box 1715  
Tamworth NSW 2340

Dear Mr Holmes

### Re: Submission on the draft Australian Biodiversity Conservation Strategy 2010-2020

This submission is from the Environment Institute of Australia and New Zealand (EIANZ). The Institute is the peak professional body for environmental practitioners in Australasia, and promotes independent and interdisciplinary discourse on environmental issues. The Institute advocates that best environmental practice be delivered by competent and ethical environmental practitioners. More information on the Institute is available at [www.eianz.org](http://www.eianz.org).

The Institute welcomes the opportunity to provide our views on the consultation draft of Australia's Biodiversity Conservation Strategy 2010-2020.

This submission is made by and on behalf of environmental practitioners who are experienced in working on biodiversity conservation. It is made with the intention of highlighting those areas where the draft could be strengthened to improve its effectiveness.

The Institute believes there is a range of commendable priorities outlined in the draft strategy. We feel the draft strategy could be strengthened by sharpening its focus in a number of areas. These areas, which the Institute believes could limit the strategy's application in practice, include:

- More focus on implementation, particularly standards by which biodiversity outcomes can be realised on the ground;
- More integration with state and local government policies; and
- Additional focus on ecosystem services.

The detail of our submission is attached. The Institute would welcome the opportunity to expand on the points raised as appropriate.

Yours sincerely,

Prof Ian Spellerberg  
Acting President,  
Environment Institute of Australia and New Zealand

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Consultation Draft of Australia's Biodiversity Conservation Strategy 2010-2020  
Detailed Submission from the Environment Institute of Australia and New Zealand

### **The Environment Institute of Australia and New Zealand**

The Environment Institute of Australia and New Zealand (EIANZ) is the peak professional body for environmental practitioners in Australasia, and promotes independent and interdisciplinary discourse on environmental issues. The Institute advocates that best environmental practice be delivered by competent and ethical environmental practitioners. More information on the Institute is available at [www.eianz.org](http://www.eianz.org).

EIANZ Ecology is the Institute's ecology group, and it has taken the lead in preparing the Institute's submission<sup>1</sup>.

EIANZ Ecology currently operates a correspondence network with ecologists throughout Australia and New Zealand, and with other professional associations. The qualifications and affiliations indicate a strong emphasis on ecology and high level of experience.

EIANZ Ecology has recently completed submissions for the EPBC Act Senate Inquiry and review, which drew substantial comments from a questionnaire of members and other practising professional ecologists on national biodiversity matters. It has also produced a Discussion Paper on Biological Diversity. These documents are available on the group's website (<http://eianzecology.blogspot.com>) and form the basis for this submission.

### **The Institute's perspective**

The Institute firmly believes that good environmental outcomes are the product of good environmental policy and good environmental practice.

We do not believe we can secure good outcomes in our collective efforts to protect and enhance the environment without good environmental practice. The Institute's central focus is on improving standards of environmental practice.

In the context of the consultation draft, the Institute recognises that ecology is key to understanding biodiversity but that biodiversity management is inherently multi-disciplinary, because it interacts with social, cultural and economic change. For this reason we are particularly interested in the design of biodiversity strategies to facilitate Australia's role in meeting objectives of the World Summit on Sustainable Development, 2010 goals of the Convention on Biological Diversity (CBD), and so on. Our focus is on environmental practice, so we emphasise creating biodiversity outcomes at the policy and implementation level. The Institute is not a research organisation but it does boast a high level of broad professional experience.

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<sup>1</sup> The input of the following Members is gratefully acknowledged: Simon Mustoe BSc (Hons) Ecology, CEnvP, MEIANZ; Martin Juniper, BAppSc (EnvSci) CEnvP MEIANZ; Martin Predavec, MEIANZ; John Braid, BSc (Hons) Env Mgt, Dip Eng Surv, CEnvP, MEIANZ.; Steven Sass, B.App.Sci (Env.Sci) (Hons) Ecology. MEIANZ, CEnvP; Brad Dreiss, BEnvMgt (Hon), MEIANZ

## High level responses to the consultation draft

The Institute believes there is a range of commendable priorities outlined in the draft strategy. We feel the draft strategy could be strengthened by sharpening its focus in a number of areas. These areas, which the Institute believes could limit the strategy's application in practice, include:

1. More focus on **implementation**, particularly standards by which biodiversity outcomes can be realised on the ground;
2. More **integration** with state and local government policies; and
3. Additional focus on **other tools** e.g. Ecosystem Services Assessment.

