

Friday 15th April 2011

Biodiversity Integration Unit
Department of Environment and Resource Management
GPO Box 2454
Brisbane QLD 4001

Email: biodiversity@derm.qld.gov.au

Dear Sir/Madam

RE: SUBMISSION ON "BUILDING NATURE'S RESILIENCE: A DRAFT BIODIVERSITY STRATEGY FOR QUEENSLAND"

The Environment Institute of Australia and New Zealand South East Queensland Division (EIANZ SEQ Division) thank the Queensland Government for the invitation to make a submission in relation to the Draft Biodiversity Strategy for Queensland. SEQ Division's response is in its Submission at Attachment A.

The EIANZ's goals are to advance ethical and competent environmental practice, promote environmental knowledge and awareness, and facilitate interaction among environmental practitioners. Our vision is for sustainable and equitable management of the environment through excellence in environmental practice. Members of the EIANZ are fully qualified professional practitioners with experience in a broad range of environmental fields.

The EIANZ's position is that a sustainable environment is one that is environmentally, economically and socially sustainable. The Institute would like to see that existing biodiversity resources are preserved and enhanced, 'net gain' outcomes are enforced to assist in reversing biodiversity loss and that holistic and field based approaches to biodiversity become the norm.

Do not hesitate to contact me via email david.carberry@rpsgroup.com.au or phone (0439 600 566) if you would like to discuss our submission further.

Yours faithfully

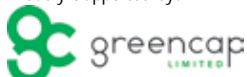


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ATTACHMENT A

EIANZ Submission on 'Building Nature's Resilience – A Draft Biodiversity Strategy for Queensland (QLD)' 2011

Recommended Approach and Overarching Comments

The Environment Institute of Australia and New Zealand (EIANZ) is a non-profit, apolitical professional association. Founded in 1987, the Institute is multi-disciplinary in membership and provides scope and opportunity for professional and academic interchange across all sectors of the diverse environmental industry.

The Institute has a key role within the Australian and New Zealand communities as a major contributor to the formulation of effective and responsible policies in the broad field of environmental management. The practical consequence of the Institute's involvement in environmental reform processes is a long-term improvement in the quality of environmental management. This will, in turn, lead to a better protected and managed global environment as Institute members pursue their endeavours and apply their skills to local environments.

The Environment Institute of Australia and New Zealand ('EIANZ') is generally supportive of the Primary and Supporting Objectives of the document entitled Building Nature's Resilience – A Draft Strategy for Queensland ('Qld Biodiversity Strategy') as published by the Department of Environment and Resource Management (DERM) in December 2010. Concepts of particular importance are centred on building resilience of Queensland's ecotypes, a holistic or whole of landscape approach to biodiversity management and the development of partnerships. Generally the strategy is structured well.

The EIANZ recommends the following approach to Biodiversity and Native Vegetation Management, as published on the EIANZ website www.eianz.org:

The sustainable management of biodiversity is reliant on the implementation of the following principles:

- that biodiversity is conserved, in situ, across all levels and scales - structure, function and composition are conserved at site, regional, state and national scales;
- that examples of all ecological communities are adequately managed for conservation; and
- that ecological communities are managed to support and enhance viable populations of flora and fauna and ecological functions.

EIANZ recommends the adoption of the *precautionary principle* along with other principles of *sustainable development* in decisions affecting biodiversity. This acknowledges the complexity inherent in ecological systems and the possibility of unforeseen outcomes due to incomplete knowledge. Where practical, existing biodiversity resources can be preserved and enhanced through:

- appropriate recognition and valuation;
- setting of appropriate goals and targets;
- creation of biodiversity corridors and diverse landscapes;
- preservation of ecological communities;

- requirements for compensatory habitat creation or protection, and restoration of damage; and
- application of adaptive management principles.

EIANZ considers that in implementing planning and regulatory decision-making, 'net gain' outcomes are required to assist in reversing biodiversity loss.

In addition, there are a number of information gaps and a critical need to accelerate taxonomic studies on micro-organisms, fungi and lower organisms, which are very diverse and numerous. Other challenges are the lack of availability of professional resources in biodiversity in industry and government to enable effective decision making.

