



Australian
Conservation
Foundation

Directions for the National Reserve System A Partnership Approach¹

A Submission to the National Reserves System
Section, Australian Government Department of the
Environment and Heritage

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¹ This submission has been prepared in response to the discussion paper *Directions for the National Reserve System - A Partnership Approach* and refers to that document throughout.

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1.0 Introduction

For over nearly 40 years the Australian Conservation Foundation (ACF) has been a strong advocate for a full range of policies aimed at protecting Australia's natural environment. ACF has championed the protection of Australia's natural and cultural landscapes and wildlife for the full range of their values, intrinsic, biological, aesthetic, recreational and cultural.

Biodiversity conservation is at the heart of much of our work and is one of ACF's key objectives. ACF sees Australia's protected areas as the core lands of biodiversity conservation and has therefore supported the aims of the National Reserve System to deliver a comprehensive, adequate and representative reserve system. ACF's key document *Natural Advantage: A Blueprint for a Sustainable Australia 2001* urged the completion and adequate funding of the NRS (Chapter 15.)

The ACF acknowledges that the National Reserve System has made significant advances toward a comprehensive system of protected areas especially in the innovative areas of Indigenous protected areas (IPAs) and private protected areas (PPAs). ACF commends the work of the Taskforce in taking forward this important area of public policy. However, it is clear that the full implementation of national targets set out in the *National Biodiversity Strategy* and the *National Objectives and Targets for Biodiversity Conservation, 2001-05* is well behind target. The targets set out in this paper will also be unlikely to be reached without strengthening the programs and, most importantly, significantly increasing funding.

2.0 General Points

- ACF strongly supports the opening statement of the Directions Paper:

The Taskforce notes that experience in Australia to date has generally demonstrated that it is seven times more cost effective to conserve intact native ecosystems rather than attempting to re-establish them after they have been cleared or significantly degraded. The next decade will be a critical period for biodiversity conservation planning in Australia and presents significant opportunities for progressing a comprehensive, adequate and representative NRS.

This succinct statement provides a powerful argument for an urgent and appropriately funded 'whole of government' suite of policies to protect *existing* ecosystems across Australia, with the NRS providing the central component in a full range of integrated mechanisms across both private and public lands.

2.1 Funding

- Given the clear financial efficacy of ecosystem retention ACF holds that this comprehensive effort should logically attract commensurate funding with the national land repair effort, the National Action Plan for Salinity and Water Quality (NAPSQW) which is approximately \$1.4 billion over 8 years.

- The Australian Government has extended the Natural Heritage Trust (NHT) for a further five years to 2006-07. Among the goals stated for the extended NHT program is an explicit commitment to expand the NRS:

A substantial increase in the area and quality of the national reserve system; enhanced engagement with indigenous communities, leading to an expansion of the Indigenous Protected Area network; integration of biodiversity conservation as part of the core business of regional/catchment organisations; development and application of appropriate economic and market-based measures to support the conservation of terrestrial native biodiversity; (<http://www.nht.gov.au/extension/index.html>)

This promised expansion cannot occur without a major increase in funding.

- It is important also to note that the report prepared for the Prime Minister's Science, Engineering and Innovation Council (PMSEIC) *Setting Biodiversity Priorities* found that efforts to consolidate Australia's National Reserve System is one of the most cost-effective investments that governments can make to secure the nation's biodiversity. They held that an investment of \$300-400m would achieve 80% protection of the full range of regional ecosystems, save 14,700 native species and result in collateral benefits of \$2,000m (Possingham 2002).
- In 2002-03, the Australian Government National Reserve System Program (NRSP) funding only totalled \$11.45m while funding for the Indigenous Protected Areas Program totalled \$1.99m. This is less than half of the \$23.6m spent in 2001-02 (DEH 2002). There is recent information which suggests that the funding for the current year has fallen dramatically to a mere \$2.33million (Senator Andrew Bartlett: Press release 26/3/2004).
- The current funding is therefore completely inadequate given the scale and importance of the task. Having reviewed past documents and recommendations ACF believes that \$300 million over 6 years, or \$50m per year of Commonwealth funds on a 2:1 funding formula with the states and territories is an appropriate budget for this critical program.
- In reference to 1.7 Issues in the Development of the NRS it is not just the inadequacy of funding which inhibits the NRS, but the uncertainty of funding. Both are critical priorities to address. Strong variations in funding create uncertainty for the States in acquiring new NRS properties. The NRSP funding allocation should be changed to 3-year block funding.

