
Categories:

Blue category

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Thankyou for allowing me to comment on the draft Biodiversity Act. The following comments are intended to support the government's new Biodiversity Act to achieve real outcomes in biodiversity conservation, retention, remediation and regeneration.

I have over 30 years experience in working with biodiversity conservation on -ground and on government panels and groups in natural resource management, soils, conservation and national parks. I started the Goolwa to Wellington Local Action Planning process and saw the successful introduction of the GWLAP group. I also produced a 'volunteers in conservation manual' for DEWNR and led a national wildlife and native plants study group. I have worked with rare and threatened flora and fauna species management, served on Friends of Parks Board and numerous Parks and Nature groups . Our previous property had Heritage and Sanctuary status. I hope you will accept my comments in relation to the Biodiversity Act in good faith.

Congratulations in incorporating many acts into the one piece of legislation . In one way this is monumental in its convenience, but in another , it leaves open other areas not addressed which should be in the Act. I refer to such acts as those pertaining to Cat and dog management, water management , feral and invasive species management eg. duck and kangaroo shooting, purposes of museums and their management etc. Albeit, those that are in the current draft would appear to have greater power in legislation ,providing ,there is no loss to the meaning of the previous individual acts.

Legislators need to ensure that current acts reflect on the powers of the old acts , but with the power to modernise actions, words, penalties and any other changes needed etc. to better relate to the 21st century.

There must be an understanding of what biodiversity is, and it needs to be inclusive of 'the web of life' , tailored to native or naturally occurring species including wildlife and native plants. It needs to address all threats and impacts because once biodiversity is lost, it is gone forever. And need I say that we are already on that pathway.

It needs to be inclusive and over-riding of other acts because of its importance to our very survival in these changing times.

Emergency powers could be given the power to act , in national disasters , but I do not believe that the CFS should be given everyday powers over biodiversity. There needs to be negotiation and coordinated action of all affected agencies , and separate enforcement processes with breaches of the Act.

I question whether an adequate explanation has been given for what constitutes 'animal' in the definition and probably favour the use of 'wildlife' to be more encompassing. As currently recorded there appears little room for the inclusion of fungi and other botanica , invertebrates and insects, (that may yet to be discovered), marine creatures, etc. It is implied that you mean birds, mammals, reptiles and insects but is it actually clearly stated throughout ?You do actually mention 'fish' specifically.

There needs to be set criteria covering birds and other species native and migratory? Perhaps you have covered these in the new Act, but I could not find them specified as such, and this would leave the legislation open to interpretation. I apologise if there is a definition given somewhere.

Biodiversity, individual species, remnants, threatened associations, habitats and ecosystems need to be given an economic \$value to, and of, the asset, to ensure what remains is protected. Any development etc. needs to take into account the value of retention of existing biodiversity, even if it is a single century old tree, so that it can be valued in different terms (eg \$) to what it has been. I am suggesting a definitive ecological environment economic \$ asset value.

Value adding also needs to encompass remediation, restoration and revegetation of denuded areas as actions enforceable under law, as well as the actions of destruction of native vegetation. There should also be set penalties for non compliance of the Act.

To ensure this happens there needs to be a law enforcement branch and court (EDO), with legal powers aimed at non-negotiable protection measures. There needs to be adequate funding of agencies to undertake this.

There also needs to be two State based agencies- State Herbarium and SA Museum. These are needed to provide scientific expertise and a repository for all specimens pertaining to the State's biodiversity, and as such to manage biological and scientific databases. Only then can an identifiable, quantifiable SOE reporting, be undertaken with creditable and specific values to the State's biodiversity assets. These agencies are needed to manage, identify, protect, regulate and to act as a basis to restore SA ecosystems and all native species - ie. a scientific body charged with looking after such State assets and databases. There needs to be adequate funding for such bodies.

There should also be a sharing of some of the specific roles between Inter-government agencies, and departments, as they are all fighting/contributing for the same dollars. PIRSA and DEW, NPW, NVC, etc. need to work together in a shared responsibility towards animal and vegetation management, and the role of biodiversity and in retaining vegetation. And, to ensure that it is all done in the manner intended, it must be adequately funded.

There are a number of impacts to biodiversity which have not been addressed and appear to be missing from the Act. Climate change and biodiversity loss have been stated but what about population growth, dieback, fire, disease, biosecurity, changing land uses, housing and development, over allocation of water, access to protected areas especially by nature based tourism, mining and exploration, tourism, forestry, and inappropriate fire regimes. With the last point, the Ngarrindjeri never used fire stick farming, so there should never be prescribed burns on Ngarrindjeri country. Prescribed burns need to be undertaken in a proper manner by the indigenous peoples with the expertise on country, and not left to agencies such as DEW or CFS. Tourism based activities in protected areas needs to be strictly controlled for conservation and cultural protection. Many native species or habitat has been destroyed by such practices. Our biodiversity and species loss, has occurred in the past, and such actions have been disregarded. We can not afford to have prescribed burns that set fire to parks, when the responsibility clearly lies with private properties, landowners and residents, in the Mt Lofty Ranges, or with local or state government departments on their lands needing to control weeds.

