

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

13 March 2018

Dear Sir/Madam

**RE: AUSTRALIA'S STRATEGY FOR NATURE 2018 – 2030 – SUBMISSION FROM THE  
COUNCILS OF THE HUNTER, CENTRAL COAST AND MID-COAST REGION**

The Hunter, Central Coast and Mid-Coast Region welcomes the opportunity to comment on the draft *Australia's Strategy for Nature 2018-2030: Australia's biodiversity conservation strategy and action inventory* released on 15 December 2017.

The attached submission was developed by the Hunter Joint Organisation of Councils Environment Division, through an open consultative process with officers and senior managers from the following NSW Local Government Authorities:

- Central Coast Council
- Cessnock City Council
- Dungog Shire Council
- Lake Macquarie City Council
- Maitland City Council
- Mid-Coast Council
- Muswellbrook Shire Council
- City of Newcastle
- Port Stephens Council
- Singleton Council
- Upper Hunter Shire Council

The Councils of the region, along with the Hunter Joint Organisation of Councils, have a long history of biodiversity protection of our region, and have compiled a significant library of spatial data on species, landscapes and habitats. Since 1996, Hunter Councils has successfully sourced \$21.8 Million dollars from the Federal and State governments to work with member councils on biodiversity and broader sustainability issues, not including the many millions of dollars our member councils have invested in similar and complementary projects. The introduction of legislation that directly contradicts the proven effectiveness of these conservation efforts is not supported by the councils of the region.

The region is approximately 35,000 km<sup>2</sup>, with some 4,800 plants and animals, 300 of which are included on State and/or Federal Threatened Species lists, over 30 vegetation communities that are State and/or Federally listed as endangered or critically endangered. The region is home to sites of International Significance such as The Greater Blue Mountains Area (Wollemi & Yengo National Parks), Gondwana Rainforests of Australia (Barrington Tops National Park), and the Myall Lakes & Hunter Estuary Wetland RAMSAR sites; and crosses four bioregion boundaries (North Coast, Sydney Basin, Brigalow Belt South, and New England Tableland).

The region is continuing to experience pressure from mining and residential development, and new regional growth plans (Central Coast and Hunter regions) acknowledge and support increased loss of vital biodiversity values for the region, state and country. Any lessening of protection regulations will undoubtedly increase fragmentation, reduce structural connectivity and ultimately allow land clearing, the prime Key Threatening Process to continue. This loss will not only damage biodiversity, but also negatively impact on agricultural activities, Local Government's economic efficiency, and ultimately impact on the State's food security as we move into a carbon constrained economy.

We strongly recommend the Federal Government completely overhaul the draft strategy to ensure it provides a meaningful and detailed guide to biodiversity protection for our Country. The Councils of the region respectfully request that the Strategy:

- protect Australia's incredible nature and all it provides, through the development and adherence to measurable and ambitious protection goals and targets.
- align the targets (to be developed) in Australia's Strategy for Nature, with the targets agreed in the UN Convention on Biological Diversity held in 2010.
- identify and fund state and local based action that addresses the prevailing threats to our native species (climate change, habitat destruction and invasive species).

Please do not hesitate to contact Mr. Bradley Nolan (Director Hunter Joint Organisation of Councils Environment Division) on 02 4978 4024 to discuss any aspect of this submission.

Yours Sincerely

**Roger Stephan**  
Chief Executive Officer

## Detailed Submission

The following submission has been compiled with advice and information from the 11 Councils of the Hunter, Central Coast and Mid-Coast Region of NSW. Individual member Councils will also submit their own detailed submissions to the Draft Strategy. This submission will support and provide regional context for those individual submissions.

### Review of the Biodiversity Conservation Strategy 2010-2030

In 2016 the Australian Government undertook a review of the Australian Biodiversity Conservation Strategy 2010-2030 to review how successful activity had been to meeting the goals and targets set out in the Strategy. The Strategy was developed as *“the guiding framework for governments to conserve our national biodiversity to 2030. It provides an overview of the state of Australia’s biodiversity and outlines collective priorities for conservation. The Strategy aims to coordinate efforts at a national level across all sectors to sustainably manage biological resources in a way that meets our current needs and ensures their long term resilience, health and viability”*<sup>1</sup>.

The Review noted that Strategy *“had not been a strong driver”* of conservation efforts, and found that there were several factors affecting the Strategy’s implementation, and therefore success, in delivering its intent. Barriers were identified as governance, reporting and institutional frameworks, ability to facilitate increased engagement in biodiversity conservation across society, and the effectiveness of the Strategy’s design for prioritising and coordinating action.