2.2 Planning Context

- ACF also strongly supports the recognition in Planning Context (1.4) that biodiversity conservation will require *both* a CAR reserve system and '*ecologically sustainable management of natural resources across the broader landscape*'. ACF has long been an advocate of extending nature conservation out from the core lands to the whole landscape – a concept variously called 'bioregional planning', 'ecosystem networks' or 'whole of

landscape' approaches. Part of this concept of nature conservation is the understanding that in many cases people are a vital element of the landscape. In particular, the Indigenous Peoples of northern Australia are the foundation on which the newly formed ACF Northern Australia program has built its strategy.

- Conservation on *all* lands is vital but ACF also wishes to emphasise that the viability of the NRS itself will depend not only on adequate selection, design and management effectiveness, but the sympathetic management of public and private adjacent lands. It will be critical that the regional delivery of NRM incorporates strategies to support and protect reserves from threatening processes beyond the reserve boundaries.
- It is equally important to include indigenous rights which will be crucial to the effective management of many areas. The loss of ecosystems often means the loss of cultural integrity and traditional value systems.
- ACF agrees that conservation across all lands requires 'new partnerships' between 'governments, communities, and private landowners, including indigenous landowners' (p.25). In some cases traditional owners are not in possession of their lands but their interests should be acknowledged.
- Therefore ACF supports the statement '*To this end the Directions Statement has been developed to enable the NRS to be part of an integrated natural resource management approach to planning and management*' (p.6).
- However, this could be interpreted as meaning that the lines between the NRS and NRM should be completely blurred. ACF does not support confusion about what is or is not a protected area and part of the NRS. ACF holds that protected areas are, and must remain, distinct from the vital goal of sustainable natural resource management. Any 'protected area' of any IUCN category is an area '*especially dedicated to the protection and maintenance of biodiversity*' (IUCN 1994). Therefore, ACF supports integration but believes that protected areas *must* remain a distinct and meaningful category. This appears to be acknowledged later in the paper on pages 21,22.

3.0 Comments on Key Principles (2.1)

- **Add Resilience:** An additional principle should be inserted which emphasises that the NRS should also be aiming for not only CAR characteristics but also resilience in the face of climate change. Key aspects of resilience will be adequate size and connectivity with other ecosystems.
- **Ecosystem /Regional Ecosystems:** The emphasis on regional ecosystems and species information being the 'primary planning information' for the NRS is supported. However, other values of protected areas such as cultural responsibility and importance to indigenous

communities, geodiversity, landscape beauty and recreation should be accorded value. Throughout the paper there is a clear impression that the reserves of Australia are managed for biodiversity alone. While biodiversity or nature conservation is unquestionably the predominant and overarching goal, this does not reflect the legislation or the reality in Australia. Indeed our major national parks constitute the key attraction of our \$59 billion dollar tourism industry. This deserves some recognition.

- **Threat:** While ACF supports priority generally being given to ecosystems where there is a high risk of loss and foreclosure of options, this could result in a great deal of the limited resources going in to secure small and highly vulnerable areas. However, there also needs to be priority for the very limited remaining circumstances where the retention of 'abundance' - large, relatively intact systems - can also be secured, for example in Northern Australia. This is particularly important in the light of climate change where science indicates that smaller reserves will be very vulnerable and large areas will be necessary to support resilience and adaptation. These lands are also important for protecting the rights of indigenous people and in turn protecting the traditional ecosystem understandings of communities.
- **Highly Protected Areas:** The statement '*the NRS will aim to have some highly protected areas in each IBRA region*' is very vague. So much of Australia is highly modified that it is a reasonable goal to have a great deal of the NRS managed principally for high protection. This would also acknowledge the reality that even 'strictly protected' reserves are subject to multiple threats to their ecological integrity through weeds, feral animals, inappropriate fire use and other threats. IUCN Category II does not preclude human use, especially for ecotourism or in regards to use by the indigenous original owners of the land. It would be better to insert a goal that the NRS will aim to have the maximum area practicable -managed for high protection.
- **All appropriate protection methods:** The mixture of tools needed to achieve regional conservation is strongly accepted and promoted by ACF in such publications as *Repairing the Country: Leveraging Private Investment 2001*. Again it is critical that the strategies for extending the NRS and integrating it with NRM identified in Directions 31-34 are adequately funded.
- **Public land should be used first:** While there may be economic reasons for this emphasis it may contradict various other principles such as giving primacy to conserving the most endangered areas first. Ecological importance and threat should be the key determinants of priority.
- **Integrated decision making /Least Cost Approach:** While this approach is sensible ACF wishes to add a caveat. As in most public policy decisions there will sometimes be 'economic and social costs' around conservation decisions. Long term public good may at times require short term costs. Therefore, while the optimal outcome should be sought, ACF would not

endorse a recipe for constant compromise. Decision making should also look beyond short term costs to incorporate the many long term quantifiable and non-quantifiable benefits involved in protecting biodiversity, including future potential markets for ecosystem services.

