01 March 2024

A Response to the Discussion Paper
Developing a Biodiversity Act for South Australia

Zoos South Australia

Adelaide Zoo
Frome Road
Adelaide SA 5000
AUSTRALIA
Phone (08) 8267 3255
Fax (08) 8239 0637
adelaidezoo.com.au

Monarto Safari Park
Princes Highway
Monarto SA 5254
AUSTRALIA
Phone (08) 8534 4100
Fax (08) 8534 4077
monartosafari.com.au

information@zoossa.com.au
zoossa.com.au

South Australia's Biodiversity Act should take into consideration legal frameworks, community engagement, scientific input, and effective implementation. It's crucial to involve all stakeholders, including government agencies, Indigenous communities, scientists, landowners, NGOs, and the public, in the process of improving the Biodiversity Act, to ensure a holistic and effective approach.

The following list of recommendations details some key areas that the Act should meaningfully incorporate to ensure that it best supports South Australia's rich biodiversity and that it represents the best interests of its citizens …

1. **Review and Update Legislation:**
   a. Regularly review the Biodiversity Act to ensure it aligns with current scientific knowledge and best practices.
   b. Address any gaps or inconsistencies in the legislation.
   c. Ensure the Act cannot be subverted, superseded or weakened by other legislation.
   d. Use unambiguous phrasing in the Act. In the YourSAy survey the language included contingent phrasing such as "The Act could…", whereas the Act itself should include more affirmative phrasing such as "The Act does…".
   e. Support Australia's international obligations under all biodiversity-related treaties, including the United Nations Convention on Biological Diversity and its supplementary protocols: the Nagoya Protocol on Access and Benefit-sharing, and the Cartagena Protocol on Biosafety.
2. **Incorporate Indigenous Knowledge:**
   a. Collaborate with Indigenous communities to include their perspectives and traditional ecological knowledge in the co-design, development and implementation of biodiversity legislation and policies, while ensuring that their knowledge and wisdom are not misused or misappropriated.
   b. Recognize and respect Indigenous rights and land management practices.
3. **Strengthen Habitat Protection:**

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a. Enhance measures for protecting critical habitats, including those for endangered and threatened species.
b. Implement policies that prevent habitat fragmentation and degradation.

4. **Promote Sustainable Land Use:**
   a. Develop and implement policies that encourage sustainable land use practices, including eco-friendly agriculture and forestry practices, and fire regimes that are not only based on asset protection, but that also takes biodiversity into account.
   b. Provide incentives for landowners who actively contribute to biodiversity conservation.
   c. Ensure renewable initiatives do not impact habitat for native species.
5. **Community Engagement:**
   a. Encourage public participation in biodiversity conservation through community education programs and awareness campaigns.
   b. Establish mechanisms for community input in decision-making processes.
   c. Provide information to the community in an easy to read and understandable form to allow for better informed community input.
6. **Monitoring and Research:**
   a. Invest in scientific research to better understand local ecosystems and species, with a focus on knowledge gaps and areas/species of high risk.
   b. Implement robust monitoring programs to assess the effectiveness of biodiversity conservation efforts.
   c. Encourage the cooperation of all relevant stakeholders in the planning and undertaking of monitoring programs.
7. **Incentivise Conservation on Private Land:**
   a. Provide financial incentives, tax breaks, or other benefits for private landowners who actively contribute to biodiversity conservation on their properties.
   b. Develop partnerships with NGOs and private organizations to support conservation efforts.
   c. Develop programs that assist private landowners to contribute to biodiversity conservation where knowledge of 'how best to assist' is not well articulated or present.
   d. Ensure the Act protects biodiversity on private land from unintended or hidden consequences—e.g., the misuse or abuse of the label "eco-tourism" as a mechanism to

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exploit the environment in an unconventional manner.

8. **Climate Change Considerations:**
   a. Integrate climate change considerations into biodiversity planning to address the impact of climate change on ecosystems and species.
   b. Develop strategies to enhance ecosystem resilience in the face of climate change.
9. **Cross-Sector Collaboration:**
   a. Facilitate collaboration between government agencies, NGOs, industry stakeholders, and research institutions to address biodiversity challenges collectively.
   b. Promote integrated approaches that consider the interconnectedness of various sectors.
   c. Ensure a 'One Plan Approach' to management practices as recommended by the International Union for the Conservation of Nature's Conservation Planning Specialist Group, effectively integrating all in situ and ex situ conservation efforts.
10. **Enforcement and Compliance:**
    a. Strengthen enforcement mechanisms to ensure compliance with biodiversity regulations.
    b. Implement stronger penalties for illegal activities that harm biodiversity, ensuring that they serve as a deterrent and not a notional 'slap on the wrist'.
11. **Education and Outreach:**
    a. Increase public awareness about the importance of biodiversity and the role individuals can play in conservation efforts.
    b. Develop new, and encourage and improve existing, initiatives that allow public to interact with and learn about their local biodiversity, and how they can assist scientific research (citizen science programs).
    c. Integrate biodiversity education into school curricula.
12. **Adaptive Management:**
    a. Adopt an adaptive management approach that allows for continuous improvement based on monitoring and evaluation data.
    b. Adjust policies as needed to respond to emerging threats and challenges, as well as unforeseen unintended consequences.
    c. Incentivise and resource the preservation of species by cryopreserving gametes and tissues, while simultaneously addressing threatening processes, buying time for management practices to yield results prior to imminent or effective extinction.

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13. **Invasive Animal Control:**
    a. Directly address challenges presented by invasive animals and plants on biodiversity loss.
    b. Clearly define and classify invasive species, providing a mechanism for regularly updating and adding species to the list based on scientific evidence.
    c. Ensure the adoption of integrated pest management (IPM) strategies, combining biological, chemical, physical, and cultural control methods, as well as a central repository for related data available to relevant researchers.
    d. Strengthen and better police biosecurity measures to enforce strict quarantine measures at entry points to prevent the unintentional introduction of invasive species.
    e. Provide incentives for compliance with invasive species management measures and penalties for non-compliance, including fines, legal consequences, or other enforcement measures to ensure that individuals and organizations take the issue seriously.
    f. Ensure a comprehensive cat management plan, including mechanisms to eliminate existing feral cats, mechanisms to regulate unhelpful behaviour by cat owners (e.g., release of reproductive cats into wild spaces, allowing cats access to wild spaces at night, etc.). An integrated program of desexing, tagging and electronic monitoring all domestic cats should be adopted.
14. **Illegal Wildlife Trade Control:**
    a. Strengthen and appropriately police wildlife trafficking to eliminate the illegal exportation of the State's natural biological assets.
15. **Resource the Act:**
    a. Ensure adequate resources are directed toward the effective implementation of the Act. Protecting and restoring biodiversity requires personnel, equipment, supplies, collaboration with and incentives for landowners, administrative support for legislation, and in some cases the direct acquisition of land and sea areas. A substantial increase in State investment is imperative to implement the measures outlined in the Biodiversity Act Discussion Paper.

ZOOS SOUTH AUSTRALIA

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ROYAL Zoological SOCIETY of S.A. Incorporated

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