

TO: Senate Inquiry on the Faunal Extinction Crisis

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RE: Submission to the Senate Standing Committees on Environment and Communications Inquiry into Australia's Faunal Extinction Crisis

Thank you for opportunity to submit to the Senate Inquiry on the faunal extinction crisis.

The Central Victorian Biolinks Alliance is keen to present to the Committee on this Submission. We look forward to hearing from you.

Please note that we are working on case studies of work undertaken for EPBC and/or FFG listed species and will submit these ASAP.

The Central Victorian Biolinks Alliance Inc (Biolinks Alliance) was initiated in 2010 in response to local landcare and other environment organisations recognizing they needed to think and plan on a landscape scale in order to see their bit of the jigsaw in the bigger picture.

This was needed for two main reasons: Victoria has been heavily cleared especially on private land and is the most cleared State in the Commonwealth. Its native vegetation landscape is now highly fragmented which means many animals let alone plants cannot move from one patch to the other: a scenario that has led to regional extinctions. With climate change on top of this the situation is dire.

When we take the number of threatened species as an indicator then the natural environment in Central Victoria is in serious trouble¹. Research on woodland birds despite heroic efforts by local conservation and Landcare groups, as well as parks and other agency staff and individual landowners. Even the areas that have had a lot of attention are still going backwards².

The environment groups that came together in 2010 identified the urgent need for connected conservation areas across Central Victoria, from the Grampians in the west to Alexandra in the east, north to the Murray River and south to not far south of The Great Dividing Range.

¹ Attachment 1: list of threatened Fauna species - Central Vic only (Vic Bio Atlas data); Attachment 2 for full list.

² Vic Catchment Management Council. 2007. *Catchment Condition Report, 2007*. See Attachment 3. p45: *Case Study – Muckleford Landscape Zone Vegetation Condition Change*.

2018, September. Submission by Central Victorian Biolinks Alliance Inc to Senate Inquiry on Extinctions.

They agreed that the only way to link the landscape across the region was by having a plan that focused on people learning the new practical science-based approaches and cooperating to implementation at a “landscape”³ scale.

The Biolinks Alliance now has 18 member Landcare Networks, Conservation Management Networks and regional environment groups and is an active partner with the Great Eastern Ranges initiative; we are all actively involved in implementing community-based conservation with the goal:

“To improve the connectivity, condition and resilience of landscapes and halt the further decline of species.”

The Alliance not only aims to have nature thrive but to work in partnership with First Nations as well as productive agriculture.

1. Underpinning principles of our submission

- i. Protection and health of Nature is fundamental to our existence and a healthy community and economy.
- ii. That Nature has a right to exist for its own sake not just because it is useful for *homo sapiens*.
- iii. That we as a society are being highly negligent not only to our fellow species but also to current and future generations of humans if we do not seriously work for a healthy natural environment; without appropriate planning, implementation and funding we are fundamentally and knowingly planning to fail.
- iv. Ref (k): The Commonwealth is responsible for the laws, policies and resources needed to protect our environment; the buck stops with the Commonwealth as the responsible authority.
- v. Ref (g) Indigenous Australians have the rights and aspirations and knowledge to fully participate in caring for the environment in partnership with all Australians and should be funded appropriately to do so eg via an expanded National Indigenous Program.
- vi. There are ways forward: restore and maintain healthy ecological systems and biodiversity including a commitment that we do not knowingly send a species to extinction. Instead, provide the long term commitment and adequate funding for the right suite of measure to assist species to adapt to climate change and integrate with productive agriculture and other land uses. The community is already there and works very hard (see Attachment 4 for examples⁴) but where is our national government?

And further:

The Independent Review of the Environment Protection and Biodiversity Conservation (EPBC) Act 1999 by Allan Hawke, and the response from the then Labor Government is still relevant to this Inquiry as it would appear that few of the recommendations were implemented. We assume that this information will be considered by the Committee and it is not attached here.

³ A loose term varying in size but bigger than the remit of one landcare group; can be up to 1500km as in GondwanaLink in SW WA, or 3000km for the Great Eastern Ranges program or as small as 50km.

