



## **CLARENCE ENVIRONMENT CENTRE**

29-31 Skinner Street

South Grafton 2460

Phone/ Fax: 02 6643 1863

Web site: [www.cec.org.au](http://www.cec.org.au)

E-mail: [admin@cec.org.au](mailto:admin@cec.org.au)

# **SUBMISSION**

to

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

on its

**National Strategy for the  
Conservation of Australia's Biological Diversity**

### **Terms of reference**

- \* building ecosystem resilience
- \* mainstreaming biodiversity
- \* knowledge for all
- \* getting results
- \* involving Indigenous peoples
- \* measuring success.

**Prepared by John Edwards  
Honorary Secretary  
27<sup>th</sup> April 2009**

# Submission to the National Strategy for the Conservation of Australia's Biological Diversity

## Foreword:

The current Consultation Draft of Australia's Biodiversity Conservation Strategy contains a list of excellent "*Principles underlying the development and implementation of the strategy*". The Clarence Environment Centre believes those principles will provide the foundations of the Draft but point out that the original Strategy, introduced in 1996, contained an equally strong set of principles which received little attention over the following decade, reducing them to little more than 'motherhood statements'.

The opening statement in the foreword to the 1996 "National Strategy for the conservation of Australia's Biodiversity" explains that: "*Conservation of biological diversity is a foundation of ecologically sustainable development and is one of the three core objectives of the National Strategy for Ecologically Sustainable Development*" (ESD). The inclusion of ESD highlights the major flaw that has traditionally dogged plans for biodiversity conservation across the globe.

Put simply, ESD is tied to "Growth", with no time-frame other than interim target dates. **Growth, in perpetuity, simply cannot be sustained in any form, least of all ecologically**, being a convenient phrase invented by economists driven by relatively short term financial considerations.

The Strategy's opening statement is followed by the assertion that: "*Biological diversity underpins human well-being through the provision of ecological services such as those that are essential for the maintenance of soil fertility and clean, fresh water and air.*" Despite this all too frequent acknowledgment of the importance of biodiversity, and the claim (page 25) that "*Governments will demonstrate leadership and provide direction*", our governments have paid little more than lip-service to biodiversity protection. That is no more obvious than in New South Wales where the government has introduced the BioBank legislation that ultimately trades off 50% of the State's biodiversity to allow for sustained growth.

As well that State's government has systematically dismantled the EP&A Act through the Part 5A amendments, has whittled away at environmental protection under Forests Agreements Licence, and has held up the Review of the highly damaging Plantations and Reafforestation Act for over 4 years.

Past grand plans and vision statements abound. It was almost a decade ago that the Northern Rivers Catchment Management Authority presented its "Catchment Management Blueprint", one objective of which was: "*No net loss of native vegetation from 2000.*" Immediately prior to that publication, the "North Coast Regional Development Strategy" identified similar desirable outcomes, and urged among others, the "*use of common corridors for infrastructure provision*".

A decade on and land-clearing is progressing unchecked under a myriad of guises, both legal and illegal, and the use of common corridors for infrastructure only ever occurs if it happens to be convenient. The proposed Pacific Highway upgrade through the Clarence Valley (it is an entirely new motorway, not an upgrade), is a case in point. That motorway's preferred route runs through more than 50km of forests, not because it is the shortest route, but because that is the cheapest land.

The failure to combine infrastructure to common corridors is no more stark than that of the construction of the Shannon Creek dam near Grafton. In that case, two corridors totaling over 10km were cleared through bushland impacting 3 Endangered Ecological Communities and a wetland in the process, one for a pipeline, the other for an access road. **Federal and State Environment Departments allowed this to happen despite destruction of five threatened plant species, and known habitat for at least fifteen threatened fauna, supposedly protected under their respective jurisdictions.**

The Consultation Draft of the Strategy contains a concise analysis of “Why biodiversity matters” (page 17), including: **“Healthy ecosystems support life on earth and are vital to the wellbeing of present and future generations. Ecosystem services provide life-sustaining benefits and maintain the conditions for life on earth.”** Given that analysis, why do we continue to fail to place a dollar value on those services?

We note the document does also include Action 6.2.2: **“Incorporate biodiversity and ecosystem services into national accounts and corporate reporting.”** Also we note (page 25) the Draft Strategy declaring the need to provide **“tools that allow the costs and benefits of biodiversity to be taken into account on an equal footing with social and economic factors”** It is only by allowing this that biodiversity will be seen as an asset, rather than the more commonly expressed belief that it is a liability (fire hazard, pest infested, reducing potential housing land values, etc). We will be interested to see how Government achieves this aim.

The Consultation Draft's front cover claims its **Vision** is to see that **“Australia’s biodiversity is healthy, and resilient to climate change”**. But then the third line of the Executive Summary claims: **“It sets national direction for biodiversity conservation over the next decade.”** It is hoped that due consideration is given to the next thousand years during which, some scientists predict, the effects of climate change such as global warming and sea level rise, will continue to be felt.

Despite a clear statement of Principle (#2) that: **“the cooperation of conservation groups is critical to the conservation of biological diversity”**, the Strategy was formulated with input from the Agriculture and Resources Management Council of Australia and New Zealand; the Australian Forestry Council; the Australian and New Zealand Fisheries and Aquaculture Council; the Australian and New Zealand Minerals and Energy Council, and the Industry, Technology and Regional Development Council. Apart from stating that the **“views of the conservation movement were also sought”**, no single group is identified as having assisted in formulating the Strategy.

