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Biodiversity Discussion Paper Comments
Department of Environment and Climate Change
PO Box A290
Sydney South NSW 1232

CM003-09

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A New Biodiversity Strategy for NSW – Discussion Paper

The Sydney Coastal Councils Group (SCCG) would like to take this opportunity to provide comment on the *A new Biodiversity Strategy for New South Wales* Discussion Paper. To assist in providing constructive feedback the attached submission will provide recommendations related to the implementation of a Biodiversity Strategy for New South Wales on the following issues:

- The role of Local Government
- Implementation of Regional Conservation Initiatives
- Monitoring and evaluation;
- Climate change; and
- Marine and coastal biodiversity.

I trust that the information provided in this submission will receive the appropriate attention. If you wish to clarify any matter in this correspondence or require further information, please contact SCCG Senior Coastal Projects Officer, Craig Morrison on (02) 9246 7702 or craig@sydneycoastalcouncils.com.au.

Yours sincerely,

Clr. Wendy McMurdo
Chairperson

1. Introduction

The SCCG supports the broad objectives and key directions outlined in the discussion paper. Combined with the NSW Natural Resources Monitoring and Reporting Strategy and proposed Regional Conservation Initiatives the new strategy offers a significant opportunity to establish a framework that assists in prioritising actions that address the adverse impacts on the terrestrial, freshwater and marine biodiversity of NSW.

The importance of the Natural Resources Commission in overseeing the Strategy's delivery is coordinated across all NSW Government departments and agencies cannot be overstated. Through its 2007/2008 annual report the NRC highlighted the need for better alignment between catchment planning and land use planning to achieve the state-wide targets for biodiversity.

To ensure a whole of Government approach to the Strategy's delivery the SCCG recommends:

- The NRC be given the responsibility for monitoring the implementation, reporting and review of Strategy; and
- The NRC be given the responsibility for assessing and reporting the integration of the Strategy into the land-use planning, decision making and information collection functions of NSW Government Departments including the NSW Department of Planning, the Department of Primary Industries and the NSW Department of Lands.

The Strategy's success will depend on all stakeholders being able to identify and resource specific actions that deliver the directions and objectives identified in the discussion paper. In making this submission the SCCG is aiming to provide recommendations when implemented that assist in increasing the capacity of councils to identify and implement actions that result in positive biodiversity outcomes. The submission will focus on the following issues:

- The role of Local Government
- Implementation of Regional Conservation Initiatives
- Monitoring and evaluation;
- Climate change; and
- Marine and coastal biodiversity.

Key Points

Better alignment between catchment planning and land use planning is required to achieve the state-wide targets for biodiversity.

Implementation of the Strategy will depend on the identification and resourcing of specific local and regional actions. Local Government must be assisted in identifying local actions that contribute to the achievement of the objectives and key directions identified in the discussion paper.

Recommendations:

The NRC be given the responsibility for monitoring the implementation, reporting and review of Strategy.

The NRC be given the responsibility for assessing and reporting the integration of the Strategy into the land-use planning, decision making and information collection functions of NSW Government Departments including the NSW Department of Planning, the Department of Primary Industries and the NSW Department of Lands.

2. The role of Local Government

Local Government invest a significant amount of time and financial resources in the protection, management and restoration of biodiversity on public and private land in NSW. Therefore, the SCCG recommends that all Local Governments in partnership with the NSW Government be incorporated into the implementation, monitoring and evaluation aspects of the strategy's delivery.

Maintaining the continuity and enhancing success of existing programs and identifying gaps in information provision, reporting and resources should be key areas of focus for ongoing consultation. Specifically, the SCCG recommends the DECC consult with councils on:

- Maintaining and supporting existing management actions and projects;
- Identifying and addressing gaps in existing programs and resourcing that will limit effective implementation of the strategy's directions;
- Prioritising actions and programs that have local and regional benefits;
- Identifying opportunities for coordination in data collection, management and access to assist the strategy's monitoring and evaluation;
- Utilising and enhancing existing council partnerships with residents, community groups and regional bodies to support the strategy's implementation; and
- Linking of the strategy's delivery and reporting with other reporting processes including council internal reporting processes and external reporting including integrating sustainability reporting requirements, State of Environment reporting and State Plan Reporting.