⁴ 2014. Doc prepared by Farm Tree and Landcare Assoc and Vic Landcare Council for meeting with MPs: *The Case for Funding Landcare Facilitators*. Attachment 4.

2. State of Play in 2.1) Australia and 2.2) Central Victoria

TofR: (a) the ongoing decline in the population and conservation status of Australia's nearly 500 threatened fauna species;

2.1 Australia and very low international ranking re funding on biodiversity

In the last 200 years Australia has had one of the worst extinction records in the world, leading the world on mammal extinctions, with 27 confirmed extinctions since European settlement, whilst the number of species listed as threatened continues to increase.

As recognised in the 2016 State of the Environment Report as reported by its author, Professor Jackson⁵:

“Australia’s biodiversity is continuing to decline, with some exceptions, and new approaches are needed to prevent accelerating decline in many species. Since 2011, the list of nationally threatened species and ecological communities has lengthened, with the addition of 30 new ecological communities, and 44 animal and 5 plant species. Two species have been reported as probably extinct: the Bramble Cay melomys and the Christmas Island forest skink.”

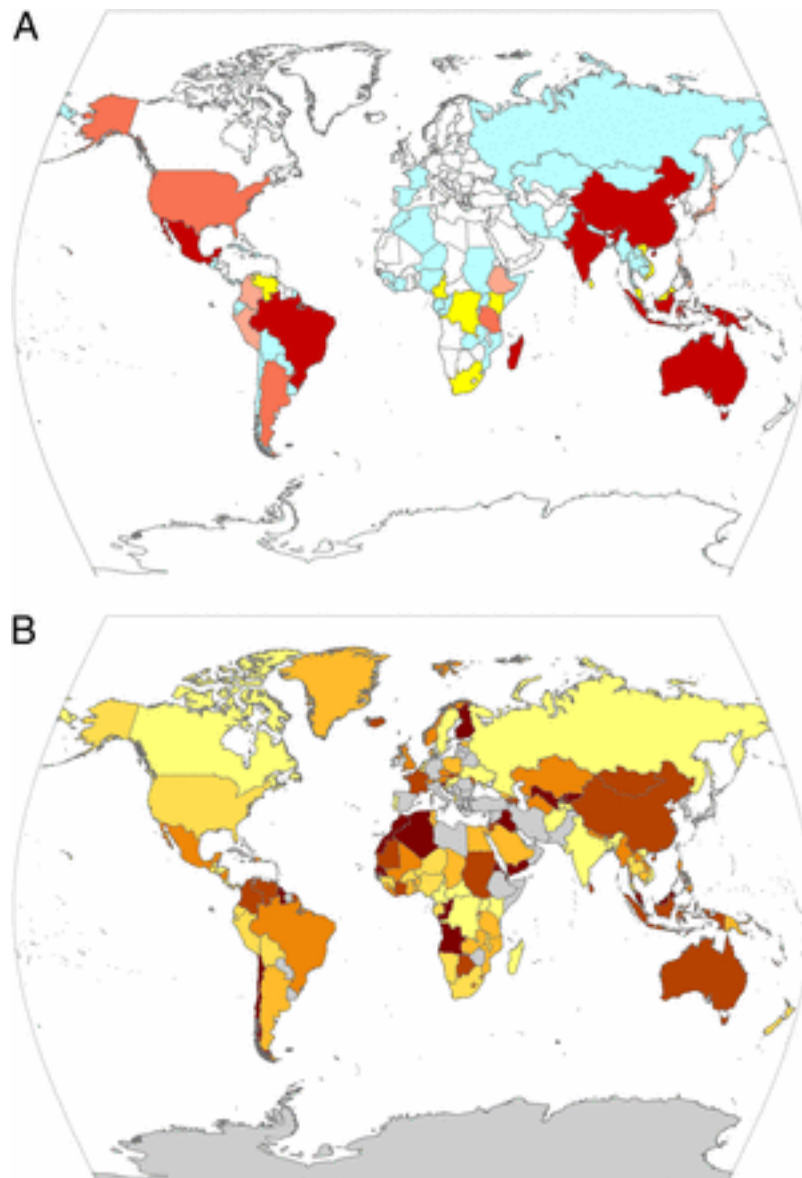
This is a national disgrace.