With protection of biological diversity presumably a key outcome, we believe that lack of input by conservationists ultimately led the Principle's failure to make any significant impact on biodiversity destruction that has continued across the country throughout the Strategy's 10 year history.

This is confirmed in the Consultation Draft (page 10) with acknowledgment that **“We observe and note report after report of the downward trend in our biodiversity: the Australia State of the Environment 2006 report found that biodiversity is in serious decline (Beeton et al. 2006); the second environmental performance review of Australia by the Organisation for Economic Co-operation and Development, 2008, reports that despite improved efforts the downward trend in the conservation status of some species continues.”** It is clear that, despite a seemingly impressive list of “current work”, the Strategy is failing to achieve its stated objectives.

The Clarence Environment Centre believes that, when dealing with corporate greed, biodiversity protection must move beyond education, strategies, principles, codes of practice, and self regulation, because they have failed. Strong, unequivocal legislation must be introduced. But at the same time we point out that **laws are only as good as their implementation. Regulatory agencies must be adequately resourced to monitor compliance, and given the power, and backing, to impose realistic penalties on those breaching the laws.** We note this is proposed in section 2.2 (page 26) with the stated intention to: **“Ensure complementary legislative frameworks and approaches across the three tiers of government to conserve biodiversity.”** Legislation to protect the environment is already in place, but is seldom used, and continually watered down in response to intense lobbying and political donations from cashed-up self-interested developers and industries.

Despite that rather pessimistic note, we find the comment (page 10) that: **“Business as usual is no longer an option”**, extremely heartening, and hope that message is heeded.

## Identified Threats to biodiversity (Page 5 of the Consultation Draft)

There are six main threats listed:

- \* *climate change (resulting in conditions such as prolonged drought)*
- \* *invasive species*
- \* *loss, fragmentation and degradation of habitat*
- \* *unsustainable use of natural resources*
- \* *changes to the aquatic environment and water flows*
- \* *inappropriate fire regimes.*

**We make the following comments on those identified threats, identifying what we see as past failures. Our aim is to stimulate debate and thought processes, which we hope might influence future decisions, and hopefully spur some action to protect biodiversity over the long term.**

- **Climate change:** Humans have caused climate change through excessive CO<sup>2</sup> emissions into the atmosphere. Nevertheless, we in Australia have failed to reduce carbon emissions despite the Hawke Government first adopting emissions targets in 1990. We notice that addressing emissions was never mentioned in the original Strategy, so we applaud the current Consultation Draft's claim (page 11) that: ***“efforts to reduce greenhouse gas emissions and reduce the adverse impacts of economic development”*** are continuing.

Nevertheless, the recent Senate Inquiry into the proposed Carbon Reduction Scheme learned that CO<sup>2</sup> emissions continue to rise at 2% per annum (CSIRO scientists acting individually), showing those past “efforts” to be dismally inadequate.

**We believe the current Government's plan to prop up polluting industries, rather than renewable energy technology, is a gross misjudgment, and needs to be reconsidered.**

- **Invasive species** are still introduced and spread through garden escapees, use of inappropriate roadside species, and the dumping of unwanted pets. Even government projects, such as our local Coffs Harbour - Clarence Valley regional water supply, broke the undertaking to use plants and seed from local native species for regeneration works, and instead planted exotic species.

Regulatory authorities do not have the resources for compliance monitoring, and even when members of the public report these breaches, those authorities fail to take punitive action, and invariably excuse the proponent's action. The worst examples of weed invasion are found in government managed forests and national parks, which are starved of funding for eradication.

- **Loss, fragmentation and degradation of habitat** is still widespread, often legally, using a large number of legislated loopholes. Principle #8 in the original “National Strategy for the Conservation of Australia's Biological Diversity caught our attention, declaring a need for ***“sympathetic management of all other areas, including agriculture”***.
- In NSW, one piece of legislation in particular, the Plantations and Reafforestation Act, is anything but 'sympathetic' to biodiversity, with hundreds of thousands of hectares of monoculture plantations already established in NSW, most of them on a 10 to 15 year cycle for wood-chip production.

**Under the Act, plantations can only be developed on land that was 'predominantly' cleared in 1990, meaning 18 year old regrowth is bulldozed and burned to be replaced by threes that will be harvested in 15 years. Also bulldozed is any remnant forest smaller than one, any 'irregular projections' from neighbouring forests (up to 10% of that forest); all dead trees (safety), even if they contain hollows; and all hollow-bearing trees in excess of one per hectare (even that one can be bulldozed if replaced by 10 seedlings).**

The Southern Cross University found that local plantations require fertilizer, and up to 5 applications of various herbicides within the first two years. This is followed in most cases with regular applications of insecticide to combat psyllid attack, as many as 3 per year.

While the Act is a State concern, these plantations are almost fully funded by 100% tax concessions **regulated by the Federal Government**. At the same time some of the **poisons now saturating the landscape have been banned overseas. These chemicals have been linked to cancers, birth defects, infertility, multiple organ failure, and death. All are being legally used under Federal Government legislation.** These chemicals make it almost impossible to maintain even basic levels of biodiversity. The impacts of this extreme chemical use on water quality is unknown because no testing is undertaken on mainland Australia.

