

17 February 2025

Biodiversity Coordination Unit
Department for Environment and Water
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Adelaide SA 5001

Via email: biodiversityact@sa.gov.au

Submission on the Draft Biodiversity Bill 2025

Thank you for the opportunity to review the Draft Biodiversity Bill. The City of Burnside places great strategic importance on, and allocates substantial resources to biodiversity. Council's Strategic Community Plan, 'Burnside 2030', includes four priorities that demonstrate this commitment:

- Enhance canopy cover and greening;
- Functional and attractive streets, spaces and neighbourhoods that are green and cooling;
- Healthy habitats and biodiversity preserved and enhanced; and
- Increase community environmental initiatives and education.

Our feedback on the draft Bill is:

1. Definitions

1. Clarify the definition of "native plants" to specify those indigenous to South Australia. This distinction will support the control of environmental weeds and promote biodiversity through revegetation efforts in areas previously planted with non-local species. This clarification is important because there are plants that are native to Australia that can be environmental weeds in South Australia. Examples include Sweet Pittosporum (*Pittosporum undulatum*) and Acacia species planted outside of their natural range.
2. Define "domestic garden" with reasonable size limits. With no defined size, large areas could be called "private gardens" to gain unwarranted exemptions to the Bill. In Burnside, this measure is particularly important for larger, peri-urban properties in the Hills Face Zone, where exemptions could negatively impact the conservation of biodiversity.

2. Jurisdiction Over Greater Metropolitan Adelaide

1. Extend native vegetation protections to cover metropolitan areas, ensuring biodiversity conservation efforts are consistent across all landscapes.

2. Clarify that 'Critical Habitat' declarations for threatened species can apply in urban areas, including metropolitan Adelaide, recognising the importance of urban habitats for the persistence of threatened species.

3. Other Key Considerations

1. Ensure transparency in Significant Environmental Benefit (SEB) calculations, aligning with best practices from other Australian jurisdictions, based on a comprehensive review.
2. Strengthen the role of First Nations peoples by incorporating co-management and decision-making responsibilities in conservation and ecosystem management initiatives.
3. Establish a clear interface between the new biodiversity committees and local government to facilitate effective collaboration and implementation at all levels.

4. Develop a State-Wide Spatial Dataset of Natural Assets

1. Replace the outdated native vegetation data layer with a modern, comprehensive spatial dataset that captures the full range of natural assets.
2. Incorporate new features, including urban sites and habitat corridors.
3. Adopt a standardised approach to categorisation and attributes to ensure consistency and usability across agencies and be supported by legislated, ongoing funding to ensure long-term data maintenance and accessibility.

This dataset would serve multiple agencies and land managers by enabling:

- i. Quantification of conservation efforts and optimisation of resource allocation based on accurate, up-to-date data.
- ii. Fauna population distribution modelling.
- iii. Enhanced environmental reporting, including State of the Environment reports.

We recognise that collaboration is essential to achieving the objectives of this legislation. We commend the Biodiversity Coordination Unit for its efforts in developing the draft Bill and appreciate the opportunity to provide feedback.

This submission is not a formal Council submission but has been prepared by the Environment and Infrastructure team at the City of Burnside.

Kind regards

[Redacted Signature]

[Redacted Title]