Key Point

The contribution of council projects and programs to the strategy success must be maintained and coordinated with additional resources provided on a merits basis by the NSW Government.

Recommendations:

DECC consult with councils on:

- Maintaining and supporting existing management actions and projects linked to the strategy's delivery;
- Identifying gaps and addressing in existing programs and resourcing that will limit effective implementation of the strategy's directions;
- Prioritising actions and programs that have local and regional benefits ;
- Identifying opportunities for coordination in data collection, management and access to assist the strategy's monitoring and evaluation;
- Utilising and enhancing existing council partnerships with residents, community groups and regional bodies to support the strategy's implementation; and
- Linking of the strategy's delivery and reporting with other reporting processes including council internal reporting processes and external reporting including integrating sustainability reporting requirements, State of Environment reporting and State Plan Reporting.

3. Implementation of Regional Conservation Initiatives

The development and implementation of regional plans, including regional planning strategies, Catchment Action Plans (CAPs) and Regional Conservation Plans (RCPs), that coordinate stakeholder delivery of biodiversity and Natural Resource Management (NRM) outcomes is an essential component of biodiversity planning. Therefore, the SCCG supports the concept of Regional Conservation Initiatives (RCIs) that will provide a conservation package enhancing the collaboration of partners as well as identifying and prioritising actions to be incorporated into existing partnerships and programs.

To ensure consistency and reduced overlap with programs and processes that are already established, the RCIs will need to be integrated with existing local biodiversity management plans and regional NRM plans including RCPs and CAPs. To assist this, the SCCG recommends that DECC work with the NRC and CMAs to establish a process for integrating the RCIs with existing regional plans including RCPs and CAPs. Additionally the SCCG recommends that the NRC be given the responsibility for monitoring the implementation, reporting and review of this process.

The successful and ongoing implementation of regional plans such as CAPs has been limited due to a number of factors including uncertainty surrounding ongoing funding and a lack of whole of Government support and ownership of the management actions identified. This has led to a loss of continuity in project delivery and inconsistencies in policy direction and decisions between agencies responsible for delivering NRM outcomes and other NSW Government Departments. It is hoped that the actions outlined in new Biodiversity Strategy will deal with this.

To address this, the SCCG recommends that:

- DECC develop a framework for the formation, facilitation and resourcing of partnerships necessary to achieve the goals of the RCIs and strategy;
- All RCIs be underpinned by an implementation plan and investment strategy outlining priority actions and timelines for delivery;
- Responsibility for delivery of priority actions identified in RCIs be agreed to by stakeholders;
- DECC and other relevant agencies, including the Department of Primary Industries, NSW Lands and the NSW Department of Planning, provide additional coordination and technical support to councils delivering local biodiversity projects that deliver regional priority outcomes identified in the RCIs and strategy;
- DECC work with the NSW Department of Planning on model provisions and strategies that enable integration of the objective of the strategy with existing Environmental Planning Instruments and strategic plans; and
- The NRC be given the responsibility for monitoring the implementation, reporting and review of the RCIs.

Key point

At present a number of regional plans and strategies exist that deliver the intended outcomes of the proposed RCIs. If DECC proceed with the preparation of RCIs consultation must occur with all stakeholders to ensure that:

- Overlap or inconsistency with existing plans does not occur;
- The actions identified within the RCIs are agreed to by the organisations responsible for their delivery and adequately funded.
- Integration with existing Environmental Planning Instruments and strategies.

Recommendations:

DECC consult with the NRC and CMAs to establish a process for integrating the RCIs with existing regional plans including RCPs and CAPs.

DECC develop a framework for the formation, facilitation and resourcing of partnerships necessary to achieve the goals of the RCIs and strategy;

All RCIs be underpinned by an implementation plan and investment strategy outlining priority actions and timelines for delivery;

Responsibility for delivery of priority actions identified in RCIs be agreed to by stakeholders with the responsibility for delivery;

DECC and other relevant agencies, including the Department of Primary Industries, NSW Lands and the NSW Department of Planning, provide additional coordination and technical support to councils delivering local biodiversity projects that deliver regional priority outcomes identified in the RCIs and strategy;

DECC work with the NSW Department of Planning on model provisions and strategies that enable integration of the objective of the strategy with existing Environmental Planning Instruments and strategic plans; and

The NRC be given the responsibility for monitoring the implementation, reporting and review of the RCIs.

