15 September 2024

The Biodiversity Strategy Team
Department of Environment, Science and Innovation
Environment & Conservation Policy and Legislation
Environment and Heritage Policy and Programs
GPO Box 2454
Brisbane QLD 4001

Via email: biodiversitystrategy@des.qld.gov.au

Dear Sir/Madam

RE: Submission – Consultation Performance Framework – EIANZ SEQ Division

The Environment Institute of Australia and New Zealand (EIANZ) is Australasia's peak body for environmental professionals. We represent members from a diverse range of technical professions including scientists, policy makers, engineers, lawyers, social scientists, heritage professionals and economists. Our members are at the forefront of issues such as biodiversity and climate change, and many have direct experience of working with the current *Environment Protection and Biodiversity Conservation Act 1999* (Cth) and *Environmental Protection Act 1994* (Qld) (EP Act) as both administrators and proponents.

This submission has been developed by EIANZ's Southeast Queensland Division (EIANZ-SEQ).

The move by the Department of Environment, Science and Innovation (DESI) to establish a specific and measurable indicator-based framework for measuring progress towards the 2022 Biodiversity Strategy is commendable, particularly as DESI is seeking alignment with the adopted Global Biodiversity Framework (2022) and endorsed Australia's National Strategy for Nature (2024).

The 2022 Biodiversity Strategy establishes a vision, outcomes, goals and objectives for nature and biodiversity in QLD and it is understood that the Performance Framework will measure and track progress towards this vision, outcome, goals and objectives. It is recommended that clarity is provided regarding the baseline from which progress will be measured. We appreciate that there may not be baseline data for all elements and indicators, however, identifying a baseline year (preferably 2020, in line with the Global Biodiversity Framework) with a caveat noting not all elements have data for that year will provide integrity and alignment with the definition of Nature Positive and the Global Biodiversity Framework.

Performance Framework

QUESTION 1: What do you think successful biodiversity conservation in Queensland looks like?

EIANZ-SEQ considers that successful biodiversity conservation means that, in the next five years, there is an increase in measurable biodiversity indicators such as extent of remnant vegetation, essential habitat, riparian vegetation and wetlands.

In the longer term, biodiversity conservation will have been successful if the range of plant and animal species, and abundance of each species increases through a network of protected areas that is comprehensive, adequate and representative. However, EIANZ-SEQ considers that this will only occur if short term goals of increasing habitat and protecting habitat from

pests, diseases and fragmentation are achieved, based on multiple sources of evidence including traditional knowledge.

QUESTION 2: Does the Performance Framework capture this? Why or why not?

EIANZ-SEQ considers that the Performance Framework is unlikely to lead to successful biodiversity conservation. This is because:

- The targets specified are mostly not measurable or quantifiable. As such, the targets are unlikely to drive changes to influence in current levels of pressure on biodiversity in Queensland.
- The performance framework does not reflect the urgency of halting and reversing loss of native vegetation and habitat.
- The ongoing, piecemeal clearing of the remnant vegetation and habitat that supports biodiversity needs to be measured and reported on, as a means of deterring this clearing and prioritising maintenance of biodiversity in decision-making.
- A continued focus on protecting 'important ecosystem services' presents potential for conflict between provisioning services (which often focus on extraction) and regulating and supporting services that are necessary for broader objectives of biodiversity and carbon sequestration to be achieved.
- The performance framework needs to provide quantifiable targets that, by setting thresholds for when clearing or other impacts on areas of high biodiversity value might be unacceptable, provide a focal point for trade-offs in decision-making.
- The performance framework introduces further delays in enacting biodiversity conservation, for example while more work is done to define what is 'high biodiversity value' and to define monitoring approaches.
- The climate change impacts from Queensland's continued reliance on coal and gas.

QUESTION 3: Do you think this framework will help measure progress towards the 2050 vision?

Not at this stage. More work needs to be done to quantify the performance indicators. Otherwise, it will be too easy to continue to trade-off biodiversity conservation against other demands.

