



Categories:

Blue category

Dear Sir/Madam,

I wish to make the following submission regarding the Department for Environment and Water's public consultation on the draft Biodiversity Bill.

Overtime many of the marine and fresh water species have disappeared. On Page 60 (Part6 D4) s81(1) regarding species of fish added to threatened species.

1. it is my understanding that the method of determining if a species is threatened is lacking due to there is no data baseline, the bill needs to address this. In cases when currently non-commercial fish species become threatened the usual summation is because there is no existing data on these animals, there can be no conclusion based on fact and therefore there is no need to go any further, therefore blocking any determination of "threatened". Many species are uncommon and rarely seen or noted, maybe for many years (eg about 100 years, lampreys in Adelaide Hills region) and therefore not listed as threatened because there is no data on the species. Many marine species have fallen into this scenario also and think this needs to be addressed in the Act where there can be some provision to acknowledge the fact of species disappearing to the point that these need to be recognised as threatened due to the lack of occurrences either as catch or confirmed sightings.
2. The bill should take into account the emerging science and reclassification of species, which determines what was once historically considered a single species then recognises the fact that these can then be realised as multiple separate species, so there is a need to protect against localised extinctions also of some species and regard these as threatened under the Act. (eg recently the Giant Australian Cuttlefish (North Upper Spencer Gulf) was recognised as a separate species to GAC's in the South).

(1)"If a species of fish is added to the threatened species list, the Minister must consult with the Minister responsible for the administration of the Fisheries Management 15 Act 2007 to determine appropriate mechanisms for ongoing protection of the species aimed at ensuring sustainability of the species."

(2) If, after consultation under subsection (1), the Minister determines that protections under the Fisheries Management Act 2007 are appropriate, the Minister may not prescribe the species of fish for the purposes of the definition of protected animal in 20 section 3.