A response to the *Threatened Species Strategy Action Plan 2021–2026* Consultation Paper

Invasive Species Council

30 July 2021

Document details

Invasive Species Council. 2021. A response to the *Threatened Species Strategy Action Plan 2021--2026* consultation paper. 30 July 2021.

About the Invasive Species Council

The Invasive Species Council was formed in 2002 to advocate for stronger laws, policies and programs to keep Australian biodiversity safe from weeds, feral animals, exotic pathogens and other invaders. It is a not-for-profit charitable organisation funded predominantly by donations from supporters and philanthropic organisations.

Intellectual property rights

Inquiries

Invasive Species Council
Address: PO Box 818, Katoomba NSW 2780, Australia
ABN: 27 101 522 829
Web: invasives.org.au
Email: isc@invasives.org.au

Contents

Introduction

We focus here on the first five Action Areas. These include the activities essential for the transformational changes needed to recover threatened species and places in the long term -- namely, mitigation of the big threats to biodiversity and effective conservation planning.

The prioritisation of species and places is also important, but unless the proposed recovery actions are coupled with widespread application of threat abatement, including through new planning and policy measures, as well as research to strengthen Australia's abatement capacity, recovery progress will be 'a drop in the bucket' compared to what is needed.

Target setting

A high level of ambition is needed for target setting, including for meeting new international targets currently under development as part of the post 2020 Global Biodiversity Framework, and achieving the goals and objectives in Australia's Strategy for Nature (2019-30). The identification of synergies across the Action Areas will be important for defining cumulative targets, as will the adaptation of targets over time as new challenges arise.

A dedicated consultative process would be helpful for setting SMART targets for new and established invasive threats. The best scientific information available is needed to ensure they are specific and measurable. To ensure they are also achievable, realistic and time-bound it may be necessary to cross-check the assumptions within the Theory of Change logic and the activities being proposed.

Ongoing engagement

Each of the proposed action areas needs ongoing engagement with stakeholders to fully canvass options, identify priorities, set targets and guide delivery. We recommend expert reference groups be established to bring together key knowledge holders, including from both scientific and First Nations perspectives, to guide the further development and delivery of each action area.

To help promote continued engagement the Action Plan could become an online 'living document' through which stakeholders can see progress towards targets and the cumulative impact of individual actions across tenures.

Recommendations:

1. Establish expert reference groups to:
    a. inform target setting for both long-term and short-term targets
    b. evaluate the performance of key actions and recommend iterative improvements over time.
2. It is critical that the action plan and the Threatened Species Strategy more broadly is adequately funded. The action plan should transparently set out the anticipated costs of relevant actions and identify sources of investment.

1. Action Area 1 - Mitigating new and established threats

General comments: We strongly endorse this as a priority Action Area. All proposed actions are focused on invasive species, which should be reflected in the Action Area title (to avoid the implication that the major threats are all invasive). Although there is a strong rationale for each of the proposed actions, the paper provides no information about how they were selected as priorities. There are several other potential priorities, so transparent prioritisation is needed.

Question A: Responses to proposed actions

1.1 Feral cats and foxes: Strongly agree. These are major extinction drivers and some good progress on feral cats was made under the previous strategy. The 2008 fox threat abatement plan (TAP) for foxes needs review and revision. A high priority should be development of more effective and more humane control tools.

1.2 Myrtle rust: Strongly agree. A major emerging threat. The national action plan should be implemented.

1.3 Invasive grasses: Strongly agree. These are major threats, with potential to get much worse in interaction with adverse fire regimes. The 2012 TAP needs revision. Buffel grass should be a high priority, with potential for collaboration with impacted Traditional Owners.

1.4 New incursions: Strongly agree, with the proviso that the focus should not be restricted to the 'National Priority List of Exotic Environmental Pests, Weeds and Diseases' (EEPL), which includes only a subset of high-risk potential invaders. As an additional activity, we recommend systematic assessments of risks in particular groups where information is currently lacking. One obvious high priority gap is fungal pathogens.

Question B: Other potential actions

There are numerous additional potential actions. These should be comprehensively canvassed. Options include:

- Feral goats: Major threat neglected across much of Australia. TAP needs review and revision.
- Opuntioid cacti: Potential to become catastrophic threats. Recognised as Weeds of National Significance but need much more national focus.
- Invasive fish: Major threat to freshwater fish (several species on the brink of extinction)
- Invasive ants (particularly yellow crazy ants): Add value to existing work. National ant plan needs implementation.
- Marine invaders: A neglected environment in this plan and a neglected threat category in Australia.

Question C: Relative importance

Prioritisation criteria are needed as the basis for answering this question.

