

# Australia's Biodiversity Conservation Strategy 2010—2020

Comments on the Consultation Draft

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## Recommendations

Recommendation 1. The consultation draft *Biodiversity Conservation Strategy* should be withdrawn and a new comprehensive draft prepared with wide community consultation.

Recommendation 2. The 2008 *Australian Terrestrial Biodiversity Assessment* should be published immediately so that it can inform preparation of the new draft strategy.

Recommendation 3. The Commonwealth should prepare its own national biodiversity strategy as a matter of urgency, showing how Australia will meet its international obligations for biodiversity protection, and including clear goals, priorities, actions and funding commitments.

Recommendation 4. Australian governments should cooperate to produce, as a matter of urgency, a fully-funded action plan for biodiversity and climate, recognising the vital role of natural ecosystems in mitigating as well as adapting to climate change.

# 1. The draft 'strategy' is not a strategy

A strategy ought to be a detailed plan of action to achieve a goal. This purported 'strategy' lacks most of the pre-requisites. It compares unfavourably with the Defence White Paper 2009, which also addresses an issue characterised by a complex and uncertain future, long lead times and the need for a comprehensive approach to setting goals and targets. It even compares unfavourably with the 1996 Biodiversity Strategy which at least included some actions with measurable results. In this version, 'actions' are nothing more than 'a possible set of options for delivering the outcomes of the strategy' (p.20). They are unfunded.

The goal of the 1996 strategy was 'to protect biological diversity and maintain ecological processes and systems'. This draft strategy has no goal, but a 'vision' – 'Australia's biodiversity is healthy, resilient to climate change and valued for its essential contribution to our existence'. It makes no explicit commitment to protect biodiversity, ecosystems or ecological processes. Furthermore, the vision is entirely human-centred; unlike the Convention on Biological Diversity, it fails to recognise the intrinsic value of biological diversity.

The 'strategy' lists key events and processes that informed its development. Notably absent is the second *Australian Terrestrial Biodiversity Assessment* due in May 2008. This assessment is obviously crucial in preparing a responsive up-to-date strategy but remains unpublished.

Overall, the 'strategy' fails to

- o establish clear goals;
- o analyse critically the current situation and outlook;
- o identify and assess policy options;
- o set priorities on the basis of a clearly articulated analysis;
- o determine actions, timelines and resources required to achieve the priorities;
- o review the adequacy of current capabilities and resources;
- o review relationships with other agencies, organisations and the wider community;
- o determine specific responsibilities and funding needs.

Biodiversity protection, especially in the context of the climate crisis (see below), is an issue of national and international importance that deserves fully developed, intellectually rigorous strategic planning.

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Recommendation 2. The 2008 *Australian Terrestrial Biodiversity Assessment* should be published immediately so that it can inform preparation of the new draft strategy.

# 2. Commonwealth responsibility

The Commonwealth has clear responsibility for biodiversity through the International Convention on Biological Diversity, Ramsar Convention and numerous other international agreements, some of which are domesticated through the *Environment Protection and Biodiversity Conservation Act 1999*.

The Commonwealth government's own 2009 report to the Biodiversity Convention acknowledges the finding of the 2006 State of the Environment Report that 'biodiversity is in serious decline'<sup>1</sup>. Far from

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<sup>1</sup> <http://www.cbd.int/doc/world/au/au-nr-04-en.pdf>

responding vigorously to redress the situation, the 2008 *Terrestrial Biodiversity Assessment* is a year overdue; the 2009 budget abolished Land & Water Australia, one of the last sources of dedicated public good research on land, water and biodiversity at the national level; and the Biological Diversity Advisory Committee, established under the EPBC Act, remains defunct as it has been since February 2007.

The draft Biodiversity Conservation Strategy was prepared, not by the Commonwealth, but by the Natural Resource Management Ministerial Council representing all Australian governments. The outcome is a 'lowest common denominator' document. The onus is on the Commonwealth government to take the issue of biodiversity seriously, recognising that the case for forward-planning for biodiversity is just as compelling as for territorial defence. Consistent with its international obligations, it should prepare a truly national, cutting-edge and properly-funded strategy for biodiversity, taking into account the implications of the climate crisis.

Recommendation 3. The Commonwealth should prepare its own national biodiversity strategy as a matter of urgency, showing how Australia will meet its international obligations for biodiversity protection, and including clear goals, priorities, actions and funding commitments.

