

Re: South Australia's Draft Biodiversity Bill

OzFish Unlimited welcomes the opportunity to provide a submission to the draft *Biodiversity Bill 2025*.

Established in 2017, OzFish is Australia's only national fish habitat restoration charity. It mobilises recreational fishers and other locals passionate about their waterways to take hands-on actions to restore the nation's rivers, oceans, wetlands and more.

OzFish has more than 100 active projects across every state and territory in Australia, that involve re-snagging, yabby trap round-ups, large-scale shellfish reef and seagrass restoration, fish-translocations in the face of drought, revegetation of riverbanks, climate change mitigation, and significant rubbish removal, management and recycling.

In South Australia, we are locally responsible for the [‘Seeds for Snapper’ project](#), now in its fifth year. Seeds for Snapper restores lost *Posidonia* seagrass meadows along the Adelaide and Fleurieu coastlines. Another significant project in SA, part of our [Shellfish Revolution program](#), restores functionally extinct flat oyster reefs in the [Port River-Barker Inlet Estuary](#).

Through our numerous projects, workshops, forums, social media channels, and project partners throughout SA, we engage with thousands of SA recreational fishers and community members concerned about fishes and aquatic habitats each year.

Approximately [25% of South Australians recreationally fish each year](#), contributing over \$900 million to the state economy, over 6% of which, activity participants in conserving and restoring aquatic habitats.

Background

Australia's native fish need healthy habitat within functioning ecosystems to survive and thrive. Fish habitat needs include suitable food sources, water quality, specific temperature ranges, flow, structure, and vegetation. Occupying important ecological functions in aquatic environments, and providing socio-cultural value, it is beneficial to all South Australians to ensure the health and vitality of our fish populations.

Over the past two centuries, there has been a rapid decline in the health of fish habitats, and the distribution and populations of South Australian fish species. Freshwater, estuarine and marine waterways across the state have been negatively impacted by human activity.

This includes the clearance of native vegetation from 70% of agricultural land in SA, including riparian vegetation, leading to erosion, sedimentation and increased turbidity in adjacent and downstream waterways.

Snags (woody debris) are a key habitat for many SA fish species for spawning, foraging and finding shelter. [Millions of snags were removed from SA rivers](#) from at least 1855, particularly from the Murray River to increase boat accessibility. In conjunction with de-snagging, riparian

vegetation loss has impacted the ability of waterways to replenish new snags, leaf litter, and insects necessary to sustain healthy fish populations.

Riparian and coastal vegetation loss, poor water quality, and dredging have led to the degradation of estuarine and coastal seagrass meadows, including about [one-third of former nearshore meadows along the Adelaide metropolitan coastline](#) since the 1950s. Along with mangroves and saltmarsh, these coastal vegetation communities provide essential fish nursery habitats, carbon sinks, and shoreline protection.

Networks of native shellfish reefs were once common to SA's sheltered coastal waters, providing key habitats for aquatic organisms and filtering vast amounts of water. Tragically, destructive overharvesting, diseases and substrate loss resulted in the functional extinction of native oyster reefs across [>800 square kilometres of SA's coastal regions by the 1950s](#). Many of these former reef sites are now situated within urbanised estuaries, ports, and coastlines where restoration is needed to recover structural fish habitats, and reinstate nutrient sinks from urban runoff and pollution.

Theme 1. Strengthening protections

We support the expanded definition of native plants to include algal species, including over [1,200 marine algae](#) and canopy-forming macroalgae such as golden kelp (*Ecklonia radiata*) and Bull kelp (*Durvillaea potatorum*) that characterise the [Great Southern Reef](#). These macroalgae reefs function as important habitats for recreational and commercial species including snapper (*Pagrus auratus*), southern rock lobsters (*Jasus edwardsii*), and abalone (*Haliotis* spp.).

We also support the expanded definition of protected animals to include threatened fish species in conjunction with the *Fisheries Management Act 2007*, in particular, [diminished freshwater fishes](#), such as glassfish (*Ambassis* sp.), pygmy perches (*Nannoperca* spp.) and gudgeons (*Mogurnda* spp.). Given the regional extinction of Macquarie perch (*Macquaria australasica*) and trout cod (*Maccullochella macquariensis*), which were formally fisheries-target species in SA, we support efforts to evaluate historic declines supported by this Bill, and recover populations of these species to sustainable levels.

