

16 March 2018

National Biodiversity Strategy Secretariat  
Department of the Environment and Energy  
GPO Box 787  
CANBERRA ACT 2601

Department of the Environment and Energy

Dear Sir or Madame,

**RE: Submission on the draft for  
Australia's strategy for nature 2018-2030**

We welcome the opportunity to provide comments on the draft for Australia's revised strategy for nature 2018-2030. The Australian Marine Sciences Association (AMSA) has also previously engaged in consultations about Australia's biodiversity strategy. The following comments are provided on behalf of members of AMSA.

AMSA represents Australian marine scientists from academia, industry, and government and engages in public policy discussion where we have specialist knowledge. Founded in 1963, the organisation has grown into Australia's largest professional organisation for practicing marine scientists; representing over 800 professional marine scientists across all Australian states and territories.

Our comments are addressing the draft revised strategy in general, as few specific regards are given to marine and coastal sciences and conservation. AMSA is also fully endorsing the nine key recommendations released today by the Ecological Society of Australia\*.

We are available for further consultation and discussion about the revised strategy.  
Kind regards,

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Associate Professor Will Figueira  
*President, Australian Marine Sciences Association*  
[president@amsa.asn.au](mailto:president@amsa.asn.au)

\* <https://theconversation.com/australias-draft-strategy-for-nature-doesnt-cut-it-here-are-nine-ways-to-fix-it-92345>

The *draft strategy revision* follows on from a substantial, focussed and comprehensive document for *Australia's Biodiversity Conservation Strategy 2010-2030* (referred to as the *Strategy* below), which includes well-defined terminology, background information and national as well as international policy context, well-defined targets for biodiversity conservation, and represents a real strategy document.

In contrast, the *draft strategy revision* is a brief outline of ideas with no identification of threats or conservation targets, and deviating from the ambition and principles of biodiversity conservation that were outlined in the *Strategy*. The new focus is far more on management of biological resources, and less on managing biodiversity for meeting conservation objectives.

The revision recommended in the review of the *Strategy* in 2015 was meant to address how the *Strategy* can be better realised. The *draft strategy revision* has moved outside of this recommendation by redefining the actual *Strategy* in such a way that the aims to conserve Australia's unique national biodiversity are becoming distorted. It is not at all clear from the *draft strategy revision* how a better delivery of the original targets can be achieved. Changing the goal post is not an effective way forward to deliver on biodiversity conservation.

**Recommendation #1: The *draft strategy revision* is to be rewritten to retain the core principles, original vision wording, targets and directives from *Australia's Biodiversity Conservation Strategy 2010-2030* and to focus specifically on improvements in policy and management that can achieve a delivery of the original *Strategy*.**

One of the review recommendations and ambitions of the revision was to improve on environmental and biodiversity conservation issues across boundaries, jurisdictions and all sectors. However, the *draft strategy revision* is not clearly articulating how this coordinated effort across jurisdictions will be achieved.

While the *draft strategy revision* includes a section on working together to address national and international obligations (page 6), and places itself in a coordinating central position in Figure 1 (page 7), no detail is provided on how such coordination can be realised and overcome the jurisdictional hurdles. Just stating that a national approach is required (page 6) is insufficient as it is repeating the review, but not addressing it.

A coordinated and targeted approach to biodiversity conservation (page 6) can be beneficial if it is effectively addressing conservation objectives, and properly resourced. The *draft strategy revision* is silent on resourcing, and any attempt to establish a coordinated approach to further cut costs in biodiversity conservation should be avoided.

**Recommendation #2: The *draft strategy revision* is to be revised to address how biodiversity conservation can be effectively realised across jurisdictional boundaries.**

In an attempt to make the language of the *draft strategy revision* more understandable to the wider audience, terminology changes have occurred which are also changing the meaning. Replacing 'biodiversity' with 'nature' in the title of the document is concerning, especially with following definitions of 'nature' (page 3 and 4) which include agricultural, urban and industrial land as nature. This redefinition is disturbing, as it ignores one of the main threats to biodiversity coming from land-clearance.

Throughout the *draft strategy revision*, the wording changes imply a deviation from the ambition to protect and conserve Australia's unique habitats and biodiversity. For example, the text on page 4 on 'why is nature important' includes not a word on the thousands of species that are at home in Australia's nature. Omitting a focus on biodiversity in this description is symptomatic of the changed focus of this draft.

The *draft strategy revision* is, however, inconsistent and page 5 is rightly acknowledging the mega-diversity and responsibility to protect and conserve this biodiversity. This focus should be much more coherent throughout the revised strategy.

**Recommendation #3: The *draft strategy revision* is to be revised to adopt the original definitions of biodiversity and other terminology as per original *Strategy*. A clear distinction is needed to focus conservation efforts on Australia's biodiversity, its truly natural ecosystems, and exclude landscapes that have been cleared or built upon by humans.**

**Recommendation #4: The *draft strategy revision* can be strengthened by the addition of more detail on restoration and conservation efforts to return land- and seascape that has been degraded by human activities.**

The *draft strategy revision* has three main goals, but the sequence of the goals does, again, not reflect a priority on biodiversity conservation. The wording of the goals is also not strong enough to achieve conservation outcomes. Given the severity of increasingly cumulative threats to biodiversity, 'care for nature...' is not enough.

