



16 March 2016

Comment on the draft Revision of Australia’s Biodiversity Conservation Strategy – “Australia’s Strategy for Nature 2018-2030”

The Royal Zoological Society of New South Wales (RZS NSW) is Australia’s oldest and largest zoological society, comprising approximately 800 members, including professional zoologists and ecologists and members of the broader community passionate about the conservation of Australia’s unique animals.

The RZS NSW has approached the draft *Revision of Australia’s Biodiversity Conservation Strategy – “Australia’s Strategy for Nature 2018-2030”* backed by a long history of interest in and involvement with the conservation of Australasian fauna, through research, development of legislation and management plans, and through academic inquiry and dissemination of information.

In 2004, the Society published the proceedings of a symposium, titled “Threatened species legislation: is it just an act?” (Hutchings *et al.* 2004 - <https://doi.org/10.7882/FS.2004.052>). Fourteen years later, the question in the title is still very relevant. As highlighted in the latest State of the Environment Report (2016), current strategies and legislation are not succeeding in terms of conserving Australia’s biodiversity. This is seen in the most basic measures of decline in the populations of our native species, leading to an increase in the number of species listed as threatened.

The RZS NSW believe that strategies such as Australia’s Biodiversity Strategy are important guiding documents in biodiversity conservation, and the revision is a key opportunity to take a step forward in this important task; one that shouldn’t be missed. However, we are strongly of the opinion that the proposed “Strategy for Nature” is a retrograde step for biodiversity conservation. The revised strategy is a document that, at best, presents vague aspirational statements without the backup of clear and measurable targets or actions for implementation. At its worst, the document contains motherhood statements that bypass the government’s responsibility to effectively implement strategies that will make a significant and positive difference to biodiversity conservation. We therefore urge that the draft revision of *Australia’s Biodiversity Conservation Strategy – “Australia’s Strategy for Nature 2018-2030”* be reconsidered and refocussed towards clearly and effectively conserving the rapidly dwindling biodiversity of Australia.

The RZS NSW has the dual objectives of promoting and advancing the science of zoology and protecting, preserving and conserving the indigenous animals of Australia and their associated habitats. To this end we have provided comments on the draft Revision of Australia’s Biodiversity Conservation Strategy – “Australia’s Strategy for Nature 2018-2030” (the Strategy), focussing on the issues that will affect fauna. The main point of each comment is highlighted in bold.



General comments

- We believe that **the Strategy must include clear objectives, actions and timeframes for implementation**. Without a clear and robust framework for implementation, the strategy becomes simple motherhood statements. An inventory of current projects that fit against the actions is an important step, but it is totally insufficient to deal with the significant problems faced by biodiversity in Australia today. Actions should be clearly monitored to determine their effectiveness – ideally the strategy should sit within an adaptive management/monitoring framework.
- The Strategy must also **include clear guidelines as to how effective these actions are, how will these be monitored**. This information must be publically disseminated.
- Associated with the clear objectives, **there must be an increase in funding committed by the Government to implement the strategy** and thus to indicate a clear commitment to biodiversity conservation. While indicators of the health of Australia's biodiversity have declined (see the 2016 State of the Environment report), the Australian government's funding of programs aimed at biodiversity conservation has significantly declined since 2013.
- We are concerned at the overall change of vision from *biodiversity conservation* to *nature conservation*. This change takes the focus away from biodiversity, allowing other measures to be included that don't focus on the significant threats to biodiversity. We recommend that **the government revises and strengthens Australia's biodiversity conservation strategy, while at the same time creating a nature conservation strategy** that focusses on community engagement. This split will allow more needed focus on biodiversity, allowing the strategy to build on significant work that has been done in the past. The distinction between biodiversity conservation and nature conservation appears to be recognised on page 6 of the draft Strategy.
- We believe that Australia's biodiversity conservation strategy **must be founded on solid science**, while at the same time be accessible to a broad range of stakeholders. The current document and its sporadic and irregular use of references, suggest little scientific input to the drafting process.
- **The strategy must recognise the threats facing Australia's biodiversity**. For example, to talk about the benefits of nature to agriculture and in turn the benefits of agriculture to the Australian economy (p. 5), without considering the significant negative impacts that agriculture has on Australia's biodiversity is misguided and misleading.
- **The strategy must link clearly with the existing legislative and policy framework and highlight where deficiencies occur**. For example, the *Environment Protection and Biodiversity Conservation Act 1999* does not consider cumulative impacts on biodiversity, which are recognised as significant factors in the decline of many species.

Specific comments

- P5. **Biodiversity must be defined correctly**. Most accepted definitions will include ecological systems (ecosystems) as *part* of biodiversity. The *Environment Protection and Biodiversity Conservation Act 1999* defines biodiversity as: "the variability among living organisms from all sources (including terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part) and includes: (a) diversity within species and between species; and (b) diversity of ecosystems".



- P7. While an inventory of current actions by various levels of government is important, this is insufficient to drive the change required to turn around the parlous state of biodiversity conservation in Australia. **Clear and measureable actions must be linked to the objectives.**
- P8. We believe the figure on Page 8 showing ‘how the strategy’s goals link together’ is totally naïve, and also disingenuous owing to the vagueness of the goals that are stated. **Effective biodiversity conservation requires strong, determined, long-term leadership and commitment by governments.** We believe that people *do* care about the environment and biodiversity, but that effective change must come from government(s).
- P13. Objective 9 provides a good example of the vagueness of the document. While ‘enriching cities and towns with nature’ is a good thing to include as part of a biodiversity strategy, the overly simplistic nature of the content glosses over or ignores **what we know about urban biodiversity, what is currently being done in urban environments in Australia and what could/should be done.**
- P14. While we agree that it is important to assess and report on our successes, it is equally **important to report on our failures.** Key to all reporting is a robust and effective monitoring system.
- P 15. We note the statement following “**Objective 10: Increase knowledge about nature to make better decisions.**” The dangerous implication of this statement is that we only have *gaps* in our knowledge, whereas, the ignorance of most of our native wildlife is enormous, including the threats, their cumulative impact and new issues, such a climate change. The **Strategy must state clearly that we are constrained in any effort to conserve biodiversity by a significant lack of knowledge. This must be addressed through a sustained increase in funding for research (including monitoring).**

In summary, we strongly urge the government to significantly revise and strengthen the current biodiversity strategy and focus on:

1. Recognising the problem/threats faced by Australia’s biodiversity. This must go further than simple threatened species lists.
2. Recognising and building on the significant work that has already been done.
3. Recognising the importance of research relating to Australia’s biodiversity.
4. Including actions that will directly address the threats: Actions that have foundations based on science and are critically evaluated through follow up monitoring.
5. Including monitoring and targets that will assess the effectiveness of the strategy in years to come.

Effective biodiversity conservation requires robust and sound planning and leadership. We sincerely hope that the government is up to the task. RZS NSW would be happy to assist the government in this process where possible.