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Reference: SB:RA:cr

Biodiversity Coordination Unit
Department of Environment and Water
GPO Box 1047
Adelaide, SA 5001

1 March 2024

Dear Sir/Madam

Re: Biodiversity Act for South Australia - Discussion Paper consultation

Thank you for the opportunity to provide input to the development of a new Biodiversity Act for South Australia. Our organisations staff and board members have reviewed the discussion paper. A summary of our discussions follows:

1. The Limestone Coast Landscape Board is supportive of the development of this act. A well-constructed act would align to our Regional Landscape Priority of "Conserving and enhancing our region's biodiversity, and Section 25(1)(a) of the South Australian Landscape Act 2019 that outlines the function of landscape boards to *facilitate integrated landscape management and biodiversity conservation*. The Limestone Coast Landscape Board will remain part of further consultation through the development of the Act.

2. The Limestone Coast Landscape Board supports the content of the letter sent by David Greenhough on 1 March 2024 as a joint Landscape Board response to the act's development.

3. In addition to the joint landscape board response, the Limestone Coast Landscape board would like to emphasise the following:

   <u>Creating a meaningful act.</u>
   The final version of the act should be a useful document, providing genuine and practical means of protecting our biodiversity. This includes ensuring that First Nations involvement in the development and enforcement of the act is genuine and expectations of First Nations groups are realistic and achievable.

   <u>Funding and resourcing.</u>
   Concerns have been raised over how the implementation of the act's contents will be funded or resourced. This should be made clear and transparent from early on in its development. For example if stronger compliance actions are enforced will this responsibility fall on DEW or Landscape Boards?

   <u>Minimising impact</u>
   The discussion paper illustrates a mitigation hierarchy for impacts to biodiversity from Avoid to offset. Measures should be considered to ensure that such ideologies are

actually put into practice. These should also be consistent across industries, ensuring that large scale mining or development can't easily override biodiversity.

Incentives vs Sanctions

While penalties are an effective way to discourage undesirable actions relating to the act, incentivising positive actions should be considered just as strongly. We would strongly support the increase use of incentivised works and behaviours to help create lasting changes in community mind-sets and actions.

I thank you again for the opportunity to provide input to the development of a new Biodiversity Act for South Australia, and look forward to being part of the continuing development process.

Yours sincerely



Steve Bourne
General Manager
Limestone Coast Landscape Board