Continuous Improvement

QUESTION 4: What do you think of the continuous improvement cycle as shown? Does it capture the important steps needed to drive results for biodiversity conservation?

EIANZ-SEQ supports an adaptive management framework as shown in Figure 3. However, EIANZ-SEQ is concerned that monitoring is not to commence until 2027. This is a significant delay when all biodiversity indicators reported on in the State of the Environment Report 2020 are in decline.

EIANZ-SEQ considers that existing biodiversity indicators that are already monitored by the Queensland Government, for example through the State Landcover and Trees Survey, be adopted, at least in the short term, as a means of measuring biodiversity in Queensland. A key advantage of this is that this data has been collected for several decades, and hence, trends will be more apparent.

If the need for further indicators is identified, these should be developed as quickly as possible, however, immediate adoption of existing indicators will allow progress to be monitored from today, rather than delaying another three years.

EIANZ-SEQ also suggests clarification as follows:

- Adapt – it is assumed that "our approaches" means the existing actions. That is, the Adapt stage will result in improvements to existing actions and identification of new actions.

- Continuously improve – it is assumed when implementing "new actions" that the "revised actions" (i.e. improved existing actions + new actions) will be implemented. It is unclear what is meant by "improvements to science" – does this mean that the revised actions are based on new scientific knowledge? It should not just be based on scientific advances, but also on incorporation of traditional knowledge, as part of multiple sources of evidence.
- Review and refresh – show the text in brackets read "(and then every five years, from 2030)".

QUESTION 5: Do you see you or your organisation as a contributor to any of the stages of continuous improvement?

Members of EIANZ-SEQ may act in a range of functions around the collection and analysis of data underpinning the continuous improvement cycle.

Proposed protect target

PROPOSED TARGET: Effectively protect areas of high biodiversity value to ensure net gain in extent and condition by 2030 as part of the national 30 by 30 target.

QUESTION 6: How confident are you that the Protect target will support the Biodiversity Strategy to achieve results by 2030?

EIANZ-SEQ supports increased protection of areas of high biodiversity value, but considers that this target is (a) not measurable and (b) too vague.

The target appears based on the idea of protecting 30% of high biodiversity areas by 2030, which is supported, but needs to be much more clearly stated. Otherwise, ongoing incremental losses of areas of high biodiversity value can occur without being seen to be inconsistent with the overall goal of conservation of biodiversity. EIANZ-SEQ suggests that the target should be reworded to say "Protect 30% of land and inshore marine areas from clearing and other threats by 2030".

Another key concern with this target is the meaning of 'effectively protect'. EIANZ-SEQ is of the view that 'effectively protecting' areas of high biodiversity value must be defined, for instance, at a minimum, as prohibiting clearing of these areas and preferably expanded to include protection from threats such as pest invasion and climate change. Lower levels of protection such as systems that require a permit to clear for development are unlikely to be effective. For example, while the Vegetation Management Act 1999 was intended to conserve remnant vegetation by requiring a permit to clear, between 1999 and 2017, there has been a 9.8% decrease in the extent of 'endangered' regional ecosystems, a 6.2% decrease in the extent of 'of concern' regional ecosystems and a 1.6% decrease in the extent of 'no concern at present' regional ecosystems[1]. The most recent Statewide Landcover and Trees Survey indicates that 323,676 hectares of native forest and bushland was cleared in 2021/22.

EIANZ-SEQ does not consider that offsets should be used to compensate for clearing of high biodiversity value areas unless the offsets are in place before the clearing occurs. EIANZ-SEQ has concerns about the effectiveness of biodiversity offsets, particularly given the ongoing decline in biodiversity in Queensland since the first Queensland offsets policies were introduced in 2008. In the intervening 26 years, biodiversity has continued to decline across all indicators including extent and condition of regional ecosystems and number of listed threatened species[2].

