

Comments on Australia's Biodiversity Conservation Strategy 2010–2020, consultation draft

Recommendation

Because this strategy does not provide a clear basis for effective action to conserve biodiversity, it should be redrafted to:

- (a) nominate specific objectives and actions and assessable targets that will comprehensively and effectively address threats and advance conservation biodiversity to meet Australia's commitments under the Convention on Biological Diversity and elsewhere,
- (b) explicate lessons to be learned from the failure of the 1996 strategy to reverse the downward trends for Australian biodiversity; and
- (c) demonstrate a commitment by the federal government to leadership on biodiversity conservation.

Rationale

Lack of specific goals, targets and actions: This strategy provides only vague objectives and actions, and sets no specific targets for achieving biodiversity conservation. Many of the goals are about process rather than conservation. The strategy promises to be “a roadmap to guide action by all levels of government, the community, Indigenous peoples and the private sector”, but is more like an impressionistic landscape watercolour than a roadmap.

Despite the opening promise that the strategy is a “call to action,” very little action is specified. Of the only one of six priorities directly focused on biodiversity conservation – ‘building ecosystem resilience’ – many of the seven ‘actions’ are not focused directly on achieving conservation outcomes: recognising the significance of ecological processes, preparing conservation plans, and setting priorities, for example. Where there are no targets, there is no ‘roadmap’ for conservation.

With most states and NRM bodies and many local governments already having plans for biodiversity conservation, Australia is awash with conservation plans that typically promise much but deliver little. They need to be tied to specific long-term funding and reform commitments. There is rightly

strong community cynicism about proposals to develop more plans that are often a substitute for implementing the legal and policy reforms essential to conserving biodiversity.

This biodiversity strategy can be unfavourably contrasted with other strategy type documents that do provide a specific basis for reform. Take the National Water Initiative, for example, that sets out specific targets and actions. This is the sort of specificity needed to drive reforms. As it is, the vagueness of the strategy will permit each state and territory to simply package their current agendas up in a state plan, probably with equally vague goals and targets.

Failure to provide the basis for action on invasive species: The strategy rightly recognizes invasive species as one of the top threats to Australian biodiversity, and that climate change will act to exacerbate invasive species.

However, despite encouraging rhetoric about the need to address key threats, the strategy does not set out any basis for doing so or identify targets specific to threats. The relevant 'action', addressing threats in general, is to set priorities and develop programs. The strategy is not helpful as a roadmap unless it identifies the priorities and specifies the programs that will be developed.

A national biodiversity strategy should set out actions and targets that will enable Australia to meet its commitments under the Convention on Biological Diversity, including those specific to invasive species:

Prevent the introduction of, control or eradicate those alien species which threaten ecosystems, habitats or species (Article 8h).

This requires actions such as:

- ◆ Eradicating invasive or potentially invasive plants and animals where feasible in order to prevent the development of much more serious threats in the future, including under climate change – for example, eradicating high-risk garden plants in the Wet Tropics region before they establish or spread so as to prevent future invasions that would compromise world heritage values, and eradicating newly established feral deer populations.
- ◆ Controlling invasive species to protect important conservation values, such as threatened species and ecological communities, and regulating actions to prevent further spread of such species – for example, controlling the propagation of invasive plants around wetlands and national parks.
- ◆ Regulating the introduction of new genetic variants of existing weeds and pests that are likely greatly exacerbate their threats in future – either because some new variants will be more invasive (as was the concern with savannah cats) or because multiple strains endow a weed

or pest with much greater adaptive and invasive capacity.

- ◆ Implementing risk assessment of new introductions to states/bioregions to prevent the spread of invasive species into new areas
- ◆ Proper resourcing and implementation of threat abatement plans, such as that for *Phytophthora cinnamomi* that threatens hundreds of endemic plant species.
- ◆ Addressing the threats of invasive species that undermine ecological processes, such as flammable invasive pasture grasses that greatly increase fire intensity and invade fire-sensitive ecosystems.

Failure to analyse outcomes from previous strategy: There is little to give the Australian community confidence that this strategy will succeed where previous strategies (the 1996 strategy as well as various state and regional strategies) have not, for the previous failures have not been analysed and addressed. There are claims that this strategy offers a 'new approach', but there is no substantiation of that claim by comparing it to previous approaches.

This strategy should be informed by an analysis of why biodiversity continues to decline in Australia despite the 1996 biodiversity strategy, despite existing environmental laws and policy, and despite the wealth of the country and the support of Australians for conservation. Such analysis is essential as a basis for addressing deficiencies and barriers to reform.

With invasive species, for example, while there has been considerable improvement in quarantine laws since 1996 (requiring risk assessment of new proposed imports) there are no controls over hundreds of invasive species such that high-risk weeds and pests continue to be sold and propagated in new places. There has been insufficient and only short-term funding for programs to address threats. There is no indication that the new strategy will provide the basis to address these issues.

Lack of evidence of federal government leadership: This strategy manifests little evidence that the federal government will take a leadership role in biodiversity conservation. While it is necessary for all governments, communities and businesses to be involved, unless there is federal government leadership and direction-setting, the outcomes will inevitably be weak and inconsistent.