

18 February 2025



Submission on Biodiversity Bill

To whom it may concern,

Campbelltown Land Group Inc (CLG) are a voluntary conservation organization working primarily in Wadmore Park / Pulyonna Wira ('the Park'), in Adelaide north-east suburbs. Our group has over 150 years of accumulated experience of working the Park. The Park hosts EPBC listed species such as the Plum and Pake leak orchid, as well as many state and regionally threatened and vulnerable species. Our group, we believe, are well qualified to speak to improving the Biodiversity Bill.

Our group supports elements of the Bill which:

- **deter wrongdoing**, such as tougher penalties for breaches.
- provide **transparency** and the development of a Biodiversity Register.
- promote **community involvement** through third party standing for **civil enforcement** of breaches of the Act.

Our group does not believe the Bill is strong enough as currently drafted to adequately achieve its intended object of improving the state of SA's biodiversity. The Bill must therefore be strengthened as follows:

- adding appropriate safeguard mechanisms to prevent inappropriate development that would have an egregious negative impact on biodiversity, such as through an early "no" to clearly unacceptable proposals. This will necessitate **primacy over other legislation**, such as the Planning, Development and Infrastructure Act 2016. It must also set a limit on the use of the flawed mechanism of "offsets" to compensate for biodiversity loss from development by identifying a threshold of biodiversity loss beyond which no "offset" will be contemplated.
- **compelling** the Minister to make key decisions, such as regarding the listing of species as threatened with extinction and identifying their critical habitat. Current drafting of the Bill allows for **too much discretion** in this regard, meaning these key decisions could be avoided or delayed.

The Bill as current drafted:

- places **too much power** in the hands of the Minister. The Biodiversity Council should consist of the Conservation Council SA, and other peak bodies. Members of the Biodiversity Council should not be appointed by the Minister.
- should include **youth** in the Biodiversity Council as they are rarely represented in any decision making around biodiversity, which affects their future. This can include a representative from Landcare Association of SA or equivalent organisation. If we are serious about intergenerational legacy, then we ask to provide a role to youth in the decision-making process.
- disappointingly does not address the **“joint proclamation”** of National Parks in South Australia, which allows for mining leases to persist in areas that have been set aside for biodiversity conservation.
- must be accompanied by a commitment to **funding**.
- does not provide protection to **metro Adelaide**. This is of grave concern to our group. There are biodiversity hotspots within the metro area which require protection. The Park, described at the beginning of our letter, is considered one of the most intact, best examples of Adelaide Plains vegetation, yet it is very vulnerable. It can be cleared, repurposed, or have inappropriate actions performed on it. For many years our groups have expended significant time and money in fighting off such actions, where the Park needs to be covered by a Bill such as this. A strong Bill, particularly in the area of declaring a critical habitat, would go a long way to its protection.

While the Bill is an excellent step it has a way to go to truly meet its primary objective. Our group would like to thank you for the opportunity to help improve the Biodiversity Bill. We would like to thank the team coordinating feedback on the Bill.

Your sincerely,

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