Wording for some of the objectives for each of the goals (e.g. 'encourage', 'empower') can be improved.

**Recommendation #5: The *draft strategy revision* is to be revised with the following sequence of goals, with some rewording:**

- 1. Protect nature and all its diversity**
- 2. Build and share knowledge**
- 2. Connect all Australians with nature**

We welcome that 'seascape' is mentioned under goal 2 ('Care for nature in all its diversity', page 12), however, given the size of Australia's marine jurisdiction, the text here, and throughout the draft, gives very little consideration to coastal and marine ecosystems.

Instead, the description of goal 2 has a very strong focus on urban and agricultural land. It appears to be more of a vision than present reality that urban areas 'retain substantial natural areas and native species' (page 12), and few are 'clean, green cities' (page 5). The statements on agricultural land are ignoring the amount of land clearance and degradation that has occurred, and unsustainable irrigation practices which are affecting catchment to coast connectivity and processes in coastal ecosystems. Encouragement to farmers to engage in habitat restoration and improved practices with less environmental footprint are welcome.

The *draft strategy revision* fails to address the threats of climate change on Australia's biodiversity. This threat is manifold, from direct impacts on species tolerance thresholds, bleaching of coral reefs, increased disturbance from more severe and unpredictable weather events, ocean acidification, sea-level rise, coastal squeeze etc. These threats are endangering ecosystem functions and services.

**Recommendation #6: The *draft strategy revision* is to be revised to focus on natural, non-build/non-human land- and seascapes for the current goal 2.**

**Recommendation #7: The *draft strategy revision* is to be revised to include climate change effects on biodiversity under goal 2.**

Objective 5 is the only part where the protection of areas is addressed. Australia would have indeed had an opportunity to lead the world (page 12) in the protection of biodiversity through protected areas several years ago, but other countries have now exceeded Australia in achieving targets set by international conventions. The substantial reduction in the area under high conservation categories in the revised draft management plans for the Commonwealth Marine Reserves (now 'Marine Parks') will not only mean that Australia loses a global leadership role, but that Australia will also fail to meet the Aichi target and the CAR principle under the UN Convention on Biological Diversity (CBD). More recent conventions and the Promise of Sydney have argued for increased areas under protection. However, the *draft strategy*

*revision* fails to outline how Australia will meet its international obligations. This was one of the review recommendations from 2015 and aims of the strategy revision, which the draft is not delivering on.

It is also part of Australia's obligations under the CBD to establish a comprehensive, adequate and representative (CAR) system of protected areas, which had been incorporated into policy such as Australia's National Representative System of Marine Protected Areas. Objective 5 (page 13) is only mentioning representativeness.

**Recommendation #8: The *draft strategy revision* is to be revised to substantiate detail on how Australia will meet international conservation targets and principles under the CBD, in particular the Aichi targets.**

The text for goal 2 is also mixing up nature management with natural resource use (paragraph 4 on page 12, and objective 8, page 13). It is not clear how biodiversity conservation can be achieved by 'strategic planning and trade-offs between use and protection' (page 13). It should be further clarified how 'continuous improvement of fisheries practices' (page 13) will lead to conservation of fish stocks and biodiversity protection, and not accelerated overfishing.

**Recommendation #9: The *draft strategy revision* is to be revised so that the objectives for goal 2 are focussing on protection and conservation of biodiversity.**

Throughout the *draft strategy revision*, the relevance for science to provide knowledge and data for meeting the goals and objectives is hardly ever mentioned. Scientific assessment is needed to inform the listing of species (objective 6), processes underlying resilience (page 12), ecosystem restoration approaches through eco-engineering (objective 7), etc. Goal 3 (page 14) is including the need for evidence-based approaches, but building the knowledgebase through scientific research in ecology and conservation is inadequately articulated. Objective 10 is omitting the academic institutions and research agency that are in fact providing the required knowledge increase and develop effective measures (objective 12).

Given the high biodiversity in Australia, including many undescribed species, it is also unacceptable that the *draft strategy revision* is not highlighting the relevance of taxonomic research carried out at Australia's museums.

**Recommendation #10: The *draft strategy revision* is to be revised to acknowledge and highlight the need for science and identify proper and adequate funding mechanisms for research on biodiversity conservation.**

The approach forward outlined on pages 16 & 17 is insufficient for a strategy to address the conservation of Australia's biodiversity and meet international commitments under the CBD. An action inventory is a recording and reporting exercise, but will not enable real action to achieve biodiversity conservation. It is also a backward looking activity, inadequate to address the multiple and cumulative threats to biodiversity in Australia.

There is no mention of any review period for the revised strategy.

**Recommendation #11: The 'action inventory' should receive only a minor role, be deleted from the subtitle of a revised *draft strategy revision* and be replaced by proper actions for biodiversity conservation, including adequate funding.**