

NSW Office of Environment and Heritage

Conservation Programs Branch

Level 12

PO Box A290

Sydney South NSW 2000

Via Email: Imbc.support@environment.nsw.gov.au



15th December 2017

To Whom it May Concern

Re: *Draft Biodiversity Conservation Investment Strategy 2017-2037*

Thank you for the opportunity to provide comment into the *Draft Biodiversity Conservation Investment Strategy 2017-2037*.

Farmers for Climate Action is an inclusive movement of farmers and agricultural industry leaders calling for climate solutions and supporting farmers and regional communities to not only adapt to changing climatic conditions, but to lead the way in creating climate solutions. Our network of over 3,000 Australian farmers and industry leaders are drawn from a diverse array of agricultural industries and from all sides of politics. Farmers for Climate Action believe in preserving the viability of Australian agriculture for future generations of Australian farmers, recognising that Australia's future lies with clean energy, clean water and food security.

Farmers for Climate Action recognises that agriculture is Australia's most exposed industry to climate change and that Australian farmers are on the front line of extreme weather events. Right across our country, farmers are already witnessing the impacts of climate change; from increased severity of tropical cyclones in the north, changing rainfall and weather patterns and the increased likelihood of drought and heatwave conditions through vast areas of our country.

Emerging social and environmental challenges occurring in Australia and globally demonstrate the need for a proactive, preemptive and innovative response to the way we are managing our environment and food production systems. There is mounting pressure globally for leaders to address key issues in relation to the maintenance of healthy vegetated landscapes, soil health development and the integrated ecological systems they support.

Responsible management of NSW's natural capital requires an improved and more integrated approach to 'whole of landscape' management, with an appropriate Government framework providing the right incentives for farmers and private landholders to responsibly manage the landscape. Farmers for Climate Action believes it is imperative to prioritise the care and maintenance of our natural capital and associated ecosystem services, recognising that healthy and productive farming systems are closely linked to a healthy and well balanced landscape.

Farmers for Climate Action welcomes the *Biodiversity Conservation investment Strategy* as a positive starting point to address biodiversity challenges under the revised legislative framework - recognising the flexibility and overall support for long-term positive outcomes.

The below have been identified as areas throughout the strategy requiring further clarification.

Emissions Profile

The emissions element of vegetation management appear to be inadequately considered - reflecting the gap between Federal policy (emissions) and State policy (biodiversity and conservation legislation). As we move towards a carbon constrained future, Farmers for Climate Action is championing the role played by farmers in creating climate solutions. A clear understanding of the emissions profile, reflecting both emissions and sequestration arising from the management of natural landscapes will form an important component of maintaining agriculture's social licence over the next few decades.

Clarifying Growth Targets

There is a need for stronger detail around growth targets to be specified within the strategy and/or supporting documentation to also reflect the targeted net impacts on biodiversity overall.

Focus on Outcomes

Farmers for Climate Action believes that the emphasis through the *Biodiversity Conservation Investment Strategy* and all supporting documentation must be on achieving net positive biodiversity outcomes, not the maintenance of an implementation mechanism (the offset market). Farmers for Climate Action has previously noted this as a concern in reference to the *Biodiversity Conservation Trust Discussion Paper: Proposed BCT Programs* and we strongly urge the Office of Environment and Heritage to ensure that positive biodiversity outcomes remain front and centre.

3 Year Review

As with all new programs and investment strategies, the review process will be critical in ensuring that net positive outcomes are being achieved. Farmers for Climate Action would welcome the opportunity be involved in the review process.

Conclusion

Farmers for Climate Action is supportive of the implementation of the *Biodiversity Conservation Investment Strategy* as a positive step towards strengthening biodiversity outcomes under the new legislative framework.

Please do not hesitate to contact me to discuss this submission in further detail.

Sincerely

A handwritten signature in black ink, appearing to read 'V. Morgan-Schmidt', with a large, stylized initial 'V'.

Verity Morgan-Schmidt

CEO Farmers for Climate Action

W: www.farmersforclimateaction.org.au