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I applaud South Australia's ambition to have a modern and nationally consistent process to assess and recognise threatened native species and ecological communities, aligned with international best-practice.

South Australia is correct to recognize that it does not currently have a dedicated Act to safeguard biodiversity and that such legislation is needed to close current gaps in protections.

The DRAFT bill is a good start, but as it stands it is NOT aligned with international best-practice. It is very seriously inadequate in its consideration of organisms which are not animals or plants. This feedback specifically addresses the DRAFT's deficiency in handling fungi. Other major kingdoms of life, for example Bacteria, Chromista and Protista, merit similar attention.

Fungi are NOT plants. In science, they have for at least 60 years been considered as an independent biological kingdom, different from animals and plants. Scientists widely accept that kingdom Fungi is more diverse than the plant kingdom and contains far more species. Their biology is different. Their habitats are different. Their role in ecosystems is different. In a nutshell, you can't conserve the producers (plants) and the consumers (animals) unless you also protect the recyclers (fungi). The present DRAFT singularly fails to address this. Fungi are mentioned only five times, once in the contents (under "Miscellaneous"), once in "Interpretation" (where they are defined as plants), and three times in the section "Miscellaneous" itself, which states that, apart from protected species, anyone can collect them as much as they like.

It means the DRAFT is scientifically way out-of-date and has no recognition of the vast array of ecosystem services provided by fungi, nor of their many indigenous and endemic species. It does not recognize potential threats, nor is the knowledge gap for fungi acknowledged (current conservative estimates are that, globally, at least 90% of fungal species have not yet been discovered). Finally, there are no provisions specifically aimed at protecting fungi.

The whole document gives the impression that animal and plant conservation experts have been consulted, but not people who work with fungi. These people exist in Australia [REDACTED] [REDACTED] would be excellent people to start with). Their opinions are valuable to you. They can help make this DRAFT much better. Attached, please find some resources which are need to address the deficiencies. Please take particular note of the "Pledge" issued jointly by the governments of Chile and the UK at the CBD 16 Conference of the Parties in Colombia last October. That pledge has already been endorsed by many other countries, and is a clear indication of what "international best-practice" should look and of the direction the wind is blowing for fungal conservation. If I can be of any further assistance, please contact me.

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