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Congratulations on putting all these different acts into one act for convenience, providing, there is no loss to the meaning of the individual acts.

I did not see an explanation of the term 'animal' which you refer to. Perhaps 'wildlife' might have been a better term to use. It would appear that you mean to include birds, reptiles, insects etc but this is not actually stated even though you do mention fish separately. Shouldn't there be criteria covering birds - native and migratory, and other species such as reptiles, bats, mammals and insects. Botanica should also cover mosses, lichens and fungi, not just angiosperms. Perhaps these are covered in the new act but I could not see them specified anywhere.

I disagree with 4(2) Fire and Emergency services in over- ruling other acts. This should be in conjunction with or on the understanding of other acts and with the power to act in an emergency.

6 (2) I also disagree with the statement relating to clearance of vegetation in areas not deemed critical habitat. Native plants as critical habitat is stated as protected only - thereby allowing other clearance to occur. In the situation today all areas of habitat should be treated as critical, especially to survival under climate change. Your statement virtually allows developers and local government and other agencies to destroy areas it sees fit for development purposes. Century old vegetation should not be destroyed to place buildings, these need to be retained and buildings worked around them. Even if there is an expectation of developers etc. to restore and revegetate, it may not happen. Replacement of vegetation will take decades to provide the same habitat that we cannot afford to lose. May I remind you that under your rationale objects, principles and general it is a duty of the Act to protect all biodiversity and

c) is sustainable and appropriate such that health and resilience of vegetation is maintained. There is a general obligation to prevent biodiversity loss whether it be in a single tree or a clump of vegetation. It is providing habitat to wildlife- birds, reptiles, insects, animals.

I do not see any reference to the dog and cat management act or to feral species in the act. This probably should be included as biodiversity loss also occurs due to feral pests and weeds. These need to be controlled to prevent further biodiversity loss.

Division 2(3) regarding to who the Minister must consult with - CCSA, LGA, Primary Producers Association, and Climate Change Council. This is a Biodiversity Act so what about DEW and NP &W or their Consultative Committees, the State Herbarium or NVC, and/or PIRSA.

Regarding appointees to decision making bodies -stating that they must be public servants is discriminatory as some persons have qualifications and experience in these areas but are not necessarily employed by the government. It is also probably a fairer system to appoint some persons outside the government, for a non biased and overall balanced view as in the past. People in government offices and employment and people with the hands-on experience and knowledge in the community and on the ground also with qualifications and skill set, make for a better balanced committee.

Regarding Threatened species list -this should include locally rare, locally vulnerable, locally endangered as well as the statewide listings. A 'protected animal' does not accurately define birds, reptiles or insects unless stated under definitions.

I trust that you will consider some of this for the new Biodiversity Act.

Yours sincerely

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