EIANZ considers that **leadership, education and awareness** regarding biodiversity are priority responsibilities for all levels of Government and industry. Particular roles include:

- building adequate capacity and resources through development of professional recognition, best practice guidelines and competency frameworks, and encouraging young scientists to enter careers related to biodiversity;
- providing assistance to land owners with appropriate active land management techniques, and incentives and schemes promoting enhancements;
- improving community and socio-economic understanding of biodiversity issues, including the importance of site level biodiversity in a regional context;
- improving and coordinating reporting on protected areas and off-reserve areas, distinguishing between habitats and species of different levels of exposure, outlining threatening processes, and timelines for completion of actions;
- co-ordinating with policy and regulating agencies related to emerging priorities, including climate change and sustainable development; and
- ensuring that regional NRM and catchment bodies recognise the importance of biodiversity management in both time and space in their plans, strategies, program implementation and management and that sufficient funds are available to ensure positive change.

EIANZ considers that ongoing **research** is required to:

- identify data gaps that are currently restricting effective protected area planning and management;
- further assess threatening processes, in particular the impact of climate change on habitats, communities, populations and their distribution, and natural processes;
- develop the taxonomic knowledge necessary for the conservation and sustainable use of biodiversity;
- continually improve understanding of ecological processes, systems and species at the macro and micro levels, and the origins, evolution and interrelationships of Australia's and New Zealand's unique biota;
- develop, continually monitor, report and revise national biodiversity standards, objectives and targets (including enhanced development of indicators and metrics, and biodiversity protection targets for competing land uses);
- estimate and describe the benefits, including economic and social, associated with maintaining and enhancing protected areas; and

- improve the uptake and consistency of digital mapping to present and coordinate sets of related data.

EIANZ considers that **planning and regulatory decision-making** is required to:

- consider biodiversity in all environmental planning and impact assessment. This includes modified landscapes and urban areas, not just relatively intact ecological or reserve systems;
- ensure biodiversity values are an integral consideration of environmental assessment undertaken as part of triple bottom line decision making (i.e. taking account of environmental, social and economic considerations);
- foster the development and adoption of strategic approaches and frameworks to biodiversity conservation, which provide a national or regional context for decision making at local, project, or site scales.
- ensure that in environmental impact assessment (EIA), biodiversity is always considered early in the process. This will lead to more robust development outcomes and mitigation, less conflict in the later stages of the EIA process and more consistent decision making;
- use the principles of avoid-minimise-offset of biodiversity to deliver 'net gain' outcomes in planning and development assessment;
- develop consistent but appropriately flexible ways of measuring and evaluating biodiversity loss and gain (e.g. NSW Biometrics and Biobanking, Victorian Habitat Hectares, or the Business and Biodiversity Offsets Program) in planning and regulatory decisions, including ultimately nationally consistent schemes;
- evaluate the full economic impact of biodiversity loss, including species loss, loss of landscape function, and loss or degradation of environmental services, and take this into account in decision-making;
- recognise that there will always be insufficient information where biodiversity is concerned. Risk and uncertainty are inherent in all decision-making for biodiversity and precautionary approaches should be adopted; and
- favour the development of consistent decision-making processes at all levels of government.

EIANZ considers that **monitoring, evaluation and reporting** of biodiversity are required to:

- improve performance by learning from past successes and failures, and to implement adaptive management;
- consider effects at a range of spatial and temporal scales; and
- use a range of measures and performance indicators over a variety of geographic and temporal scales. Single quantitative measures may be useful but other measures are needed with a range of complexity/sophistication. The role of qualitative assessment (including well documented 'ecological intuition') should also be recognized as valid.

EIANZ considers **coordination, networking and information sharing** at all levels of Government, as well as the public, is required to:

- foster and develop international relationships with other agencies;
- enhance the effectiveness of existing information sharing networks and identify and address data gaps;
- develop consistent baseline data through networks and partnerships;

- maximise available resources and knowledge from non-government organisations and other capabilities; and
- recognise the importance of using geographic boundaries (such as catchment or bio-regional boundaries) in preference to political boundaries for environmental management, environmental planning and impact assessment.

The EIANZ encourages the full support of Government at all levels in **native vegetation retention and revegetation** initiatives.

The Institute supports the application of legislative controls to ensure that clearance of native vegetation is regulated by Government. We take the position that incentives such as rate relief should be available to private landholders to retain native vegetation intact as a contribution to maintenance of biodiversity, catchment protection and scenic landscapes.

