



16 March 2018

Ref: 05-014-03-0014MD

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

Dear Sir/Madam,

**COMMENTS ON THE REVISED 'AUSTRALIA'S STRATEGY FOR NATURE 2018 – 2030:
AUSTRALIA'S BIODIVERSITY CONSERVATION STRATEGY AND ACTION INVENTORY'**

The Western Australian Local Government Association (WALGA) is the peak industry body for Local Government in Western Australia. WALGA is an independent, membership-based organisation that represents and supports the interests of 138 Local Governments in WA.

WALGA thanks the Department of the Environment and Energy (DoEE) for the opportunity to comment on the revised *Australia's Strategy for Nature 2018 – 2030: Australia's Biodiversity Conservation Strategy and Action Inventory* (the strategy). WALGA completed an InfoPage on the strategy and promoted the public comment period to the sector on 30 January. As of 13 March, WALGA had received submissions from four Local Governments in response to the invitation to contribute to a coordinated submission; these being the cities of Perth, Canning and Kwinana, and the Town of Port Hedland.

Due to the timeframe of the consultation period, the comments contained in this submission were endorsed by WALGA's Executive Committee, however have not yet been considered or endorsed by WALGA's State Council. Please be advised that as such this is an interim submission. WALGA reserves the right to modify or withdraw the comments as directed by State Council at the next meeting, to be held on 6 June 2018.

WALGA believes the Australian Government provides a crucial role in setting a national framework for biodiversity conservation and providing strong policy guidance. Local governments in Western Australia manage a variety of rich and diverse natural ecosystems, with the south west of the state being one of the world's 34 internationally recognised biodiversity hotspots. Local Governments in Western Australia regard it as essential that all levels of government remain focussed on the protection and conservation of Australia's environment for future generations. In particular, they feel strongly that the omission of outcomes, targets and funding pathways in the strategy demonstrate a general distancing and lack of commitment to biodiversity conservation at the national level. They also believe that the recommendations of the *Report on the Review of the first five years of Australia's Biodiversity Conservation Strategy 2010 – 2030* have, by large, not been addressed by the strategy. WA Local Governments also expressed concern that the strategy does not provide any tangible direction on how to overcome the fragmented nature of environmental management in Australia, as documented in the Australian State of the Environment Report (DoEE, 2016).

In accordance with the submissions received from Local Government, WALGA considers that the strategy requires significant revision to provide an effective national framework for biodiversity conservation, set measurable outcomes and targets, and commit adequate funding for implementation and monitoring of results. The three goals and objectives 1-12 outlined in the strategy are supported, subject to being integrated with the necessary revisions recommended in this submission.

The following positions statements and recommendations aim to strengthen the strategy's ability to drive action across jurisdictional and sectoral boundaries, and halt Australia's ongoing decline in biodiversity.

1) *Unclear alignment of the strategy with the Convention on Biological Diversity's Strategic Plan*

The strategy does not clearly demonstrate how the goals and objectives align with the Australian ratified *Convention on Biological Diversity 1993*, the associated *Strategic Plan for Biodiversity 2011-2020* and its Aichi Biodiversity Targets. As Australia's National Biodiversity Strategy and Action Plan for the Convention, WALGA recommends that the strategy clearly identifies the goals and objectives that aim to meet our international biodiversity obligations.

2) *Inadequate conveyance of the urgency of action required*

The strategy doesn't convey the urgency of action required to conserve Australia's biodiversity. The mission of Convention's *Strategic Plan for Biodiversity 2011 - 2020* is to "take effective and urgent action to halt the loss of biodiversity". Despite our efforts to date, and a range of specific national environmental frameworks and legislation, biodiversity continues to decline. Australia has a growing list of more than 1,800 plants and animals listed as threatened under the *Environmental Protection and Biodiversity Conservation Act 1999*, and is among the top 10 countries in the world for species that are endangered or threatened. Since the previous *Australia's Biodiversity Conservation Strategy 2010 – 2030* (the ABC Strategy) was released, there is growing consensus in the scientific community that humanity's impact on Earth is now so profound that the planet is entering a new geological epoch, the Anthropocene (Zalasiewicz *et al.*, 2017).

