



Biodiversity Coordination Unit
Department for Environment and Water
GPO BOX 1047
Adelaide SA 5001
Via email: biodiversityact@sa.gov.au
12 February 2025

Dear Biodiversity Coordination Unit,

RE: Submission on South Australia's Draft Biodiversity Bill

The Management Committee of Friends of Scott Creek Conservation Park (the Management Committee) welcomes the opportunity to provide a submission South Australia's Draft Biodiversity Bill.

The Friends of Scott Creek Conservation Park (FoSCCP or the Friends) are a group of volunteers who have been protecting and restoring Scott Creek Conservation Park since 1990. The Friends is a non-profit with over 40 members.

Scott Creek Conservation Park (the Park) is a significant conservation area of 750 hectares in the Mt Lofty Ranges and is home to many threatened species. The Park is managed by the Department for Environment and Water (DEW) through the National Parks and Wildlife Service South Australia (NPWS SA) and they oversee and support the work we do.

The Management Committee supports the introduction of South Australia's Biodiversity Act and the objects in the draft Biodiversity Bill, as they align with our mission to protect and enhance Scott Creek Conservation Park, such as:

- To protect, restore and enhance biodiversity such that there is an improvement in the state of biodiversity at all scales and to build the resilience of biodiversity, including resilience to the impacts of climate change.
- To identify and prioritise biodiversity assets for conservation and restoration
- And that the current generation maintains or enhances the health and resilience of biodiversity for the benefit of future generations –

We support the principle that decisions should be based on the best available evidence, scientific evidence, First Nations' knowledge and local knowledge, and to take into account the impacts of climate change. We hope that monitoring data such as the Friends of Scott



Creek CP bird monitoring data, available in the BirdLife Australia's national Birddata database, may be considered in such decision-making.

The Management Committee supports expanding the definitions of native plants and protected animals to recognise algae, fungi, threatened invertebrates, threatened amphibians, and threatened fish.

We also support a broader definition of native plants to include those native to all of Australia as this can be useful for restoration work in a changing climate.

However, invasive Australian plant species need to be managed in the park where they are a threat to local biodiversity. Given that our bushcare work is approved by NPWS, we understand that this Bill still allows our Friends' bushcare activities and contractor work to control problematic plants that are native to other states such as Tasmanian Blue Gum and Blue Bell Creeper.

The Management Committee supports the introduction of a legislated process to identify and lists threatened species and threatened ecological communities, which will include public nominations, an assessment informed by a scientific committee, public consultation and the publication of the final decisions.

We support the proposal to declare 'critical habitat' if area contributes significantly to the conservation of a threatened species, threatened ecological community or other listed ecological entity. We also support the development of action plans for their protection and that it will be required to take reasonable steps to implement and report on the action plan. We agree that action plans may specify roles of various stakeholders involved in conservation efforts, such as our Friends group when relevant.

The Management Committee supports the proposed 'provisional listing' of species and ecological communities in certain circumstances, for example, where extinction risk after a natural disaster and immediate protection is required to manage the extinction risk. We hope this includes non-natural disasters such as the arson attack that caused the Cherry Gardens bushfire in 2021, which burnt 2/3 of the of the Park and therefore impacted on many threatened species in Park.

The Management Committee supports the development of a State Biodiversity Plan, which is to contain specific actions (and we assume funding) to protect threatened species.

Finally, The Management Committee are pleased to see that it will continue to be illegal to collect wood from national parks.



The Management Committee is happy for this submission to be published.

Yours Sincerely,

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