We welcome the establishment of a threatened ecological communities list and public nomination process to gain conservation status to diminished South Australian species and ecosystems. This includes protections for remnant native flat oyster (*Ostrea angasi*) reefs, which have declined [by over 90% in South Australia](#), with few functioning reefs remaining. These reefs were [historically valuable fish habitat](#) for recreational species including King George Whiting (*Sillaginodes punctatus*), and snapper (*Pagrus auratus*), and supported commercial and recreational fisheries in their own rights. **Legislation to establish 'Critical Habitats' and threatened ecological communities would be invaluable to the recovery of such ecosystems to sustainable levels**, and to support flow-on socioecological benefits.

Theme 2. Facilitating increased restoration

Given the regional need for large-scale habitat restoration to address extensive habitat loss in South Australian waterways, **we recommend that the streamlining of restoration permits and processes are integrated into the *Biodiversity Bill 2025***. This is based on recent findings that [restoration permitting processes are often complex, time-consuming, costly, and difficult to navigate](#), with ongoing liability and approval conditions inhibiting effective restoration efforts. **To support biodiversity restoration and conservation, legislation that promotes active restoration across private and public land is needed** so that South Australian organisations and communities are best positioned to benefit from opportunities such as the Australian Government's Nature Repair Market, the Blue Carbon Market, and other initiatives.

Aquatic and riparian vegetation including seagrass, saltmarsh, mangrove, and reed communities have been permitted for clearance under the *Native Vegetation Act 1991*. In many instances, this represents the loss of fish structural habitats, or ecological functions associated with maintaining suitable habitat requirements. We note that [while existing legislation has facilitated aquatic habitat clearance](#), aquatic revegetation and restoration opportunities have historically been limited from the Native Vegetation Incentives Programs, which have focused on terrestrial revegetation and offset purchases on private land. Given historic and ongoing pressures to aquatic vegetation communities (e.g. [seagrass meadows](#), [saltmarsh](#)) and associated fish populations, **we recommend that proposed funding models, including the Biodiversity Restoration Fund and Biodiversity Conservation Fund, should not be limited to private land**. This includes aquatic reserves, marine parks, community land, Crown land and sea within State waters where the loss or degradation of vegetation, or other ecosystems has or continues to occur. Additionally, restoration on public land (and state public waters) ensures public participation in biodiversity restoration, and continued access to its benefits. Processes and funding to support restoration on public land should be facilitated by legislation in the *Biodiversity Bill 2025*.

We support the proposed strengthening of native plant laws to protect planted native vegetation more than 20 years old. This change will better protect the social and ecological value associated with ongoing and historic conservation and restoration efforts, particularly riparian revegetation and our ongoing efforts to restore seagrass meadows in SA. It ensures that community action to support biodiversity through revegetation, and its benefits will be protected for future generations.

We welcome the development of threat abatement plans for serious threatening processes. We support efforts to recognise and address systemic stressors and threats to aquatic environments and species. This includes emerging and historic pollution, changes in waterflow that impact the habitat or reproduction of fisheries species, impacts of invasive species, and losses of structural fish habitats.

Theme 3. Earlier and transparent decision making

We support the proposed *Biodiversity Council* having a member with expertise and experience in aquatic biodiversity conservation and restoration to advocate and provide relevant information to support aquatic habitats, and their benefits to recreational fishers and waterway users. Additionally, **we recommend efforts to streamline restoration and permitting processes through linkages to other legislation**, particularly the *Fisheries Management Act 2007*, *Marine Parks Act 2007*, and *Crownland Management Act 2009*. Efforts to consolidate scientific datasets and making them publicly available are also valued for supporting restoration and conservation planning, and communicating fish benefits from environmental programs.

OzFish Unlimited thank the Department for Environment and Water for considering our submission and we would welcome the opportunity to provide further information should it be required.

Sincerely,

OzFish Unlimited – South Australia

OzFish Unlimited