Recommendations:

3. Comprehensively identify priority action options, specify criteria for selecting priorities and apply a transparent prioritisation process.
4. Change the Action Area heading to 'Mitigating new and established invasive species threats'.
5. Expand the proposed activity under Action 1.4 to include a focus on high-risk incursions beyond those in the EEPL. Include a new proposed activity to undertake systematic assessments of high risk potential invasive species in groups such as fungal pathogens.

2. Action Area 2 - Conserving, restoring and improving habitat

General comments: We strongly endorse this as an action area. It needs to be coupled with more effective use of Commonwealth tools and powers for habitat protection and a strong focus on threat management to optimise habitat values.

Question A: Responses to proposed actions

2.1 Building habitat connectivity: Agree: While habitat connectivity is an important part of conservation planning, more research is needed about which priority species would benefit and what the costs would be. Risk assessments are needed for wildlife corridors, to evaluate how these may act as vectors that facilitate the spread of fire, weeds, diseases and problematic native species (eg noisy miners). Corridors often need intensive management. This proposed action could be included as a potential activity in the following action (2.2) rather than as a standalone action.

2.2 Protect and improve habitat for priority species and places: Strongly agree. Success will depend on more effective use of Commonwealth tools for habitat protection, particularly critical habitat provisions, and reforms to enable their application to protect other habitats of national significance such as climate change refugia and intact ecosystems. A national restoration plan is needed. Given the scale of restoration required (and the expense), national priorities should be defined. These should include climate refugia and refuges from other threats. Restoration for carbon purposes should be optimised for biodiversity conservation. Commonwealth conservation agreements under Part 14 of the EPBC Act are also a flexible conservation instrument that can be used to shape management actions and protect specific locations. A habitat focus needs to be coupled with management strategies for fire, invasive species and livestock grazing to optimise habitat values.

2.3 Improve adoption of two-way fire management: Strongly agree. It needs to include a strong focus on generating the evidence base to support two-way management, particularly information about the fire responses of threatened species. Any particular regime will benefit some species but disadvantage others, and we need to be sure that very rare species are not adversely impacted by fire management, whether for hazard reduction or cultural and conservation burning.

Question B: Other potential actions

As noted above, legislative reforms to improve the protection of critical habitats is warranted. Strengthening the application of the critical habitat register, whereby the register is able to effectively operate beyond Commonwealth land and sea areas is an important reform to enable a stronger Commonwealth role in habitat protection and management, particularly for nationally listed threatened species.

Recommendations:

6. Include a focus on strengthening critical habitat provisions under the EPBC Act and ensure a focus on protecting habitats that provide climate refugia, now and into the future.
7. Erasure that habitat protection measures are accompanied by management responsibilities to reduce and eliminate invasive species from key sites.

3. Action Area 3 - Emergency preparedness and response

General comments: We strongly endorse this action area. As the Black Summer fires showed, there is a great need for nationally coordinated emergency preparation, response and recovery processes focused on biodiversity. This should add value to existing state and territory activities and be informed by risk and gap analyses. The main focus here is on fire disasters. While the other types of disasters mentioned here -- floods, storms and droughts -- require very different responses, they have in common a need for a process to identify risks, make preparations and institute national processes for responding to emergencies, and recovering after a disaster. The National Environmental Biosecurity Response Agreement (NEBRA) process offers one model for a national process, with its defined decision-making protocols and funding arrangements.

Question A: Responses to proposed actions

3.1 Establishing insurance populations: Strongly agree. This should apply more broadly as a strategy for species at great risk of extinction. Australia's most recent extinctions (Christmas Island pipistrelle, Christmas Island forest skink, Bramble Cay melomys) could have been averted by this.

3.2 Integrated, accessible data and mapping ...: Strongly agree. Information about important environmental assets needs to be incorporated into all emergency preparedness and response plans and accorded a high priority in decision-making processes at all levels of government.

3.3 Responding to future emergencies: Strongly agree. We need criteria for what constitutes a national environmental emergency, and a clear allocation of responsibilities and processes for responding to emergencies (as there are for nationally significant incursions of new invasive species). The preparation for fire emergencies should include identifying and protecting refugia, addressing the threats that exacerbate fire risks -- particularly flammable invasive pasture grasses (and other weeds) and forest logging -- and promoting hazard reduction methods that do not exacerbate habitat destruction and other threatening processes.

Question B: Other potential priorities

Other priorities for responding to bushfire emergencies should be determined once there has been a decision on listing 'Fire regimes that cause biodiversity decline' as a KTP and the intended government response if the KTP is listed. There is also a strong potential overlap with the work of the new National Recovery and Resilience Agency, which will have a risk reduction and preparedness policy function for natural disasters. There should be close collaboration with the agency to ensure that biodiversity is a high priority in their preparedness focus.

