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A few quick comments regarding your discussion paper “Developing a Biodiversity Act for South Australia”.

Most of the matters for consideration seem like common sense to me, and I'm surprised they aren't already baked into legislation.

I would just like to very briefly comment on your topic 8, as someone who has a long-standing interest in managing a large HA as

part of a group, and as someone who has recently been granted an HA for his own country property:

23. TheActcouldconsiderbroadeningorcreating schemes to further support the establishment and management of conservation areas on private and other land.
24. TheActcouldseektoenableadditionalincentives, including the provision of financial and technical assistance, to landholders who have entered into formal agreements for conservation.

As a native seed collector for Trees for Life for over 30 years, I have noticed 1st hand areas of the state where broad-acre remnant

vegetation is incredibly rare, and areas where it is more common. Stringybark forest in the south Mt Lofty Ranges is now rare and

threatened not just by climate change and weeds but by urban encroachment. Grassy woodland and grassland in the eastern and northern

Mt Lofty Ranges and the southern Flinders has been almost extirpated because of the high agricultural value of these areas as cropping

and grazing lands. Wetlands in the south east have been drained to bring them into production. I could go on. Conversely, mallee

and northern rangeland areas, while badly affected by recent human activity, still have large areas where reservation - either public

or private - is possible. A cursory glance at a map of SA HAs backs this up - cheaper land in these areas where widespread clearing has

been less complete dominates HAs. This isn't a bad thing, but it leaves a void which governments could help fill.

I would like to suggest the creation of a 2 tier HA system to try and bring some of these under-represented ecological associations

into the system. The current system should by all means continue, and have a secure funding stream into the future so that incentives

for all who need them are there. Above this however could be a 'priority tier' of HAs that could offer added incentives (professional advice,

more fencing help, subsidies for weed and feral animal control, replanting, council rate relief, perhaps relaxation of the dwelling rules etc)

for land that was considered especially under-represented, rare, and at risk. This is especially true for the high value farmland and especially

the peri-urban land that will continue to disappear as land values rise and urban sprawl continues.

The 'priority tier' HA could perhaps also be offered in mallee and rangeland areas where an agglomeration of several adjacent HAs makes it

possible to reserve really significant areas, especially in cases where the owners of different but adjacent HAs are prepared to work to a

consistent management plan.

My final point is in regard to the low priority given to offset in your topic 2 mitigation hierarchy. In 'priority tier' areas we are already in a full scale

ecological emergency with regard to these ecological associations, and so surely offset targets should be more ambitious.

Thanks for the opportunity

Phil Bagust