

## Magnetic Island Nature Care Association Inc. (MINCA)

### 1. 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*

We consider and understand the threats to be extremely important but, ultimately, our consideration is irrelevant. What do the experts say? Threats cannot be assessed on the basis of some popularity poll. As it stands, answers to this question will be of use only in assessing any gaps between perceptions and reality. We trust decisions will be made on the basis of the latter.

The threats are not important in *reversing* the decline; they *increase* the decline. Hopefully, this repeated error in the report is grammatical rather than intellectual. In our response we have assumed that strongly agree, for example, means that we strongly agree that climate change is a significant threat to biodiversity. Unfortunately, some may, understandably, interpret this question the other way (ie 'I strongly disagree that climate change is important in reversing the decline in Australia's biodiversity' [logical]), so results will be ambiguous.

**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*

No. Because *the strategy does not address the main threats*. It lists them and then goes on to discuss at length and repetitively, six 'priorities for change' which are procedural – and illogical...

The failure to address the main threats is despite the fact that the 1996 Strategy noted "It is vital to anticipate, prevent and attack at source the causes of significant reduction or loss of biological diversity"; the National Biodiversity & Climate Change Action Plan 2004-2007 stated 'The response must be to address the causes of climate change...'.. It is a very basic tenet of long-term problem-solving that the causes not the symptoms must be addressed.

**Do you think the six 'priorities for change' identified are the most important ones? If not what others would you suggest?**   *Maximum 90 words*

No. Again, the strategy is focusing on procedure. How, for example, is 'Measuring success' a priority for change (except maybe a change in procedure). Priority 5, 'Involving Indigenous peoples' is not a change; it was included in the second principle and throughout the 1996 Strategy, and in the 2001-05 Objectives and Targets.

Similarly, 'Getting results' and 'Measuring success' are not part of a *strategy* – they are tools by which the effectiveness of a strategy is assessed.

**The priorities must address directly the causes of loss of biodiversity.**

Furthermore, why are the priorities called 'priorities for change'? All six have been invoked in earlier documents/approaches to maintaining diversity? That being the case, the first sentence of the Executive Summary 'Australia's Biodiversity Conservation Strategy is a new approach to addressing biodiversity conservation in a rapidly changing world' lacks credibility. Joined with the second sentence, 'The strategy is a call to action', the opening has the tone of a political brochure.

**Do you have any comments on the vision?**   *Maximum 90 words*

The 'vision' should not include the phrase 'resilient to climate change'. If biodiversity is healthy, it has not been damaged by climate change or any of the other causes. By accepting the need for the environment to thrive in the face of adversity (that is, to 'put up with' climate change) you are acknowledging the right of climate change to have a negative impact on biodiversity. This is a highly anthropocentric position – one sorely out of place in a document on biodiversity.

The 1996 strategy stated it well, when it noted: 'There is in the community a view that the conservation of biological diversity also has an ethical basis. We share the Earth with many other life forms that warrant our respect, whether or not they are of benefit to us. Earth belongs to the future as well as the present; no single species or generation can claim it as its own.' The current strategy should not resile from this.

**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

**Do you have any other comments on these issues?**   *Maximum 180 words*

The draft is again focusing on process. What good are procedural 'balance', 'emphasis', 'focus' etc if the results in terms of biodiversity are poor?

In relation to scale, an important oversight in the Draft is that decisions about land use are often made at the micro (suburban block) scale by local government agents. This can and does lead to 'death by a thousand cuts'. This important issue needs to be addressed by the Strategy, beyond the cavalier statement: "Local government engagement in the strategy will, in general, be managed through the relevant state and territory government mechanisms" (p.50). What if it isn't?

The issue of climate change is not adequately dealt with. Nowhere does the Draft strongly advocate decreasing actions that contribute to climate change. In this regard, the Draft is a backward step from earlier documents.

The Strategy relies too much on education and persuasion rather than on legislation and enforcement. There is insufficient time to 'jolly' people along. And how realistic is it to expect all education departments to change curricula in line with this strategy?

**4. Do you think the Consultation Draft adequately covers the roles of Indigenous peoples in biodiversity management?**   *Maximum 270 words*

Given that there are between 2 and almost 3 times as many actions identified for this priority as for the others, we would assume so. We would prefer, however, that this question be answered by indigenous people.

**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*

Many of the proposed actions (eg time-series ABS surveys) would take considerable time – time we do not have. (Note, Appendix 9 of the Draft Strategy points out that significant loss of biodiversity is projected to occur by 2020.) Unclear what is meant by ‘Improve information infrastructure’; to what extent is this a larger issue, or is it an indication of a proposed plan to overhaul some IT used specifically for NRM?

The draft proposes to incorporate systems (6.2.2) in the first two years of the strategy - that is, *before* they are developed (6.2.1). This is impossible.