At least a minimum 30% of the State needs to be conserved, and not open to mining, logging or development. In the past governments dictated land clearance of agricultural lands, now it can see the error and must put back the equivalent of what has been destroyed. There needs to be a clause indicating that land owners need to replace a percentage of vegetation lost. They may need financial incentives to do this. Thousands of significant trees and native vegetation has been lost under the Planning Code. We need the mature trees and vegetation for habitats, for shade, and for water conservation. We can put some of it back, but it should never be just bulldozed for housing development.

Adelaide was known around the world as the green oasis of parklands and park like places. Why are we destroying this asset, faster than ever?

We need to understand that we are creating a desert, not a green oasis, and this action of desertification must cease if we are to have any chance of survival on this planet. There needs to be better management by governments and their agencies. We need to embrace green spaces, natural vegetation, landscapes and biodiversity.

There need to be clauses inserted to protect biodiversity remnants , and remnant species especially on unprotected , unrepresented habitats, ecosystems and crown and conservation areas . This protection is even more important as in the past we have only looked at specific ecosystems , at the exclusion /expense of others. We need a change of mindset in the importance of retaining native vegetation , regardless of what species it is, or where it sits in the understorey or ecosystem, or what habitat it provides. We need to do this, not only for the benefits of biodiversity, but for wildlife - for our honey bees and agriculture , but for better land management practices overall. Compliance should include all places whether they be cemeteries, road verges , coastal dune areas , local government parks , fringing wetlands, creek lines , riparian areas , even farm fencing / buffer zones, township areas , parking lots etc.

Water from the Great Artesian Basin has taken millenia to form and we are utilising it at an alarming rate , that will leave Australia with no water for survival. Controls over this and the River Murray must be aimed at restoring the water , and bringing each back from the brink. Water supplies will continue to reduce under climate change and we are destroying what we already have by overuse and contamination. South Australia cannot exist without water. Everything suffers without water. Nothing can survive without water.

Nationally, population controls are necessary with a stable national population goal ,that cause no loss to biodiversity outcomes - this should be the aim, and perhaps SA needs to be proactive towards this.

We know that climate change will continue , and we are powerless against it and so we need to look at improving what we have and managing our natural resources better . A change in mindset may assist this, whereby we value what is naturally around us. Unfortunately species loss will continue to occur and Australia has an appalling 'greatest species loss rate ' in the world. Something needs to occur and quickly. Halting biodiversity habitat loss is the first most important step. This means at the expense of planning and development, mining etc.

We also need to look at large scale revegetation measures and planting more native vegetation , planting different crops, with plants more suitable to our Australian climate etc. However we need to realise all restoration efforts will take years to provide an equivalent habitat for our declining species. Hence the need for protecting and conserving remaining biodiversity, whether a patch of vegetation or a single large tree. We need to see these as assets for trees encourage greater rainfall collection, and water is our next main goal. But we need to act now , not 20 years down the track. We want something for our children and grandchildren to appreciate. We need to acknowledge that our Indigenous people cared for this land with a passion knowing how fragile it was. They knew how to protect ,yet use sparingly, the life forms on it , and we must follow their belief and guidance in caring for country. We need to protect cultural heritage both European and indigenous , and as previously stated we need to change the mindset by education and positive actions. This starts with governments and local people in communities both taking responsibility for biodiversity.

Prevention is better than trying to cure a problem. We must 'Preserve, enhance, and increase. ' Investing in biodiversity is investing in our survival.

On another point, there are no definition of limits on targeted species given, eg kangaroo culling, duck shooting etc. Invasive species and feral animals come at a cost to biodiversity . We need to ensure humane destruction of vermin , and native species (when required) , and weeds and other invasive plants . Destruction should be based on best practice without the use of chemicals or poisons , which have the ability to be transferred to non target species and even the livestock and produce that we eventually eat.

Biodiversity should not be limited to ecosystems or habitats, it should be addressed for individual plants and animals that are considered locally, as well as nationally rare, at risk, threatened, or vulnerable. Meaning that their value is seen across ecosystems and habitats .Why? because in a disaster a whole protected area may be completely destroyed and there may be a gene pool of the same or slight variant in another area , to allow replacement to occur. This raises questions on penalties for biodiversity loss through deliberate acts destroying biodiversity, such as that of deliberate acts that cause bushfires or wildfires, or bulldozers and graders ,of local government road maintenance crews. Mining developers need to comply with revegetation, or in leaving areas of pristine habitat that is a no-go mining zone. This also supports attaching an economic and environmental value to such assets.

Regarding threatened species , we need to conform to national assessment methodology and SA needs to adhere to IUCN ratings.

I could go on, but the Biodiversity Act does need to be all - encompassing , as it relates to our very survival in the future , given our climate extremes , and to prioritise the slowing down of species loss and extinctions. It needs to ensure whatever actions are taken in managing threats and biodiversity outcomes , are prioritised accordingly and are well funded. The Act needs to have penalties and consequences for non compliance or blatant disregard. It needs to stand in support for all biodiversity, plants, animals, birds, reptiles , marine creatures , insects etc. -all Australian wildlife -and it needs to be enforceable. It needs adequate funding and the appropriate state agencies to manage databases and collections, and to highlight the need for conservation of species and areas.

Thankyou for the opportunity to comment .

Yours sincerely

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Sent from my iPad