4.0 Comments on Directions

1. Progressing Comprehensiveness

- ACF believes that the goal of 80% is inadequate and that we should aspire to 100% comprehensiveness. The 1996 *National Strategy for the Conservation of Australia's Biological Diversity* undertook to establish a fully comprehensive reserve system under a ten-year program. (1.4.1). Therefore aiming for only 80% by 2010-15 is a disappointing goal. The phrase 'might not be possible' (p18) is no reason not to aim for 100% when there is broad consensus that 100% is what we should be trying to achieve.

- Similarly the draft goal is in conflict with the commitment made by the current government prior to the 2001 federal election which read:

'expand the national reserve system by ... working with state and territory governments and regional organisations to establish, by 2005, a representative sample of each bioregion within the national reserve system...'

(Liberal/National Coalition, *Our Future Action Plan: A Better Environment*, p. 39).

- As a society we have invested a great deal in gathering the ecosystem data and developing the framework (IBRA) to progress comprehensiveness, what is now necessary is straightforward implementation assisted by adequate funding.

2. Progressing adequacy

ACF supports the general direction of this recommendation but makes the following points.

- The issue of adequacy should be judged not in terms of size in hectares or proportion of an ecosystem reserved. The adequacy of a PA will be determined more by the condition and function of the ecosystems in the context of a whole of landscape view. Adequacy will also be dependent on a long-term inclusive approach to management of the total landscape, including the recognition of indigenous people's rights and interests.
- One has to be cautious with the term 'replication of sampled ecosystems' as it suggests that all landscapes will be sampled and that the best aim is for adequate replication of that sampling. There are certainly important areas of Australia where large areas are relatively intact like many parts in Northern Australia, the aim here should be large-scale community and conservation approaches that are inclusive yet versatile enough to provide positive opportunities, given the very limited possibilities for this remaining in the world. It is not sufficient to reserve a nominal percentage of each ecosystem and then proceed with land clearing and water diversion elsewhere.

- Another example would be a wetland/riparian ecosystem, where no matter how large the proportion reserved, if ecosystem function in ground and surface water flows, nutrient levels, etc is not maintained through proper provision under statute and through management, adequacy cannot be claimed.
- One therefore needs to look at whether or not the area designated as a PA is 'adequate' to maintain its ecological functions (hydrological, speciation, etc) and the implications for protective management of whole landscapes, incorporating the people and social aspects, with the PA system as a necessary but not sufficient core to the community and conservation systems.

3. Progressing representativeness

- The suggested goal of 80% by 2010-2020 is ironic given that the suggested goal of the 1993 *Biodiversity : The Role of Protected Areas Report* (House of Representatives 1993) advised the same goal of 80% by the year 2000 (p.xv). This clearly underscores despite advances we are well behind targets and that we should as a nation commit substantial resources to these clear and scientifically mandated goals.
- ACF suggests that targets of 80% representativeness by 2010, and 100% by 2015 are appropriate and achievable targets.
- As in our comments on adequacy there is some concern that the 'sampling approach ' should be seen as the minimum approach. Recalling the critical opening statement of the paper on the efficacy of biodiversity retention, public policy should be aiming at large scale and whole of bioregion conservation where this is still possible. One needs to reflect that under a purely % sampling approach the region of the Wollemi, where both internationally significant biological discoveries (the Wollemi pine) and Aboriginal heritage sites have been found, would probably be rejected as surplus to needs.

4. Protecting threatened species and ecosystems

- ACF supports all critical habitat of all endangered species and communities on state or Commonwealth lists to be included in the NRS by 2010. At present the statement is somewhat vague: how many of each species are to be included, and at what time of year/stage in their life cycle? Efforts should also be made on a sub-regional level, to avoid local extinctions, the insidious early part of the extinction process. It would be reasonable to target regional level by 2007 and sub-regional by 2010.

