



## Australian Government

### Department of the Environment, Water, Heritage and the Arts

Do you consider the main biodiversity threats identified in the Consultation Draft (see below) to be the most important in reversing the decline in Australia's biodiversity?

- climate change  
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- invasive species  
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- loss and fragmentation of habitats  
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- degradation of habitats  
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- unsustainable use of natural resources  
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- changes to the aquatic environment and water flows  
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- inappropriate fire regimes  
strongly agree somewhat agree somewhat disagree strongly disagree not sure

Are there any other threats you think should be addressed?

*Maximum 90 words*

There is a danger climate change will create perverse incentives to undertake actions which are negative to biodiversity. For example major fire events could lead to pressures for non scientifically based frequent back burning and greater creation of fire trails. Coastal erosion could lead to pressure to build seawalls, etc. Increasing temperatures could lead to additional development pressures in cooler parts of Australia.

Also the whole area of perverse incentives from drought assistance, policies on grazing and the role of the taxation system need addressing.



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2. Do you think that the proposed 'priorities for change' (outlined in the 'Making Enduring Changes' section) will be effective at delivering the Strategy's vision to ensure Australia's biodiversity 'is healthy, resilient to climate change and valued for its essential contribution to our existence'?

*Maximum 90 words*

Yes, the priorities are well chosen, although WCPA would prioritise 1. WCPA believes that the most critical task is to conserve as much as practical of the remaining intact natural systems in conservation reserves and where this is not possible use other methods of governance, private trusts, IPAs, covenants and MBIs on private lands, agrobiodiversity initiatives, etc to create supportive landscapes and connective landscapes.

Do you think the six 'priorities for change' identified are the most important ones? If not what others would you suggest?

*Maximum 90 words*

Yes these are excellent and comprehensive goals but see notes below on the lack of a message of sufficient urgency for action and clear measurable targets.

Do you have any comments on the vision?

*Maximum 90 words*

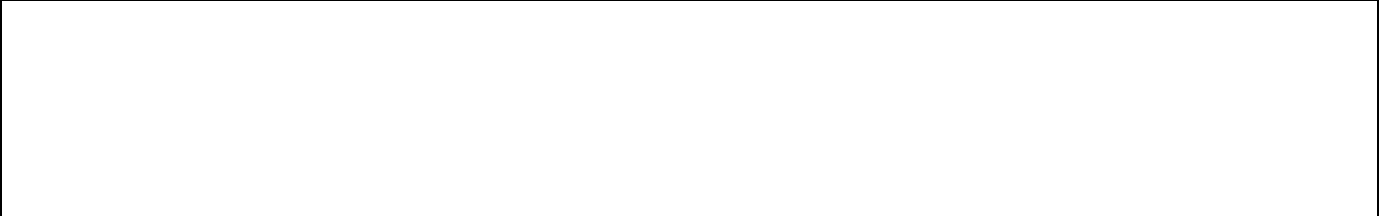
It needs improving, some statements are perhaps obscure in meaning. For example 'Biodiversity is essential for our existence' might be worded " Our native plants, animals and natural systems provide many services to all Australians and are the foundation of a healthy economy". 'Biodiversity is of value in its own right' might be worded " All living things are the result of millions of years of evolution and have value in their own right not just as a 'resource ' for humans"



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3. Do you consider that the Consultation Draft:

- promotes a good balance between conservation on private and public lands?  
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- will facilitate a good mix of regulation and incentives?  
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- provides a good balance between marine and terrestrial issues?  
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- provides the necessary national framework to produce innovative conservation action?  
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- has a sufficient focus on institutional arrangements and change?  
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- provides sufficient emphasis on improving community awareness of biodiversity?  
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- addresses the need to implement conservation action at the appropriate scale(s)?  
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- is applicable to urban and rural environments  
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- provides a clear framework for balancing conservation, social and economic issues?  
strongly agree somewhat agree somewhat disagree strongly disagree not sure
- adequately deals with the issue of climate change?  
strongly agree somewhat agree somewhat disagree strongly disagree not sure



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Do you have any other comments on these issues?

*Maximum 180 words*

The strategy lacked a sense of urgency which WCPA would see as clearly apparent- not just in the face of climate change. Even without climate change we are facing a national( nad international) biodiversity crisis (see recent work on the loss of mammals in northern Australia) - this is happening largely due to weeds and ferals and inappropriate fire.

The role of natural systems in the climate change mitigation, as opposed to adaptation agenda is not dealt with adequately, nor is the vital role of natural systems in providing ecosystem services such as protecting water catchments.



