



Interdisciplinary Conservation Science
Research Group, RMIT
GPO Box 2476
Melbourne 3001
Victoria, Australia

National Biodiversity Strategy Secretariat
Department of the Environment and Energy
GPO Box 787
CANBERRA ACT 2601

Contributing Authors: Thami Croeser, Dr Georgia Garrard, Dr Alex Kusmanoff, Dr Ascelin Gordon, Professor Sarah Bekessy, Lindall Kidd, Katherine Berthon, Matthew Selinske, Emily Gregg, Dr Freya Thomas, Dr Holly Kirk, Dr Luis Mata, Florence Damiens, Dr Matthew Hardy, Dr Isaac Peterson, Dr Laura Mumaw, Dr Nooshin Torabi, Ana Backstrom, Sarrah Hurley

Contact: thami.croeser@rmit.edu.au

RE: Australia's Strategy for Nature 2018–2030

As a leading collective of Australian researchers in the fields of biodiversity conservation and threatened species management, we have anticipated the release of Australia's Strategy for Nature 2018-2030 ('the draft Strategy') with some interest. We thank you for your work on this document, and appreciate the chance to give input.

We are pleased to note a shift to the more accessible term 'nature' in the title, and applaud the emphasis on human experiences of nature. This is important both as an avenue to human wellbeing but also as a key means to build support for conservation action. The focus on cities is also laudable, given that cities are known hotspots for threatened species¹. Urban biodiversity is not only important from a conservation perspective; it also is key to the liveability of our cities.

Despite these positive steps, our overall assessment of the draft Strategy is one of serious concern. Although we agree generally with the overall approach to the Strategy, this draft lacks the detail necessary to give effect to its objectives. Australia's biodiversity faces grave challenges, and the strategy in its current form misses important opportunities to effectively address these. We have highlighted three key areas for improvement.

1. Threatening processes must be addressed with specific, measurable actions

The strategy in its current form lacks specific actions and the goals and objectives it contains are not measurable or robust. This is a substantial step backwards from the 2010 Biodiversity Strategy, which had 10 measurable national targets. The latest draft makes no reference to the 2010 targets, nor does it build on this base. There is no practical commitment in the draft Strategy to halting the key threatening processes that continue to drive species loss. This is despite clear evidence indicating the escalating and serious threats posed

¹ Ives CD, Lentini PE, Threlfall CG, Ikin K, Shanahan DF, Garrard GE, Bekessy SA, Fuller RA, Mumaw L, Rayner L, Rowe R, Valentine L, Kendall D. (2016) Cities are hotspots for threatened species. *Global Ecology and Biogeography* 25: 117–26.

by processes including land clearing, feral animals, urban sprawl, changed fire regimes and industrial logging². Failing to effectively address threatening processes will result in further Australian extinctions³. The Victorian Government's recently released biodiversity strategy, *Protecting Victoria's Environment – Biodiversity 2037*, contains a key performance indicators with associated measurable targets that may be used to guide the development of meaningful targets at the National level, including (for example):

- "a 100% net positive Change in Suitable Habitat in 50 years for threatened species";
- "200,000 hectares of new protected area on private land by 2037";
- "0 vulnerable or near-threatened species have increased their listing to endangered by 2037"; and
- "200,000 hectares of revegetation in priority areas for connectivity between habitats by 2037".⁴

The proposed 'action inventory' offers a potentially useful approach to coordinating implementation actions, but we caution that reliance on this alone to direct the roles and responsibilities of government and other actors would be insufficient. We are also concerned that, as drafted, the inventory implies an effective abdication of federal responsibility for threatened species management. This is despite the Australian Government having direct responsibility for the protection of threatened species as a signatory to the Convention on Biological Diversity, and through the administration of the EPBC Act, while also collecting approximately 80% of all tax revenue⁵.

As a nation with the resources and expertise to conduct world-leading biodiversity conservation, Australia's Strategy for Nature should represent global best practice, and a progression on past strategies. Instead, we are now at a point where the Rwanda Biodiversity Policy⁶ is a far more effective basis for conservation action; Rwanda's strategy has concrete objectives, tangible commitments, and measurable outcomes. A federal policy that is substantially outperformed by that of a developing country recovering from war and genocide can hardly hope to inspire action in state and local governments, nor from our people.