### 1. Implementation

The consultation draft does not outline a proposed implementation framework. This would help provide direction, in particular by highlighting the key decision-support tools for biodiversity management.

Our submission to the EPBC Act Senate inquiry was based on feedback from 170 members about how well the Act was protecting biodiversity. It concluded that the Act itself was not necessarily failing but there needed to be “stronger policy and enhanced implementation”. Since the EPBC Act is the Commonwealth Government's primary instrument for effecting biodiversity conservation, these recommendations are relevant here.

The Institute recommended better ecological impact assessment practice and “integrated knowledge of Australian landscape systems, biodiversity, vegetation and species across the whole continent”. The latter could be achieved by development of Biodiversity Action Plans (BAPs). These are well-recognised tools for biodiversity management, although are absent through most of Australia.

The components of good quality BAPs do though exist in some areas but more can and should be achieved through the systematic development and delivery of BAPs at the national level. We believe a national strategy for BAPs is needed to:

- Define a more consistent approach across all jurisdictions;
- Roll out this approach nation-wide;
- Maintain information quality; and
- Guarantee that information is written and presented in a manner that befits biodiversity decision-making.

Critically, BAPs identify structure, function and components of the landscape used as a ‘benchmark’ for evaluating the ‘value’ of what might be lost. Similar policies and some relevant components of BAPs exist in some jurisdictions but there is no comprehensive and adequate approach that can be applied across the whole of Australia. In the absence of comprehensive and adequate BAPs, value cannot be calculated and EIA or other decision-making processes become unbounded, whilst loss evaluation is done poorly or arbitrarily.<sup>2</sup>

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<sup>2</sup> Commonly, this leads to cost blow-out or, just as often, omission of important matters at the expense of less important matters because there is no reasonable basis to limit the scope of EIAs. Without BAPs, it essentially falls to individual development proponents to emulate the BAP process themselves but since this requires a

This is one of the core failings of EIA, creating uncertainty and inestimable risk and cost for developers and the environment.

## 2. Integration

It is notable that in the recent consultations with Institute ecologists, protection of specific threatened species or even National Parks was not identified as key to national biodiversity management success. The Draft Australia's Biodiversity Conservation Strategy 2010-2020 recognises that biodiversity is a landscape-scale issue. However, many substantial impacts on ecosystem services occur outside protected areas, requiring effective engagement of developers and other land-users. For example, clearing of farm paddocks has been identified as a major source of deforestation in New South Wales.

Biodiversity management nation-wide, whether it is at the national, state or local level, is realised through environmental legislation and policy. Outside National Parks there would be limited requirements if it were not for these statutes. We are surprised therefore that concepts like impact assessment or other equivalent policy mechanisms for biodiversity management (with or without formal EIA) are barely mentioned in the consultation draft.

The Institute believes Ecological Impact Assessment (EcIA) has an important role to play in this regard.

EIANZ Ecology is currently producing EcIA Guidelines. EcIA is not equivalent to environmental impact assessment (EIA), although it is used in that process. EcIA is a broader tool for scoping, evaluating and managing biodiversity at any scale and in any situation. It relates to all decision-making processes that affect the natural environment, such as farm paddock clearing, species management or development planning and Strategic Environmental Assessment (SEA). The following figure describes EcIA.

The relationship between EcIA and BAPs:

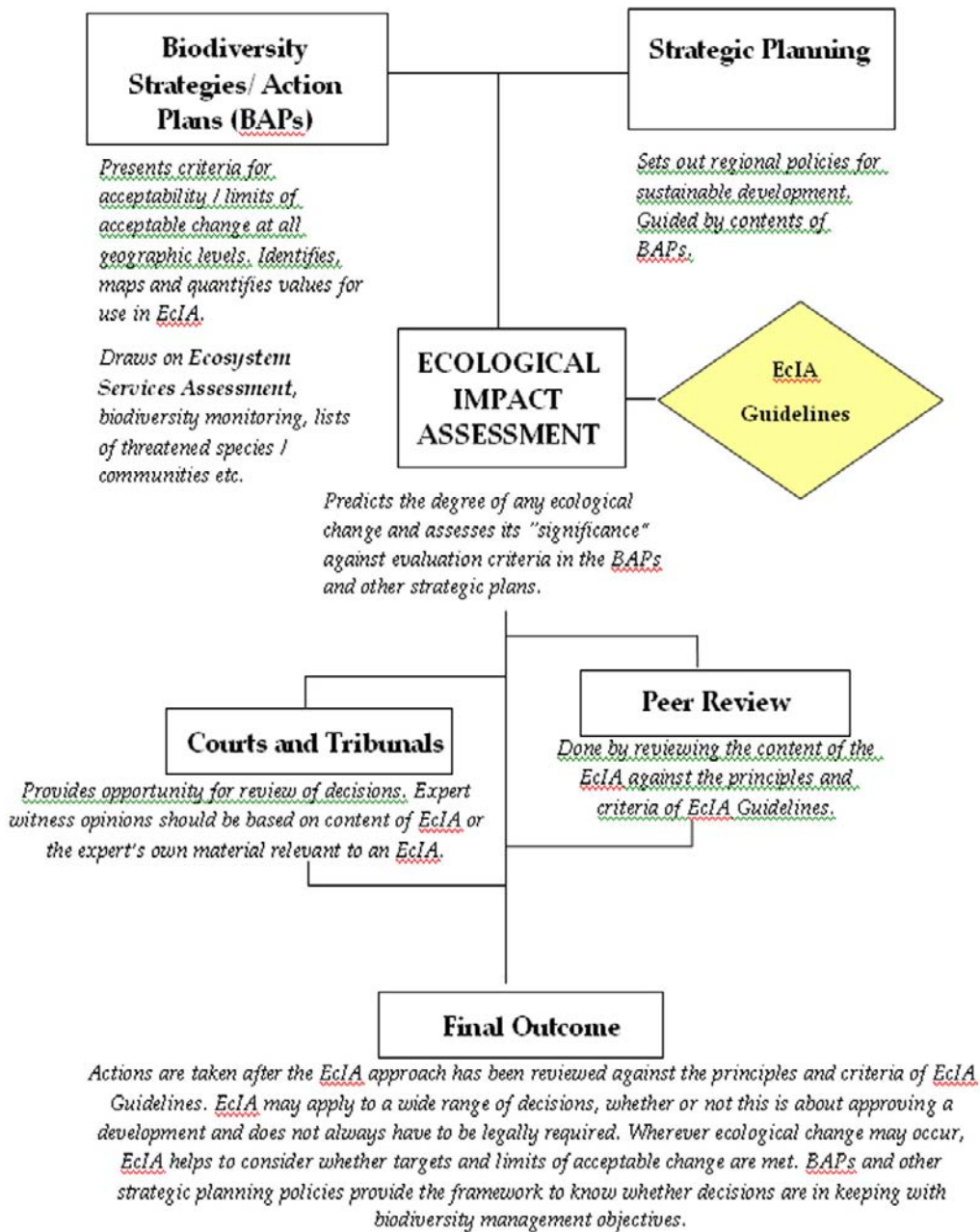
- To create the foundation for halting and reversing biodiversity loss<sup>3</sup> requires biodiversity offset tools (note, mechanisms for offsets exist in some states and are also incorporated into EIANZ Ecology's EcIA Guidelines).
- To create the foundation for tools like biodiversity offsets requires rigorous EcIA.
- To create the foundation for rigorous EcIA requires comprehensive and adequate BAPs.
- There are a range of other tools that support BAPs and EcIA (some of which are notably included in the current draft strategy) but overall, a combination of these provides a framework for biodiversity management and would apply to all decisions with potential to affect the environment.

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holistic social and economic review of entire regions, is outside their scope. This approach, which currently applies to most EIA processes throughout Australia, never works as it is a grossly inadequate basis for determining social, economic and cultural value of biodiversity assets, including ecosystem services.

<sup>3</sup> Halting and reversing biodiversity loss by 2010 is a commitment that Australia has made under the Convention on Biological Diversity.