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[1] Queensland State of the Environment Report 2020

[2] Queensland State of the Environment Report 2020

There seems to be little scientific evidence to demonstrate the effectiveness of offsets in maintaining and protecting biodiversity. Issues include the overall difficulty in restoring habitat given the soil and climatic conditions in Queensland, that offsets may only be managed for short periods of time before being abandoned, and that offsets can only be effective in the long term when the land is permanently protected from other development pressures. Recently published studies in Australia (Australian Conservation Foundation (2024), Jacobs Group (2024), zu Ermgassen et al. (2023),Gibbons et al. (2018), Sonter et al. (2020)) and overseas (zu Ermgassen et al. (2019), Badgley et al. (2022), zu Ermgassen et al. (2020), Maseyk et al. (2021), Weissgerber et al. (2019)) all highlight the ineffectiveness of offsetting.

EIANZ-SEQ considers that the only effective way to protect areas of high biodiversity value is a prohibition on clearing of these areas.

As noted earlier, focusing only on areas of high biodiversity may be inadequate. For example, a focus on threatened species does not prevent other species from becoming threatened. Further, habitat connectivity and movement corridors may not, when assessed against criteria, be of high biodiversity value, but are critical for genetic exchange and minimising the impacts of fragmentation. Ongoing clearing in critical corridors (both continuous and stepping stone) of all categories of native vegetation will not support connectivity outcomes. The Framework needs to better define and address connectivity using a sound scientific approach (noting that Principle 6 of the Strategy is "Science, the best available knowledge, and reliable data drives decision making"), otherwise results promoted in the Biodiversity Strategy are unlikely to be achieved.

QUESTION 7: Are you (or your organisation) taking action to contribute to the Protect target? If so, what contributions are you making and what are your measures of progress?

Members of EIANZ-SEQ are involved in assessing and managing areas of high biodiversity value in a number of ways. One important aspect is carrying out ecological surveys as part of impact assessment and development approval processes. EIANZ-SEQ members conduct these surveys in accordance with guidelines and assess biodiversity against criteria established in State and Federal government regulatory and policy frameworks.

QUESTION 8: What biodiversity values do you think are most important to consider in identifying and mapping areas of high biodiversity value?

EIANZ-SEQ supports the six characteristics for areas of "high biodiversity value" set out on page 8 of the consultation paper, including recognition of the values and traditional knowledge of Indigenous peoples. EIANZ-SEQ notes that the phrase "important for retaining ecological connectivity" is not well defined. At present most corridors are mapped through expert input as part of the Biodiversity Planning Assessments and focus primarily on areas of remnant vegetation (i.e. Category B). Greater focus is necessary on all areas required for connectivity (i.e. remnant, non-remnant and areas requiring restoration) with a focus on the movement requirements of umbrella species for each bioregion and taking into account future wildlife movement needs under climate change scenarios.

EIANZ-SEQ also notes that areas that do not qualify as 'high biodiversity value' may still be important, for example in maintenance of genetic diversity and providing buffers around areas of high biodiversity value to, for example, provide resistance to pest species. These areas are under pressure.

However, more broadly, EIANZ-SEQ is concerned that the actual areas of high biodiversity values have not yet been identified. While EIANZ-SEQ agrees with the six characteristics listed on Page 8, EIANZ-SEQ cautions that further efforts to define, identify and map high biodiversity value areas against these criteria will delay enactment of measures to actually protect these areas.

EIANZ-SEQ strongly suggests that existing designations for Matters of State Environmental Significance (MSES) be used as default for areas of high biodiversity value in the short term, so that these areas can be immediately protected. Specifically, the following areas that are already clearly identified and mapped, should be protected:

- Endangered and of concern regional ecosystems (9% of the land area of Queensland at the present extent)
- Essential habitat
- Riparian zones on streams of order 3 and above
- Wetlands and groundwater dependent ecosystems.

While further work is carried out to define high biodiversity value, EIANZ-SEQ suggests a moratorium on clearing or otherwise disturbing the above four categories while this work is done. This will at least ensure that the main features of biodiversity are protected immediately, hopefully slowing down biodiversity loss and moving Queensland towards the target of 30% of high biodiversity areas protected by 2030 (which is only five years away).