The continuing decline in Australia's biodiversity has been raised in all of the Australian State of the Environment reports commissioned by the Commonwealth of Australia over the past 20 years. Each report has highlighted the value of biodiversity, the key pressures and the gaps hindering effective biodiversity management, and noted the need for urgent action and investment. WALGA recommends that the strategy clearly communicates the need for both immediate and long-term interventions required to protect biodiversity and maintain ecosystem services.

3) *Lack of detail for primary audience and inappropriate terminology*

The strategy moves away from detailed, technical information to simplistic, broad statements. There is a significant loss of background and scientific information, as evidenced by the strategy's 17 pages compared with the 100-page ABC Strategy. The purpose of a national strategy is to provide the context and overarching policy framework to effectively direct and coordinate the effort of State and Local Government, and other professional organisations working in the conservation field. It appears that the strategy has been developed with a general member of the community as the primary audience. WALGA believes the lack of

detail in the strategy is inadequate for the government, business and community groups that will drive the required conservation action. While the strategy needs to be clear and concise, and able to be readily understood and implemented, the oversimplification of complex matters will only result in a document that is ambiguous and has no practical application.

Language is critical in helping individuals to connect with the issue and trigger a desired response. WALGA believes that there is a need to find the right balance between the use of language that aims to mainstream biodiversity and the need for a scientifically rigorous strategy. The title 'Australia's strategy for nature' fails to inspire the connection between Australian's and nature, and the strategy itself is overly simplified. Finland's 'Saving Nature for People' national strategy and action plan (Finnish Government, 2012) and the City of Melbourne's 'Nature in the City' strategy (City of Melbourne, 2017) are good examples of strategies that achieve a balance between speaking to people's love of nature whilst being scientifically robust documents that provide strong strategic direction.

To connect with all Australians and encourage individuals to contribute personally to biodiversity conservation, it is suggested that the strategy be accompanied by a communication plan, rather than trying to achieve this through the document itself. For example, given farmers manage over 60% of the Australian landscape, Landcare and NRM regional bodies with existing relationships with local farmers are best placed to deliver targeted messaging and work with communities to coordinate the required on-ground action.

4) Goal 1: Connect all Australians with nature – Supported

WALGA supports Goal 1 and the accompanying Objectives 1-4, which focus on the need to re-connect individuals with nature and support increased participation of Aboriginal and Torres Strait Islander people in environmental management. WALGA recommends that the goal states the importance of early engagement and the development of strong, ongoing relationships with Aboriginal and Torres Strait Islander people to plan and deliver conservation activities. Many Local Governments have a number of culturally significant sites within their municipalities, and ensuring that Aboriginal people are actively engaged in conservation endeavours will only enhance partnerships and thus benefit whole communities.

Local Governments play a key role in empowering Australians to be active stewards of nature, and increase Australians' understanding of nature. Community events such as National Tree Day, and deliberative democracy to inform Local Government strategic priorities, are examples of successful mechanisms used to engage local communities in environmental matters.

5) Goal 2: Care for nature in all its diversity - Supported

WALGA supports Goal 2 and the accompanying Objectives 5-9, which focus on the need to conserve the biodiversity of all environments, use natural resources in a sustainable manner, reduce threats and build resilience.

WALGA notes that the goal discusses the need for enhanced ecosystem resilience, however the strategy does not provide any information on threatening processes. The key and emerging threats to biodiversity should be clearly outlined, given they underpin the need for the strategy. Particular attention should be given to climate change and its impacts, given its

geographic extent, magnitude, speed of potential changes, and in the way it can exacerbate other threats.

WALGA strongly supports the need for improvements to planning, regulation, environmental impact assessment and approvals processes outlined in Objective 7. In Western Australia, there is the need to ensure the conservation of biological diversity and ecological integrity is an integral part of the planning process, to address the accelerating land clearing and loss of habitat. There is also an inadequate understanding and capacity to measure and address the cumulative impacts of development. Across Australia, there is a key need for complementary policy and strengthened legislative frameworks to protect biodiversity that are enforced at the national, state and territory levels.

