

Biodiversity Coordination Unit

Department for Environment and Water

Date: 18th February 2025

Australian Citizen Science Association, South Australian Chapter (ACSA-SA), response to South Australia's draft Biodiversity Bill

Dear Biodiversity Coordination Unit,

Thank you for the invitation to comment on the draft Biodiversity Bill 2025. ACSA-SA welcomes the State Government's commitment to developing a Biodiversity Act to better protect the state's unique and precious biodiversity. We urge the State Government to make the most of this opportunity to support stronger nature laws to prevent further destruction of biodiversity and to provide a framework for scaling up effective restoration, measuring the impact of our efforts and engaging South Australians to care for their greatest asset.

The Australian Citizen Science Association was created to advance citizen science through sharing of knowledge, collaboration, capacity building and advocacy for citizen science. The South Australian Chapter's (ACSA-SA) role is to connect with the national body and undertake these activities through working closely with the South Australian community, research institutions, non- government organisations and government.

While citizen science can be incorporated into almost any aspect of science, the majority of our members work within the environment sector where citizen science really comes into its own and can have real world outcomes. In fact, well organised citizen science is critical for collecting timely data on our native species in these times of rapid climate change, population expansion and development. There are numerous current and recent examples where the data collected by paid ecologists is grossly inadequate to assess current status and monitor change, particularly across wide geographic areas and citizen science is able to fill these critical gaps; e.g. native orchids, shore birds, microbats, frogs and freshwater turtles. Citizen science has also been shown to have the added benefits of educating community participants and increasing the chance of them engaging further with local conservation activities and policy development.

There are a number of elements of the draft legislation that provide positive steps forward including provisions for:

- a Biodiversity Council and Scientific Committee,
- a State Biodiversity Plan and Register,
- a formalised process for listing threatened ecological communities and critical habitat,
- protection for native plantings,
- third party standing for civil enforcement of breaches of the Act,
- tougher penalties for breaches of the Act,
- application of a mitigation hierarchy for native vegetation clearance applications, and
- improved recognition of First Nations culture, knowledge and important role in biodiversity conservation

There are however, significant areas for improvement if the Act is to meet its objects including:

- establishing primacy over other legislation to cease the steady erosion of our natural estate through business as usual decision making
- ensure the Minister for Environment has agency to refuse activity with an unacceptable impact, as well as
- establishing clear mechanisms through the Act to source the long-term funds needed to underpin the considerable protection and restoration works required.

The Biodiversity Council report prepared for the State Government in December 2023 identified a funding gap of \$400 million per annum in South Australia to reverse biodiversity decline, with a realistic increase in annual government investment being around \$100 million.^[1] We urge the Bill to include a mechanism to increase investment in the State's biodiversity.

Role of Citizen Science

The Act could build on the investment of the last three years in citizen science for biodiversity by recognising it in the principles of Act, including citizen science as part of the State Biodiversity Plan and ensuring ongoing investment in citizen science programs to meet the Act's provisions to maintain a strong data set for decision making in SA.

Ongoing investment in Citizen Science will play a valuable role in improving our shared knowledge about South Australia's biodiversity.

Organisations such as ACSA-SA can play a vital role to inform the development of measurable targets and state-wide biodiversity indicators and to support their application.

We welcome the opportunity to speak further on these points.

Yours sincerely,

[Redacted signature]

[Redacted signature]
[Redacted name]

[Redacted signature]
[Redacted name]

^[1] Biodiversity Council, https://biodiversitycouncil.org.au/admin/uploads/Biodiversity_Council_2023_SA_Biodiversity_in_a_Changing_Climate_FINAL_REPORT_with_links_604862e258.pdf