[redacted]

I wish to make a personal submission to the review of the Biodiversity Act. Please note that these are my personal comments and are not necessarily the views of the environmental organisations with which I have a roles (eg Green Adelaide, the landscape Boards, SA Museum, Marine Discovery Centre etc)

These organisations may or may not make their own submissions.

I wish to make three personal points concerning areas of the document that appear to be missing or which have only cursory comment.

1: Primacy. We need to ensure that the biodiversity act ranks higher than other acts including mining, pastoral, and even some urban development. If the act subserves others, then it will have no teeth. It is very unclear where this Act sits in the hierarchy of legislation, and what that will mean for Biodiversity conservation in South Australia

2: Revegetation and rewilding. The act cannot simply support preservation and conservation of species and ecosystems (as important as residual natural areas are) but needs to address the urgent need to repair and recover large areas of the state. We must address both the need for revegetation and rewilding programs in the face of climate change and other human impacts. The Act must also link directly to the Commonwealth Nature Repair Bill and revisions to the EPPC Act to secure a role in the Federal response to the biodiversity crisis.

3: Funding. There is no mention in the proposal about how the actions of the Act will be funded. Whilst there are a number of mechanisms to finance the Act, some of the more obvious ones such as onsets and offsets have been shown to be infective (see the Henry report in response to the NSW Biodiversity Act). There is also a section about duty of care which could imply the need to develop some sort of inspectorate or compliance unit, which will require funding, depending what sort of enforcement "Duty of Care" requires. More importantly, other segments of the proposed Act such as the establishment of a committee to review the status of species and ecosystems, will require funding. And even more importantly, the entire Act is dependent on the maintenance of an outstanding and continually developed database. This database is referred to in the proposal. However, the database itself is completely dependent on the maintenance, development, digitisation, and long-term storage of the actual biological samples. The State's biological materials are located in the Herbarium in the Botanic Gardens, and in the fauna collection in the SA Museum. However, these vital collections are in a poor state of maintenance and are at serious risk of damage or loss due to failing storage infrastructure. In fact, there is no finance available to continue to develop the collections. Yet, without these collections, we have no database. With out the database we cannot make informed policies and decisions. Without the capacity to make good decisions, the Act is worthless. No reference is made at all to how these collections will be maintained and developed and even accessed to continually improve the Department's databases. In my view, it is critically vital that the Act addresses a mechanism to support the funding of these collections.

I am happy to meet and discuss these and any other issues at any time

Yours sincerely

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