5. Vulnerable species and ecosystems.

- 'Significant progress' is vague; a clear target is necessary. There is a need to aim for inclusion of viable populations of all vulnerable species and communities on state or commonwealth lists in each sub-region by 2010.

6. IBRA Update

- ACF supports the continued work on IBRA as a central tool in designing both an adequate NRS and identifying priorities for the complementary NRM system.

7.& 8. Assessing priorities

- Should the time-lines on these directions be linked? Is it wise to finalise the IBRA priority list two years before completing the pre-European mapping? ACF suggests timing on both directions should be 2006.

9. Implementation Plans

- Given the national direction of regional delivery of integrated NRM, regional NRM bodies should be mindful of NRS implementation plans in developing their regional strategies to ensure complementarity and best use of resources. This is critical as many 'off reserve' NRM activities will impact on the long-term viability of the reserve areas.

10. Freshwater Ecosystems

- ACF supports the incorporation of freshwater ecosystems into the NRS. However, in this complex area there is a need for nationwide agreement on policy principles for freshwater protected areas including the implications for allocation and management of groundwater and surface water resources.
- ACF endorses the recommendation in the PMSEIC report *Sustaining our Natural Systems and Biodiversity*, May 2002 to identify Australia's 'least altered' rivers as 'Heritage Rivers' and ensure they are fully protected by Commonwealth law. Any development of freshwater reserves should incorporate indigenous rights and interests in water and rights to practice traditional hunting and fulfil cultural responsibilities.

11. Long Term Targets

- ACF supports the idea of long-term targets but is concerned that the idea of targets, interpreted too narrowly, runs against the idea that whole landscapes need protection from clearing, and other destructive processes, not just 'samples'.

12. Monitoring and Evaluation

- ACF supports regular reporting against CAR criteria. NRS reports could be included in SOE reports. Funded research needs to be conducted to produce the best methodology for monitoring ecological integrity (as indicated in Direction 29).

13. IUCN Categorisation

- This recommendation is strongly supported. The discussion on IUCN categories under 3.1 is important and ACF commends the clarification that the NRS will be limited to those areas which are '*dedicated* for the primary purpose of protection and maintenance of biodiversity' and just as importantly *managed* to contribute to CAR objectives.
- The IUCN categories, with their emphasis on land usage as the key classification issue, remain the most useful and globally accepted classification.

14. Standards

- This recommendation is strongly supported.

15. Documentation

- This recommendation is strongly supported. The standards set out in 3.2 which support this recommendation are sound but should include management effectiveness, which in turn includes monitoring for ecosystem integrity.

16. Agreement of State and Territory to IPAs and PPAs

- ACF understands the rationale behind this direction given in 3.3. However there is a possibility that this could give the state or territory an effective veto over these highly effective programs. A political tension between state and Commonwealth governments could prevent the progress of a dedication. While the agreement of all parties is to be preferred it may be unwise to make this arbitrary.

17. Excisions

- ACF supports long term security of reserves and therefore believes that this should read '*jurisdictions to examine their processes and legislation to ensure that any proposal to excise an area from a NRS Protected Area is made subject to a process of public notification and passage through parliament.*' Excision is a very serious step and should have proper parliamentary scrutiny.

18. Protected Area Mechanisms

- ACF agrees with the content in the section 3.4 and the profound need to continue to stimulate development of additional conservation mechanisms to the public protected areas estate.
- However, the wording of the recommendation needs to be clearer in its intent. It should not be broad enough to lead to possible interpretations that it endorses private management of public parks. ACF is strongly opposed to commercialisation of protected areas and the private management of public parks.
- However, private organisations, such as bona fide conservation trusts like the Australian Bush Heritage Fund, have a legitimate role to play in the NRS both in establishing and managing private lands for conservation and cooperatively managing lands with adjoining land managers from public sector agencies.
- This issue of cooperative management in fact deserves *more* emphasis and funded promotion by government as it is a critical way by which partnerships could enhance biodiversity outcomes. Obvious examples are the management of feral animals and weed species, fire management and water quality measures across adjoining public/private lands.
- There are also legitimate areas in which corporate interests could contribute lands and or management skills to a NRS system. These could be legitimately explored eg large cattle properties could contract for substantial natural areas to be managed by a conservation agency or organisation.
- The issue of whether to include covenanted lands in the NRS (p28) should perhaps be assessed by ecological viability and/or size criteria. Small areas of suburban bushland, even if covenanted, are unlikely to have long

term ecological viability, whereas larger properties with less vulnerability may well contribute to the NRS.