On the international stage Australia is now ranked one of the worst countries in the world for underfunding biodiversity conservation, grouped among many developing countries. This was in 2013 and funding has decreased substantially since that study⁶. See Maps below.

Underfunding means there will be ongoing decline and this is totally unacceptable.

⁵ Jackson, W. 2017, March 7th. *Five-yearly environmental stocktake highlights the conflict between economy and nature*. The Conversation. <https://theconversation.com/five-yearly-environmental-stocktake-highlights-the-conflict-between-economy-and-nature-73964>. Accessed Sept 10th, 2018. See Attachment 5.

⁶ Waldron, A., et al. 2013. *Targeting global conservation funding to limit immediate biodiversity declines*. Proceedings of the National Academy of Sciences 110:12144-12148. See Attachment 6.



MAPS A and B

(A) Levels of threatened global biodiversity (measured as threatened mammal GBF; see text and [SI Appendix](#)) stewarded by each country. Color coding is in blocks of 0.5 SDs, with white and blue showing very low and low threatened diversity (<0.25 SD, -0.25–0.25 SD); yellow, medium diversity; and the four red colors, high diversity (0.75 SD to >2.3 SD, darker reds indicating higher values).

NOTE: Australia is high diversity.

(B) Underfunding levels from the predictor model (darker colors indicate worse underfunding, in blocks of 20 countries). Somalia was not analyzed but is probably also highly underfunded

NOTE: Australia is in worse underfunding category.

2.2 In Victoria

In Victoria the situation is no better as recognised by the Victorian National Parks Association quoting Geyle (2018)⁷:

⁷ Geyle, Hayley M. 2018. *Quantifying extinction risk and forecasting the number of impending Australian bird and mammal extinctions* Pacific Conservation Biology 24(2) 157-167 <https://doi.org/10.1071/PC18006>

“In Victoria, the picture is worse. Since European settlement:

- Victoria is the most cleared state in the Commonwealth with over 50 per cent of the state’s native vegetation cleared and a much higher percentage of private land.
- 18 species of mammal, 2 birds, 1 snake, 3 freshwater fish, 6 invertebrates and 51 plants have become extinct.
- Between one quarter and one-third of all of Victoria’s terrestrial plants, birds, reptiles, amphibians and mammals, along with numerous invertebrates and ecological communities, are considered threatened with extinction.”

2.3 In Central Victoria

2.3.1 EPBC listed faunal species in Central Victoria

Central Victoria contains 198 fauna species listed under the EPBC Act including well-known species such as the Malleefowl, Swift Parrot, Regent Honeyeater, Greater Glider and Growling Grass Frog. See Attachment 1 for full list of faunal species listed under FFG and/or EPBC⁸.

Those with Recovery Plans (Plans) include Regent Honeyeater (2016), Swift Parrot (2011), Growling Grass Frog (2012), but not Greater Glider.

However there is little information on whether the Recovery Plans are properly funded even this year, let alone over the time required “to recover” the species which is presumably what is meant by the title.

2.3.2 The EPBC List is the tip of the iceberg for species on the continuum of ‘safe’ to ‘extinct’.

The EPBC List is a very conservative list of threatened species; there are many species lining up to fall into – if every species was assessed - the officially threatened list.

Examples in central Victoria:

i) Species that have not even been described, let alone assessed for EPBC listing.

Many invertebrates that are essential parts of our biodiversity and healthy ecosystems would fall into this category.

ii) Species that are listed as threatened under FFG and may be eligible to be listed under EPBC.

Many species listed as threatened under Victoria’s Flora and Fauna Guarantee Act are not listed under EPBC Act (see Attachment 1). This may be because the species is plentiful in other states. However there is no readily available information on whether they should have been assessed for EPBC listing or not; the work hasn’t gone into the research and documentation necessary to clearly identify the status of species and submit those species for listing. Further, definitions of biodiversity include the genetic diversity that is essential for adaptation; many threatened species in Victoria are likely to have different genetic makeup to species in other parts of Australia and loss of species in Victoria could reduce the ability of species to adapt and evolve in response to change.

iii) The path to becoming a threatened species starts with the fragmentation of populations leaving isolated populations that are vulnerable to local extinction.