We are of the view that Government at all levels has a clear role in ensuring that further clearance of native vegetation on public land only proceeds when cost-benefit analysis demonstrates a net benefit to the regional community (including assessment of economic, social, cultural, biophysical and environmental costs and impacts).

The EIANZ believes regional vegetation plans should be prepared where catchment and property management plans are absent. Such plans should be based on scientific assessment and mapping of the presence, distribution and abundance of species composition and condition of native plants.

The EIANZ opposes the clearing of native vegetation communities containing rare and threatened species when other viable alternatives are available.

The EIANZ is of the opinion that native vegetation clearance (within designated parameters/triggers) on all tenures should be subject to public scrutiny and appropriate controls. The attitude of 'Freeholders Rights prevail over all else' is now dated as we take a more holistic approach to management of the nation's natural resources. Where there is community consensus that clearance of native vegetation on private land should be constrained for the public good, it is appropriate that some recompense is made to the landholder. More positively, incentives, such as rate relief and subsidised fencing, should be available nationally to secure retention of native vegetation. This should encourage more landholders to place conservation covenants on their title.

Comments on 'Building Nature's Resilience – A Draft Strategy for Queensland' ('Old Biodiversity Strategy')

Whilst it is acknowledged that the Biodiversity Strategy is intended to be a high level strategic document, the EIANZ has concerns around how the specific objectives of the strategy could be implemented. The document mentions a landscape approach however it also promotes the use of common species and 'iconic' species as priorities for realisation of the document objectives. The Institute again cautions against the use of arbitrary and high level desktop based mechanisms to determine elements of ecological significance. The determination of ecosystem elements of a given property/region should be based on scientific data as opposed to environmental planning overlays.

It is proposed that the strategy focuses on maintenance/protection of ecosystem functionality/service. A strategic approach to this would give rise to the protection of threatened species, common species and iconic species while simplifying pathways for implementation. Collaboration between environmental practitioners, government, the development sectors and other stakeholders would allow for the identification of species,

ecological communities, linkages and key management priorities at polygon, property and catchment levels. Such an approach would result in landscape scale solutions to biodiversity management.

There is little mention of 'skilling up' future environmental decision makers and managers or existing practitioners in the environmental industry (local government, NGOs and private sector). The State can play an active role in this by supporting educational institutes and industry groups such as the EIANZ.

The EIANZ urges the Queensland Government to strengthen the role of environmental practitioners in assessment, management and planning actions for the ongoing management of significant ecological feature and functions. The introduction of prescribed ecological corridor mapping evokes concern from our members, as such an approach could lead to desktop science rather than the use of ground-truthed, field-derived data on the site (or catchment) significance and its linkage potential. Environmental practitioners have a key role to play in the delivery of the Biodiversity Strategy's objectives through collaboration with the Queensland Government and other stakeholders.

One of the significant actions which the Queensland Government should implement is to promote and publicise the release of new documents. For example, the "Back on Track Species Prioritisation Framework" appears to have been published without any notice and is buried in the depths of the Department of Environment and Resource Management (DERM) website. Our members have found that even DERM staff are frequently unaware of the existence of relevant key documents and likewise officers of other Government departments and local governments are not advised of new documentation publications that may be relevant to their work. The EIANZ appreciate advice of the publication of such documents so that this information may be disseminated to members.

We support the priority action of moving to reflect strategic biodiversity planning into all state and local planning instruments wherever relevant. Such an approach would encourage biodiversity planning at a multidisciplinary level thus maximising opportunity for multifunctional and landscape scale ecological development solutions. The EIANZ encourages the Government to look to deliver the biodiversity strategy through a modification of existing planning frameworks and instruments where possible to maximise uptake in mainstream actions and minimise the complexity of development and other activities across Queensland. We recommend that this intention to integrate with existing frameworks be identified in the Biodiversity Strategy and that the opportunities and mechanisms to do so be outlined.

In addition, the Strategy should discuss how it links with the strategies and principles in other strategies and plans, such as those for Greenspace, Outdoor Recreation, Natural Resource Management plans and the SEQ Regional Plan. Any apparent conflicts of position or strategy should be clarified.