**If biodiversity is to be protected, changes to these various Acts, must be considered.**

- **Rural residential development is still widespread despite its identified contribution to urban sprawl and biodiversity loss.** State planning authorities have refused to wind back land already zoned for this purpose, guaranteeing the ongoing destruction of native vegetation. These lifestyle blocks, measuring up to 10 hectares, are generally totally cleared of vegetation, or 'underscrubbed', utilising a raft of legalities allowing uncontrolled clearing for building envelope; fencing (12m, with no control on the number of fences); bushfire control, safety, amenities provision (phone, power, water, sewerage, roads), and routine agricultural activities.
- **All infrastructure provision:** - Motorways, dams, sewerage works, pipelines (sewerage, water and gas), air ports, and power and telecommunication lines, **are all constructed at the expense of native vegetation.** In fact forested land is preferred for these developments because it is generally seen as cheap and non-productive. More vegetation is destroyed along roadsides to provide line of sight, and other safety considerations. Despite motorways taking up to 50 metres width, construction companies routinely clear over 100 metres, replanting a plethora of species, mostly not of local provenance, that will take upwards of 200 years to reach the same maturity as the forests they removed.
- **Unsustainable use of natural resources .** This comes in two categories – 'renewable' and 'finite'.
  - **Any use of a finite resource is unsustainable,** and while not suggesting we should cease mining those resources, we would make a number of significant points:
    - Australia's finite mineral resources are being exported at an frightening rate and at an appallingly low price to meet competition and balance of trade. To be this reckless with resources that will ultimately run out, some sooner than later, at give-away prices simply to match rock-bottom prices offered by competitors, is economically irresponsible.
  - Governments are not addressing issues such as packaging, 'planned obsolescence', and recycling, more needs to be done to address this waste of resources.
  - All our mineral exports are priced at the basic cost of extraction. No consideration is given to the cost of rehabilitation beyond a cosmetic replanting of trees at the extraction site. In the global context for example, what has the petrochemical industry paid to rehabilitate the polluted and poisoned world it has created for us? **Again this must be addressed.**
- Our **renewable resources** are likewise over exploited.
  - **Fisheries** are struggling worldwide, and not helped by **toxic run-off from land-based agriculture, sewerage disposal, and plastics pollution.** Fishing horror stories, such as Sydney Harbour where fish are poisonous and cannot be eaten, repeated incidents of infected oyster leases, and problems of on-land acid sulphate soil disturbance, continue to arise. Worldwide, wherever we look, be it collapse Cod and Salmon fisheries, plastic pollution of the Pacific, to Somali fishermen turning to piracy, the news is all bad!

- **State forests are being over-logged** to the point of collapse; recently confirmed by the NSW Auditor General. This has led to predictable repercussions such as the emerging Bell Miner Associated Dieback that currently threatens 2.4 million hectares of sclerophyll forests across NSW (NSW Scientific Committee Key Threatening Process determination).
- And decades of **unsustainable agricultural practices** has seen vast stretches of once productive food-producing land turned into virtual salt deserts across southern Australia.
- **Alter the aquatic environment.** This is happening in numerous ways.
  - By **effluent pollution** with ocean or river outfalls the commonly adopted option.
  - **Dam building** is still the popular political knee-jerk response to water shortages, despite most of southern Australia's dams standing only half full for years on end, resulting in serious degradation and declining biodiversity down-stream.
  - **Over fishing**, mainly an international problem that is being exacerbated by Australia's willingness to import fish as our own stocks decline, with no questions asked as to the sustainability of those fisheries.
  - **Tourism and leisure** which combine to love our beaches, reefs, and rivers to death, and policies that appear to allow developers to destroy habitat at will, albeit with a few hoops to jump through, to set up shop in the most aesthetically beautiful locations, destroying reefs, sea grasses, mangroves, and coastal and estuarine habitat to build marinas and other infrastructure. The NSW Government now plans to open national parks for development.
  - By allowing **cattle to trample stream banks** and defecate in our water, because of a lack of political will to force the fencing off of waterways. Cattle are still adgisted in NSW State forests, and logging is allowed to within 5 metres of stream banks, resulting in unavoidable erosion and siltation. Rural Lands Protection Boards routinely ring-bark and clear trees along stock routes and reserves, for no other reason that they feel they should be doing something.
  - By allowing virtually **unrestricted trenching of infrastructure**, particularly pipelines, **across rivers and wetlands**. Again, our local regional water supply is an example, trenching its concrete encased pipeline across numerous rivers and creeks, including the Orara River, which it managed to cross 3 times on the route from Nymboida to Coffs Harbour. The Fisheries Department had called for under-boring of the River to protect endangered Cod habitat, but that was rejected by the proponent as being too time consuming.
- **Inappropriate fire regimes.** Deciding what constitutes appropriate fire regimes is hotly debated, with extremes separately advocating either no fire, or yearly hazard reduction.

The suggestion (page 9) that *“We have learnt lessons on the use of fire from our Indigenous land managers,”* is scary, because it seems we have not learned the true lesson. There is a strong body of scientific evidence suggesting that burning by indigenous peoples over 60,000 years is the major cause of our arid interior, and that flora remaining today are survivors that tolerate fire. Many of our most endangered species have only survived these fires because they are protected from fire on cliff faces or rainforest in high rainfall regions where fire cannot reach them.