QUESTION 9: Do you agree with the proposed characteristics to define 'areas of high biodiversity value' for this target? How might these need to be improved to ensure the target delivers the desired outcomes for Queensland's species and ecosystems?

As noted in EIANZ-SEQ's response to Question 8, we concur with the six characteristics used to define areas of high biodiversity value in principle, but suggest that, given the imperative to get effective protection in place, existing designations be used to define areas requiring protection.

The role of traditional knowledge in defining high biodiversity areas (as part of multiple sources of evidence) should also be clarified, for example by reference to the knowledge of Traditional Owners and/or Native Title holders.

Proposed restore target

PROPOSED TARGET: Restoration is underway in up to 2 million hectares of priority degraded ecosystems by 2030.

QUESTION 10: How confident are you that the Restore target will support the Biodiversity Strategy to achieve results by 2030?

As two million hectares is not a particularly large area, this target is achievable if works commence immediately. However, even if complete reconstruction of ecosystems was undertaken, it is likely the quantum of clearing[3] will outstrip two million hectares identified for restoration, meaning that unless degraded ecosystem areas are not carefully directed to areas that require them the most, there will likely be an ongoing loss of biodiversity. As such it is not anticipated that the Framework will achieve the reinstatement of ecosystem function and recovery of species populations results flagged in the Biodiversity Strategy.

Further, EIANZ-SEQ is concerned that rehabilitation sites have not yet been identified and that this may take several more years. There is a lack of clarity in how restoration is defined, what activities would classify as restoration, how restoration is measured and how social or cultural factors are integrated into this. It is also unclear whether 'restoration' includes both pest management activity and/or complete reconstruction/revegetation of ecosystems.

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[3] The average statewide clearing reported through SLATS for the three previous reporting periods is 442,633ha. If this rate of clearing continues, then over the next 6 years a total of 2,655,798ha of woody vegetation will be cleared.

QUESTION 11: Are you (or your organisation) undertaking restoration projects or developing a natural capital account/ method that would provide useful information on progress towards achievement of the restoration target?

Members of EIANZ-SEQ are involved in mine site rehabilitation and habitat restoration projects including planning, implementation and monitoring.

QUESTION 12: Are you (or your organisation) taking action to contribute to the Restore target? If so, what contributions are you making and what are your measures of progress?

Not applicable

QUESTION 13: What do you think is important to consider in identifying Queensland's restoration priorities? Are there any opportunities that should be considered or barriers to be addressed?

As it is only five and a half years to 2030, it is critical that restoration sites be identified immediately, so that works can begin. The lack of clarity of what is meant by "Priority degraded ecosystems" is likely to lead to further delay in implementation.

EIANZ-SEQ suggests the quickest way to do this is to ask natural resource management, catchment management and regional conservation groups and Traditional Owners to nominate key priorities. These groups typically have a good local knowledge of the priority areas and range of projects that they seek to implement, often with some initial planning in place.

Priority areas may include connecting fragmented patches of remnant or high-value regrowth or areas that could provide stepping stones of no more than 50m separation between fragmented patches of vegetation, core habitat and critical habitat for EVNT species, riparian areas and coastal strips, wetland areas, mangroves and saltmarsh areas that provide valuable flood protection ecosystem services.

Restoration needs to be carefully planned, managed and monitored. EIANZ-SEQ suggests the 'National Standards for the Practice of Ecological Restoration in Australia' Ed 2.2 (Society of Ecological Restoration Australia (SERA), 2021) and the associated recovery wheels are considered in the definition and indicators for restoration.

Proposed recover target

PROPOSED TARGET: Improve threatened species recovery and reduce overall extinction risk by 2030.

QUESTION 14: How confident are you that the Recover target will support the Biodiversity Strategy to achieve results by 2030?

The target is not measurable in its current form. It is not clear what the baseline is, or how 'recovery' and 'extinction risk' are to be measured. It is not clear why the term 'improve' has been used rather than increase as per the Biodiversity Strategy. There is a subtle but important difference between the two terms, and EIANZ-SEQ considers that increase provides a better basis for measurement (e.g. actions could be undertaken to improve persistence of a species in the wild but may not result in an increase in the number of species persisting in the wild).

