

# **Tasmania's Draft Threatened Species Strategy**

Submission by the  
Invasive Species Council

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## Document details

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### About the Invasive Species Council

The Invasive Species Council was formed in 2002 to advocate for stronger laws, policies and programs to keep Australian biodiversity safe from weeds, feral animals, exotic pathogens and other invaders. It is a not-for-profit charitable organisation, funded predominantly by donations from supporters and philanthropic organisations.

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## Executive Summary

The Invasive Species Council welcomes the opportunity to comment on Tasmania's draft Threatened Species Strategy. While it provides a high-level framework, it lacks the specificity, accountability and resourcing required to drive meaningful conservation outcomes. Thus, in its current form, the strategy is unlikely to halt species decline or prevent further extinctions.

The most significant weakness is the failure to clearly identify, prioritise and address the key threatening processes driving biodiversity loss. The draft strategy does not provide a mechanism for identifying or ranking key threats and does not commit to the development of threat abatement plans. This represents a step backwards from the 2000 strategy, which recognised that threatened species are the result of underlying threats and that managing those threats is the most effective and efficient approach to conservation.

The strategy also lacks measurable targets, timeframes and a monitoring framework, making it impossible to assess progress or ensure accountability. This is despite strong stakeholder feedback calling for clear, time-bound and measurable objectives. In addition, the strategy does not commit to sustained funding or clearly define the role of government in coordinating and delivering conservation action, placing undue emphasis on 'collective effort' without the necessary structure to support it.

Without a focus on threat identification, prioritisation and abatement, supported by measurable targets, resourcing commitments and strong governance, the strategy risks perpetuating the gap between intent and implementation identified in previous approaches.

Refocusing the strategy on managing the threats driving biodiversity loss is essential if Tasmania is to reverse current trends and achieve meaningful conservation outcomes. To be effective, the strategy must explicitly identify and prioritise key threatening processes, commit to the development and implementation of threat abatement plans, include clear, time-bound and measurable targets, and provide sustained funding.

## Key Recommendations

- 1) **Reinstate a threat-based framework**  
The Strategy should explicitly identify and list key threatening processes (KTPs) and embed threat abatement as the central organising principle for conservation action.
- 2) **Commit to threat prioritisation and abatement planning**  
Establish a process to identify and prioritise threats, and commit to the development and implementation of threat abatement plans for all priority threats.
- 3) **Introduce measurable targets and accountability**  
Include clear, time-bound, measurable (SMART) targets for threat reduction and species recovery, aligned with national and international commitments
- 4) **Commit to resourcing and government leadership**  
Provide long-term, sustained funding, and clearly define government responsibility for priority setting, coordination and delivery.

# Key Issues in the Draft Strategy

## Lack of specificity and failure to meet statutory requirements

The Threatened Species Protection Act 1995 requires the Tasmanian Threatened Species Strategy to specify ‘the means by which the objectives of this Act are to be achieved’. However, this draft explicitly positions itself as a high-level coordinating framework and states that it is ‘not intended to be a comprehensive operational plan’.

While this approach may support flexibility, it comes at the cost of clarity, accountability and effectiveness, particularly in a context where biodiversity decline is driven by well-understood threats. The result is a document that articulates aspirations but does not meaningfully direct action or provide the means by which the objectives of the Act will be achieved.

This risks perpetuating the ‘gap between intent and visible implementation’ identified in consultation. As noted in the consultation summary, one of the strongest criticisms of the previous Strategy was the lack of measurable outcomes and timelines. The current draft does not address this concern.

The urgency of this issue is underscored by the 2024 State of the Environment Report, which found that all indicators of biodiversity are in fair to poor condition and declining. The failure to implement the previous strategy and tackle key threatening processes behind those trends is a major issue the new strategy needs to fix. In its current state, the draft strategy is unlikely to drive action to tackle any threats or see any reversal in declining trends.

The strategy should provide clear, time-bound, measurable targets for action, aligned with international and national targets. This includes target 6 of the Kunming-Montreal Global Biodiversity Framework: reduce the introduction of invasive alien species by 50% and minimize their impact.