Figure: Ecological Impact Assessment



One of the guiding principles in the International Association for Impact Assessment's special publication "Biodiversity in Impact Assessment" recommends to:

*"... develop a biodiversity screening map indicating important biodiversity values and ecosystem services. If possible, integrate this activity with the development of a National Biodiversity Strategy and Action Plan (NBSAP) and/or biodiversity planning at sub-national levels (e.g., regions, local authorities, towns) to identify conservation priorities and targets."*

Because robust EclA depends on BAPs, the roll-out of biodiversity action plans should be a principal focus of Australia's Biodiversity Conservation Strategy 2010-2020. Most existing difficulties with biodiversity management can be addressed through a combination of:

- A better framework for EclA; and
- Adequate and comprehensive BAPs at the local, regional, state and national level.

The chances of halting or reversing biodiversity loss by 2010, as pledged by Australia and referred to on page 55 of the draft of Australia's Biodiversity Conservation Strategy 2010-2020, are, in the Institute's view, already limited. This makes biodiversity management an ever more urgent requirement in the coming decade.

Biodiversity is also integrally linked with other national socio-economic and cultural strategies that should be equally recognised. This includes, as an example, Tourism Australia's National Landscapes Program, which identifies nature at the landscape level, as key to reversing loss in Australia's tourism revenue. This is one of many bases for essential ecosystem service analysis.

The Institute believes the Commonwealth Government should not simply be reiterating the case for biodiversity conservation in the strategy. Many tools to improve biodiversity conservation outcomes already exist and many local and state governments, often at the front line in making decisions pertaining to biodiversity conservation, are developing their own significant control measures. Where they are not, the Commonwealth Government could commend the work of relevant constituents and facilitate roll out of best practice biodiversity conservation tools.

The Institute's position is that the EPBC Act is designed to create bilateral agreements and the Commonwealth Government has the power not only to recommend but also require deliverables in some cases. Ideally, a biodiversity strategy should inform the country what levels of action would be considered 'acceptable', even if there is flexibility to accommodate policy differences between jurisdictions. Without this, the strategy can not readily be used in practice.

### 3. Other Tools

A number of other important tools already exist and the strategy should refer to these. Internationally-adopted strategies such as the Business Biodiversity Offsets Program use processes first developed by Australian state government advisors to 'value' and measure habitat (the basis for EclA evaluation and biodiversity offsets). This could be reflected in the current draft, not as a point of note, but as a pointer to all states and local governments on best practice. We are mindful that biodiversity offsets do not appear to be mentioned in the current draft; a significant omission in our view.

There are also steps being made towards a better national accounting system for biodiversity, particularly in terms of essential ecosystem services. For example, the Wentworth Group's *Accounting for Nature and Ecological Processes in Victoria: Policy Priorities for Sustaining Biodiversity* by the Victoria Naturally Alliance.

Examples of how this should be done could be given much higher priority in the current draft strategy, noting that this would be a principle component of BAPs.

## Conclusions

In summary, the current draft of *Australia's Biodiversity Conservation Strategy 2010-2020* could:

- Present an overall framework for biodiversity management;
- Identify and embrace tools already available for national biodiversity management (e.g. EclA Guidelines, biodiversity offsets and ecosystem services assessment);
- Expand on relevant biodiversity work across the country and provide examples of these tools, that may be considered best practice; and
- Lead Australia with a strategy that guides the production of consistent, adequate and representative BAPs at local, regional, state and national levels.

We believe the Commonwealth Government should play a stronger role in biodiversity management, as it does regulate Australia's obligations to the international community and many biodiversity problems cross jurisdictional boundaries. EIANZ Ecology is doing what it can by creating EclA Guidelines, a principal tool for biodiversity management. This will create the platform for implementing on-the-ground outcomes, such as biodiversity offsets. However, the critical evaluation processes of EclA (and for that matter, EIA or any other environmental decision-making) cannot be done without comprehensive and adequate BAPs. These are increasingly needed to head off shortcomings in development decision-making processes, which can cause unnecessary controversy and cost to the economy. The Commonwealth Government alone is capable of administering development of BAPs.

In conclusion, development of BAPs across Australia would provide more than adequate focus for Australia's Biodiversity Conservation Strategy 2010-2020, incorporating many of the fundamental principles of ecosystem service analysis and integrating existing state and local efforts. The strategy should do more to present simple advice on how this can be done, paving the way for less economically and environmentally risky decision-making at all levels of Government.

As always, the Institute is in a position to offer assistance to the National Biodiversity Strategy Review Task Group.