Key findings of the Review were:

- The strategy did not engage, guide, or communicate its objectives to all audiences in a useful way
  - The Strategy is long and often technical, limiting its ability to influence a broad audience
  - The Strategy does not clearly articulate its intended use for different levels of government and other relevant sectors
  - There is inadequate guidance for decision makers to determine how best to direct investment for biodiversity conservation
  - Overall, the Strategy’s targets did not effectively guide the efforts of governments, other organisations or individuals. Some targets were unclear or difficult to measure, while others were not tightly tied to the Strategy’s outcomes.
- The Strategy is too focused on preventing the loss of biodiversity in natural terrestrial environments and does not consider biodiversity contributions across all landscapes
  - The Strategy is generally focused on the restoration and protection of natural environments and does not provide a framework for biodiversity conservation in built or production landscapes.

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<sup>1</sup> Department of Environment (2016), *Report on the Review of the first five years of Australia’s Conservation Strategy 2010-2030*, Commonwealth of Australia.

- The Strategy does not clearly resonate with people living in urban or rural environments or make key linkages to livelihoods, and health and wellbeing.
- The Strategy includes few outcomes designed to specifically improve the health and resilience of biodiversity in marine and aquatic environments.
- The Strategy does not adequately recognise that governments must achieve a balance between short and long term social, economic and environmental interests.
- The Strategy has not effectively influenced biodiversity conservation activities
  - There was no ongoing oversight from jurisdictions to facilitate and coordinate implementation of the Strategy.
  - An implementation plan, including allocation of responsibility for actions, has not been established and coordinated implementation of the Strategy has been ineffective.
  - The expectation that a new, stand-alone monitoring and reporting framework would be developed for the Strategy was ambitious and did not build on existing efforts.
- Alignment of the Strategy with the Convention on Biological Diversity, and other related international obligations, could be enhanced
  - Timing of the Strategy's release was not ideal as it preceded the adoption of the Convention's Strategic Plan, making its implementation through the Strategy challenging.
  - The Strategy could more comprehensively align with the Convention's Strategic Plan and be adaptable to evolving themes and priorities

The Review further recommended any revised Strategy was to:

- Manage transboundary environmental issues,
- Deliver on biodiversity-related issues that require Australian Government authority or cooperation from multiple jurisdictions, and
- Coordinate effort and leverage investment on shared priorities for biodiversity management.

The Councils of the Region believe the draft "*Australia's Strategy For nature 2018 – 2030*" (the Draft National Strategy) does not appropriately respond to the findings of the review as it no longer includes any protections from loss, targets for action, or guidance for investment or decision making. It appears that in the Government's desire to make the document more accessible to a wide audience, it has lost all meaningful relevance to the authorities and organisations that rely on it to provide the governance structures necessary to drive prioritisation of conservation works.

The Councils of the region feel the Draft National Strategy entirely fails to address any of the review's comments, and fails to achieve the former Strategy's primary goal of coordinating conservation efforts across all sectors.

Furthermore, The Draft National Strategy fails to provide a Commonwealth framework to support the preparation and implementation of an action inventory to achieve the goals and objectives of the strategy at a local, state/territory and federal level.

## Recommendations

1. The draft *Australia's Strategy for Nature 2018 – 2030* be reviewed and re-written to address the findings of the 2016 Review, ensuring that the new Strategy will empower all sectors to sustainably manage our biological resources to meet our current needs and ensure their long-term resilience, health, and viability.

## Draft Strategy Vision and Objectives

The Councils of the region support the vision and objectives outlined in the Draft National Strategy, including recognition of the important role played by local government in caring for nature. Whilst the vision and objectives are commendable and important, the purpose of a national strategy for biodiversity conservation is to outline how objectives will be achieved by the Australian Government in co-operation with state, territory and local governments. The draft national strategy could be improved by identifying clear priorities and actions for caring for nature over the period to 2030, and articulating appropriate principles to support investment and decision-making.

Importantly, the strategy should reference previous national biodiversity strategies, state strategies and other important documents such as *Australia's State of the Environment Report* (see Cresswell ID & Murphy HT, 2017, *Australia State of the Environment 2016: Biodiversity*, Independent Report to the Australian Government Minister for the Environment and Energy, Australian Government Department of the Environment and Energy, Canberra). It should include an evaluation of these strategies and their implementation, to ensure that the current strategy builds on previous experience.

The exhibited Draft National Strategy currently lacks detail, compared to previous strategies including *Australia's Biodiversity Strategy 2010 – 2030*<sup>2</sup>, and *Australia's Biodiversity Conservation Strategy 2010-2030*<sup>3</sup>. The Draft National Strategy could be improved by more closely following the format and approach of the existing strategy.

## Recommendations

2. The draft National Strategy for nature 2018-2030 should be completely revised to include measurable and achievable protection goals and targets that can support investment and decision-making.
3. The proposed principles should be more specific and relevant to the Draft National Strategy's objectives and the proposed objectives tangible and measurable.
4. The Draft National Strategy for nature 2018-2030 should be re-written to include appropriate detail (as per previous National Strategies) to guide implementation of actions and build on previous experience.