## Absence of explicit threat identification and prioritisation

The draft strategy lacks the most fundamental step in conservation planning: clearly identifying and prioritising the drivers of decline. The draft contains only a general commitment to manage ‘priority threats’. It specifies no mechanism to identify and rank threats, no system for tracking progress on threat reduction, and no commitment to the development of threat abatement plans. This is despite the previous consultation identifying strong support for retaining a focus on key threatening processes.

Arguably, in failing to include proposals for ensuring the identification and proper management of threatening processes, the strategy falls short of the requirements of s10 of the *Threatened Species Protection Act 1995*.

In contrast, the 2000 Strategy was generally commended for its emphasis on key threatening processes. Additionally, there was strong support in previous consultation for retaining a focus on addressing major drivers of species decline, such as invasive species, habitat loss and degradation and climate-related impacts. Similarly supported was the retention of a prioritisation approach for threatened species, acknowledging that some species will require specific interventions for successful recovery.

This shift away from a clear, evidence-based threat abatement model toward a more abstract coordination framework is concerning, particularly given that the previous, more detailed

strategy was not effectively implemented, with not a single threat abatement plan being made. This is a critical gap that the new strategy should address.

### **Underemphasis of prevention and biosecurity**

It is a widely recognised principle in conservation that preventing threats is more effective than reactive species recovery. While the draft strategy references prevention conceptually, it does not provide mechanisms to operationalise it, such as strengthened biosecurity systems, early detection and rapid response, or eradication of new incursions. This underemphasis overlooks one of the most cost-effective and evidence-based approaches to conservation.

### **Lack of measurable targets and outcomes**

The draft strategy sets broad, qualitative aims such as ‘species are secured or recovered’ and ‘declines are halted’, but includes no measurable targets, defines no timeframes, and provides no baseline or metrics for success. In its current form, the strategy does not define what success looks like in measurable terms, limiting its utility for guiding or evaluating conservation action. Without measurable outcomes, it will be impossible to assess effectiveness or demonstrate accountability.

The failure to include clear and measurable targets is disappointing, given the resounding feedback in previous consultation is that the current strategy objectives lack specificity and actionable targets, with calls for the objectives to be framed as specific, measurable, actionable, relevant and time-bound (SMART) goals. Opportunities were identified to both strengthen the ambition and broaden the scope beyond species-level issues to include systematic threats, landscape-level action and broader biodiversity goals.

### **Insufficient attention to resourcing and government responsibility**

While the draft acknowledges finite resources, it does not commit to increased or sustained funding. Nor does it outline funding mechanisms or allocation principles. The emphasis on ‘collective effort’ risks minimising the central role of government in setting priorities, coordinating action, and providing sustained funding. This was a key concern raised in previous consultation and remains unresolved.

## **Responses to questions in the Threatened Species Strategy Discussion paper**

### **Q1. Does the draft Strategy provide a clear and useful framework?**

The strategy provides a high-level conceptual framework, but lacks the specificity required to guide real-world decision-making. It does not clearly identify or prioritise the key threatening processes driving species decline, despite acknowledging their importance.

The proposed ‘priority setting process’ is undefined, with no detail on methodology, governance, timelines or transparency. Without clear direction on what threats to address, where, and how, the strategy risks being useless.

### **Q2. How useful are the key elements (vision, guiding approaches, pillars, aims)?**

The vision and guiding approaches are appropriate but generic and broad, and do not meaningfully differentiate priorities or actions.

The strategic pillars are broadly sound, but do not translate into actionable direction without measurable targets, baselines or timeframes.

With no clear link between the strategy's elements and on-ground outcomes, particularly with threat reduction, the strategy does not provide sufficient guidance for organisations to align investment or operational decisions.

### **Q3. Will the Strategic Pillars support the Vision?**

The pillars identify important components of conservation, but do not prioritise the management of threats as the central mechanism for achieving the vision. 'Impacts from priority threats are proactively managed' is included as an aim, but there is no mechanism to identify, list or rank threats, no requirement for threat abatement planning, and no system for tracking progress on threat reduction. Without embedding threat abatement as the core organising principle, the pillars are unlikely to halt species decline.

### **Q4. Do the long-term aims clearly describe what success looks like?**

The long-term aims are aspirational but not measurable. There are no quantitative targets (e.g. reduction in threats, number of species recovered, area of habitat restored), no timeframes specified for achieving outcomes, no baseline or monitoring framework defined to assess progress. As a result, the strategy cannot be evaluated or provide for accountability.