The sweeping action ‘Cause practitioners to modify and change practices as a result of monitoring the effectiveness of programs’ would appear to be heroic in its aims, but how would/could this be done?

Suggest that rather than start again from square one, the strategy ensure that maximum benefit is derived from existing systems of monitoring and reporting. There would seem to be a proliferation of systems already in existence. A stock take of all these could be conducted in six months, which would identify areas that need better enforcement of reporting obligations, need for consolidation, etc.

**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*

The Strategy fails to acknowledge or address the fact that many decisions influencing biodiversity are made at the local government level. Without legislative authority at this level – and without enforcement and the political will to enforce legislation at all levels – this and other strategies will fail.

Reliance on education rather than legislation (ie on persuasion rather than compulsion) has been shown to be effective in anything but the long-term – ie over time periods that we do not have in this situation. Also, the strategy relies on the formal education systems across the country, but does not have the imprimatur of any of the Ministers for Education.

**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 needs to rely more on ‘sticks’ (not just on carrots). Legislation needs to be clear, strong and enforced; reliance on education has been shown to be too slow to achieve the necessary goals. Ironically, while the current Federal government has a clear and overwhelming mandate to address environmental issues, it has shied away from fulfilling commitments in this area. This draft could have given voice to the demonstrated desires

of the community; it has not. It has not addressed the fact, for example, that dealing with climate change now will cost less than dealing with the impacts later. Many arguments are available and could have been adopted to strengthen the force of this draft.

**8. Is the Consultation Draft sufficiently clear about its role and how it will be implemented?**   *Maximum 270 words*

Yes. But that is the problem. The strategy is focusing on itself as an end point. It uses verbose managerial speak to 'sound' good, but appears to have few 'guts'.

**9. Does the Consultation Draft reflect the best practice on biodiversity conservation?**   *Maximum 270 words*

We hope not, for if this is best practice, we have little expectation of a biologically diverse future.

**10. Will the Consultation Draft effectively engage private sector interests in long-term biodiversity conservation?**   *Maximum 270 words*

What is the fundamental difference between this question and Question 7 above?

**Do you have any other comments you wish to make on the Consultation Draft?**   *Maximum 360 words*

The Strategy is a significant disappointment in that it appears to rely on form rather than content. To be honest, it is hard to believe that it is the best that could have been developed after two years and teams of people together having/employing decades of education, thousands of miles of travel, reams of paper and acres of trees, It is disappointingly anthropocentric (eg, non-human ecological communities must adapt to human behaviour (that, for example, changes the climate)).

The focus on form is accentuated by the glossy/full colour presentation (compare, for example, the 1996 Strategy) and the inclusion of unnecessary case studies.

The document is unnecessarily 'wordy' and reliant on 'bureaucratese' – in places becoming nothing more than an inaccurate dictionary. For example on page 12 it is considered necessary to define the word 'results': 'The results are the expected 'on-ground' consequences of successful implementation of the actions.' NOTE: results are outcomes, they are not *expected* anything.

The document is inaccurate in its use of words. For example, 'the main biodiversity threats identified ... to be the most important in reversing the decline in Australia's biodiversity' (see comment in (1) above), and (p. 15) 'The elements of the strategy and

the ways in which it will be implemented need to be monitored in an adaptive and flexible way...’ – adaptive and flexible monitoring would be a disaster!

There is no explanation about why this strategy appears to have walked away from preceding strategies (Appendix 5 does not do this – it explains current management thinking on decision-making). It is easy to conclude that the desire to be ‘new’ is a political rather than a scientific one.

The strategy relies on impossible targets for success (eg, p.48 ‘For this strategy to be effective, all Australians need to want, and be prepared, to contribute personally to biodiversity conservation. This would involve learning more about how to live sustainably; for example, by supporting, joining or forming groups concerned with issues such as conserving particular species or areas, reducing their ecological footprint and living more sustainably.’)

The document relies on ‘feel good’ generalizations rather than concrete actions (eg, ‘develop innovative programs’ (p.22); ‘cause industry to adopt innovative management’ (p.34).

The tick and flick format for responding to this strategy belies its importance and suggest to those using up much of their leisure time to respond because of their concern for the issue, that the focus is on the ease of collating responses by staff of DEWHA, rather than obtaining useful input from very concerned stakeholders.

The word limit imposed on answers is almost an insult. The issue is a vital and complex one - to distill answers to such an extent means that valuable feedback will be lost and serves to give respondents the impression that their views are not really wanted.

Furthermore, the system is very poorly designed in that, for example, the respondent is only made aware that the allowed 90 words is really only 500 characters (inc. spaces) *after* the respondent has finalized (often by committee) their wording. And the system can’t accurately count!