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28 February 2025

Biodiversity Coordination Unit
Department for Environment and Water
GPO BOX 1047
Adelaide SA 5001

Via email: biodiversityact@sa.gov.au

I am writing on behalf of the City of Adelaide regarding the proposed *Biodiversity Act (SA)* (the Act) currently under consideration.

This is an administrative response and is not a formal position of the Council elect.

The Adelaide Park Lands are a vital ecological and cultural asset for the City of Adelaide, Greater Adelaide and South Australia. Any new legislation that applies to the Adelaide Park Lands must contribute to clear and transparent decision making for this important community and natural asset.

The City of Adelaide requested in its submission to the Department for Environment and Water's Developing a Biodiversity Act for South Australia Discussion Paper, a series of matters requiring statutory and process clarification.

To provide constructive feedback, it is crucial that the City of Adelaide has a thorough understanding of the implications of the Act on the Adelaide Park Lands.

To that end, I acknowledge that members of the Department of Environment and Water (DEW) met with Administration at the City of Adelaide 27 February 2025 to discuss the Act.

After careful review, Administration has formed a view that sufficient uncertainty remains as to the how the Act will apply to the Adelaide Park Lands, which operates under multiple State and Federal legislations and an established governance framework set out in the *Adelaide Park Lands Act 2005 (SA)*. This is in further context of the conversation with DEW, where DEW were unable to clarify how the various legislative regimes interplay in the context of the Adelaide Park Lands.

As such, the City of Adelaide is unable to support the proposed Act at this time.

The City of Adelaide appreciates the intent of the Act and the potential benefits; however, matters remain unresolved regarding the interaction of the Act with existing legislations and governance structures which are unlikely to contribute to a clear and transparent decision framework in the interests of protecting biodiversity in the Adelaide Park Lands.

We look forward to your response and hope to engage in constructive dialogue to address these concerns. Thank you for your attention to this matter.

Further information can be directed to [REDACTED] Manager Park Lands and Sustainability on [REDACTED] or [REDACTED]

Yours sincerely

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