4. Monitoring and evaluation

The discussion paper notes that evaluation of the strategy will occur through reporting of progress towards achieving the biodiversity targets outlined in the state-wide targets for NRM. The NRC has identified that CMAs through the reporting of their CAPs play a crucial role in the collection and analysis of biodiversity information at a landscape scale. Therefore the SCCG recommends the role of the 13 CMAs in NSW in collecting and analysing data for the monitoring and evaluation of the Strategy is clearly defined and articulated.

For many of the Catchment wide and state-wide biodiversity targets the information to monitor and evaluate change does not currently exist. Without the appropriate data, measuring the achievement or progress towards targets will be very difficult. Therefore, SCCG requests that in the final draft of the Strategy DECC clearly state how the data needed to measure the targets will be attained, analysed and maintained.

To effectively monitor and evaluate implementation of the strategy will require:

- The existence of biodiversity information that has been collected and maintained consistently across NSW to create a baseline from which change can be assessed; and
- Standard collection and maintenance strategies for ongoing data gathering monitor change over time.

To address this, the SCCG recommends DECC develop an information framework and strategy that identifies the following:

- What information is needed to benchmark and measure progress towards achievement of the strategy's directions and objectives;
- How (scales, timeframes, measurements) the necessary information is to be collected;
- Which stakeholders will be requested to, or responsible for, providing additional information; and
- Which organisation or organisations will be responsible for ongoing storage and dissemination of information utilised for monitoring and evaluation.

Key Point:

The NRC and 13 CMAs in NSW are responsible for collecting biodiversity information at landscape and catchment scales. The roles of these bodies in collecting information for the monitoring and reporting of the Strategy's success must be clearly defined.

Recommendations:

The final draft of the Strategy clearly state how the data needed to measure the targets will be attained, analysed and maintained.

The role of the 13 CMAs in NSW in collecting and analysing data for the monitoring and evaluation of the strategy be clearly defined and articulated.

DECC develop an information framework and strategy that identifies the following:

- What information is needed to measure progress towards achievement of the Strategy's directions and objectives;
- How (scales, timeframes, measurements) the necessary information is to be collected;
- Which stakeholders will be requested to, or responsible for, providing additional information; and
- Which organisation or organisations will be responsible for ongoing storage and dissemination of information utilised for monitoring and evaluation.

5. Climate Change

Climate change will have a significant impact on the biodiversity of NSW. In the NSW coastal zone the existing ecosystems and beach environments provide a broad range of biodiversity benefits. These values must be maintained and protected from the potential impacts of climate change. To assist in achieving this the SCCG recommends through the NSW Climate Action Plan, DECC take responsibility for developing and implementing a framework and investment program that prioritises the necessary research and identification of risk management responses to build the resilience of biodiversity in NSW to climate change. Documents that outline possible methodologies for achieving this include:

- *2004 – 2007 National Biodiversity and Climate Change Action Plan* (Natural Resource Management Ministerial Council 2004);
- *The National Climate Change Adaptation Framework* (The Council of Australian Governments 2006);
- *2007 -2008 NSW Biodiversity and Climate Change Adaptation Framework* (NSW Interagency Biodiversity and Climate Change Impacts and Adaptations Framework 2007); and
- *Implications of Climate Change for Australia's National Reserve System: A Preliminary Assessment* (Department of Climate Change 2008).

The SCCG supports the objective and key directions outlined in the discussion paper. Additional to the key directions outlined in chapter 7, the SCCG recommends:

- The NSW Governments work with all stakeholders to identify and prioritise management actions that protect the existing biodiversity services of coastal environment in NSW; and
- The NSW Governments work with councils to investigate opportunities for strengthening existing legislation and regulation in order to protect vulnerable threatened species, populations and communities impacted by climate change be explored and implemented at the appropriate scale and locations.