There needs to be greater recognition of the role of local government in biodiversity protection, management and enhancement. Many local governments contribute to biodiversity protection, management and enhancement through the establishment of conservation areas, integrating biodiversity protection and enhancement measures into planning schemes, supporting community groups and actively undertaking on ground environmental works – just to mention some of the ways. There are however local governments that do not have the resources necessary to consider biodiversity issues. By supporting existing programs and assisting local governments to develop new approaches to biodiversity protection/management/enhancement (e.g. through local biodiversity strategies, local corridor maps) the State will be making a major contribution to 'building nature's resilience'.

In looking to achieve greater resilience and representativeness of Queensland's ecological features, the EIANZ encourages the use of scientifically rigorous environmental offsets when applied at a landscape function level. The EIANZ cautions against over regulation or monopolisation of environmental offsetting mechanisms in Queensland. The concern here is that prescriptive and centralised approaches to offsetting can reduce the flexibility/accessibility of this impact mitigation measure. For example large landholders have a strategic role to play in locally based offsets. When substantiated by science, such offset proposition can be more valuable than a monetary contribution type offset scheme. A key concern of the Institute is the apparent monopoly of the proprietary company trading as Ecofund on delivery of strategic biodiversity offset planning and delivery outcomes for the State. Such an approach could preclude environmental practitioners and other stakeholders alike from bringing their expertise to biodiversity planning in Queensland.

Some specific comments regarding the strategy follow:

- P27. In text box "Guiding principles for selecting new terrestrial protected areas". Whilst corridors are discussed elsewhere in the strategy the introduction of corridors here is important. For instance, "build(ing) resilience to climate change" requires a well-connected network of reserves;
- P32. The reference to Ecofund appears to be very commercial in its orientation. At a minimum the text box "Ecofund growing a greener Queensland" should include reference to existence of broader brokerage industry of reputable providers;
- P37. 2nd paragraph under the title "Future focus" – "Prioritising the allocation of available resources, by clearly identifying the value, biodiversity benefit....". Is there a process for this to happen in a scientifically rigorous fashion?
- P.39. 2(c) Priority Actions – As many common species occur on private lands there needs to be priority actions that relate to community engagement and off reserve conservation strategies;
- P.39. 2(d) Priority Action # 1 – The 'ecosystem-based' approach is largely the current approach to biodiversity protection i.e. the Vegetation Management Act 1999 relies on regional ecosystems as a surrogate for biodiversity protection. Whilst an ecosystem-approach may succeed in achieving a comprehensive, adequate and representative outcome for ecosystems, this does not always entail conservation of species. In order to protect 'habitat' of many species there is a need to take a 'whole of landscape' approach (e.g. Cassowaries require integral rainforest ecosystems, but also require intervening areas regrowth, backyards and roads for daily movement and dispersal – i.e. they require a whole of landscape approach);
- P40. Targets, 5th dot point – Whilst targets are good, aiming for only 5 is too low. Enhancement should occur across multiple corridors and perhaps 5 could be monitored;
- P41. 2nd paragraph of "Corridors are critical". Excellent point and perhaps requires greater emphasis in later actions e.g. Support local government to identify and map their local corridor networks (i.e. above and beyond the stock route network);
- P43. "Managing extent, condition and connectivity: Priority Actions", "Key Outcomes", 3rd dot point – Local Government should also be included here;
- P43. "Managing extent, condition and connectivity: Priority Actions", "Strategies" or later Actions under 3(e) – Wildlife crossings of roads, rail, power easements and other linear infrastructure;
- P45. 3(b) "Managing biosecurity risks" priority actions – consider adding "identify emerging or potential pests/diseases before they become a problem"; and
- P46. 3(e) "Improve ecological connectivity across landscapes and seascapes", "Priority actions", #1 – Should consider defining a network of State, Regional and Local corridors and then prioritising them. Also add *Work with relevant stakeholders to integrate in new projects and retrofit on existing infrastructure wildlife crossings of roads, rail, power easements and other linear infrastructure.*

In summary, the EIANZ is supportive of the intent of the strategy and encourages the Queensland Government to embrace the site specific and scientific knowledge of environmental practitioners in the implementation of the strategy objectives. The EIANZ cautions against over prescriptive and monopolised approaches to ecological planning which can preclude the delivery of valuable and high level ecological outcomes.