Peter Andrews, the writer of two books on the subject, “Back from the Brink”, and “Beyond the Brink”, claims 60,000 years of Aboriginal stewardship of the land has *“caused enormous damage to the landscape”*.

Case Study 11 (page 45 of the Consultation Draft), clearly identifies that 15 years of monitoring in Kakadu NP has; *“... provided clear information showing decline in some fire-sensitive heath lands, ... increases and decreases in forest stand basal areas dependent upon fire history, region-wide increases and decreases in some plant species, and overall decline in native mammal fauna in part related to fire history.”*

The Consultation Draft acknowledges that new, as yet unpublished research (Steffen et al. Forthcoming)", has identified that climate change will exacerbate existing stressors such as fire.

**Overall, we believe indigenous knowledge relating to fire should be treated with extreme caution, with modern scientific knowledge given a higher rating.**

\* \* \*

**The Consultation Draft acknowledges the fact (page 10) that biodiversity continues to decline across Australia, reinforcing our claim that, despite a seemingly impressive list of "current work", the Strategy is failing to achieve its stated objective.**

### **Building on current work**

Not surprisingly, given our previous comments, the segment "Building on current work", contains few initiatives of any substance. There is a claim that: *"All the governments of Australia have invested considerably in the development and implementation of biodiversity conservation policies and programs."*

However, while policies may have been developed, actual examples of their actually preventing biodiversity loss are rare. In fact the NSW BioBanking scheme, and previous compensatory habitat requirements, allow vegetation to be cleared without any vegetation being replanted elsewhere. In every case where these schemes have been implemented, there has been a massive net loss of biodiversity.

We acknowledge the increase in the size of terrestrial and marine reserve systems, including World Heritage places. Whether that increase can be said to be "significant", as claimed, is open to the long-running debate over the definition of 'significant'.

Of the other listed achievements that are to be built on, most have very flimsy foundations, with some barely past the site preparation stage:

- \* *"improvements in the conservation status of particular species and communities"*, is also questionable, given there are no records, as far as we are aware, of species other than whales whose declines have been reversed.
- \* *"collaborative development of Indigenous Protected Areas, where Indigenous peoples manage their country to preserve its values"*, is tainted by the acceptance of killing protected wildlife because it is 'traditional'. This is even allowed in areas where those indigenous peoples have long since moved away from traditional lifestyles.
- \* *"emergence of private conservation reserves run by non-government organisations"*, is something in which Government can take very little pride, and have generally emerged because private citizens feel they can no longer stand aside and ignore government failures to adequately protect wildlife. The Government's current plan to mine land protected by the Irwin family in Queensland, puts this supposed support in context.
- \* *"development and implementation of sustainable fisheries management plans for all of Australia's major fisheries"*. We can only point to our local Clarence River industry which has struggled for years, while in Sydney Harbour fishing has been banned because of heavy metal pollution that cannot be cleaned up. We also hear stories of illegal fishing by foreign fishermen across Australia's northern waters, taking unsustainable quantities of shellfish, shark fins etc, and whale killing by Japanese in southern sanctuaries.
- \* *"strengthened requirements and outcomes for conservation and sustainable forest management through regional forest agreements"* Sustainable Forest Management is a myth, no more than a phrase incorporated into the 1999 NSW Forests Agreements. In reality, what is happening is far from sustainable (see NSW Auditor General's report, April 2009).

While Forest Agreements did protect certain forest categories such as rainforest and old-growth, Forests NSW managed to annihilate vast areas of old-growth forest in the years leading up to the Agreements being signed. That, and continued, over-logging of the balance has seen forest canopies so reduced that understory weed and vine explosions have seen an influx of Bell Miner birds, and the rapid spread of Bell Miner Associated dieback.

Today, with the disease spreading rapidly, and no solution in sight, an estimated 2.4 million hectares of forests in NSW alone, are at risk (NSW Scientific Committee, Key Threatening Process determination, November 1998).

- \* ***“legislation by all governments to protect native vegetation from broadscale land clearing”***. This legislation, at least in the Northern Rivers region of NSW, is proving to be totally ineffective, with land-clearing progressing apace. Much of this clearing is illegal, however changes to Part 3A of the State planning laws, the introduction of the Plantations and Reafforestation Act, and Biobanking legislation, supported by changes to the Native Veg Act, all combine to legalise land-clearing on a scale that has not been matched since the free selection years of the late 1800s.

Recent revelations by CSIRO Scientists at Senate hearings on the government's Carbon Reduction Scheme, who have decided to 'break their silence' on the issue, confirm our worst fears. **Serious penalties for land-clearing must be imposed, and administered.**

- \* ***“clarification of rights to extract water, and formal recognition of the right to allocations for environmental flows (i.e. the water needed to keep a watercourse healthy).”*** This is one piece of legislation that is having some beneficial effect although, in this region of NSW, we have not experienced serious drought since 2002, and therefore the law has not been fully tested. What we do know is that in 2002, when the worst drought on record occurred, all environmental flow protection was removed from the main tributary of the Clarence River, the Nymboida, and water was pumped 80km to fill Coffs Harbour's Karangi reservoir.