WALGA notes that '*Objective 8 – use and develop natural resources in an ecologically sustainable way*' needs to reflect not only the impact of industries such as agriculture and fisheries, but also consider that of heavy extractive industries and the role they play in the loss of biodiversity. The extraction, processing and export of mining commodities is important to the economy of Western Australia and the nation, however it is necessary to achieve a better balance between resource extraction and the delivery of conservation outcomes.

WALGA strongly supports '*Objective 9 - enrich cities and towns with nature*'. Given over 90% of all Australians live in urban areas, it is critical that land use planning and urban design retain ecologically diverse natural areas in an interconnected network within urban environments to provide communities with close proximity to nature. In particular, urban bushland areas are vital to foster the learning and nature based activities that will develop an individual's appreciation and connection with nature. The options outlined under this objective could also include the importance of streetscapes and public open space in providing for biodiversity, and the value of additional habitat features such as fauna nest boxes.

6) Goal 3: Build and share knowledge - Supported

WALGA supports Goal 3 and the accompanying Objective 10-12, which focus on the need to build and share knowledge, and effectively measure progress towards achievement of the strategy's goals and objectives.

7) Appropriate supporting principles

WALGA supports all the identified principles that underpin the implementation of the goals and objectives in the strategy. In particular, where the evidence base is lacking, the precautionary principle should be applied and appropriate risk mitigation actions taken. WALGA recommends the reinstatement of a principle in the previous ABC Strategy "biodiversity is best conserved by protecting existing natural habitats across landscapes and seascapes, including in urban and rural environments". WALGA also recommends inclusion of a principle regarding the environmental impact mitigation hierarchy of prevent, minimise, rehabilitate and offset.

8) Lack of measureable priorities and targets

The strategy does not include national outcomes and targets necessary to meet the goals and objectives. Rather, it introduces the concept of an on-line action inventory, where local, state and federal governments would partner to identify and coordinate actions that will achieve the strategy's goals and objectives. It is proposed that this would be provided in an easy-to-use

public format to allow non-government stakeholders identify where their effort is best directed to support the strategy. The strategy notes that the online capabilities, content and timelines for an action inventory are yet to be finalised and will be informed by the consultation process.

WALGA believes the Australian Government should reinstate the national-scale outcomes and targets in the ABC strategy following direct consultation with government and non-government stakeholders, to focus effort on the most pressing priorities for biodiversity conservation. The removal of all outcomes and targets outlined in the ABC Strategy, after five years of a 20 year implementation time frame, is unwarranted and will have negative impacts on the long-term stability in the planning and investment required for effective recovery effort.

The strategy should not be viewed as a national platform to draw together policies and programs, but rather as a driving force to focus the required action. WALGA considers that outcome driven targets are necessary to guide the contributing actions of government, business and community sectors, and without them the value of the strategy risks being lost. It would also be beneficial if the outcomes and targets could be used in future Australian State of the Environment reporting. WALGA also believes there is a need for clear lines of accountability for the roles and responsibilities of organisations to ensure follow-through of policy to action.

9) *Potentially onerous reporting requirements*

The strategy recommends the development of an on-line action inventory to provide an integrated, transparent and regularly updated database of nature conservation and management activity. WALGA supports the development of a robust method of identifying and measuring the action commitment by organisations, which is adaptable to allow for changes to institutional arrangements over the strategy's duration.

However, WALGA has reservations that the proposed action inventory could require significant investment that may be better directed towards strategy implementation, given it will require a new system that is able to aggregate and standardise data from multiple sources to enable a meaningful assessment of progress. WALGA is also concerned that the action inventory could impose onerous reporting requirements on contributing organisations.

WALGA recommends that state and local government are engaged to determine the most appropriate reporting mechanism that will allow progress of strategy implementation to be measured. This may include a review of the suitability of, or compatibility with, existing monitoring systems within jurisdictions to measure progress against action commitments. For example, Western Australia is covered by seven regional Natural Resource Management organisations that already provide project progress updates on a continual basis to the Australian Government through the MERIT monitoring and reporting system.

