

26 February 2025

██████████
Biodiversity Coordination Unit
Department for Environment and Water
Government of South Australia

Via email: biodiversityact@sa.gov.au

Dear ██████████

Re: South Australia's draft Biodiversity Bill

Green Building Council of Australia (GBCA) welcomes the opportunity to provide comment on South Australia's draft Biodiversity Bill (the Bill). Since our inception in 2002, GBCA has been working with government, industry and a range of stakeholders to recognise the impacts of the built environment on climate change and our natural environment and realise the opportunities for the built environment to make positive change.

GBCA commends the South Australian government on taking this significant step to enhance the protection and restoration of the state's biodiversity. We note the Bill absorbs the Native Vegetation Act 1991 and proposes changes to several other Acts, such as the National Parks and Wildlife Act 1972, Environment Protection Act 1993, Landscape South Australia Act 2019, Planning, Development and Infrastructure Act 2016 and the Wilderness Protection Act 1992. GBCA supports the consolidation and changes to the above Acts to create a streamlined piece of legislation and a simplified governing framework for stakeholders to navigate and adhere to.

GBCA is an industry association with more than 650 member organisations, including many that work in or with the housing construction sector. GBCA's purpose is to lead the sustainable transformation of the built environment. We do this primarily through our core functions:

- We advocate policies and programs that support our vision and purpose.
- We educate industry, government practitioners and decision-makers, and promote green building programs, technologies, design practices and operations.
- We collaborate with our members and other stakeholders to achieve our mission and strategic objectives.
- We rate the sustainability of buildings, fitouts and communities through Australia's largest national, voluntary, holistic rating system – Green Star.

Green Star is Australia's most widely used sustainability rating system for the design, construction and performance of buildings – including social infrastructure – fitouts and communities. Green Star aims to transform the built environment by:

- reducing the impact of climate change
- enhancing our health and quality of life
- restoring and protecting our planet's biodiversity and ecosystems
- driving resilient outcomes for buildings, fitouts, and communities

- contributing to market transformation and a sustainable economy.

Australia's built environment has a critical role to play in helping Australia to achieve its contributions to the [Kunming-Montreal Global Biodiversity Framework](#)¹ (GBF). In recent years GBCA has increased focus on how buildings and the built environment can achieve nature positive outcomes.

In March 2024, GBCA released a discussion paper, [A nature roadmap for the built environment](#)² (Nature Roadmap discussion paper) which evaluates environmental risks and opportunities, explores innovative concepts for nature regeneration, and underscores the collaborative roles required for success. The Nature Roadmap discussion paper follows a previous report, [Building with Nature 2.0](#)³, released by GBCA in 2023 and [Building with Nature](#)⁴, released in 2018. Following feedback on these papers, GBCA is working with stakeholders from the built environment, government, science and academic sectors to develop a Nature Roadmap that will provide a clear pathway for the built environment to actively contribute to the enhancement of nature and biodiversity.

Five updated principles are proposed in the GBCA's Nature roadmap discussion paper to ensure the best possible alignment GBF targets and goals and set a path to nature positive buildings and communities. These are:

1. Protects nature: Protect the ecological and biodiversity value of habitats, both on and adjacent to the site, during and post-construction.
2. Connects nature: Establish or maintain ecological connections by linking native or built landscape corridors.
3. Uses low-impact materials: Minimise environmental impacts from supply chains; prevent destruction of native forests
4. Renews nature over time: Enhance on-site ecology and biodiversity, and compensate with offsite restoration for remaining supply chain impacts, to deliver a net gain in biodiversity.
5. Brings nature and communities together: Collaborate with First Nations people and engage the broader community.

We note that these proposed principles align with the Objects of the Bill. The Bill and the Nature Roadmap both aim to enhance biodiversity conservation, where the Bill focuses on legislative measures for biodiversity conservation at the state level, the Nature Roadmap is a strategic framework promoting sustainable practices and guiding the built environment sector toward positive nature outcomes.

We note that the Bill does not include specific provisions targeting supply chains. Instead, it introduces a general duty requiring individuals, businesses, and government agencies to take reasonable steps to prevent or minimize harm to biodiversity. Products and materials used in the built environment require extraction from forests, mines and quarries. These are then manufactured and transported to sites for construction. At the end of their use, they will be disposed of to landfill, recycled or reused. Each of these processes impact nature. In May 2024, GBCA released [A nature roadmap for the built environment - A](#)

¹ <https://www.cbd.int/gbf>

² <https://gbca-web.s3.amazonaws.com/media/documents/a-nature-roadmap-for-the-built-environment-discussion-paper.pdf>

³ <https://gbca-web.s3.amazonaws.com/media/documents/building-nature-2.0-discussion-paper.pdf>

⁴ https://gbca-web.s3.amazonaws.com/media/documents/gbca-future-focus-building-with-nature-fa-web_emZlpIB.pdf

[Discussion paper for the supply chain](#)⁵, the paper evaluates environmental risks and opportunities pertinent to the industry, clarifies the role of the supply chain and outlines the regulatory frameworks that are impacting it. Feedback from the supply chain discussion paper will inform the final version of the above proposed principles listed above.

The Green Star Buildings v1 rating tool was released in 2020, and we are already seeing examples of how building projects are embracing opportunities to not only avoid harm to the natural environment, but to find ways to enhance nature and improve biodiversity. We are currently consulting on [Green Star Building v1.1](#)⁶ rating tool which introduces the concept of biodiversity net gain requirement. Biodiversity Net Gain as a concept aims to enhance biodiversity post-development by creating new habitats, enriching existing ones, and fostering wildlife connectivity. 'Biodiversity net gain' adheres to the Proximity Principle: If on-site gains are unachievable, off-site local enhancements are next. The UK Government introduced a Biodiversity Net Gain requirement for all projects. A standard calculation methodology was developed, and projects must show that net gain has been achieved.

GBCA supports the establishment of the Biodiversity Council (the Council) to serve as a guiding body to ensure biodiversity is effectively conserved, protected, and managed in the state. We note the requirement for the Minister for Climate, Environment and Water to consult with the Conservation Council of South Australia, the Local Government Association of South Australia, Primary Producers South Australia and the Premier's Climate Change Council before appointing persons to the Council.

GBCA strongly recommends that a body representing the built environment sector is also added to the list of bodies that the Minister must consult with. The building sector plays a significant role in shaping land use and urban development, which in turn affects local biodiversity. Urban sprawl, construction, and development can disrupt ecosystems, fragment habitats, and lead to the loss of species. Having representation from the building sector ensures that these impacts are considered in biodiversity decision-making and helps to incorporate sustainable development practices that minimize harm to the environment. GBCA welcomes the opportunity to discuss how it can support the Biodiversity Council.

To arrange further discussion or for clarification of the points made above, please do not hesitate to contact [REDACTED] Senior Manager Policy and Government Relations, via email at [REDACTED]

Yours sincerely

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⁵ <https://gbca-web.s3.amazonaws.com/media/documents/gbca-nature-roadmap-supply-chain-discussion-paper.pdf>

⁶ <https://gbca-web.s3.amazonaws.com/media/documents/green-star-buildings-v1.1-consultation-paper.pdf>