This was simply achieved by a regional manager declaring a state of emergency. The 95<sup>th</sup> percentile environmental flow in the Nymboida River (225ML/day) was scrapped, and flows reduced to a double digits for months on end allowing a mere trickle to continue downstream, with the 'mighty Clarence' reduced to just 45ML/day.

The point we make is, that while legislation might be in place to protect waterways, when the crunch comes, that protection can be removed by the stroke of a pen.

- \* ***“incorporation of biodiversity objectives in all 56 natural resource management regions across the country”***. As stated at the end of the third paragraph of the Consultation Draft's Summary (page 5), all Governments recognise that ***“biodiversity in Australia is still in decline.”*** That statement shows how ineffective these 'biodiversity objectives' have been.
- \* ***“development of new markets for protecting native habitat on private land.”*** We are sorry. We have no idea what markets have been developed to protect native habitat on private land. Owing to the fact that we are a volunteer run organisation with limited resources, we are unable to explore this issue to comment objectively.
- \* ***“efforts to reduce greenhouse gas emissions and reduce the adverse impacts of economic development”***. With CO<sub>2</sub> emissions continuing their upward spiral, these supposed efforts are clearly not enough. The pathetic 5% emissions reduction target set recently by the Federal Government, is an indication of a serious lack of commitment to address the climate change problem. At the same time it must be recognised that while impacts of economic development might be 'reduced', they cannot be eliminated. **Economic development therefore, remains the greatest threat to biodiversity.**

- \* ***“increased protection of the biodiversity of the Great Barrier Reef—”*** While we applaud the \$2 billion “Reef Rescue” allocation, we believe, given wide-spread scientific belief that the reef is doomed, we believe some of this funding should be diverted to concentrate on reducing agricultural run-off, sewerage outfalls, and general pollution along all of Australia's coastline.

**In conclusion:** It is clear that past efforts to protect biodiversity have been largely ineffective. The Clarence Environment Centre believes the Consultation Draft's comment (page 11) that: ***“We are placing an increasing emphasis on acting at the right scale”***, must be put into action.

Likewise, the promise to promote the sustainable use of biological resources, must be more than rhetoric. Timber, agriculture, and fishing industries are all under extreme stress as a result of past and present inappropriate practices, which are generally progressing unchanged. Traditional agriculture, the provision of food for an increasing world population, is also under threat from competing demands for biofuels, leisure activities (from golf courses to game farms for hunting), and urban expansion.

## **Priorities for Change**

- The Consultation Draft lists 6 ‘priorities for change’. While we believe in the importance of ***Building ecosystem resilience; mainstreaming biodiversity***, and imparting ***knowledge for all***, getting results is something that has been the stumbling block in the past.

Wildlife corridors must be identified across the country, and those corridors enhanced and protected. This needs to be a cooperative effort between all levels of government, with planning departments at all levels given clear guidelines.

**Up until now, unenforcible codes of practice, guidelines, and industry self-regulation, simply hasn't worked. A much tougher line must be taken to protect biodiversity, particularly in relation to land-clearing, and must extend beyond education, and into the courts, with appropriate penalties applied.**

- ***Involving Indigenous peoples*** and recognising their special relationship with Australia’s natural environments, the cultural significance of that relationship, and its ongoing importance to the conservation of Australia’s biodiversity, is likewise critically important. Indigenous peoples now manage 20% of Australia's land mass (A11, page 48), vast tracts of which contain the last remaining vestiges of unspoiled biodiversity.

**Unfortunately, history has shown that disadvantaged peoples are repeatedly forced to relinquish their hard-fought inheritance in exchange for basic standards of housing, health and education, something most Australians take for granted (refer Western Australian Government moves to develop natural gas field in the Kimberly Region). All Australian governments, through their close association with 'big money', and their addiction to economic growth, are knee-deep in this scandalous manipulation and exploitation.**

How Government can hope to achieve protection of biodiversity through education on the one hand, while encouraging the rape of natural resources on the other, is problematical, and one that must be addressed. Seemingly the Consultation Draft accepts this reality (page 14) when identifying the need to: ***“secure and enhance critical intact habitats to increase ecosystem resilience”***. **The Kimberly would seem to be a good place to start!**

- We applaud the Table 1.1 list of priority actions, and actions specified on Page 14, and express the hope that they are fully implemented, particularly **Action 4.3.2: *“Review and reform legislation to improve biodiversity conservation outcomes across all sectors.”*** Some hard and fast examples of how this will be achieved, would strengthen the final ABCS draft.

- In terms of the proposed *monitoring of effectiveness*, we question the five year monitoring proposal (page 15). Given the list of Priority Actions to be taken within 2 years, we suggest that monitoring should occur at that 2 year point, to ensure all priority actions have at least been initiated. Perhaps the proposed annual reporting will achieve this aim, but it will do no harm to have checks.

## General comments

### Recreational Shooting.

We note the partnership between recreational shooters groups, which has been hailed a success in South Australia's "Bounceback" program. A similar partnership is also being undertaken in NSW State forests.

However we issue a note of caution, and point out that some recreational shooters are more concerned with sustaining their sport than sustaining biodiversity. There have been instances where hunters have been reported introducing wild pigs into north coast forests for that purpose.

