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The Honourable Tanya Plibersek, Minister for the Environment and Water
Australian Government
Department of Climate Change, Energy, the Environment and Water

18 August 2022

Dear Ms Plibersek,

We need a new biodiversity conservation framework based on restoring ecosystems, rather than individual species protection.

May we offer our heartfelt congratulations on your recent appointment as Minister for the Environment and Water. We are Nature Conservation Margaret River Region, a non-profit community-based environmental organisation working on key environmental challenges facing the southwest of Western Australia.

We are writing to you to strongly advocate and request a new biodiversity conservation approach based on ecosystem preservation and restoration. We believe the benefits of an ecosystem approach are manifold and will bring about significantly greater and more rapid positive change in biodiversity conservation than the current framework.

In the past, the national response to the accelerating need for biodiversity conservation has been to identify and seek to protect threatened species by means of species listings and protection plans. However, this approach is simply not working. Over the past twenty years, we have experienced first-hand the difficulties of working within this framework and we believe it is time for a change.

Problems with the current framework

The current species-focussed approach is set out in the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). As you know, in 2020, an independent review of the EPBC Act was carried out, and was scathing in its criticisms of the EPBC Act's effectiveness:

‘Since the EPBC Act was introduced, the threat status of species has deteriorated. Approximately 4 times more vulnerable-listed species have shown declines in their threat status (become more threatened) than those that have shown an improvement.’¹

Numerous problems exist with the underlying approach of individual species protection, including the exclusion of unlisted species which may nevertheless be threatened, incomplete or non-existent plans for many listed species (with an estimated timeframe of 36 years for completing all plans), and the use of information which is often out of date. Under the current framework, it is not surprising that biodiversity has remained in overall decline.²

As a conservation organisation working on local landscape scales, we constantly strive to ensure our resources are used effectively. We are well aware of the numerous species in our region needing support, many of which are not (yet) listed or do not have formal plans, and we endeavour to support as many native species as possible with the resources we have. Receiving funding to support only one species at a time can create a disjointed management impact.³ We believe the biodiversity crisis in Australia needs to be addressed using a fundamentally different approach in order to be effective.

Benefits of an ecosystem approach

In our view, an approach based on rehabilitation and preservation of ecosystems would provide much more effective support for biodiversity conservation in Australia.

An ecosystem approach is **a proactive approach**, in that it supports multiple species interconnected within an ecosystem, which can prevent species decline before it happens, as well as supporting multiple threatened species within an ecosystem.

A healthy functioning ecosystem will **provide long term support** for the species within it. It creates functional habitat for a wide range of taxa and can incorporate broader beneficial actions such as the removal of threats, the reintroduction of threatened species and the creation of overall landscape linkages for species movement.

The ecosystem approach also **aligns with global and national perspectives**, such as the United Nations Environment Program (UNEP) which has taken an ecosystem approach in its draft Biodiversity Conservation Plan 2022, alongside the recently launched UN Decade on Ecosystem Rehabilitation.⁴ This approach also allows greater alignment with other national environmental efforts, which will reduce the disjointed effect of the current approach.

It also benefits climate change efforts by creating resilient ecosystems which can help to **mitigate the impacts of climate change** for biodiversity - and for people. The linkages between the two crises are well documented, and the benefit of ecosystem restoration to both underpins the current UNEP focus:

‘Ecosystem restoration is pivotal to tackling climate change and species extinction together.’⁵

¹ Independent Review of the EPBC Act (2020), section 1.1

² Independent Review of the EPBC Act (2020), section 1.3.2

³ This effect was noted in the Independent Review of the EPBC Act (2020) section 1.3.2; we are clearly not alone in our experience.

⁴ United Nations Environment Programme (UNEP) (2022) <https://www.unep.org/news-and-stories/story/heres-how-five-countries-are-reviving-biodiversity>

⁵ United Nations Environment Programme (UNEP) (2021) <https://www.unep.org/resources/ecosystem-restoration-people-nature-climate>

In addition, monitoring ecosystems can be done in multiple ways, allowing a choice of simpler and more **cost-effective monitoring** to provide indicators of successful functioning. At present, approximately half the funds provided for listed threatened species management are allocated to research and monitoring,⁶ which could be redirected under an ecosystem approach directly towards achieving on-ground results.

Conclusion and request

For all the reasons set out above, we strongly advocate a new national biodiversity conservation approach based on ecosystem preservation and restoration. Based on our experience, this is the most effective and efficient approach to conserve biodiversity in the context of the current ongoing crisis. Action is what is needed, and an ecosystem framework is the best way to achieve it.

If you support this change, we would be delighted to meet with you to discuss this approach and create regional media engagement on this issue.

Yours sincerely,

Nature Conservation Margaret River Region

⁶ Buxton, R.T., Avery-Gomm, S., Lin, H.Y. et al. Half of resources in threatened species conservation plans are allocated to research and monitoring. *Nat Commun* 11, 4668 (2020). <https://doi.org/10.1038/s41467-020-18486-6>