The text seems to imply that this target will be achieved indirectly, through achievement of the other targets, rather than through any direct interventions. Given that the Framework seems to further delay action against the protect and restore targets (while more work is done on what needs protecting and restoring), it is unlikely that any change in the status of threatened species can be achieved by 2030.

EIANZ-SEQ suggests that the target in the Framework should draw more directly on the strategic approach promoted in the Biodiversity Strategy ("*a strategic, structured, and outcomes-focused approach is required to effectively conserve and recover Queensland's threatened*

species. A strategic approach to recovery will increase the number of species that can persist in the wild").

Overall, EIANZ-SEQ considers it unlikely that any measurable restoration of threatened species populations will occur by 2030, without a series of targeted interventions that are started immediately. EIANZ-SEQ suggests that natural resource management, catchment management and regional conservation groups and Traditional Owners be consulted as a matter of urgency to identify key sites in their jurisdictions that have already been identified as important for threatened species. Work should commence by the end of 2024 on protecting and restoring these sites if 2030 targets are to be met.

QUESTION 15: Are you (or your organisation) taking action to contribute to the Recover target? If so, what contributions are you making and what are your measures of progress?

Not applicable

Proposed mitigate target

PROPOSED TARGET: Mitigate key threats to biodiversity and enhance nature's resilience to change by 2030.

QUESTION 16: How confident are you that the Mitigate target will support the Biodiversity Strategy to achieve results by 2030?

EIANZ-SEQ is not confident that the proposed target will support the implementation of the Biodiversity Strategy. The target itself is too vague, for example how will 'nature's resilience to change' be measured?

Importantly, the two most significant threats to biodiversity that require mitigation are land clearing and climate change and neither of these are addressed. EIANZ-SEQ considers that unless both threats are named, and specific targets to mitigate each threat are provided, it is unlikely that any measurable progress can be made.

As yet, the Framework does not set targets in relation to reducing land clearing. EIANZ-SEQ has already noted in response to the Protect Target (questions 6 and 8) the need to immediately halt clearing of certain MSES. This is the only way that the threat of land clearing can be mitigated and progress can be made towards at least halting biodiversity decline by 2030.

In relation to climate change, while Queensland government's commitments to reducing domestic greenhouse gas emissions within the state are commendable, these efforts only address a small proportion of emissions that Queensland is responsible for.

EIANZ advocates that producers of fossil fuels should take responsibility for scope 3 emissions, both by transitioning away from exporting coal and gas, and working more closely with trading partners to address scope 3 emissions.[4]

EIANZ-SEQ considers that the mitigate target cannot be achieved unless specific targets to rapidly address issues such as fugitive methane emissions from existing coal mines and halt all new developments of fossil fuel resources, in recognition of the IPCC's sixth assessment report's finding that estimates future CO_2 emissions from existing fossil fuel infrastructures already exceed the remaining carbon budget of 1.5 °C (as estimated in 2023)[5].

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[4] Scope 3 embedded emissions: EIANZ climate change supplemental position statement
https://www.eianz.org/document/item/7403
[5] EIANZ Policy Submission: Australian Climate Change Authority 2024 Issues Paper – Consultation
https://www.eianz.org/document/item/7659

QUESTION 17: Are you (or your organisation) taking action to contribute to the Mitigate target? If so, what contributions are you making and what are your measures of progress?

Not applicable

Proposed mainstream target

PROPOSED TARGET: Integrate biodiversity into relevant decisions of government, business and community by 2030.

QUESTION 18: How confident are you that the Mainstream target will support the Biodiversity Strategy to achieve results by 2030?

EIANZ-SEQ strongly supports integrated decision-making, that is, decision-making that takes into account the impacts of the decision on biodiversity and considers that this target expands on the goals of the Biodiversity Strategy.