An example of this process is the Grey-crowned Babbler over the past 30 years. It was last seen in south-eastern SA in 1983; during the 1990s it was lost from the Grampians, in the 2000s from Mornington Peninsula, and there are several other populations across Victoria that are heading towards extinction. Its last stronghold is an area

⁸ Victoria Biodiversity Atlas central Victoria polygons as listed in Attachment 1 and 2 (17/04/18 version).

around Violet Town where government funding and huge volunteer efforts have been invested in very slowly increasing numbers and suitable habitat for the species⁹.

However, little comprehensive assessment has been done in Victoria of other species that are currently threatened at a local and regional level. And, so far as is known, no regional management authority or local government area has identified species that are under threat in their area unless already listed under the FFG or EPBC Act.

There is a lot of anecdotal evidence of species that have been seen in a region within living memory but are no longer seen including, in Central Victoria. For example, Bush Stone-curlews with their distinctive curlew calls were well known within living memory but have now disappeared from many parts of Central Victoria. Even what might be thought as common species such as Boobook and Kookaburra are declining in some localities in central Victoria¹⁰.

These are species that are known to have declined, but there are many other less obvious species – invertebrates for instance - that just disappear without us knowing let alone knowing what roles they may be playing in the ecological systems. As Deakin University ecologists write (see Attachment 8):

“Species richness may remain unchanged even though many species are declining. It is only when species become locally extinct that species richness falls. If we react only to a decline in species richness (e.g. at around 10% cover), it will be too late for many species that have already become threatened.”¹¹

Locality by locality, the loss of a species extends to wider regions and can extend rapidly to become extinct or near-extinct across the whole range of a species.

iv) We know little about ongoing decline

Only 40% of nationally-listed threatened species have Recovery Plans, 10% of species have unfinished Plans and most Plans are years out of date and have no up-to-date actions or resources to be of any value¹². Plans are required to be reviewed under the Act every five years; this does not appear to be happening.

Without Recovery Plans (or Conservation Advice - a streamlined alternative to Recovery Plans but with less regulatory power) what monitoring is undertaken, if any, of management actions and key threats? We can't manage what we don't know.

For Central Victoria monitoring is, so far as we know, largely done by citizen science groups such as members of Birdlife Australia, Nature Watch¹³ or by academia. There does not appear to be a systematic monitoring program even of 'indicator' species that might tell us how well our ecological systems are travelling.

Two threatened species that are listed as near threatened/vulnerable in Central Victoria have little or no monitoring and don't have a Recovery Plan including:

i. Greater Glider currently listed as Vulnerable under EPCB and FFG¹⁴ but no Recovery Plan

Greater Gliders declined substantially in the 2000s in both foothill forests and ash forests, including areas that burned in 2009 and areas that did not burn¹⁵. Yet, from the Commonwealth Department of Environment's website¹⁶ we find:

⁹ Robinson, D. 2017. *The Babbler Project - linking people and land. Linking Landscapes Symposium*, Biolinks Alliance. <https://centralvicbiolinks.org.au/linking-landscapes/> (accessed September 9th, 2018).

¹⁰ Pers comm. Sept2018. Kara Kara CMN who work on habitat for these species with revegetation and nest-boxes.

¹¹ Radford, J, A Bennett, L MacRaid.2004. *How Much Habitat is Enough*. Deakin Uni, Land&Water Aust. DSE (VicGovt) Attachment 8

¹² 2018, Feb20th. The Guardian '*Fantasy documents*': recovery plans failing Australia's endangered species.

¹³ Run by Victorian National Parks Association over the last decade.

¹⁴ http://www.environment.gov.au/cgibin/sprat/public/publicspecies.pl?taxon_id=254 Accessed 07/09/2018

¹⁵ McNabb, E.G., Cheers, G. and Loyn, R.H. 2012. *Persistence of owls and arboreal mammals after severe wildfire in the Goulburn-Broken catchment*. ARI Client Report 153 for the Goulburn-Broken Catchment Management Authority.

“Recovery Plan required, stopping decline and supporting recovery is complex, due to the requirement for a high level of planning to abate the threats, a high level of support by key stakeholders, a high level of prioritisation and a highly adaptive management process. Existing mechanisms are not adequate to address these needs (2/05/2016).”

