

Australia's Strategy for Nature 2018-2030 draft

A submission to the draft Australia's Biodiversity Conservation Strategy and Action Inventory

March 2018

This submission was prepared by the Invasive Species Council. The Invasive Species Council was formed in 2002 to seek stronger laws, policies and programs to keep Australian biodiversity safe from weeds, feral animals and other invaders, with a focus on prevention and early action.

General comments

Australia's Strategy for Nature 2018-2030 (the Strategy) is the Biodiversity Working Group's revised strategy following the scheduled 2015 review¹ (the Review) of its predecessor: 'Australia's Biodiversity Conservation Strategy 2010-2030. The purpose of the Review was to assess progress in implementing the original strategy, including against the 10 national targets it defined. The Review also considered whether the targets or other elements of the original strategy should be amended.

1. The Strategy is much weaker than its predecessor

The key findings of the Review were that the 2010-2030 Strategy: was not a useful communication tool, was too narrowly focussed, was not effective in influencing conservation activities, and was not well aligned with international strategies. The Strategy 2018-2030 picks up some of the recommendations and as a result is framed in more user-friendly language and mentions biodiversity in production and urban landscapes. However, the Strategy is significantly weaker in most areas identified in the Review than was its predecessor. If adopted in its current form the Strategy will do nothing to drive conservation action, will be an embarrassment internationally, and frankly will do a great dis-service to the many talented and dedicated people in all levels of government who are striving to protect Australia's biodiversity.

2. The Strategy has no strategies

The Strategy is vague and weak. It is an aspirational document with qualitative goals and objectives. It contains the higher-level elements of a strategy such as vision, goals, objectives

¹ Report on the Review of the first five years of Australia's Biodiversity Conservation Strategy 2010-2030, Commonwealth of Australia 2016.

and underlying principles. It also alludes to actions by suggesting governments could create an inventory to 'showcase how each government is delivering on-ground action.' However, the Strategy lacks any of the features one might ascribe to the 'shared roadmap' it purports to be. Ironically, what the Strategy lacks is the strategies that would form the causal link between objectives and actions. What the roadmap lacks is roads.

3. The Strategy fails to meet our international commitments

The 10 National Targets of the original strategy have not been revised but abandoned altogether. Without them the Strategy can have no national action plan to achieve the targets, no implementation plan, and no plan for monitoring and reporting. Australia's Biodiversity Conservation Strategy 2010-2030 was the central plank of our National Biodiversity Strategy and Action Plan (NBSAP), a mandatory requirement for a contracting party to the UN Convention on Biological Diversity (CBD). The Strategy, as currently proposed, does not meet the requirements of an NBSAP, and its adoption would remove that central plank leaving us potentially in breach of our international obligations.

4. The Strategy fails to show national leadership

The goals and objectives of a national strategy can only be achieved by coordinated and cooperative actions among all levels of government and with a number of non-government actors. The removal of obstacles through the alignment of legislation, policies and programs takes time, considerable effort and political will. Reaching agreement on roles and responsibilities at each level of government, with associated financial implications, can be tortuous and protracted. The Strategy does not address these essential matters and will do nothing to drive the changes required to remove institutional roadblocks, inconsistencies and wasteful duplication.

5. The strategy doesn't address deficiencies in threat abatement planning

The strategy does not address the poor performance of key threatening process listings and related threat abatement planning. This is of direct relevance to addressing the problem of invasive species since two-thirds of the listed key threatening processes are invasive species threats. Performance of 11 of the 21 key threatening process listings has been reviewed (mostly by internal review). This found that there was good progress made for 4 listings, moderate progress for 4 listings and poor progress for 3 listings. One of the threat abatement plans with 'moderate progress' (feral cats) has recently made 'good progress' due to a concerted national effort and funding. There was no evidence of progress in addressing the catch-all 'novel biota' key threatening process listing.

Recommendations

Main recommendation

The Invasive Species Council strongly recommends the proposed Strategy be discarded and the Biodiversity Working Group produce a more appropriate, comprehensive strategy that improves the 2010-2030 Strategy in line with recommendations of the Review and meets the requirements of an NBSAP as recognised by the CBD.

In re-visiting the national approach to invasive species, the Biodiversity Working Group should look to embrace the relevant target of the CBD Strategic Plan, Aichi Target 9 which states:

By 2020, invasive alien species and pathways are identified, prioritised, priority species are controlled or eradicated, and measures are in place to manage pathways to prevent their introduction and establishment.

The relevant target of the 2010-2030 Strategy was Target 7:

By 2015, reduce by at least 10% the impacts of invasive species on threatened species and ecological communities in terrestrial, aquatic and marine environments.

In 2014 Australia reported to the CBD² that:

Target 7...is proving more challenging, due to the absence of baseline data and suitable monitoring and measurement methodologies.

Failure to achieve any reduction in the impacts of invasive species in the past five years was also confirmed by the 2016 State of the Environment Report. Not only has the target not been met but the original Strategy gave no details on how the target was arrived at, what actions would be taken to achieve it, nor how the reduced impacts would be measured.

Further recommendations

ISC has consistently recommended a number of actions that are necessary for us to achieve a significant and lasting reduction in the impacts of invasive species on Australia's biodiversity. These include but are not limited to:

1. Bring institutional arrangements for environmental biosecurity up to similar level of capability and preparedness as those existing for agricultural and human health threats;
2. Implement the recommendations of the 2015 Senate inquiry into environmental biosecurity and the relevant recommendations of the 2017 independent review of Australia's national biosecurity system;

² Australia's Fifth National Report to the Convention on Biological Diversity. May 2014. Australian Government.

3. Harmonise laws, policies and programs that deal with invasive species prevention, eradication, containment and management at all levels of governments;
4. Identify the most important novel threatening species (current and future), analyse pathways and risks of entry, and build and maintain adequate biosecurity controls;
5. Establish baseline data of current impacts of key invasive species and methods for assessing the impacts of management actions;
6. In prioritising existing invasive species for management action, capitalise on previous investment in research and development, and build on previous successful management actions;
7. Most importantly, adequately fund the above program so that the return on investment to Australia's nature and to our health, wellbeing, prosperity and quality of life is maximize.