In this regard we strongly recommend the strategy is revised to include a set of species-specific and context-specific actions for threatened species recovery and feral pest management, building on existing programs. The investment of substantial long-term funding, attached to permanent staffing, clear allocation of jurisdictional responsibility and a robust and adaptive monitoring program, would represent a tiny fraction of the total federal revenue base (>\$369 billion in 2015-16⁷), but would deliver important biodiversity outcomes in addition to substantial co-benefits to human health and well-being, agricultural productivity, adaptation to climate change and liveability.

2. A well-managed and representative network of protected areas is vital

Protected area management is critical to the conservation and recovery of threatened species. The draft Strategy touches this crucial point very lightly indeed, briefly noting the potential for better management and

² Australian Government, Australia State of the Environment 2016 <https://soe.environment.gov.au/frameworks/pressures>

³ Lindenmayer, D. 2015. 'Continental-level biodiversity collapse', Proceedings of the National Academy of Sciences, vol. 112(15), p.4514-4515

⁴ Department of Environment, Land, Water and Planning (2018) Biodiversity 2037 Monitoring, Evaluation and Reporting Framework Version 1.0. Victorian Government Department of Environment, Land, Water and Planning, Melbourne.

⁵ Australian Bureau of Statistics, Taxation Revenue Key Figures <http://www.abs.gov.au/ausstats/abs@.nsf/mf/5506.0>

⁶ Republic of Rwanda, Rwanda Biodiversity Policy, http://rema.gov.rw/rema_doc/pab/RWANDA%20BIODIVERSITY%20POLICY.pdf

⁷ Australian Bureau of Statistics, Taxation Revenue Key Figures, <http://www.abs.gov.au/ausstats/abs@.nsf/mf/5506.0>

representativeness of Australia's network of protected areas but making no firm commitments. Again, this contrasts poorly with our 2010 strategy, which included the following substantial target:

“By 2015, achieve a national increase of 600,000 km² of native habitat managed primarily for biodiversity conservation across terrestrial, aquatic and marine environments”

While this target did not necessarily ensure a network of representative, connected or well-managed protected areas, it was a much clearer and more transparent approach than that of our current document. The draft Strategy has the opportunity to build on the 2010 target, rather than retreating to generalised statements of support.

Abroad, South Africa's National Protected Areas Expansion Strategy stands as a good example of a systematic and evidence-based program of protected area expansion⁸. A recent review of Australia's protected area found that only half of our biomes are adequately represented, and some have very low rates of protection⁹. A revised Strategy for Nature should commit to a similarly robust strategic review of the current and future ability of the protected area network to comprehensively represent Australia's biodiversity at both ecosystem and species level.

The management of our existing network of protected areas also requires substantial commitment, particularly to protect species and ecosystems threatened by cross-boundary issues. However, if it is possible for nations such as Bhutan to orchestrate financial mechanisms to provide permanent, adequate funding for managing a network of protected areas¹⁰, this is truly within the capacity of the Australian Government.

3. Legal reform can deliver excellent conservation outcomes – especially on land clearing

It is unfortunate that the draft Strategy is silent on legislative avenues for biodiversity protection. Legislation can be the difference between extinction and recovery. For example, in the mid-1960s fewer than 500 nesting pairs of Bald Eagles lived in the US. Without a ban on the pesticide DDT, which interferes with the reproduction of birds, America's avian icon may have gone extinct.

The prominent legal opportunity at the federal level in 2018 is to establish a strong framework to limit tree clearing. A recent analysis of the International Union for the Conservation of Nature's Red List data found that habitat loss is the number one threat to biodiversity worldwide¹¹. Australia's State of the Environment reporting shows that this is also the case at home¹² (see Figure 1). Yet, in Australia, vegetation clearing continues to increase. Currently this is regulated differently within each state and territory, and has been subject to wild fluctuations, with relaxations in clearing laws driving major increases in clearing and associated loss of habitat. For example, clearing in Queensland has escalated rapidly, with 395,000ha of vegetation cleared in 2015-16; more than a third of this being in catchments of the Great Barrier Reef¹³. NSW is currently implementing changes that will relax its own vegetation clearing controls, and which is expected to drive a similar increase in clearing. Clearing at such a vast scale is a serious concern for Australian biodiversity, and a stronger Strategy could be a foundation for federal laws that would provide greater certainty, as well as greater protection.