Need for Additional recommendation

- 3.4.3 Discusses the important issue of the need for contiguous 'protected area networks' and non-contiguous 'conservation management networks' like the Grassy Box Woodland project. There should be a further clear recommendation which actively urges jurisdictions to promote these important mechanisms.

19. Management Accreditation

- The notion of accrediting management consistent with various IUCN categories has merit and should be considered. However, ACF is wary of any step which might lead towards contracting out of the management of public parklands to private interests.

20. Advice

- The wording here suggests a one way flow of expertise from public to private. While assistance from agencies to private conservation is supported, the idea of mutual assistance is important. There may well be times where private land trusts have developed skills that they can share with public land managers. The traditional knowledge of indigenous people is also a valuable dimension of information exchange for better management.

21-22 Monitoring

- ACF agrees that proper reporting as outlined in 3.6 is essential. However, in line with earlier comments, management effectiveness or ecological integrity indicators are also necessary. These should be included in a).
- While monitoring is essential, requirements should not be so costly and time consuming that they act as a disincentive for private land conservation.

23-25.

- Supported. These recommendations underscore the view of the ACF that most protected area issues must be managed in a broader landscape context. Management plans are critical to good management but only adequate funding will ensure their implementation.

26. Key Management Issues

- The section 4.3 outlines some of the major management issues, including introduced species, fire management and tourism facing Australian protected areas. The recommendation to develop best practice principles is supported with the caveat that they should be flexible enough to accommodate the great variability of ecosystems in our continent.
- There also needs to be care under Neighbour Relations and Stakeholder Involvement that opponents of the principal biodiversity conservation function of the protected area are not given an excessive voice.

- New management regimes should be inclusive of the positive influences that indigenous land management processes can contribute to the landscape as a whole.

27. Indigenous Engagement

- This recommendation is in line with ACF's policies of supporting indigenous rights (See ACF Policies 48. and 64.) ACF would like to underscore the importance of indigenous rights and interests being recognised and fully respected as part of a true 'Partnership Approach'.

28. Legislative mechanisms

- ACF's view on this recommendation depends on the intention. If it means making these entities more secure, then there needs to be a cautious approach. On the one hand there is the argument that IPAs and PPAs are not 'secure' and are therefore vulnerable. On the other hand this is exactly why many IPAs have been able to be negotiated, because it was an 'entry level' commitment which did not necessarily tie communities into a permanent situation before they were ready. There is merit in maintaining this situation. Provision for a more legislatively secure form of IPA could be established should the community wish to proceed. Most PPAs secure a binding covenant on their properties and are therefore reasonably secure.
- The issue of mining rights on PPAs however definitely needs investigation.

29/30 Monitoring and Evaluation

- ACF supports the identification of management effectiveness as a key issue and supports the early implementation of evaluation and monitoring against outcome-based performance indicators.

31-34 Progressing the NRS

- These directions are critical to the achievement of the NRS. While ACF supports these directions they all have very short time frames, mainly 2004 when clearly these programs are not complete and will need strong government support for many years. The timelines should be altered accordingly.

35. Funding

- ACF's position on funding is set out in the opening comments of the submission. Funding is the *sine qua non* of fulfilling the goals of the NRS. Maintenance of NRSP will not suffice. Targets continue to be missed. If a 2010 or even 2020 CAR target is to be met then major increases and three years security must be the highest priority.

36. Core Data

- Supported and such data to be publicly available on the internet.

37. Community awareness of NRS

- ACF views this objective as somewhat weak as 'appropriate material' may suggest minor measures such as a few pamphlets. Australia has a great

deal to be proud of in its protected areas. The concept of commitment to biodiversity conservation and to reserves as the core lands of the national effort, should be a priority for government. Changing demographics, cultural differences, highly urbanised people, stresses on leisure time may all undermine support for conservation over time without concerted attempts to communicate both tangible (\$57billion from tourism alone) and intangible values of conserved land and sea.

- It is significant that our national reserves – Uluru, Kakadu, Purnulu, the Great Barrier Reef and our unique wildlife are our key identifiers in the international community and the key attractor for international tourism. There is scope for the government to promote the reserve system as not only a critical means of conserving biodiversity, a substantial economic asset but a major source of identity and pride for all Australians.

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