10) *Lack of funding for implementation*

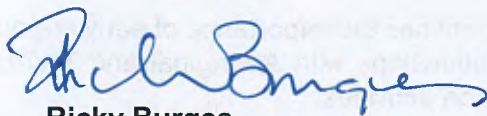
The strategy provides no information on funding pathways and support mechanisms. Local government and natural resource management regional programs work at the grass roots level and remain critical in the on-ground achievement of the goals and objectives. There is a wealth of local experience and capacity that exists in these organisations that should be capitalised upon and supported through the provision of adequate funding for action

implementation and monitoring of results. The reliance on Local government rates revenue, or NGO fundraising, to undertake the required direct action is not sufficient nor sustainable.

WALGA suggests that the establishment of a bilateral agreement between the Government of Western Australia and the Commonwealth would be an effective method of delivering agreed outcomes for natural resource management, in particular biodiversity conservation. Undertaken successfully in the past, the bilateral agreement brought together the expertise of the Government of Western Australia and the Commonwealth, and local and regional organisations, to design, approve and deliver regional NRM strategies. The partnership successfully leveraged investment and goodwill towards achieving biodiversity conservation outcomes. With a new NRM Ministerial Council convened in Western Australia in 2018, WALGA considers discussions on a new bilateral agreement a business priority.

Should you wish to discuss this submission, please contact Melanie Davies, Biodiversity and Sustainability Project Officer, at mdavies@walga.asn.au or telephone (08) 9213 2065.

Yours sincerely



Ricky Burges
CHIEF EXECUTIVE OFFICER

Attachment 1: Summary of recommendations

References

- City of Melbourne (2017). Nature in the City: thriving biodiversity and healthy ecosystems. <http://www.melbourne.vic.gov.au/community/parks-open-spaces/urban-nature/Pages/nature-in-the-city-strategy.aspx>
- Finnish Government (2012). Saving nature for people: national action plan for the conservation and sustainable use of biodiversity in Finland 2013-2020. [http://www.ym.fi/en-US/Nature/Biodiversity/Strategy and action plan for biodiversity](http://www.ym.fi/en-US/Nature/Biodiversity/Strategy%20and%20action%20plan%20for%20biodiversity)
- Zalasiewicz *et al.* (2017). The working group on the Anthropocene: summary of evidence and interim recommendations. *Anthropocene*, Vol 19, pp 55-60.

ATTACHMENT 1: SUMMARY OF RECOMMENDATIONS

- Consultation and focus group sessions are undertaken with all key stakeholders prior to the strategy being finalised.
- The strategy clearly identifies the goals and objectives to meet our international biodiversity obligations as per the ratified *Convention on Biological Diversity 1993*, and the associated *Strategic Plan for Biodiversity 2011-2020* and its Aichi Biodiversity Targets.
- The strategy conveys the urgency and immediacy of action required to protect biodiversity and maintain ecosystem services.
- The strategy provides an overarching policy framework to effectively direct and coordinate the effort of State and Local Government, and other professional organisations working in the conservation field.
- There is a better balance between the use of language that aims to mainstream biodiversity and the need for a scientifically rigorous strategy.
- The strategy outlines the key and emerging threats to biodiversity, with particular attention to climate change and its impacts.
- An accompanying communication plan is developed to deliver targeted messaging to general members of the community.
- 'Goal 1: Connect all Australians with nature' identifies the importance of early engagement and the development of strong, ongoing relationships with Aboriginal and Torres Strait Islander people to plan and deliver conservation activities.
- 'Objective 8 – use and develop natural resources in an ecologically sustainable way' notes Australia's wealth of extractive resources and the need to achieve a balance between resource extraction and conservation outcomes.
- The strategy reinstate a supporting principle in *Australia's Biodiversity Conservation Strategy 2010 – 2030 Strategy*; "biodiversity is best conserved by protecting existing natural habitats across landscapes and seascapes, including in urban and rural environments".
- The strategy include a supporting principle based on the environmental impact mitigation hierarchy of prevent, minimise, rehabilitate and offset.
- The strategy include national-scale outcomes and targets to focus effort on the most pressing priorities for biodiversity conservation. It would be beneficial if these could be used in future Australian State of the Environment reporting.
- The strategy outline a robust method of identifying and measuring the action commitment by organisations.
- The strategy provide funding commitments for implementation of actions and monitoring of results.
- Commence discussions on a new bilateral agreement between the Government of Western Australia and the Commonwealth to leverage investment and deliver agreed outcomes for biodiversity conservation.