So we don't try? Do we just let it become more threatened?

- ii. **Yellow-bellied Glider is not listed under FFG or EPBC but is listed on the IUCN Red List so has the work been done by government to assess its status?**

v) And some of what we do know is that the decline is ‘catastrophic’

A study of birds conducted from 1995-2008 in the box-ironbark region of north-central Victoria showed that the extent of habitat in landscape is single most important factor in determining woodland-bird diversity (and abundance) and monitoring shows that there are sharp declines in species richness below 10% cover due to declines in species that begin (for most species) once cover falls below 30-35%¹⁷ (see Attachments 9 and 10).

The results and conclusions from the research report at the end of the Millennial Drought says¹⁸ (see Attachment 11):

“Results

Bird populations in the largest remnants of native vegetation (up to 40,000 ha), some of which have been declared as national parks in the past decade, experienced similar declines to those in heavily cleared landscapes. All categories of birds (guilds based on foraging substrate, diet, nest site; relative mobility; geographical distributions) were affected similarly. We detected virtually no bird breeding in the latest survey periods. Eucalypt flowering has declined significantly over the past 12 years of drought. [Our emphasis]

Main conclusions

Declines in the largest woodland remnants commensurate with those in cleared landscapes suggest that reserve systems may not be relied upon to sustain species under climate change. We attribute population declines to low breeding success due to reduced food. Resilience of bird populations in this woodland system might be increased by active management to enhance habitat quality in existing vegetation and restoration of woodland in the more fertile parts of landscapes.”

vi) And have the bird populations recovered since the Millennial Drought?

There has been some recovery following wet years but not to the level pre-drought say Bennett et al¹⁹ (See Attachment 12):

“Results

There was a substantial decline in the reporting rates of 42–62% (depending on programme) of species between surveys conducted early and late in the Big Dry. In the Big Wet, there was some recovery, with 21–29% of species increasing substantially. However, more than half of species did not recover and 14–27% of species continued to decline in reporting rate compared with early on in the Big Dry. [Our emphasis]

and

¹⁶ http://www.environment.gov.au/cgi-bin/sprat/public/publicspecies.pl?taxon_id=254. Accessed Sept 15, 2018.

¹⁷ Radford, J et al. 2005. *Landscape-level thresholds of habitat cover for woodland-dependent birds*. Biol. Cons. 124 (*2005) 317-337. Attachment 9.

AND Haslem, A. et al. 2015. *Landscape properties mediate the homogenization of bird assemblages during climatic extremes*. Ecology, 96(12),2015,pp.3165-3174. Attachment 10.

¹⁸ MacNally, R, et al. 2009. Collapse of an avifauna: climate change appears to exacerbate habitat loss and degradation. Diversity and Distributions, (Diversity Distrib.) (2009) 15, 720–730. Attachment 11.

¹⁹ Bennett, J.& D.Nimmo et al . 2014. *Resistance and resilience: can the abrupt end of extreme drought reverse avifaunal collapse?* Diversity and Distributions, (Diversity Distrib.) (2014) 20, 1321-1332. Attachment 12

“Conclusions

As declines occurred largely irrespective of ecological traits, this suggests a widespread mechanism is responsible. Species that declined the most during the Big Dry did not necessarily show the greatest recoveries. In already much modified regions, climate extremes such as extended drought will induce on-going changes in the biota. [Our emphasis]

2.3 Threatened fauna species need habitats – food and lodging - to survive

Many species, including poorly known species, are threatened because the habitat where they live is also threatened. The list of plant species and ecological communities listed under FFG/EPBC as threatened for Central Victoria is attached (Attachments 2). What fauna species might depend on these threatened plants and communities but have not yet been assessed for listing?

2.4 Known threatening processes that have not been properly addressed include:

- Native vegetation clearing (a threatening process listed under the EPBC Act)
- Fragmented landscapes
- Degraded bushland and soils; habitat is lost through “cleaning up” habitat, firewood collection, grazing and – most severely - cropping
- Changing climate (also listed under EPBC Act)
- Inappropriate fire regimes
- Environmental weeds and feral animals.