## 2.1 Forests and regional forest agreements

The draft strategy claims as an achievement: 'strengthened requirements and outcomes for conservation and sustainable forest management through regional forest agreements'. This assertion is unsupported. It is at odds with the April 2009 recommendation of the Senate Committee on Environment, Communications and the Arts:

The committee notes that the Minister for Environment has formally asked the Independent Review of the EPBC Act to consider the findings and recommendations of this inquiry (see letter 13 March 2009). Accordingly the committee recommends that the Independent Review consider the findings in this report and recommend proposals for reform that would ensure that RFAs, in respect of matters within the scope of Part 3 of the EPBC Act, deliver environmental protection outcomes, appeal rights, and enforcement mechanisms no weaker than if the EPBC Act directly applied.

The implicit conclusion is that biodiversity protection under Regional Forest Agreements is weaker even than under the Act itself. This is borne out by case studies such as the Swift Parrot, threatened by RFA-sanctioned logging in its Tasmanian breeding habitat, leading to the species being considered for listing as 'critically endangered'.<sup>2</sup>

Regional Forest Agreements are an attempt by the Commonwealth to delegate responsibility for biodiversity, in this case to the states, under long term 'strategic' agreements. The failure of RFAs, including to anticipate the emergence of climate change as a priority, reinforces the need for the Commonwealth to retain direct responsibility for biodiversity.

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<sup>2</sup> [http://www.greeninstitute.com.au/content/index.php?/site/projects/wild\\_wielangta/](http://www.greeninstitute.com.au/content/index.php?/site/projects/wild_wielangta/)

### 3. Biodiversity and climate

The goal of the UN Framework Convention on Climate Change is to prevent 'dangerous' anthropogenic interference with the climate system. This cannot be achieved without protecting biodiversity and natural ecosystems because of their role in the global carbon cycle, including permanent storage of 'green carbon'.<sup>3</sup> Australia's natural ecosystems contain some of the highest carbon densities of any in the world. On current accounting, native forest clearing and logging cause about 20% of Australia's greenhouse emissions.<sup>4</sup>

The draft Biodiversity Strategy recognises the threat of climate change to biodiversity but largely ignores the role of biodiverse natural ecosystems in mitigating climate change. This is a critical omission. It changes the whole basis on which the strategy should be developed.

A 2009 biodiversity strategy should start by recognising the importance of natural ecosystems as permanent stores of carbon, as well as their roles in protecting biodiversity, water and other values. Its goals for terrestrial biodiversity should include: protecting all remaining intact or relatively intact native forests and other natural ecosystems including wetlands; restoring degraded natural ecosystems; and giving priority to revegetation that enhances the overall resilience of natural ecosystems. It should incorporate a package of measures including –

- o an end to broadscale clearing and industrial logging of native forests, to reduce emissions and enhance sequestration as forests regrow to maturity;
- o a *REDD Plus* fund to secure the permanent protection of green carbon stores by providing an income stream to help manage legally protected native forests and other natural ecosystems and to encourage increases in soil carbon (the size of the fund should be commensurate with the value of the stored carbon – around 20% of Australia's emissions); this
- o major ongoing investment in research, education and training;
- o establishment of dedicated agencies to administer and monitor programs;
- o transition assistance for affected workers and industries.

As a sector, *biodiversity and landscape protection* is already an important source of employment, especially in rural and regional Australia (bigger than coal-mining).<sup>5</sup> The imperative to maintain natural ecosystems for climate protection opens new opportunities to fund biodiversity protection and management and create ongoing employment in the sector. This would in turn enable many of the threatening processes identified in the consultation draft to be ameliorated.

Recommendation 4. Australian governments should cooperate to produce, as a matter of urgency, a fully-funded action plan for biodiversity and climate, recognising the vital role of natural ecosystems in mitigating as well as adapting to climate change.

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<sup>3</sup> See for example <http://www.cbd.int/doc/meetings/cc/ahteg-bdcc-01/other/ahteg-bdcc-01-findings-en.pdf>

<sup>4</sup> See for example Blakers, M, 2009, *Australia's national greenhouse accounts re-arranged for policy relevance*, Green Institute working paper 4, April 2009,

[http://www.greeninstitute.com.au/content/index.php?/site/projects/forests\\_and\\_greenhouse/](http://www.greeninstitute.com.au/content/index.php?/site/projects/forests_and_greenhouse/)

<sup>5</sup> Climate Policy: Submission to Senate Select Committee Inquiry, Margaret Blakers, Green Institute, April 2009