However, EIANZ-SEQ is concerned that simply considering biodiversity in decision-making, as elucidated in the mainstream target, is unlikely to be effective in protecting biodiversity. Decision-making about development inevitably involves trade-offs between economic growth and biodiversity (and other environmental values). If this target is to make a difference compared to the status quo, stronger guidance to decision-makers is needed, emphasising that protecting and enhancing biodiversity and in particular avoiding species extinctions, should be an overriding consideration in decision-making, and placing restrictions on making decisions that reduce areas of high biodiversity value.

EIANZ-SEQ notes that the idea of mainstreaming biodiversity considerations into decision-making is not new in Queensland, and indeed has been embedded in planning and environmental protection legislation in Queensland for 30 years:

- The Queensland EP Act has the objective to "to protect Queensland's environment while allowing for development that improves the total quality of life, both now and in the future, in a way that maintains the ecological processes on which life depends (**ecologically sustainable development**)." Standard criteria are embedded in the EP Act as a guide to decision-making and include 'conservation of biological diversity and ecological integrity ((a)(iii)).
- The repealed *Integrated Planning Act 1997* (IP Act) had the purpose "to establish an efficient, effective, transparent, integrated, coordinated, and accountable system of land use planning ..., development assessment and related matters that facilitates the achievement of ecological sustainability". Among other things, the IP Act aimed to ensure that decision-making processes "take account of short and long-term environmental effects of development" (S 1.2.3(1)(a)(ii)).
- Almost identical provisions were included in the repealed *Sustainable Planning Act 2009*.
- The current *Planning Act 2016* has the purpose "to establish an efficient, effective, transparent, integrated, coordinated, and accountable system of land use planning, development assessment and related matters that facilitates the achievement of ecological sustainability" (S3(1)). The Planning Act specifically states that ecological sustainability includes "protecting ecological processes and natural systems" including biological diversity.

In the intervening three decades since these legislative instruments have been in place, while biodiversity has been considered in decision-making, this has not affected the ongoing decline in biodiversity in Queensland. Land clearing for development continues to be one of the major pressures. In addition, activities such as coal and gas extraction continue to be approved in spite of awareness of the implications of greenhouse gas emissions from these activities for biodiversity.

EIANZ-SEQ considers that that a much stronger mandate then simply considering biodiversity in Government decision-making must be applied so that activities that are shown to impact on biodiversity are not allowed to proceed. Such a mandate might include restrictions on approving actions that will clear endangered and of concern regional ecosystems, wetlands and groundwater dependent ecosystems, essential habitat for endangered species and riparian vegetation, except for pre-defined essential infrastructure and community services.

QUESTION 19: Are you (or your organisation) taking action to contribute to the Mainstream target? If so, what contributions are you making and what are your measures of progress?

EIANZ-SEQ members are regularly involved in preparing supporting documents for approval of development activities.

Proposed connect target

PROPOSED TARGET: Increase awareness and engagement in conservation efforts by 2030.

QUESTION 20: How confident are you that the Connect target will support the Biodiversity Strategy to achieve results by 2030?

The target seems well connected with the Biodiversity Strategy, although it is too broad to be measurable.

QUESTION 21: Are you (or your organisation) taking action to contribute to the Connect target? If so, what contributions are you making and what are your measures of progress?

Not relevant

QUESTION 22: What strategies do you think could be used to improve participation and engagement in conservation action?

Engagement with landholders with respect to revegetation will continue to be a difficult problem to overcome. A concerted effort is required to engage with this sector which may involve engagement of third parties to facilitate outcomes.

Actions

QUESTION 23: What additional coordination and actions do you think may be needed by the Queensland Government to ensure the targets are achieved across all sectors?