Given the above are all processes that have not been systematically addressed and certainly not at scale then it is very likely they are continuing to threaten both already listed species and species yet to be assessed. Addressing even a small number of widespread threats (vegetation clearing, invasive species, habitat degradation and climate change) could be a much more efficient use of management effort and resources. With proper resources there would be a major boost to regional economic employment as well as all the benefits that come from boosting volunteerism²⁰.

TofRef (b) the wider ecological impact of faunal extinction;

Biodiversity is responsible for a wide range of ecosystem functions including pollination, predation, nutrient recycling and many more. These functions are essential for the healthy functioning of the ecosystems all species rely on. For human health and well-being – and economies - they are known as “ecosystem services”. One simple example is the many birds that eat insects that are eating our pastures and crops. Another example is, by taking out a top predator such as the dingo, its prey will expand with likely major impacts on native vegetation and crops.

The overall impact of faunal extinctions is very hard to predict but the simpler the system the more likely it is to change to a simpler, less productive and less resilient state.

²⁰ Nature cannot be ‘recovered’ with volunteers, they are a very important part of the solution but their efforts are not supported with adequate long term funding for long-term planning and implementation.

3. Funding streams

Tof Ref (h) the adequacy of existing funding streams for implementing threatened species recovery plans and preventing threatened fauna loss in general;

3.1 Commonwealth Government funding has decreased:

“Per budget projections, the total Federal Budget in 2020-21 is projected to be 26% larger than it was in 2013-14. At the same time, environment and biodiversity spending is projected to be 41% and 50% lower respectively in 2020-21 than 2013-14 levels.”²¹

And from senior ecological scientists including the Chair of the Ecological Society of Australia:

“The inescapable truth is that Australia’s conservation spend needs to be in the billions, not the current and grossly inadequate tens of millions, to reverse the disastrous state of the environment.

Can we afford it? The 2016 Defence White Paper outlines an expansion of Australia’s defence expenditure from A\$32.4 billion in 2016-17 to A\$58.7 billion by 2025, even though the appropriate level of investment is extremely uncertain.”²² (See Attachment 13)

and

“We are more certain that our biodiversity will continue to decline with current funding levels. Every State of the Environment report shows ongoing biodiversity loss at relatively stable, low-level funding.”

3.2 At the Victorian Government level

The Victorian biodiversity strategy²³ only received an extra \$20m per annum for four years. Given that all State of the Environment Reports and Victorian Catchment Management Council reports have said the health of biodiversity in Victoria is, in general, continuing to decline, this is a woefully inadequate amount.

3.3 Without serious ongoing funding we are essentially planning to fail

This means fail not only our fellow species but also our children and our grandchildren; and we will do this knowingly. This is totally unacceptable and of enormous shame to a first-world wealthy country such as Australia and to us as Australians and to you as our representatives and decision-makers in government.

If members of the governing party were company directors they would be charged with negligence and bankruptcy as they would be trading beyond their means.

This retreat in funding has created a vacuum of environmental capacity and expertise within government and academia. While community volunteers can drive new agendas, and do incredibly valuable work on the ground, they cannot do it alone. Nor are philanthropic resources anything like enough to address the issues; very little philanthropic funding goes to the environment with most to the arts and medical topics²⁴.

²¹ 2017. Australian Conservation Foundation 2018-19 *Pre-Budget Submission to the Dept of Treasury*. <https://www.acf.org.au/submissions?page=4> Accessed March, 2018.

²² Driscoll, D, B Christensen, E Ritchie. 2017, March 21. *Government needs to front up billions, not millions, to save Australia’s threatened species*. The Conversation. <https://theconversation.com/government-needs-to-front-up-billions-not-millions-to-save-australias-threatened-species-74250>, Accessed Sept 16th, 2018. Attachment 13.

²³ Victoria State Government, 2017. *Protecting Victoria’s Environment – Biodiversity 2037*

²⁴ <https://www.fundraisingresearch.com.au/top-donors.html> accessed Sept12th, 2018

3.4 Funding for our 'natural infrastructure' must come largely from the Commonwealth government as a core budgetary item. So how much?

