



*Attn: Biodiversity Coordination Unit
Department for Environment and Water*

Subject: Submission on the Biodiversity Bill 2025

The South Australian Museum is pleased to provide feedback on the proposed *Biodiversity Conservation Act 2025*. As a statutory authority operating under the *South Australian Museum Act 1976*, the Museum is entrusted with the accumulation, care, and research of objects and specimens of scientific and historical importance to South Australia in particular, but also to the nation and the world.

Role of Museum Collections in Biodiversity Data

The South Australian Museum's faunal collections comprise approximately 5 million specimens, including:

- 180 000 vertebrates (birds, mammals, reptiles, amphibians & fishes)
- Over 2.3 million terrestrial invertebrates
- More than one million marine invertebrate specimen lots, encompassing 23 phyla.
- The Australian Biological Tissue Collection, housing some 300 000 samples, the largest wildlife tissue collection in the Southern Hemisphere. Thousands of additional specimens are added to the collection each year, providing a dynamic record of SA's changing faunal biodiversity.

The collection includes extirpated populations and extinct species, and so underpin our knowledge of species diversity, distribution, and ecological and genetic changes over time. The ongoing collection of specimens is also vital for understanding introductions of new species and the causes of changes in distribution, abundance and range of native species from climatic, anthropogenic and natural influences.

Accurate knowledge of species taxonomy and distributions is essential to effectively deliver the objects of the proposed Act. The Museum serves as the taxonomic authority for the state's fauna, assisting the Department for Environment and Water (DEW) with the state vertebrate list (census) which in turn underpins important reviews such as the State of the Environment Report produced every 5 years by the EPA. We correct misidentifications, add newly described species and new species records for the State, and regularly update the taxonomy, based on the latest research. For the Museum to become the crucial primary faunal institution supporting the State Government's legislative responsibilities, significant recognition, support and investment in advanced infrastructure is essential. Currently, no institution in South Australia possesses the comprehensive capabilities required for such a role.

Put simply, you cannot save what you do not know you have.

Feedback on Specific Provisions

- **Biodiversity Register**
 - We support the establishment of a Biodiversity Register and suggest it could also list introduced species of concern. If not within the Register, the Act should specify an alternative mechanism for listing and addressing introduced species.
- **State Biodiversity Plan**
 - We endorse the scope of the State Biodiversity Plan and recommend it explicitly includes actions against invasive species, detailing strategies for their control and mitigation to protect native biodiversity.
- **Guiding Principles:**
 - We support the proposed guiding principles and suggest explicitly incorporating the Precautionary Principle. This principle is vital when scientific evidence is lacking, ensuring that the absence of complete data doesn't hinder the protection of habitats or species.
- **Definitions**
 - In Section 2(b)(ii), we suggest differentiating between 'marine' and 'freshwater' biodiversity, as experts in riverine ecosystems may not possess expertise in marine environments and vice versa.
- **Composition of the Scientific Committee**
 - Regarding Section 24, subsection (5), we recommend clarifying whether the Chair is required to be a member of the Public Service. If the Chair is not a member of the Scientific Committee, the rationale for this structure should be provided to ensure transparency.
- **Permits**
 - We seek clarification on how the new legislation will affect existing permit processes for scientific research and collections. In particular, Scientific institutions including Universities and DEW are compelled to provide voucher specimens to the Museum as a condition of their research project permits. These specimens are crucial for the ongoing work of the SA Museum in contributing to the understanding of the State's biodiversity. It is essential that the Bill provides clear guidelines or exemptions for accredited institutions to prevent potential delays or administrative burdens that could impede critical research activities.

The South Australian Museum is committed to supporting the objectives of the Biodiversity Bill 2025. We believe that incorporating our recommendations will strengthen the Bill's effectiveness in preserving our state's rich biodiversity.

Thank you for considering our submission. We look forward to the opportunity to collaborate in the successful implementation of this important legislation.

Yours sincerely,

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Board Chair

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Acting Director