



Comments on

Australia's Biodiversity Conservation Strategy 2010-2020

Consultation Draft

by

**SOUTH AUSTRALIAN FARMERS FEDERATION
(SAFF)
NATURAL RESOURCES COMMITTEE**

On

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General Comments:

SAFF supports the development of this document which not only identifies actions (and responsibilities for those actions) but also a monitoring and evaluation framework with which to measure the implementation of the strategy.

The document fails to acknowledge the significant contribution to biodiversity that some landholders have made – either through knowledge that has been passed through generations or through activities and management practices that enhance biodiversity.

The document makes reference to the private sector through much of the document but it is not obvious to the reader that this includes all levels of business, including primary producers and landholders.

The document fails to acknowledge the role that regional natural resource management boards or the equivalent can play, and how planning that has occurred at a regional scale can assist in setting state and national priorities.

Specific Comments:

SAFF supports the Vision for Australia's Biodiversity Conservation Strategy.

Strategy principles on page 8:

Additional principles would be:

- Decisions are based on science.
- We must recognise the importance of gathering, accessing and sharing of information and knowledge. This includes respecting the information held by landholders, particularly where properties have been managed within a single family over many generations.
- Strategic partnerships, integration and cooperation across stakeholders is essential given the enormity of the task and an appropriate one for attention at the national scale.
- Innovation must be part of the solution.

1.1 Building on current work:

This section fails to acknowledge efforts made by landholders in managing biodiversity. It also fails to recognise the significant efforts (investment, research and actions) by State Governments, NRM Boards and Non-Government Organisations.

Table 1.1 – Priority for change 4: Getting results:

The only action listed here is about reviewing and reforming legislation. SAFF is concerned that legislation is the big-stick approach and that there are not positive or proactive actions listed. Some actions that could be listed include:

- Greater implementation of stewardship payments.
- Innovative practices to enhance biodiversity, eg changed grazing practices.
- Innovative practices to the management of threats such as feral animals, eg market based instruments.

Table 3.2 – Action 2.2.3:

This action needs to include the private sector as well. Primary producers and landholders need to be part of the process in developing innovative solutions.

Table 3.4 – Action 4.4.1:

This should read “Encourage or assist industry to adopt.....” The way this is currently written suggests that the big stick approach is to be used. Instead we need a much more collaborative approach if we are going to have significant achievements in biodiversity.

Table 3.6 – Action 6.4.2:

This should read “Encourage or assist to.....” instead of “Cause”.

Appendix 9.2:

This section identifies the threat to biodiversity from feral animals. However it does not acknowledge the threat to biodiversity from overabundant native species:

- Corellas are impacting on the Glossy Black Cockatoo by taking over nesting sites, and are encroaching into areas where they may not have occurred previously.
- Some species of macropods are becoming overabundant and competing with other native mammals.

The document should at least acknowledge that some native species can become overabundant and consequently compete with other native animals – this is also related to changes in habitat which allow for some species to become out of balance.

This section also fails to mention the Weeds of National significance and how that relates to this strategy. As part of this there are a number of sleeper weeds which are not currently on the list of Weeds of National significance. If action was taken now we could have an opportunity to confine or even eradicate these weeds.