### **Q5. Is there anything else you would like to tell us about the draft Strategy?**

The strategy does not adequately reflect the central role of threats in driving biodiversity loss, particularly invasive species, which are a leading cause of extinctions in Australia.

Effective threatened species conservation requires:

- systematic identification and listing of threatening processes
- prioritisation based on impact and feasibility
- dedicated threat abatement plans
- clear governance and accountability for implementation
- commitment of funding.

These elements are absent or deferred in the current draft.

### **Q6. What high-level focus areas should be a priority for our collective effort over the next 5-years? E.g. priority species recovery, threat abatement, decision-support tools, data needs, community partnerships, etc.**

- 1) Systematic identification and prioritisation of key threatening processes, including invasive species, habitat loss, adverse fire regimes and disease.
- 2) Development and implementation of threat abatement plans for all priority threats.
- 3) Prevention and early eradication of new invasive species incursions (strengthened biosecurity).
- 4) Island-based eradication programs targeting high-impact invasive species.
- 5) Clear prioritisation framework linking threats, species and places to guide investment.
- 6) Monitoring and evaluation systems tied to measurable outcomes (e.g. threat reduction, species recovery).

**Q7. Based on the focus areas you identified in the previous question, what regional-level activities should be a priority in your local area in the next 3 – 5-years? Please include your region / local area in your response.**

- 1) Island eradications:
  - Cats from Bass Strait Islands and Bruny Island
  - Pigs from Flinders Island
  - Deer from Bruny and King islands
  - Island weed eradications, eg boxthorn
- 2) Expansion of feral deer control programs, particularly in high conservation value landscapes (e.g. Midlands, World Heritage Area border regions).
- 3) Post-disturbance (e.g. fire) threat management, including invasive species control to support recovery.
- 4) Community-supported containment and management programs
  - Cat containment
  - Deer farm regulation enforcement
  - Minimum fencing standards to prevent roaming livestock

**Q8. How ready is your organisation / community to participate in implementation in the next 3 – 5-years?**

In general, it will be difficult for organisations to contribute in the absence of clear, transparent priorities (threats, species, places), long-term funding commitments, defined roles and responsibilities, and access to shared data and decision-support tools.

**Q9. Where do you see the greatest opportunities to improve coordination or reduce duplication across threatened species efforts?**

- 1) Establish prioritisation of threats, species and places to align effort across sectors.
- 2) Develop shared monitoring and reporting frameworks, rather than multiple parallel systems.
- 3) Ensure coordination is driven by priorities and outcomes, not just information sharing.

**Q10. Are there existing initiatives, partnerships or approaches that you or your organisation are involved with or know of that could be built on to support implementation?**

- 1) Existing island eradication and invasive species control programs, such as the TAC's Bass Strait islands cat eradications.
- 2) Partnerships between NGOs, Traditional Owners, and local government on landscape-scale restoration (e.g. southeast regional deer management working group).
- 3) National frameworks such as threat abatement plans and coordination roles (e.g. feral cat coordination).

**Q11. What information or actions would help you or your organisation engage with priority threats, species and places? For example, priority action guidance, recovery advice, extension activities.**

- 1) Threat abatement plans with defined actions, responsibilities and timelines.
- 2) Decision-support tools linking actions to outcomes (e.g. where intervention will have the greatest impact).
- 3) Certainty around funding and policy settings, enabling long-term planning.

**Q 12** If you or your organisation hold relevant data or undertake activities that support Strategy implementation (e.g. monitoring data, threat mapping, research), please briefly describe them.

**Q13** What types of data-sharing and reporting mechanisms would best capture and showcase the Tasmanian community's work in delivering the Strategy?

- 1) A centralised, publicly accessible platform for:
  - threat mapping
  - species monitoring
  - management actions.
- 2) Standardised reporting frameworks linked to Strategy outcomes (e.g. threat reduction metrics).
- 3) Regular statewide reporting on progress, including successes and gaps.
- 4) Integration with national datasets and monitoring programs.
- 5) Systems that prioritise usability and decision-making, not just data collection.