Key Point

The NSW Government must develop a biodiversity risk management framework to identify and prioritise actions that increase the resilience of the states biodiversity to climate change.

Recommendations:

DECC take responsibility for developing and implementing a framework and investment program that prioritises the necessary research and identification of risk management responses to build the resilience of biodiversity in NSW to climate change.

The NSW Governments work with all stakeholders to identify and prioritise management actions that protect the existing biodiversity services of coastal environment in NSW.

The NSW Governments work with Councils to investigate opportunities for strengthening existing legislation and regulation in order to protect vulnerable threatened species, populations and communities impacted by climate change be explored and implemented at the appropriate scale and locations.

6. Marine and coastal biodiversity

The iconic status of the NSW's marine and coastal biodiversity is internationally renowned. The need for the identification and prioritisation of specific actions for councils and coordinated frameworks for data collection and assessment identified previously in the submission apply equally to marine and coastal areas. Additionally, to achieve the objective of the strategy to integrate coastal zone management for positive marine and coastal biodiversity outcomes will require:

- Dedicated funding for marine and coastal biodiversity projects; and
- Increased technical support from DECC to councils in delivering the coastal and marine objectives.

SCCG believes a state funding package for coastal initiatives that provides protection, restoration and capacity building activities is required from the NSW Government. A reduction in NSW Government support for coastal programs over the last five years has forced councils to rely on limited budgets or compete for restricted grant funding to undertake coastal initiatives previously supported by the State.

The loss of many successful coastal and marine initiatives undertaken by the State is a significant concern. SCCG believes the loss of programs combined with the demise of Coastcare in NSW have limited local councils and the community's ability to protect and enhance coastal areas.

SCCG recommends that the NSW Government dedicate specific funding for initiatives and activities that are specifically undertaken in coastal and marine environments. Funding that supports coastal monitoring programs, marine species protection, coastal marine planning and capacity building would greatly assist Local Government protect the nationally significant environmental, social and economic values of the coastline zone.

A key direction of the strategy is to develop and implement coastal zone management plans and restore degraded coastal habitats. For over 30 years the NSW Government Coastal Program has provided technical advice and support to councils in the development and implementation of Coastline Management Plans (CMPs). The capacity of DECC to continue to provide this essential technical support has been limited in recent years due to reductions in internal budgets and an overall reduction in funds available from DECC to councils to implement CMPs.

To ensure the necessary technical guidance is provided to councils in delivering the coastal and marine objectives and key directions of the strategy, the SCCG recommends the NSW Government significantly increase funding and staff resources of the NSW Coastal Program currently managed by the DECC.

Key point

To achieve the marine and coastal biodiversity objective and key directions outlined in the Strategy will require:

- Dedicated funding for marine and coastal biodiversity projects; and
- Increased technical support from DECC to councils in delivering the coastal and marine objectives.

Recommendations:

SCCG recommends that the NSW Government dedicate specific funding for initiatives and activities, such as the Coasts to Clean Seas Program that are specifically undertaken in coastal and marine environments.

The NSW Government significantly increase funding and staff resources of the NSW Coastal Program currently managed by the DECC.

7. Conclusion

The NSW Government, DECC in particular, face a number of significant challenges in ensuring the objectives and key directions of the strategy for NSW can be met. These challenges can be placed in the categories of data provision; action identification and implementation as well as monitoring and resourcing.

To address these, the SCCG recommends the following actions be prioritised before the strategy is finalised:

- DECC develop a framework that clearly states how the data needed to measure biodiversity targets will be attained, analysed and managed.
- DECC establish an implementation framework for the strategy that articulates the roles and responsibilities of all relevant stakeholders in delivering the strategy; and
- The NSW Government develop incentive mechanisms and allocate specific funding to stakeholders for the delivery of actions that lead to the implementation of the objectives and key directions of the strategy.

The SCCG thanks DECC for the opportunity to provide comments on the *A new Biodiversity Strategy for New South Wales* Discussion Paper and looks forward to seeing the final strategy. If you wish to clarify any matter in this correspondence or require further information, please contact SCCG Senior Coastal Projects Officer, Craig Morrison on (02) 9246 7702 or craig@sydneycoastalcouncils.com.au.