Recommendations:

8. Review this action area subsequent to any listing of 'Fire regimes that cause biodiversity decline' as a KTP.
9. Develop a national process for preparing for and responding to national environmental emergencies. Define what counts as an environmental emergency, assess the risks for biodiversity of different types of disasters, establish a cross-jurisdictional body and expert advisory group to develop and enact responses, processes for decision-making and a funding agreement.

4. Action Area 4 - Climate change adaptation and resilience

General comments: We strongly endorse this as a priority Action Area. Activities to foster resilience to climate change should be an important focus across all action plans. We recommend updating the 2009 Biodiversity Vulnerability Assessment.

Question A: Responses to proposed actions

4.1 Research to better understand the impacts of climate change on priority species, places and related threats: Strongly agree. The second proposed action (focused on how threats will be affected by climate change) and the fourth proposed action (focused on resilience) are particularly important.

4.2 Targeted actions for climate-susceptible priority species and places: Strongly agree. The first proposed activity is particularly important. An additional high priority activity should be to focus threat abatement on climate-susceptible species and places to support their resilience. There should be a very cautious approach to the second proposed activity (translocations) given the well known risks of introducing species to new areas. Australia needs a national policy on translocations stipulating that they should be subject to risk assessment and only considered if other protection options are not feasible. The third and fourth proposed activities are encapsulated in action 3.1.

4.3 Integrating climate risk into conservation planning: Strongly agree.

5. Action Area 5 - Effective planning for conservation

General comments: We strongly endorse a conservation planning Action Area. It is critical that it includes a major focus on threat abatement planning and better integration of both threat abatement and recovery planning instruments. Threat abatement planning is mentioned only once in Action Area 5, despite the strong emphasis elsewhere on threats. The Independent review of the EPBC Act recognised the importance of planning for threat abatement as part of a revised approach to conservation planning, including as a focus of proposed strategic national plans and regional recovery plans. Threat abatement should be a key priority in all conservation planning because it is essential for:

- *Protecting threatened species and ecological communities:* Unless we reduce the impacts of major threats, many more species and ecological communities will be doomed to extinction or perpetual rarity. Addressing the underlying threats in a systematic way is a more efficient and effective means to deal with the drivers of species and ecological community declines, especially when there are nearly 2000 threatened species and ecological communities.
- *Protecting species and ecological communities not recognised as threatened*: Australia's list of nationally threatened biodiversity is far from comprehensive. There are significant delays in listing species and ecological communities, compounded by dramatic impacts on biodiversity from natural disasters, such as the catastrophic fires of 19/20. Effective threat abatement planning will help recover poorly known species and communities, as well as those in decline but not yet listed.
- *Restoring ecological health and fostering resilience*: Only through large-scale threat abatement can Australia's degraded landscapes and compromised ecological processes be restored. This is essential for fostering resilience to climate change.
- *Achieving cost-effective conservation*: Developing enduring threat abatement solutions is far less expensive over the long term than ongoing species-by-species recovery efforts. While the threats remain powerful, conservation costs will continue to escalate as more species become threatened.

Conservation planning should be one of the highest priorities for EPBC Act reform. An integrated approach to conservation planning instruments across government is needed, including improved integration across regulatory decision making, legislative reform and government grants programs.

Question A. Responses to proposed actions

5.1 Conservation planning and coordination for priority species and places: Strongly agree, but the proposed action should include a stronger focus on threat abatement planning. In addition to coordination of recovery actions, there should be greater integration of recovery priorities into threat abatement planning and visa versa. In addition to appointing recovery coordinators and establishing partnership and networks for recovery actions, there should be coordinators and taskforces established for threat abatement.

5.2 Pilot new conservation planning tools: Strongly agree. Under the EPBC Act reform agenda, biodiversity planning should be a primary focus of reforms. We note the policy imperative here to develop a pilot of an Ecological Sustainable Development plan (as defined in the final report in the EPBC Act review), but are strongly of the view that of equal importance is the need to develop regional recovery plans that effectively integrate both threat abatement and recovery planning measures.

Question B: Other potential priorities

To strengthen Australia's capacity to identify and respond to major threats to nature, we recommend an activity to systematically identify current and emerging threats categorised in a rational hierarchical schema of overarching key threatening processes (eg invasive species) and nationally significant threats (eg feral cats). This is an essential basis for developing planning and policy responses needed to abate these threats in a systematic and programmed fashion. This activity could be part of Action 5.2 or a standalone action.

Recommendations:

10. Consistent with the strong focus on threats in this action plan, increase the focus on threat abatement planning in Action Area 5 and the integration of recovery and abatement planning.
11. As part of Action 5.2, comprehensively identify Australia's major threats to nature in a rational threats schema and the policy and planning responses needed to abate these threats.