## Development Assessment Planning

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<sup>2</sup> Natural Resource Management Ministerial Council 2010

<sup>3</sup> Department of Sustainability, Environment, Water, Population and Communities (2010), *Australia's Biodiversity Conservation Strategy 2010-2030*, Commonwealth of Australia

The Councils of the region support a national approach to conserving biodiversity and a coordinated approach across local, state and federal governments to achieve the goals and objectives of the Draft National Strategy.

The Draft National Strategy fails to recognise that the cumulative impacts of approved development and the associated direct impacts of land clearing as a key threat to Biodiversity, as seen through current rates of decline in biodiversity.

The Federal Government plays an important role in promoting and supporting ecologically sustainable development (ESD) in all government planning decisions. The Draft National Strategy fails to recognise the link to the *National Strategy for ESD* which was adopted by all levels of Australian government in 1992 and embeds the principles of ESD in all levels of government decision-making processes.

Importantly, the Draft National Strategy currently does not provide a link to the key national biodiversity protection law, *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) or identify how it supports the development and implementation of national policy, programs and legislation to protect and conserve the natural environment.

The Draft National Strategy could be improved by supporting an effective framework for intergovernmental relations for environmental assessment and approval processes including involvement from state and local government for Commonwealth planning decisions that significantly affect biodiversity conservation at a local level.

### **Recommendations**

5. The Draft Strategy should align with the Convention on Biological Diversity, objectives of EPBC Act and other related international obligations which provide for the identification, conservation and protection of Australia's unique biodiversity at a Commonwealth level.
6. Priority should be given to maintaining and improving national biodiversity protection laws.
7. The Draft Strategy should recognise the impacts of land clearing rates and that the current decline in biodiversity is unsustainable and must be urgently addressed.
8. The Draft Strategy should recognise the important role that the Federal Government plays in Commonwealth planning decisions and the potential impacts Federal decisions can have on biodiversity, strategic planning and conservation actions at a local level.
9. The Draft Strategy should reinforce that Ecologically Sustainable Development (ESD) principles underpin all levels of government decision-making processes.
10. The Draft Strategy would better support effective land use planning decisions if specific consultation requirements with local government and state agencies were required for actions that involve significant removal of native vegetation.

11. Approval decisions where actions are proposed by Commonwealth agencies and/or are on Commonwealth land should adequately consider the cumulative impact of the action on the potential loss, fragmentation and/or isolation of significant biodiversity corridors within the local and regional context.

## **Strategic Land Use Planning and Biodiversity Conservation**

The Councils of the region do not believe the Draft National Strategy appropriately addresses the findings of the Review, nor does it provide appropriate leadership or governance to conservation activities at a state or local level.

The Draft National Strategy fails to provide a Commonwealth framework to support and address the need for effective integration of biodiversity in strategic land use planning by state and local governments.

The Draft National Strategy does not currently value or recognise the high ecological value and importance of Commonwealth land assets (Commonwealth Estate) and the important role these assets have in local strategic and biodiversity conservation planning. The Commonwealth Estate holds over 3 million hectares of land, with the Department of Defence Estate containing over 400 properties<sup>4</sup> many with significant biodiversity values at a Commonwealth and State/Territory level.

Importantly, the Draft National Strategy should recognise the high ecological value of the Commonwealth Estate and provide a framework for the federal government to collaborate with local government during strategic land use planning, particularly prior to divestment decisions for Commonwealth Estate with high ecological values.

It is therefore recommended that the Australian Government consider the following Biodiversity Conservation recommendations to improve the Draft National Strategy and provide stakeholders with a National Strategy they can use to guide their strategic planning decisions and conservation efforts.

12. The Draft National Strategy should recognise and address the need to increase the area of land protected in conservation reserves and the need for additional resources for conservation management.
13. The Draft National Strategy should recognise the high ecological value and importance of the Commonwealth Estate and the important role these assets have in local strategic and biodiversity conservation planning.
14. The Draft National Strategy should provide a framework for the federal government to collaborate with local government in local strategic and biodiversity conservation planning to recognise the high ecological value of the Commonwealth Estate, identify key properties within local strategic land-use plans and any long-term investment opportunities of these important key properties for local biodiversity conservation.

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<sup>4</sup> First Report of the National Commission of Audit (2014) Chapter 10.2 Management of the Commonwealth property portfolio

15. More recognition of the important role of local government in natural resource management should be given, including the need for additional funding for local or regional programs to support biodiversity conservation.
16. Developing an 'action inventory' is a useful initiative. However, the Draft Strategy would be more effective if it identified the need to integrate biodiversity protection into normal planning and administrative practice and to ensure adequate government resourcing.
17. The Draft National Strategy should recognise and address the close interrelationship between biodiversity loss and climate change.
18. The Draft National Strategy should provide direction on the removal of financial incentives and policies that directly and indirectly lead to biodiversity loss (e.g. Australian Government funding and taxation arrangements).