In relation to 'protect':

- It is unclear what "important habitats" means with regard to the Vegetation Management framework. The term is not defined in the Framework, Biodiversity Strategy, Vegetation Management Act or Regulation or in State Code 16. If the intent is to regulate the clearing of "important habitat" then this term needs to be clearly defined. The Framework would likely benefit from a list of defined terms.
- Consideration of a mitigation hierarchy (nb guidance material for State Code 25 provides a sound basis); improve financial settlement calculator; and improve role-out of funds received for financial settlements.
- Appropriately map continuous and stepping stone corridors for each bioregion in accordance with Principle 6 of the Biodiversity Strategy i.e. "Science, the best available knowledge, and reliable data drives decision making". We suggest also including "multiple sources of evidence", to ensure that traditional knowledge is not overlooked in implementing this Principle. Such corridors should be considered as part of legislative reforms.

In relation to 'restore':

- Define priority degraded ecosystems.
- Increase restoration target.

Indicators

QUESTION 25: Are there any other existing indicators that you think are suitable for inclusion in the Performance Framework?

In relation to the indicators for "protect", SLATS is a more appropriate measure with reference to vegetation loss in remnant regional ecosystems (including essential habitat, endangered, of concern and least concern) and non-remnant areas in critical corridors (see earlier comments with respect to corridors).

With respect to using existing indicators for regional ecosystems under 'restore' it is unlikely that new areas of remnant vegetation will be mapped. When new areas are mapped, which occurs rarely, they will likely reflect legacy outcomes of actions already taken. A preferrable indicator is SLATS that is further interrogated to determine how much land in particular regional ecosystem types are actively regrowing (i.e. land that is truly under restoration).

Indicators under 'mitigate' can be improved. For instance, by including targets for upper percentage limits of conservation estates that are impacted by pest plants and hectares or percent of the conservation where bushfire mitigation activities have been undertaken.

QUESTION 26: What are the priority indicators that you think should be developed to support reporting against the biodiversity targets?

EIANZ-SEQ considers that indicators for protect and restore are the highest priority.

QUESTION 27: What opportunities are there to improve data integration and sharing across non-government and government entities, to ensure biodiversity information is widely accessible, and supports reporting against biodiversity targets?

No comment.

Supporting Aboriginal peoples' and Torres Strait Islander peoples' connections to biodiversity

QUESTION 28: Does the Biodiversity Strategy and Performance Framework reflect and support the rights and interests of Aboriginal peoples and Torres Strait Islander peoples in conserving Queensland's biodiversity? How can the framework be improved to addressed this?

EIANZ-SEQ considers that the Biodiversity Strategy more appropriately recognises and respects the importance of traditional knowledge, perhaps by reference to 'multiple sources of evidence' rather than the exclusive reliance on western science, when referring to biodiversity conservation and planning

QUESTION 29: Other than co-stewardship arrangements and First Nations involvement in recovery planning, are there other indicators of success that could demonstrate how effectively the Biodiversity Strategy engages Aboriginal peoples and Torres Strait Islander peoples in its delivery?

EIANZ-SEQ suggests effective consultation with First Nations peoples, in particular Traditional Owners and Native Title holders, when defining conservation significance (of species and ecosystems) and threats.

Yours sincerely

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About EIANZ

The Environment Institute of Australia and New Zealand (EIANZ, the Institute) is a professional association for environmental practitioners. The Institute supports environmental practitioners and promotes independent and interdisciplinary discussion on environmental issues. The Institute also advocates environmental knowledge and awareness, advancing ethical and competent good practice environmental management.

A Certified Environmental Practitioner Scheme (www.cenvp.org) is also in place to assess and certify competent experienced environmental practitioners working in government, industry and the community. This includes specialist competencies such as Impact Assessment, Ecology, Land Rehabilitation and Contaminated Lands.

The EIANZ is an advocate for environmental assessment, management and monitoring investigations and reports being certified by suitably qualified and experienced persons for the completeness and scientific rigor of the documents. One of the ways of recognising a suitably qualified practitioner is through their membership of, and certification by, an organisation that holds practitioners accountable to a code of ethics and professional conduct, such as the EIANZ.

The EIANZ is a not-for-profit, charitable organisation incorporated in Victoria, and a registerable Australian body under the Corporation Act 2001 (Cwlth), allowing it to operate in all Australian jurisdictions.