As mentioned above Australia is in the disgraceful position of being one of the most underfunded countries in the world and grouped among many developing countries.

A nominal \$10 per hectare per annum across the continent plus a margin for other needs is a good starting point. This would include research and monitoring, education and training, biosecurity, supporting community groups, national reserve system funding, support for private land conservation, and a National Indigenous Ranger Program. This is about \$10 billion per annum.

Another way of looking at it would be to have, as with Defense which is also a collective responsibility, a minimum fixed proportion of GDP. We should aim to have investment in biodiversity conservation at the upper end of the OECD and G20 proportions of the GDP. This would also re-establish our leadership role in biodiversity conservation in the world – a position we held proudly and rightly for many years (and under both flavours of government).

We note the contrast with Commonwealth funding for Defense which will expand from \$32 billion in 2016-17 to \$58b in 2025 compared to \$210 million over three years (2014-17) for threatened species.

3.5 An very significant added benefit is that funding will leverage two to five times more resources as an analysis of investment in Landcare has shown repeatedly²⁵ (Attachment 14&15) and will largely be spent in rural Australia.

"The report draws out that Landcare and NRM can generate an economic return in the order of 2-5 times the original investment. This economic benefit arises through access to labour, equipment, expertise and training, financial assistance, and increased farming profitability. The scale of the economic return is also important, with Landcare contributing to individuals as well as regions (including Indigenous communities) and providing a framework for investment and support on a larger scale."²⁶ (See Attachment 15)

3.6 A definition of 'adequacy' in TofRef (h) would be that threatened species are no longer threatened; so what is needed for long-term recovery of threatened species?

Without major increase in committed long-term sufficient funding from national government many species will go extinct. Funding needs to be adequate to:

- i. Achieve a National Reserve System that is comprehensive, adequate and representative.

VNPA: The National Reserve System goals have not been met with under-representation of more than one-third of bioregions and ecosystems. The federal government must support the strategic expansion of Australia's National Reserve System to protect threatened species habitats, with an annual investment of at least \$170 million per year. This would allow Australia to properly meet our international commitments²⁷.

- ii. Develop Landscape-scale (tenure blind) plans across the country, preferably community driven but at least in partnerships between community and governments that are long-term, evidence-based, well-funded and monitored.
- iii. Provide for an expanded and well-funded Indigenous Protected Area and Ranger Program; and discuss with First Nations an expanded program for outside IPAs.
- iv. Comprehensively identify species and communities that are in decline.

²⁵ Curtis, A and R. Sample, 2010. *CBNRM in Victoria: Contributing to dialogue, learning and action. A report to the Victorian Department of Sustainability and Environment*. Attachment 14.

²⁶ GHD. 2013. *Multiple Benefits of Landcare and Natural Resource Management Final Report*. Attachment 15.

²⁷ See National Parks Australia Council: www.vnpa.org.au/npac-policy-completing-australias-national-reserve-system-of-protected-areas/

- v. Research and address the threats to species, and the habitats, ecological systems and processes that support these species.
- vi. Make a bi-partisan commitment to a healthy natural environment.
- vii. Promote the celebration of Nature and connection to community.
- viii. Put in place effective national and state laws with compliance measures and commitment to implement.
- ix. Commit to prompt, transparent and regular release of data on the state and trends of threatened species, state and impacts on critical habitat of threatened species and outcome-focussed monitoring of species conservation efforts and spending.

4. Commonwealth Government role

TofRef (d). the adequacy of Commonwealth environment laws, including but not limited to the Environment Protection and Biodiversity Conservation Act 1999, in providing sufficient protections for threatened fauna and against key threatening processes;

The Inquiry into the National Estate in 1974 concluded unequivocally that **the Australian government had the power to act and that it had a clear national duty to take the lead in conserving the National Estate**²⁸.

The Commonwealth has the obligation to act under the external affairs power of the Constitution, Section 51 (xxix) (as per the Franklin Dam case), and has obligations having signed the Convention on Biological Diversity to protect endangered species and ecological communities.

The Commonwealth has every reason in the world to ensure that our life support systems are healthy.

Full stop. And the EPBC is clearly not up to that as the health of our natural environment has continued to decline.