We point out also that the recreational shooters groups in NSW presented a submission opposing the declaration of deer as a key threatening process. **Again this move was aimed at protecting their sporting resource, not protecting biodiversity.**

### Climate Change:

We briefly addressed Climate Change earlier in this submission. However, the gravity of this event demands more attention. A stated Principle in the original Strategy was (#3): ***"It is vital to anticipate, prevent and attack at source the causes of significant reduction or loss of biological diversity"***. The world has now acknowledged that the greatest single threat to biodiversity in the medium to long term, is climate change, which is predicted to involve planet Earth in one of three greatest extinction events since life began.

However, we find climate change tucked away in Section 3 of the Strategy under the heading "Managing Threatening processes", with the stated objective to: ***"Monitor, regulate and minimise processes and categories of activities that have or are likely to have significant adverse impacts on the conservation of biological diversity and be able to respond appropriately to emergency situations."*** What happened to ***"attack at source"***?

As a result of Government's failure to accept the seriousness of climate change, nothing was done to alleviate or adapt to climate change for more than a decade, so it is gratifying to find climate change elevated somewhat in the current Draft document.

We all know the 'source' of climate change, **the burning of fossil fuels, but still the Government appears reluctant to address this issue. Despite acknowledging that: "There is a growing body of evidence showing that increases in atmospheric concentrations of 'greenhouse' gases will enhance the greenhouse effect, resulting on average in additional warming of the Earth's surface", and that This is likely to lead to climatic changes, including increased temperatures, sea level rises and altered rainfall regimes", Australia's CO<sub>2</sub> emissions continue to rise at 2% per annum, while billions of dollars are to be allocated to prop up the polluting industries and coal-fired power generators that are causing the problem.**

**As a final act of betrayal to all those who are desperately concerned about climate change, and the kind of world we pass on to our children, and despite acknowledging the cost of inaction will be far greater than the cost of action, the Government has now delayed moves on emissions reduction for a further 2 years. So much for the claim that: "Business as usual is no longer an option".**

## Protection of Prime Agricultural land

The Strategy's Introduction finishes with arguably the greatest understatement of them all: ***“If we are to achieve a sustainable future in which food, shelter, health and other basic needs of a growing global population are met, we must act now to change so that we live within the Earth’s carrying capacity.”***

Feeding a world where population is expected to rise by more than 30% in the next 50 years, when we currently have some 500 million people around the world living with hunger, is a challenge that must be met, or we face anarchy on an unprecedented scale.

Despite recognizing this (page 13 of the Strategy) when identifying the need for ***“coordinating mechanisms to ensure ecologically sustainable use of biological diversity, with particular reference to agricultural lands”***, we in the developed world are turning to the production of biofuels on a massive scale, often clearing ancient rainforest for the purpose.

We believe this is an issue for this Strategy, and must be taken seriously. Any loss of prime agricultural land for whatever reason, simply places more pressure on governments to allow further development of bushland to make up the deficit. Agricultural land must be protected.

## Valuing Resources

Principle #4 states: ***“Processes for and decisions about the allocation and use of Australia's resources should be efficient, equitable and transparent.”*** The Clarence Environment Centre is not privy to the export revenue received for its renewable or non-renewable resources. However, anecdotal evidence suggests the many of these resources are being sold at 'give-away' prices. While it is hard to justify the sale of wood-chip from old growth forests, given the hundreds of years invested by nature in that growth, it is totally impossible to justify the low prices currently received for wood-chip.

There appears to be a belief among capitalists, who cannot see beyond economic growth and the balance of payments, that natural resources are infinite – THEY ARE NOT! We currently value all our natural resources at the cost of extraction alone. The cost of the environmental damage that is caused, not only in the mining process, but in the refining (energy use and emissions); in the end use such as emissions from coal-fired power generation, and finally in the safe disposal of the product (nuclear waste and land fill).

The solution is to cost all the above components, including the 'clean-up'. Then add the cost of developing a product to replace it when it is gone. Adapting to a world without these products will be costly. It is imperative that we begin to recoup that cost now, and not be driven by the convenient 'supply and demand', or the need to sustain growth arguments. These are promoted by self interest, and greed, not by rational thought.

## Australian Overseas Responsibilities.

Principle #7 (expanded upon in Section states: ***“Australians operating beyond our national jurisdiction should respect the principles of conservation and ecologically sustainable use of biological diversity and act in accordance with any relevant national or international laws.”***

There is a supposed action (Section 6.2), that makes the 'toothless' statement that: ***“Practices that would be unacceptable in Australia should be avoided.”***

On the other hand, we are repeatedly fed the line, by government officials of all persuasions, that they cannot interfere with the internal policies of foreign nations. At the same time we sit helplessly doing nothing while horrific tales emerge of Australian company activities overseas.

Seas of mud coming from underground in Indonesia, submerging whole villages. Massive fish kills in Europe after poisonous waste escaped a burst dam and flowed down the Danube affecting the livelihoods, and possibly health, of thousands of fishermen. Atrocious stories of river poisoning from gold mining in New Guinea, and even stories of timber exploitation in the Solomon Islands.

We agree whole-heartedly with the Principle, but deplore the Government's failure to act. This is an area that should, and must be addressed.

