

**Draft Biodiversity Conservation
Investment Strategy 2017 – 2037
Public Consultation
Imbc.support@environment.nsw.gov.au**

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15 Dec 2017

**Submission on Draft Biodiversity Conservation
Investment Strategy 2017 – 2037**

Dear Sir/Madam,

I am writing to make a brief submission on the above. The submission is brief due to other pressing commitments.

Background

Envite Environment is a not-for profit organisation delivering bush regeneration and ecological restoration services in New South Wales since 1993, with recent expansion to Victoria and Queensland. Our experience, knowledge and expertise has allowed Envite Environment to gain a reputation for delivering high quality environmental services on time and within budget. Our organisation has the capacity to deliver quality environmental services with a range of community, industry and Government partners. Envite Environment has implemented environmental grants exceeding \$12 million and other ecological restoration contracts valued at over \$15 million.

Programs & Projects

Envite Environment is responsible for delivering a diverse range of natural resource management projects across eastern Australia. We work across various Government funded projects and private industry contracts.

Showcase projects and on-going programs include:

- Regeneration of Endangered Ecological Communities including Big Scrub Rainforest remnants and coastal habitats in northern NSW;
- Ecological restoration in NSW National Park Reserves;
- Restoration of the East Gippsland Rail Trail, Vic;
- Ecological restoration and mentoring alongside youth, community and indigenous groups;
- Ecological Restoration Plans;
- Specialist weed control along coastal headlands, Bega Valley, southern NSW;
- Community engagement and training in bush regeneration and ecological restoration;
- Key delivery partner in the Annual Big Scrub Rainforest Day, Australia's largest annual environmental and community event;
- Environmental education programs with schools and community groups.

Comments on the Strategy

- It is commendable that there is a public consultation period on a strategy that will guide such a large investment of public funds. It is unfortunate that the period is quite constrained. A longer consultation period would have allowed for more feedback.

- The strategy outlines the government's priorities and articulates the different components of the private land conservation framework given a suite of guiding principles and conservation concepts.
- The strategy has used Mitchell Landscapes rather than finer scale predictors of biodiversity. As the Biodiversity Assessment Methodology assessment of biodiversity values is largely based around Plant Community types it seems appropriate that this level of resolution should apply to identifying priorities at a state level in a strategic sense. Given the availability of Digital mapping this should be possible to complete albeit it may be more complex that relying on landscapes as surrogates for biodiversity.
- Under the Principle 1 the variables used do not include Old Growth Forest, Centres of Endemism or High Diversity or Refugial Areas for withstanding Climate Change. Individual threatened species (TS) habitat is not considered except when it is core Koala habitat. At best the approach represents a truncated identification of high environmental value and will as a result not accurately identify all areas that have important TS habitat or have a high concentration of TS.
- Principle 4 outlines that high environmental value assets as identified under the greatest pressure from clearing and / or intensification. The agriculturally centric approach does not adequately consider other threats which are known to impact threatened species and communities and have been identified by numerous other published reports / plans / recovery plans. Other threats which should be considered include Climate Change, Habitat loss or change not related to agriculture / clearing .e.g dieback (BMAD), high frequency fire, removal of hollow bearing trees, Weed impacts and impact of Vertebrate Pests, Impacts of Diseases.
- The identification of priority investment areas by and large excludes most of the coastal areas. Many of these habitats have outstanding conservation value and investment to enhance private land conservation would deliver high returns for biodiversity.
- The strategy does not provide detail on whether or how funds will be directed to areas which fall outside the priority (1-5) investment area classification for the Biodiversity Stewardship agreements, Conservation agreements and Wildlife refuge agreements.
- Biodiversity (species / populations and communities) is under threat across all geographic regions in NSW. Investment priorities should critically assess the costs / benefits for biodiversity and include some minimum levels of investment to ensure that highly biodiverse areas which are well represented in the reserve system are not overlooked.
- A revised approach should also give due reference to regional planning exercises which have identified whole of landscape conservation networks and regional threats.