



Submission Coversheet: Comments on Australia's Strategy for Nature 2018-2030

Overview

This submission coversheet should be used when you provide comments on the draft Revision of Australia's Biodiversity Conservation Strategy – "Australia's Strategy for Nature 2018-2030".

Contact Details

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Does this submission contain personal information about any person who is not an author of the submission?

Yes

No

If so, have they provided their consent?

Yes

No

Submission Instructions

Submissions should be made by close of business on **Friday, 16 March 2018**. The Department reserves the right not to consider late submissions. Where possible, submissions should be lodged electronically, preferably in Microsoft Word or other text based formats, via the email address:

NBSecretariat@environment.gov.au

Submissions may alternatively be sent to the postal address below to arrive by the due date.

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

Submission from the Ecosystem Science Council

The [Ecosystem Science Council](#) was established to advance the goals of *Foundations for the future: a long-term plan for Australian ecosystem science*, working with all individuals, groups and organisations within the ecosystem science and management communities.

The Department of Environment and Energy has released *Australia's strategy for nature 2018-2030*, in order to revise *Australia's Biodiversity Conservation Strategy 2010-2030* which was adopted by Commonwealth and State and Territory Governments in 2010. The stated purpose of the revision was presented on the Department of Environment and Energy's website:

'On 25 November 2016, Australian, State and Territory Environment Ministers agreed to revise "Australia's Biodiversity Conservation Strategy: 2010 – 2030" based on the findings of a review into the first five years of the Strategy's implementation. During 2017 a working group of officials from Australian, state and territory governments, and the Australian Local Government Association has worked together to prepare a revised Strategy.

The Strategy has been revised to improve its ability to drive change in biodiversity management priorities, and its alignment with Australia's international biodiversity commitments.'

(<http://www.environment.gov.au/biodiversity/conservation/strategy/draft-revision>)

We make this submission in the interests of applying ecosystem science to the conservation of biodiversity in Australia.

1. Strategic intent

We support the broad intentions of 'Australia's Biodiversity Conservation Strategy and Action Inventory', including its vision, the identification of major background needs in encouraging people to care for nature, recognition of its importance in both health and wellbeing and economic performance, its unique Australian character, and the requirement to work collaboratively.

However, we believe that the draft strategy needs to be strengthened so that it continues to reflect and further build the long-term bipartisan approaches to Australia's commitments to biodiversity conservation,

both nationally and internationally. Australia has a history of fine Biodiversity Conservation Strategies, and we believe that the draft new strategy represents a backward step.

We also believe that the stated intention of the Strategy to ‘improve its ability to drive change in biodiversity management priorities’ and to ‘align with Australia’s international biodiversity commitments’ will not be achieved with the current draft of the strategy.

We recognize that the current Strategy is in need of revision and re-focus on how to achieve its goals and targets. Performance and outcomes of the existing strategy were analysed thoroughly in the *Commonwealth of Australia Report on the Review of the first five years of Australia’s Biodiversity Conservation Strategy 2010–2030 (65 pp)*, published in 2016 by the Department of Environment. Prepared by the Biodiversity Working Group convened under the Meeting of Environment Ministers, the review contains sound analyses and recommendations for improvements to the current strategy. Ignoring the existing work and replacing it with a poorly considered draft ‘new’ strategy is not good policy. Building on existing strengths and recognizing and responding to identified weaknesses and failures is far better policy.

The Department obviously knows that prioritisation and objective-setting are fundamental to effective investment in knowledge-building – and yet it leaves its top-level Strategy silent on the matter. Desirable objectives such as ‘a coordinated national picture of natural capital and ecosystem services’ are going to be achieved by prioritisation and objective-setting. The Department should take up a position of leadership among the other jurisdictions in knowledge-building for environmental management, and thereby provide real substance to the Strategy.

2. Measurable targets

We are particularly concerned about the lack of identifiable and measurable targets that have been so successful in previous strategies, and in international strategies such as the United Nations Convention on Biodiversity Aichi Targets. In the absence of measurable goals, Australian governments will be unable to determine progress towards biodiversity conservation and recovery of threatened species, communities and ecosystems, or to prioritise resourcing to achieve desired outcomes. The identification of measurable goals should be core to the national strategy.

We are also concerned that the draft strategy does not include the putative ‘Action Inventory’ and don’t know what this inventory is intended to contain. The absence of this inventory, which could potentially address many of our concerns such as a lack of measurable targets and outcomes, means that we cannot constructively comment on the whole strategic policy.

3. The meaning of nature

The Draft strategy seeks to recast biodiversity conservation using the popular term nature, as stated on page 3 of the document:

“Nature includes landscapes, rocks, soil, fresh water and the sea, and all the variety of life (biodiversity) that makes up the non-human, non-built world.”

However, as noted in the definition, biodiversity is just one of several components of nature, and so it makes no sense to use the term nature as if it were synonymous with biodiversity. Moreover, the draft strategy overly externalises nature from people, rather than emphasizing that the wellbeing of people is totally dependent on ecosystem services provided by ‘nature’.

4. Strategic goals and objectives

The draft strategy contains laudible objectives, each of which has potential for development through targeted investment.

The problem we recognize in the draft strategy is that none of these worthy objectives is translated into a priority or measurable outcome.

The Strategy should identify areas of focal effort and core points of achievement by which it might subsequently be assessed. In particular, it needs to offer guidance to agencies and groups involved in knowledge-building, beyond implying that all activity is likely to be welcome.

The Strategy should promote the Commonwealth and State Departments' achievements in prioritising their own significant research and knowledge investments. For example, initiation of Research Hubs by the Department of the Environment and Energy has had immediate influence on R&D for environment and biodiversity far beyond Canberra and should be highlighted in the Strategy. It is an exercise in considered priority-setting. Implicit in the work of these Hubs are impact criteria with clear objectives.

As a principle, the Government must adopt a risk management approach to biodiversity and ecosystem services as the centrepiece of any strategy. Explicit analysis of risks, consequences, likelihoods and mitigation needs are essential to determine priorities.

We urge also that Australia commit explicitly to each of the Aichi Targets of the Convention on Biodiversity as part of the revision of the Strategy.

5. Climate change

The draft strategy does not recognise or address the enormous risk of climate change to biodiversity and the services it provides. The physical risks are constantly being monitored by BOM but the transitional (financial, price, policy, regulations) and liability risks to the Department as biodiversity, ecosystems and their function changes will be significant in the next decade. For example, the Australian Prudential Regulatory Authority and the Reserve Bank of Australia have recently warned businesses of the prudential risk of climate change impacts. Not to recognize the reality of climate change impacts is opening up the government to liability risk.

6. Conclusion

We urge the Commonwealth to retain and re-visit the 2010-2030 Strategy, which is a workable document, and utilize the very thorough and considered review and analysis in the Commonwealth's own *Report on the Review of the first five years of Australia's Biodiversity Conservation Strategy 2010–2030*.