## **The Expansion of Conservation Reserves**

Principle #8 states that: ***“Central to the conservation of Australia's biological diversity is the establishment of a comprehensive, representative and adequate system of ecologically viable protected areas integrated with the sympathetic management of all other areas, including agricultural and other resource production systems.”***

The Clarence Environment Centre believes that reserve and national park establishment in NSW is progressing as well as can be expected. However, the funding allocation for maintenance of those parks is abysmal. In many cases, we believe the lack of funding is deliberate, allowing political mileage to be gained, particularly in some rural electorates.

Therefore we believe a greater commitment, particularly to weed and vertebrate pest control, must be made, as both have the potential to decimate native species and reduce biodiversity.

## **Changes in land use**

The National Greenhouse Response Strategy suggests that: ***“Governments have emphasised the need to adopt land uses and management measures designed to conserve carbon sinks and increase the amount of vegetation in forests and elsewhere.”*** This is a policy we believe should receive more attention. Despite agricultural adaptation being at the forefront of many reports and strategies since 2000, little seems to have changed on the ground. The recently reported situation at Deniliquin is a case in point. In an area where drought has been ongoing, reducing the land to a near desert, and forcing the closure of a rice processing plant, we were treated to pictures of sheep being grain fed in the dust, and cultivated rice fields waiting for rain.

With predictions that climate change will make this drought situation the norm, this makes no sense at all. Whatever happened to adaptation? A greater effort must be made to make these drought prone areas sustainable.

## **Urban expansion**

We believe there is a critical need for changes to planning laws and inappropriate land zonings. In formulating the recently introduced Regional Strategies in NSW, State Planning has refused to bite the bullet over rolling back inappropriate zoning for rural residential land.

Rural residential living is one of the greatest contributors to urban sprawl and a major threat to biodiversity, because these 'lifestyle' blocks are too small to be able to retain adequate native vegetation. A lack of legislative controls, allows these properties to be 'underscrubbed', creating an open parklike appearance, with biodiversity reduced by 95%. There are tens of thousands of hectares in NSW zoned rural residential, much of it bushland, just waiting to be developed.

Likewise, we believe governments should ensure that growth areas only be allowed on cleared land which is not prime agricultural country. Too much of our food-producing land is being buried under concrete and bitumen.

## Recommendations:

Despite our negativity, the Clarence Environment Centre wishes to put forward what we believe to be some positive contributions.

### Environmental stewardship.

The Clarence Environment Centre notes that large areas of Australia are marginal at best in terms of agricultural production. Those struggling to make a living there are constantly supported by government relief, or social security funding, to keep them doing what has failed in the past.

Those activities are almost always harmful for biodiversity, and the environment in general, through soil degradation and erosion. **Would it not make more sense to pay those families a wage (stewardship payments) to do nothing but manage the property for conservation / carbon storage (concentrating possibly on pest control) allowing this to occur mainly through natural regeneration.** This could be a voluntary program with priority given to connecting landscapes. It would not only help with biodiversity retention, and help the carbon cycle, but would allow owners to remain on the land, and give back some dignity to those who have, for too long, had to rely on hand-outs.

### Creating partnerships

It is also gratifying to read the Priorities for Change (page 26. Section 2.3.1) promising to: ***“Promote participation and provide opportunities for everyone to conserve biodiversity.”***

Regrettably, the all too often **dependence on volunteers** is trotted out as a large part of the solution.

The Howard Government reduced financial support for volunteer environmental groups (GVEHO), meaning environmental projects suffered as a result. This year GVEHO grants have been reinstated with preference given to larger organisations, most of which **employ salaried personnel**, and use those grants to **employ** more people. Many of these larger groups have no land care, or tree-planting programs, but have somehow managed to retain government funding throughout.

The volunteer, not for profit organisations are left struggling to exist, with cynics believing this is a deliberate ploy to eliminate troublesome minorities, and create larger organisations that can be controlled and manipulated through their dependence on Government grant monies.

**We ask that support be given to true volunteer organisations; not necessarily through cash grants, but through: “creating Partnerships between all governments, NGOs, the community and the private sector” (stated Objective 4.3, page 34).** Many volunteers are retirees with a wide range of skills, bird watchers, botanists, geologists, etc. This resource could be tapped by employing volunteer organisations to undertake a range of environmental projects.

**Case Study.** In 2007, retired amateur botanists from the Clarence Environment Centre undertook flora studies for DECC of a National Park, a VCA property, and of land offered for acquisition. One survey was needed to formulate a Plan of Management, for which the Centre was paid. The others were all done pro bono. Retirees are currently constrained in undertaking paid employment because of pensions or tax implications. Therefore the Centre undertook the contract, reimbursing the botanists for their direct expenses, and retaining the balance to purchase equipment and help keep the organisation's shop-front premises open to continue its important community service.

There were multiple benefits. DECC obtained much needed expertise at a very competitive rate allowing them to progress the Management Plan which might otherwise have been put on hold. Retirees were able to feel productive community members, and were kept physically and mentally active, and the Environment Centre was able to benefit and continue functioning.

Over the years, our members have undertaken scientific assessments of threats to flora and fauna which have led to threatened species nominations and listings. Our members have discovered, and helped describe, new species, and provided a large amount of information and specimens to the Royal Botanic Gardens Herbarium, and contributed to the NSW Wildlife Atlas, efforts which have identified range extensions for numerous flora species.