⁸ Republic of South Africa, National Protected Areas Expansion Strategy (NPAES), <https://www.environment.gov.za/documents/strategicdocuments/npaes>

⁹ Craigie, I., Grech, A., Pressey, R.L., Adams, V.M., Hockings, M., Taylor, M. and Barnes, M. 2014. Terrestrial protected areas of Australia. In *Austral Ark*, eds. Stow, A., Maclean, N. and Holwell, G. Cambridge University Press, Cambridge, United Kingdom.

¹⁰ Bhutan For Life, 2017, <http://www.bfl.org.bt/solution.php#intro>

¹¹ Maxwell et al., 2016, Biodiversity: The ravages of guns, nets and bulldozers,

<https://www.nature.com/news/biodiversity-the-ravages-of-guns-nets-and-bulldozers-1.20381>

¹² Australian Government, State of the Environment, 2011, 2016. <https://soe.environment.gov.au/>

¹³ Queensland Government, Land cover change in Queensland 2015–16: Statewide Landcover and Trees Study Executive Summary, <https://publications.qld.gov.au/dataset/land-cover-change-in-queensland-2015-16/resource/ff99dd06-4c17-46c7-828f-5cf6e67600dd>

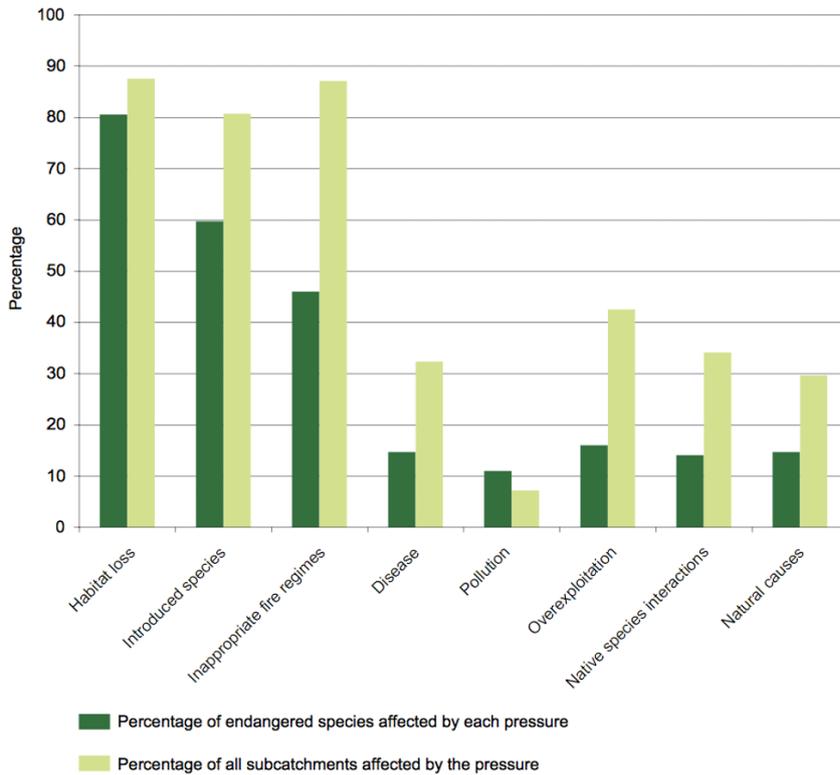


Figure 1. Pressures affecting species on Australia’s list of nationally threatened species, from the State of the Environment Report 2011.

Recommendations

The draft Strategy provides a useful starting point for developing an effective Strategy for Nature, however this will require substantial further work. In our view, it is critical that the final Strategy delivers at least the following:

- A set of ambitious, measurable objectives that build on 2010’s strategy in an evidence-based way.
- A corresponding set of specific, funded long-term actions assigned to specific agencies to confront threatening processes.
- A plan to expand our protected area network to improve representation of Australia’s biodiversity.
- A funding framework for major improvements in the management and monitoring of protected areas.
- Commitment to rapidly prepare laws to prevent further imminent excessive land clearing.

We would be happy to provide further input and advice in relation to our submission.