

Draft Submission on Australia's Strategy for Nature 2018 – 2030

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Opening

Local Government NSW (LGNSW) is the peak body for local government in NSW, representing all NSW general purpose councils and related entities. LGNSW facilitates the development of an effective community based system of local government in the State.

LGNSW welcomes the opportunity to make a submission to the Australian Government's updated national biodiversity conservation strategy entitled: Australia's strategy for nature 2018 – 2030.

This is a draft submission awaiting review by LGNSW's Board. Any amendments will be forwarded in due course.

Purpose

The strategy provides a national perspective to the conservation and management of Australia's biodiversity over the next twelve years. It has been developed by the Biodiversity Working Group which comprises representatives of the Australian Government, all states and territories and the Australian Local Government Association.

The draft Strategy updates Australia's Biodiversity Conservation Strategy released in 2010, and responds to a five-year review into the strategy's implementation.

It intends to develop an action inventory to showcase how each government is delivering on-ground action to achieve national goals and objectives. The proposed inventory will support reporting, showcase collaborative effort, and contribute to national and international goals for the natural environment.

The Australian Government is seeking feedback on the draft strategy and intends to present a final report to the Australian, state and territory environment ministers for their consideration prior to the strategy's finalisation.

Background

Biodiversity management and protection is a key area of responsibility for local government and of great interest to local communities. As established in the Charter of the NSW *Local Government Act 1993*, a council is 'to properly manage, develop, protect, restore, enhance and conserve the environment of the area for which it is responsible, in a manner that is consistent with and promotes the principles of ecologically sustainable development'. This firmly places biodiversity management as a core function for councils.

Councils' planning and approval processes are a key influence on local biodiversity management. The NSW *Environmental Planning and Assessment Act 1979* includes objects to encourage 'the protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats' and makes reference to 'ecologically sustainable development'. Councils have worked with their communities to identify and plan for the protection of their local biodiversity while creating opportunities for sustainable development.

Councils have a clear legislative mandate to manage the on-going challenge of development and maintenance of environmental values. Over time, councils have responded to this challenge through improved knowledge of and strategic planning for their local biodiversity including; undertaking mapping and assessments, developing biodiversity strategies and policies and processes, and building the capability of staff.

While the interaction between planning decisions and biodiversity management is a critical one, local government has a broader, more holistic approach to biodiversity management as public land manager and through community education and engagement activities.

Response

LGNSW provides the following comment on the proposed strategy.

Terminology

The draft strategy consciously moves away from the term 'biodiversity' and uses the term 'nature'. While this may simplify the message to the wider public, it neglects to recognise how widely used and understood the term biodiversity is. NSW has legislation directly referencing biodiversity, including the *Biodiversity Conservation Act 2016*, and many local councils have local biodiversity strategies and plans. The Convention on Biological Diversity established an international framework for the protection of biodiversity and provides a higher level framework for this national level strategy.

Any shift away from the use of the term biodiversity may result in an over-simplification of the message and ignores the interrelatedness and connectivity which reflects the real meaning of biodiversity. Such an approach may contribute to a lack of understanding, engagement and connection to current biodiversity policies, plans and processes.

Strategy audience

The strategy has been prepared for a wide range of audiences but has been written in language aimed at engaging the general public. A clearer reference to biodiversity is appropriate to ensure the objectives identified in the strategy link to wider biodiversity initiatives and strategies.

While all Australians are being asked to contribute to achieving the objectives of the strategy, governments continue to have significant responsibility, opportunity and resources to undertake this implementation in collaboration with the wider community. The strategy should ensure that the language used speaks to all prospective audiences.

Objectives

LGNSW seeks the inclusion of an additional objective relating to harmonising regulation and policies across government agencies. There are still a number of institutional barriers which continue to inhibit the conservation of biodiversity. Recognition that these exist and then identifying actions to address these further are necessary in embedding long term management and protection of biodiversity.

Valuing nature services

The challenge of valuing nature services continues to exist. Statements that diminish or question the value of nature services should be reviewed and adjusted to recognise nature services as essential.

Monitoring, enforcement and prosecution

The strategy could be strengthened by incorporating objectives that deliver strong monitoring, enforcement and prosecution.

Policy to action

While a national strategy requires the contribution of many stakeholders to achieve its goals, it is important to recognise the need to coordinate this participation. The next step for the strategy is to develop an action inventory which will be the key implementation tool. Clarity is sought on how local government and other stakeholders would participate in this process, including the proposed mechanisms to be used to develop and report on the inventory, as well as what incentive there might be for them to do so.

Councils already have clear local planning and reporting processes and with limited additional capacity may not be active contributors to the action inventory without assistance or other incentives. Direct involvement of councils in contributing their local actions is necessary to ensure outcomes across all spheres of government, and is also needed to encourage participation in the reporting phase.

The action inventory also needs to identify the investment currently being made in delivering activities to achieve strategy objectives. While opportunities to leverage current investment are needed, new funding opportunities to align with the goals and objectives of the policy are also necessary to achieve these goals.

The inventory proposes to include joint efforts of governments, communities and individuals. It should clearly identify agency funding priorities and not rely on volunteerism to achieve goals and outcomes.

Conclusion

The goals and objectives of the national strategy are very high level, but would be generally supported by local government. However, the value of the strategy will be determined through its implementation. Local government looks forward to clarity as to how and on what stakeholders can participate in moving from strategy to action.