**It is our understanding that the DECC has a large backlog of work which is being held up through a lack of funding. We believe targeted funding through DECC to volunteer organisations, could help reduce that backlog and at the same time achieve the Objectives outlined in Table 3.6 (page 44) relating to building baseline data, and ongoing monitoring.**

Therefore we believe there is scope through the proposed formulation of partnerships (Objective 2.3.1, Page 26, Objective 4.3, page 34, and Objective 6.1.1, page 44) for small volunteer groups to make a major contribution to the body of knowledge necessary for biodiversity conservation.

## **Habitat Trees**

Habitat trees, particularly old hollow bearing trees, are critical to preserving biodiversity. 150 years of timber harvesting across Australia has seen many of these old trees removed to make way for younger growth. At the same time few trees have been left to take the place of old trees that succumb to old age. In NSW the removal of old-growth trees is still allowed under forestry and plantation legislation, while 'recruitment habitat tree' programs in state forests is a farce.

**A case study:** Over the past decade we have seen the emergence of a devastating dieback occurring across wide areas of forests in coastal NSW described as Bell Miner Associated Dieback (BMAD), which has the potential to wipe out up to 4.5 million hectares of Eucalypt forests in NSW. In determining this to be a Key Threatening Process under the TSC Act, the NSW Scientific Committee has identified over logging, leading to forest canopy reduction in excess of 35% as being a trigger for the dieback which is occurring mainly in State forests.

The trees are actually being killed by naturally occurring psyllids, sap-sucking insects that repeatedly defoliate the trees which eventually die as a result. Under normal conditions, these insects are controlled by natural predators, such as sugar gliders and small insectivorous birds.

However, the over-logging that has occurred over the past decade since the Forest Agreements saw large areas of forest protected from logging, has seen forest canopies drastically reduced. This added sunlight reaching the forest floor has led to a surge in understorey growth such as introduced Lantana, or native vine species, which provide ideal habitat for Bell Birds.

The Bell Miner is an aggressive honey eating species, that also feeds off the sugary secretions of the psyllids. Given the ideal dense habitat, their populations rapidly expand, and they drive out all other bird species, particularly those that traditionally predate on the insects.

Past logging practice saw hollow-bearing trees removed to allow for younger trees to develop, and even since the agreements came into force, the forest managers are only obliged to leave 10 hollow-bearing trees in each 2 hectares.

No hollow trees, means no habitat for sugar gliders. Put simply, current logging management is killing our forests, and Forests NSW is flatly refusing to even consider the scientific evidence that has been presented on BMAD, with none of its current Operational Harvest Plans even mentioning the problem. In the wet sclerophyll forests on the Guy Fawkes – Dorrigo plateau, these plans call for an average 40% harvest on top of heavy logging that occurred only ten years earlier. The result is devastating to both the industry and biodiversity.

In late April 2009, the NSW Auditor General reported that logging in NSW was unsustainable.

Again, old growth trees are given no value other than their worth as wood-chip. We need to determine what it would cost to construct, install, and maintain a dozen or more fire-resistant nest boxes for a period of 200 years or more. Then add the value of carbon storage, clean air and water services provided, and food for animals, birds, reptiles, insects and more.

All of these vital services are currently provided absolutely free by these old-growth trees, services country wide that are worth many trillions of dollars annually, yet we think nothing of taking a bulldozer to them and selling them to overseas markets as wood-chip simply to support unsustainable economic growth.

Things must change. It is our sincere hope that the review of the National Strategy for the Conservation of Australia's Biological Diversity is taken very seriously, and that the stated principles are stringently upheld.

Thank you for the opportunity for comment.

John Edwards  
Honorary Secretary.

**Case Study.** In 2007, retired amateur botanists from the Clarence Environment Centre undertook flora studies of a National Park, a VCA property, and of land offered for acquisition, for DECC. One survey was needed to formulate a Plan of Management, for which the Centre was paid. The others were all done pro bono. Retirees are currently constrained in undertaking paid employment because of pensions or tax implications. Therefore the Centre undertook the contract, reimbursing the botanists for their direct expenses, and retaining the balance to purchase equipment and help keep the organisation's shop-front premises open to continue its important community service.

There were multiple benefits. DECC obtained much needed expertise at a very competitive rate allowing them to progress the Management Plan which might otherwise have been put on hold. Retirees were able to feel productive community members, and were kept physically and mentally active, and the Environment Centre was able to benefit and continue functioning.

Over the years, our members have undertaken scientific assessments of threats to flora and fauna which have led to threatened species nominations and listings. Our members are holders of a Scientific Licence, have discovered, and helped describe, new species, and provided a large amount of information and specimens to the Royal Botanic Gardens Herbarium, and contributed to the NSW Wildlife Atlas, efforts which have identified range extensions for numerous flora species.

**It is our understanding that the DECC has a large backlog of work which is being held up through a lack of funding. We believe targeted funding through DECC to volunteer organisations, could help reduce that backlog and at the same time achieve the Objectives outlined in Table 3.6, page 44 relating to building baseline data, and ongoing monitoring.**

Therefore we believe there is scope through the proposed formulation of partnerships (Objective 2.3.1, Page 26, Objective 4.3, page 34, and Objective 6.1.1, page 44) for small volunteer groups to make a major contribution to the body of knowledge necessary for biodiversity conservation.