Instead the Australian government has evaded its responsibility to do so limiting its powers in the Environment Protection and Biodiversity Conservation (EPBC) Act 1999 to matters of “national environmental significance” which, for biodiversity, means nationally threatened species.

For Nature in Australia the Federation is not working as no one entity is, or can be, held to account for ensuring that the health of Australia’s biodiversity is at least maintained let alone ‘restored’. So-called strategies such as the draft ‘Strategy for Nature 2018 - 2030’ are reprehensible and irresponsible. (See Attachment 16)

“It contains no firm commitments or measurable targets, and overlooks a substantial amount of relevant scientific evidence.

As representatives of Australia’s peak professional ecological body, the Ecological Society of Australia (ESA), we are deeply concerned that the strategy is not fit for its purpose of protecting Australia’s biodiversity.”²⁹

This must be fixed and it is the national Government where the buck stops. It is NOT an excuse that a State Government is refusing to fund, for instance, a Recovery Plan for a species that is nationally threatened.

Recovery Plans can be used to assess “adequacy of Commonwealth environment laws” but data is hard to come by. There appears to be a huge backlog of preparing Recovery Plans with only 40% of listed species and ecological communities having a Plan and with most of these are more than 10 years old and not being implemented or funded. As well few Plans are reviewed every five years as required under the Act.

²⁸ 1974 *Report of the National Estate: report of the Committee of Inquiry into the National Estate*. Australia. Committee of Inquiry into the National Estate.

²⁹ Ritchie, E et.al. 2018, March 16th. *Australia’s draft ‘Strategy for nature’ doesn’t cut it. Here are nine ways to fix it.* The Conversation. <https://theconversation.com/australias-draft-strategy-for-nature-doesnt-cut-it-here-are-nine-ways-to-fix-it-92345> See Attachment 16.

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So 60% of species listed don't have a Recovery Plan: that's 180 species and Ecological Communities that don't have Plans.

A Plan is of little use if there is no funding and the Commonwealth is not obligated to fund Recovery Plans under the Act. The States think the Commonwealth should fund and vice-versa so RPs are never adequately costed and even if they are/were, there are no or few funds allocated by Commonwealth or States in most instances.

We understand that while **Conservation Advice** provides a streamlined alternative to Recovery Plans they do not have the same level regulatory effect as RPs in that the Minister must 'not act inconsistently with' a RP but only needs to 'have regard to' Conservation Advice when approving an action under the environmental approvals parts of the EPBC Act.

ATTACHMENTS

Attach. 1 Central Victorian fauna listed under FFG and/or EPBC and Vic Rare or Threatened Species

Attach. 2 Central Victorian all species and communities listed under FFG and/or EPBC as threatened.

Attach. 3 Catchment Condition Report 2007 p45 Muckleford Landscape Zone Vegetation Condition Change.

Attach. 4 Farm Tree and Landcare Assoc and Vic Landcare Council. 2014 *The Case for Landcare Facilitators* (examples of what's delivered on the ground).

Attach. 5 Jackson, W. 2017. See <https://theconversation.com/five-yearly-environmental-stocktake-highlights-the-conflict-between-economy-and-nature-73964>.

Attach. 6 2013_Waldron et al_PNAS_funding

Attach. 8 Deakin Uni et al. How Much Habitat is Enough?

Attach. 9 Radford et al_2005_Biol Cons_thresholds

Attach. 10 Haslem_et_al-2015-Ecology

Attach. 11 Mac Nally et al_A decade of decline_Diversity and Distributions

Attach. 12 Bennett_et_al-2014-Diversity_and_Distributions

Attach. 13 Driscoll, D et al. 2017. See <https://theconversation.com/government-needs-to-front-up-billions-not-millions-to-save-australias-threatened-species-74250>,

Attach. 14 Curtis, A and R.Sample. 2010. CBNRM_in_Victoria Contributing to dialogue learning.

Attach. 15 GHD. 2013. Report commissioned by Aust LC Council. Multiple-Benefits-of-Landcare(4)

Attach. 16 Driscoll, D et al.2017. See: <https://theconversation.com/australias-draft-strategy-for-nature-doesnt-cut-it-here-are-nine-ways-to-fix-it-92345>

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