

Biodiversity Bill Comments from KI Land for Wildlife submission – Feb 18, 2025

Part 1 – Preliminary

1. Yes
2. No – Local or endemic plant species require a higher level of protection (particularly in functioning ecosystems or intact native vegetation) than introduced Australian species, which at times become invasive? With important symbiotic relationships in functioning ecosystems, removal of one species can significantly impact others.

Part 2: Objects, principals and general duty

3. Yes
4. Yes
5. Partly, Inclusion of ‘impacts on historic, current or potential critical habitat, including breeding and foraging refuges’ and ‘cumulative impacts’ would be good. With regard to ‘reasonable measures’, if you don’t know about the presence of a threatened species, or seek advice on its habitat requirements, significant impacts could result with minimal consequence. This is particularly relevant to changing land use and development of areas that provide important bird nesting or foraging areas, and the data deficiency on populations and distribution of many species in some South Australian locations.

Part 3: Administration

6. Yes
7. Yes
8. Yes

Part 4: Native plants

9. Yes. It needs to be clear that regulated activities include collection of native food plants (eg samphire) or other biological resources (eg beach wrack/seaweed) for commercial purposes
10. Yes. Providing that the ‘Mitigation Hierarchy’ is used in conjunction with the biodiversity value of site in question. Areas of high biodiversity value must be given the highest level of protection in this Act. Offsets must not be used as a trade off for environmental degradation to critical habitat or functioning ecosystems.
11. No. Commercial Forests become important habitat for many species, particularly in areas of agriculture. The current removal of Tasmanian Blue-gum and Radiata Pine on Kangaroo Island is a good example, whereby there has been no Environmental Impact Assessment of the significant land use change of ‘remediation’ of these Forestry lands to agriculture, despite their knowledge of threatened species (State and Federal) utilizing these areas within the Black Summer fire-scar. Commercial enterprises are a significant threat as they are often not held accountable for their actions as others are expected to be.
12. Yes

Part 5: Native animals:

13. Yes.

14. Yes, Dingoes must be recognised as a native high predator, with an important role in ecosystem health. They have been in Australia for thousands of years, so this threatened species schedules under this Act need to ensure the assessment of their current conservation status in South Australia, to enable the potential for increased protection of these native animals in the future. It would help to change the vernacular from Wild Dog to Dingo in all Acts of Parliament and clearly defining the difference between the introduced species and the native species.

15. Yes

Part 6: Threatened Species, threatened ecological communities and other ecological entities

16. Yes

17. Yes

18. Yes

19. Yes

20. Yes

21. Yes

Part 7: Conserved Areas

22. Yes

23. Yes

Part 8: Enforcement

24. Yes

25. Yes

26. Yes

27. I could not find further details referring to civil penalties in Appendix 1.

28. Yes

Part 9: Permits

29. Yes

Part 10: Miscellaneous

30. Yes

31. Yes

32. Yes

33. Yes

34. Yes

Schedule 2: Regulated acts or activities exclusions

35. Yes

36. No. Forestry, agriculture and other industry can have significant impacts on Biodiversity which extends beyond their property or management area. This may include logging of forests without environmental management plans to mitigate impacts on threatened species or threatening

processes, broad-scale application of herbicides, pesticides or rodenticides. These can cause damage to biodiversity, high order predators and threatened species across the landscape.

Schedule 3: Principals of preservation of native plants

37. Yes.

Related amendments:

38. Yes.

39. Yes,

Thank you for the opportunity to comment on this necessary piece of legislation for South Australia.

Kangaroo Island Land for Wildlife Association Incorporated