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This submission is written on behalf of the **Kangaroo Island Conservation Landowners Association, KICLA**, which represents 55 privately held conservation properties across Kangaroo Island. The association is a voice for privately held conservation land, especially in the context of island ecology. 25% of Kangaroo Island's area is valuable privately-held bush habitat.

Kangaroo Island is a recognised biodiversity hotspot in SA, a rare temperate wilderness, one of 20 Federal DCCEEW recognised Priority Places, and is unusual in retaining 50% overall uncleared land. **Kangaroo Island requires particular consideration for protection**, due to its unique island status and biosecurity requirements, especially as it comes under increasing visitation pressure and the associated impacts.

We strongly support the government's proposal to enact a Biodiversity Act to give strong protection of biodiversity primarily through **habitat protection.**

Strong legislation that puts **conservation first** is crucial to the survival of the ecologies that support all life. Such legislation needs to **be based on independent, peer-reviewed scientific advice**. This involves sound understanding of the ecosystems and effective monitoring of their condition. This up-to-date monitoring will become increasingly critical as **climate change impacts** affect habitats.

Transparency and reporting are vital to this Act being able to function to genuinely maintain biodiversity. They can only function effectively if they are backed up by an independent oversight body that can assess the reports and the impacts. Self-reporting is not sufficient to maintain best practice standards. Developers and those with an interest in removing habitat for profit will always have more resources of time and money than individuals, NGOs or government, so a well-funded and supported independent body to oversee these provisions of the Act is essential

Including an opening for Ministerial override of decisions made on a scientific basis, such as a 'Major development' provision in the proposed Act makes for politicisation of the Act, undermines the principle of **conservation first** and undermines trust in government.

Establishing an **independent body** that can function without political interference and oversee the collection, collation, distribution and management of monitoring data – both that collected previously and under the new Act – is essential.

For the Act to function, **appropriate sanctions** need to be in place, and **an independent board or body** that can follow through on failures to comply be part of its successful functioning.

At the same time, **supporting community and school-level education is crucial.** Without a grassroots level of support and involvement, constraints and requirements at a government level will be seen as obstructive and intrusive, rather than as welcome brakes on the actions of a minority damaging the interests of future generations. As alienation from the natural world becomes more and more the norm, and as climate change undermines the flourishing of the natural world, education about its values becomes more and more important. So educational programs regarding the crucial role biodiversity plays in survival of all life need to be supported and funded as part of assisting this shift towards supporting biodiversity values that is entrenched in the proposed Act.

The best and only way to conserve biodiversity is through **habitat protection**. Targeting individual threatened species rather than whole ecologies can only be effective if it is a part of retaining or establishing ecosystem sustainability.

The recognised recommendation of retaining at least **30% of habitat in any region** is paramount, and the Act needs to enshrine this on **a regional basis rather than a state-wide basis**. Taking the state as a whole could mean the 30% protected is largely rangelands in northern SA, missing out the diversity of environments in the state, including the recognised biodiversity hotspot of Kangaroo Island.

Privately-held conservation land is not subject to the political changes of policy that impact parks and reserves (cf Flinders Chase National Park). **Support for private conservation landholders and their work** – through provision of technical advice and facilitation of information sharing, as well as making financial support available.

Thank you for the opportunity to comment on this proposed Biodiversity Act for SA Discussion Paper. The current government is commended for committing to an enhanced approach to biodiversity conservation.

Our association looks forward to being able to comment on the draft legislation.

Yours sincerely

Dr Ingereth Macfarlane
Secretary
Kangaroo Island Conservation Landowners Association