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**Re: Comments on the Draft Biodiversity Conservation Investment Strategy**

Introduction:

Reading the Ministers forward one gets the impression everything is taken care of, it's simply a matter of getting on with it, sadly the reality is different.

Continued restructures and budget cuts have severely hampered New South Wales ability to manage appropriately its reserve estate. If approached holistically, my hope is the Biodiversity Conservation Investment Strategy 2017-2037 could inform the Biodiversity Conservation Trust in a way to complement the reserve system that includes and enhances the NSW National Parks Estate by the investment of much needed funds.

First though, a comprehensive state-wide corridors strategy needs to be undertaken which will inform the Trust about where to invest to best support New South Wales Biodiversity. I'm suggesting a hub and spoke corridor system linking multiple National Parks, reserves and ecosystems to enhance their potential to function as they should. This could be done, through private land conservation, to eventually link multiple hubs via corridors, to the Great Eastern Ranges.

If the Biodiversity Conservation Trust was in possession of such a state-wide plan, they could use that to deliver the private land conservation program, by targeting landholders within those corridors to participate. Then, over time New South Wales would have a linked, fully functioning reserve system.

Most of the National Park estate remains isolated in small remnant islands (reserves) therefore the ability of the system to conserve habitats, ecosystems, plant and animal species is severely impacted. Sadly, attempts to address the problem are discouraged.

eg: a recent review of the Bongil Bongil NP Management Plan exposed a reluctance to include even the mention of a linking corridor from Bongil Bongil to Bindarri NP because of 'political sensitivities', when the health, genetic diversity and well-being of arguably the States most viable Koala population is at stake.

If that tiny link was achieved two of the North Coast's best remaining Koala populations, Coffs Harbour and Port Macquarie would be joined. Thus ensuring the populations future.

In a general sense it's also worth having a whinge about Roads and Maritime Services (RMS) who continue to short change the States biodiversity by saving costs by not building high quality wildlife crossings over their darn highways, as seen in Bongil Bongil and further north between Byron Bay and the Border, providing instead, access under their highways via stormwater drains? We're now left with the hideous situation of predator species camped, hovering around the pipes as if we've provided a vending machine downtube, for them to feast on a selection of any poor species that dare use, that which we've so generously provided.

The draft strategy,

- is often difficult to read due to a combination of both complex language and use of unexplained terms, which to the writer maybe easy to comprehend but to the average person makes to document inaccessible. It is understood that the strategy deals with complex themes, but the language used needs to be reviewed and more user friendly terminology used.
- fails to address some of the key issues of conservation within the "Key Concepts of the Strategy" section such as threatened ecological communities, species, populations or habitats in addition to ecosystems, although these concepts are discussed within the document, they remain inadequately defined as part of the key concepts.
- in some instances, is very repetitive in nature with the same information and key concepts discussed multiple times, and fail to build on or create a better understanding of the investment delivery. Examples of this are the CAR protected area system and the explanations associated with this concept.
- Is limited in the explanation of the existing private landowner conservation framework for NSW and Section 1.3.1 dismisses the current systems directly which has a negative impact on the reader. The draft strategy should focus on the positives in building and tailoring investment in private land into the future, not dismissing the achievements in private land conservation to date in NSW.
- should explain in more detail, in a plain English how this investment strategy will deliver on achieving the 'sustainable farming' practices referenced and the socio-economic side of the draft strategy. The statements provide currently in the document are framed as throw away lines with no substance.
- s1.4 discusses how the strategy and scheme integrates the National & International Targets. The explanations provided are difficult to understand and seem to be limited. This section should provide a clear explanation on how these overarching documents have directly shaped the priority system for NSW. In addition, it is noted that other international agreements to which Australia is a signatory are not referenced as part of this section, e.g. JAMBA and CAMBA.
- provides an explanation of how the Priority Investment Areas are identified in s2.2; however it is also noted that variations to the listed priorities exist, as mention in the last paragraph. It is currently unclear has these variations will be applied, so to improve transparency the strategy should draft a clear rule set for investment out the Priority Investment Areas.

- refers to agricultural pressure in s2.3.3 Principle 4 datasets used, as part of the prioritisation principles, the focus in this principle is only agricultural lands, and the pressures associated with agricultural land use. Other pressures in NSW seem to be absent from consideration.
- Part 2 Priority Investment Areas (identifying Investment Areas) and Part 3 (making investment decisions) both talk about 'principles' this might present some confusion in terminology, maybe select different wording to discuss the separate processes.
- in s2.3.2 Principle 1 and s3.2 Principle 1 note that the SEPP 14/26 mapping will be used to inform the areas of High Environmental Value and the least protected ecosystems selection, however it is noted that these mapping layers have identified issues with the accuracy at property level. Will the strategy provide for an accuracy review or statements associated with the datasets used in the prioritise decision tools?
- numerous references to both core koala habitat identified under SEPP and the NSW Koala Strategy. As the SEPP 44 has no NSW mapping layer, The only mapping available useful in identifying "core" koala habitat is the limited number of adopted Koala Plans of Management undertaken by Councils, either at a whole or partial Local Government Area scale. As this is not a consistent dataset across NSW, how will differences in mapping be applied consistently across the state, this should be clarified as part of the strategy.
- s3.4 Targets, states that the targets for NSW in the short and long term is to achieve 'examples of 30 NSW Landscapes' currently unrepresented in the protected area system. What is an example? – what is a unit measure of an example. In addition to the example reference the use of the 'NSW landscapes currently sampled' (sampled meaning part of the NSW landscape (no min size) is protected under legal mechanism). The targets for the strategy are unclear and not measurable so how can they be a target? The language used is difficult, meaningless and not quantitative.
- has limited information provided on the strategy links/overlap with the Biodiversity Offsets Scheme under the *Biodiversity Conservation Act 2016*. As payment into the Biodiversity Conservation Trust represents an alternative to securing offsets resulting from development under Part 4/Part 5 of the *Environmental Planning & Assessment Act 1979*. This role is noted in s1.3.2, however not discussed, except in S2.3.2 Step two Principle 4 – where the Offset open market is mentioned.
- is unclear as it relates to the principles for investment and the functions of the Trust, and the open market operation under the BOS (s3.2 Principle 3), especially as it relates to the application of offsets. The mention that the strategy will operate outside of the areas to which the open market applies is going to be difficult to regulate.
- does not explain how the Trust operation in private land conservation intends to reduce conflicts in land use as part of the investment decision principles, as it relates to the mineral/energy resource industry over the next 20 years. What happens if conflicts arise into the future over properties subject to conservation investment? How will conflicts be managed?
- fails to cover any form of adaptive management process, independent auditing of its operation as part of the transparency commitments, public availability of records or compliance structure or delivery.
- Needs to review the links to databases provided within the document, to ensure they are up to date especially links to the NSW vegetation classification system (BioNet).

Thank you for the opportunity to comment  
Yours Faithfully