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4. Do you think the Consultation Draft adequately covers the roles of Indigenous peoples in biodiversity management?

*Maximum 270 words*

Yes generally and this involvement is strongly endorsed by the IUCN World Commission. One area which could be improved is a greater recognition of Community Conserved Areas. IPAs are to some degree formally recognised by governments but there may be many additional and perhaps smaller areas which are traditionally managed which could be accorded a greater degree of recognition and resourcing by governments.



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5. Do you consider that the proposed arrangements for reporting on implementation will be effective in the monitoring and evaluation of the expected outcomes (results) of the Consultation Draft?

strongly agree somewhat agree somewhat disagree strongly disagree not sure

Do you have any suggestions for alternative reporting arrangements?

*Maximum 270 words*

As commented elsewhere WCPA has expressed preference for clear measurable targets rather than general directions. The directions are generally very good and consistent with WCPAs approaches but the adequacy of evaluating real results must be questioned in the absence of quantifiable targets.



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6. To what extent is the Consultation Draft an appropriate national framework to achieve biodiversity conservation benefits, considering the different responsibilities, legislation and funding arrangements between governments.

*Maximum 270 words*

In general WCPA has supported strong quantifiable targets in strategies as without these it can be difficult to assess real progress. We have elsewhere advocated a "20% by 2020 target" - for 20% of Australia's lands and seas in varied governance protection regimes, similarly it would be better to see a clear cut goal for reduction in species loss and areas such as the eradication of key threatening species.

A further area which is missing is wetlands of National Significance, no where in the Draft is there mention of the Directory of Important Wetlands. Given the importance of these significant ecosystems they should be included under this Strategy.



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7. Is the Consultation Draft likely to encourage a good mix of public and private investment in biodiversity conservation?

strongly agree somewhat agree somewhat disagree strongly disagree not sure

If not how can the Consultation Draft improve in this area?

*Maximum 270 words*

The Strategy has identified involvement of the private sector which is in accordance with the internationally agreed goals of a body like the IUCN World Commission on Protected Areas. However goals like

"1.1.5 Establish a national program for off-reserve conservation" seem very broad. A true strategy needs to set out a series of actions to achieve goals and one action would be to undertake a comprehensive review aimed at removing all obstacles to conservation on private lands and enhancing the range of incentives to undertake conservation activities.



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8. Is the Consultation Draft sufficiently clear about its role and how it will be implemented?

*Maximum 270 words*

9. I cant make the answer fit in the box. Generally I think the answer is yes it is clear how the process will take place - what is less clear is that the reporting will truly give us a picture of the trends in biodiversity. The trap is that you get lengthy reports on actions taken but this can disguise actual trends - again clear goals such as reduction in species loss would help us to get an accurate picture.



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10. Does the Consultation Draft reflect the best practice on biodiversity conservation?

*Maximum 270 words*

It is certainly generally consistent with international consensus trends - the following areas are best practice: the emphasis on completing CAR protected area systems as the core lands and seas of biodiversity conservation; the emphasis on connectivity conservation through varied governance (though add community conserved areas); the involvement of the whole community- partnership approaches; the proper respect and involvement of indigenous people and the role of knowledge and science.

Weaknesses are the lack of attention to ecosystem services issues and the role of biodiversity in climate change mitigation and adaptation.



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10. Will the Consultation Draft effectively engage private sector interests in long-term biodiversity conservation?

*Maximum 270 words*

No but developed policy will. It is vital we don't spend too much time on plans and too little on actual clear cut well funded policies which really drive change.



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Do you have any other comments you wish to make on the Consultation Draft?

*Maximum 360 words*

The strategy is very good in parts but overall needs to be much more of a clarion call for urgent concerted action. Also it is silent on two vital issues:

1. how a wealthy developed country such as Australia with significant expertise in biodiversity and located in a region of the world containing several poor but mega-biodiverse countries, can assist these countries to protect their biodiversity. This is a vital area. For example Pacific nations are currently trying to implement the CBD Programme of Work on Protected Areas, but often lack expertise and capacity. Australia could play a major role.

2. The Strategy does not discuss the link between conserving our natural systems and climate change mitigation. Our native vegetation systems from forests to mangroves, grasslands and sea grasses are vital as carbon stores, as well as their other roles in protecting biodiversity, water and other values. The national carbon budget should properly recognise this holding and potential sequestration role. This is an urgent area requiring key policy development such as

an end to broadscale clearing

cessation of industrial logging of native forests, to reduce emissions

substantial restoration of ecosystems for additional sequestration as forests regrow to maturity;

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 natural ecosystems and to encourage increases in soil carbon



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