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**Submission on the *Australia's Biodiversity Conservation Strategy 2010 - 2020*
(Consultation Draft)**

The Tasmanian Conservation Trust is greatly disappointed with the *Australia's Biodiversity Conservation Strategy 2010 - 2020 (Consultation Draft)* (referred to in our submission as the Draft Strategy) as it fails to make any clear commitments on behalf of the Australian or state and territory government.

The stated priorities, objectives, actions and results listed in section 3 are generally broad or vague and there are no performance criteria to indicate what outcomes are expected on the short or medium term. The Draft Strategy therefore has limited capacity to assist governments and other stakeholders in setting strategic directions for biodiversity conservation programs.

The document is best summed up by the statement on page 20 that "The 61 actions are indicative: they are intended to guide jurisdictions and other organisations when developing and implementing their own biodiversity conservation approaches." This statement makes it clear that the Australian, state and territory governments have not committed, and do not intend to commit, to any of these actions. **The Draft Strategy would be more accurately called a statement of principles and framework for biodiversity conservation planning and we recommend such a change to the title.** We also make recommendations against some of the actions where we believe the Australian Government should make specific commitments.

Managing key threats to biodiversity is much less prominent than in the 1996 strategy and has been reduced to a sub-objective under the "Building ecosystem resilience" priority and just one action is identified. In the 1996 strategy management of key threats was one of the seven chapter headings. **We interpret this change to mean the Australian Government is diminishing the relative importance of directly managing key threats to biodiversity when this is perhaps the top priority.**

Many of the key existing agreements and programs through which the Australian and state governments currently implement conservation actions are not referred to in the appropriate actions in section 3 and these omissions should be corrected.

Comments on Section 3: specific priorities, objectives, actions and results

Priority for change 1: Building ecosystem resilience

It is quite ridiculous that this priority does not mention climate change. It must be reworded to include an objective that ecosystem resilience is to be maintained and enhanced to protect biodiversity from the likely changes resulting from climate change.

There must be an additional objective included addressing ecosystem or habitat *protection* in addition to the objective 1.1 dealing with *management*. Protection would include actions such as implementation of the National Reserve System Program (incorporate action 1.1.4) other legal or policy instruments that prevent the loss or degradation of ecosystems or habitats.

Objective 1.1

Action 1.1.1

This action does not address the objective. It is a principle and by itself does nothing to “actively” manage biodiversity.

Action 1.1.2

This action simply proposes that more plans be developed and therefore also fails to address the objective by not “actively” managing biodiversity.

This action should include a clear commitment by the Australian Government to improving the processes through which the Australian Government’s Caring For Our Country Business Plans are developed. The 2008-09 plan had little community input and addresses priorities that are idiosyncratic and far from comprehensive.

Action 1.1.3

No comment

Action 1.1.4

The commitment to “Continue to support, expand and manage the National Reserve System” is admirable but there is no detail provided on how this might be done.

Action 1.1.5

The suggestion for a “national program for off-reserve conservation” is very interesting but there should be at least some brief description of what is proposed that is not currently being implemented through other Australian Government or state and territory government programs.

Action 1.1.6

No comment

Objective 1.2:

As mentioned in the introductory comments, the key threats to biodiversity must be given far greater prominence in the Draft Strategy and more actions must be included than the single one listed. There should be actions referring to implementation of threat abatement plans established under the EPBC Act as well as actions to improve regulation and management of industries such as forestry, fisheries and farming. Links must be made to established threat management programs such as those for weeds, pests and climate change adaptation. Also, the control of threats involves regulation and this should be referred to in addition to partnerships in the responsibility column.

Priority for change 2: Mainstreaming biodiversity**Objective 2.1**

Action 2.1.1

It should be noted that education ministers will need to be involved in implementation of this action in addition to environment ministers.

Action 2.1.2

No comment.

Action 2.1.3

We understand that the State of the Environment Reporting processes at a national and state level already largely address this action. If there are different or additional actions implied in this action then it must be clarified.

Objective 2.2

Action 2.2.1

The action must refer to legislative frameworks being appropriate or effective as well as “complimentary”.

Action 2.2.2

The action and result are supported but there should be examples included to explain what assessment tools are. A Tasmanian example is the Forest Practices Advisor.

Action 2.2.3

Implementation of this action will likely require changes to legislation and planning policies and processes of governments and planning authorities and this must be at least flagged.

Objective 2.3

Action 2.3.1

No comment

Action 2.3.2

This action is supported but there needs to be reference to existing Australian Government programs that currently address the action and whether new programs are being considered. The actions and results would probably not fit the priorities and criteria of the current CFOC program.

Action 2.3.3

This action is supported however there are other markets, existing or potential, which should be referred to in addition to markets for water and carbon. An example is the market for ecosystem services.

The Australian Government should commit to taking a leadership role in addressing this action, as it has with water and carbon.

Priority for change 3: Knowledge for all

The actions listed are broadly support – no comments.

Priority for change 4: Getting results

Objective 4.1

Action 4.1.1

The existing government agreements must be identified and the action should identify what new agreements are required.

Action 4.1.2

There should be a stand-alone action stating the Australian Government's priorities.

Action 4.1.3

No comment.

Objective 4.2

Action 4.2.1

No comment.

Action 4.2.2

The Australian Government must commit to taking a leadership role in planning and implementation of continental-scale efforts.

Objective 4.3

Action 4.3.1

No comment.

Action 4.3.2

This is very similar to action 2.2.1 and the two could probably be melded into one. This action should include a review and reform of legislation that may be causing or exacerbating key threats to biodiversity.

Action 4.3.3

This is strongly supported as there are many significant failings in NRM biodiversity programs. The action should make suggestions as to the likely process through which this will be progressed.

Objective 4

Action 4.4.1

It is not at all clear what this action means. We suggest using examples to clarify what is meant by industry “management and self-regulatory systems”. Perhaps this action is referring to certification schemes?

Action 4.4.2

Reference should be made to existing incentive measures, whether any are preferred or seen as models and whether additional or new ones are proposed. The Australian Government should take a lead role in designing and implementing incentive systems.

Priority for change 5: Involving Indigenous peoples

The relevant indigenous people and groups should have been involved in development of these actions. If they have, then acknowledgement of this involvement must be included.

Pending evidence of appropriate indigenous involvement we strongly support all the actions. We note that priority 5 has considerably greater detail than any other section of the Draft Strategy and contains 20 of the total of 61 actions. It would appear that this reflects the Australian Government’s focus and interest and this should be addressed. See recommendations under other actions.

Priority for change 6: Measuring success

While all the actions in this section are supported the key issues that have not been addressed are the relative importance and cost of measuring success and the fundamental limits to acquiring such data. Our experience in threatened species projects suggests that measuring success can require a large amount of resources over decades and even then the results can be unclear or disputed. Also success for many threatened species and other environmental values may be holding the status quo. For all the actions, emphasis must be given to cost efficient measures and the need for indicators where actual measures are not feasible or cost effective.

Yours sincerely,

Peter McGlone
Acting Director