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Submission on Implementing Australia's Strategy for Nature 2024-2030

Thank you for the opportunity to make a submission.

My comments are informed by living and working as an environmental advocate and water professional in Central Australia for ten years and fifteen years of prior professional experience working with groundwater, groundwater dependent ecosystems and integrated catchment management in Western Australia. My comments are therefore focused on issues related to these topics.

Targets and enablers

Target 1. Protect or conserve 30% of Australia's land mass and 30 % of Australia's marine areas by 2030

1. Do the outcomes represent the main areas where action should be focused to achieve this target or enabler of change?

No. They are incomplete.

The following additional outcomes, with sub-outcomes are needed to:

1. ***Ensure that threats/dependencies emanating from outside of protected/conserved areas that could affect protection outcomes within these areas are also suitably managed***
   Sub outcomes:
   a. **Catchments deliver water of sufficient quantity and quality to meet conservation requirements of protected/conserved areas**
   b. **Where conservation areas include groundwater dependent ecosystems, especially in areas where evaporation exceeds rainfall for parts of the year, aquifer levels, groundwater quality and discharges are suitable to meet conserved area requirements.**
   c. **Risks from weeds and invasives emanating from outside of conserved areas are suitably managed, including laws and policies being in place to protect investments and efforts in conservation areas.**

2. ***Stop the degradation of other areas from land clearing as this is working against conservation efforts.***

Including these additional outcomes is also consistent with Objective 8 in Australia's Strategy for Nature 2024–2030 i.e. *Use and develop natural resources in an ecologically sustainable way; and* progress measure 8A I.e. N*umber of catchment-scale water management plans and decisions that include explicit consideration of environmental flow requirements*.

I expand on each outcome/sub-outcome below.

1. <u>Ensure that threats/dependencies deriving from outside of protected/conserved areas that could affect protection outcomes are also suitably managed</u>

It is insufficient and places public investments in jeopardy to manage only those threats and safeguard only those factors upon which protected/conserved areas rely that are co-located with protected/conserved areas. The main pathways that need to be managed are:

<u>1.A Catchments deliver water of sufficient quantity and quality to meet conservation requirements</u>

I am writing this submission near Daintree village. It is shocking and amazing to see that the floodway of the Daintree River remains cleared, is stocked with cattle which have unfettered river access and is infested with weeds. Unsurprisingly it is heavily eroded, with slugs of mobile sediment. If a river flowing through a World Heritage Area and discharging to the Great Barrier Reef cannot be effectively managed at the catchment level then this surely is not happening elsewhere.

Barriers to be overcome or enablers of change - As per *Australia's Strategy for Nature 2024–2030*, catchment management strategies need to be in place to ensure water of sufficient quantity and quality is delivered to meet the environmental requirements of identified protected/conserved areas and land clearing needs to stop.

<u>1.B Groundwater Dependent Ecosystems</u>
In arid and seasonally dry lands, aquatic ecosystems that are groundwater dependent ecosystems depending on regional scale aquifers are recognised as evolutionary refugia by Davis et al[1] and identified as pivotal to climate change adaptation. Terrestrial GDEs are recognised as cultural and ecological hotspots. Given climate change and many other stressors GDEs should be being prioritised for protection and conservation.

There are many examples of biodiversity hotspots that are GDEs that depend on regional aquifers. E.g.

[1] https://nccarf.edu.au/wp-content/uploads/2019/03/Davis_2013_Climate_change_adaptation_guidelines_for_arid_zone.pdf

1. Irbmangkara (Running Waters) on the Lhere Pinta (Finke River) https://alicefieldnaturalists.org.au/19_02.pdf
2. Tindall Limestone Aquifer discharges to Roper, Daly and Flora Rivers and down stream flows. These sustain listed species like sawfish, and pig nosed turtles.
3. Cambrian Limestone aquifer discharges to Lawn Hill/ Boodjamulla National Park (Aboriginal Land) and environmental flows down river in Gregory River
4. La Grange wetlands https://www.wa.gov.au/government/publications/wetlands-the-la-grange-hydrological-sub-basin

It is not sufficient to protect GDEs themselves, GDEs rely on effective management across the entire aquifer.

However regional aquifers are subject to increasing pressure from global demand, and have inadequate protections under NT water laws and other jurisdictions. (Please read case card: https://www.lettersfortheenvironment.com/wp-content/uploads/2025/09/GDEs-Case-Card-and-Letter-Writing-Tips-2.pdf).

Barriers to be overcome or enabler of change - GDEs, especially in areas where evaporation exceeds rainfall for parts of the year require urgent Commonwealth safeguards through:

1. Recognition of GDEs as a protected matter (Matter of National Environmental Significance) under the EPBC Act and degradation of GDEs from extraction being recognised as a key environmental threatening process
2. The Federal government ensuring that decisions made under NT water laws and water allocation plans are subject to review under the EPBC until the NT improves its water allocation plans and licensing processes to properly protect environmental flows. These shortcomings have been Nationally recognised[2].

1.C Risks from weeds and invasives emanating from outside of conserved areas are suitably managed, with laws and policies in place to protect investments in conservation areas

Buffel grass invasion in central Australia has been well documented as arid Australia's greatest invasives threat[3].

Buffel grass threatens the MacDonnell Ranges and Brigalow priority places identified under the Threatened Species Recovery Plan.

Buffel grass is still being planted on arid lands without permits being needed (e.g. 20 tonnes of buffel seed jettisoned from a helicopter at Windorah this year is just one tragic example). Buffel grass and the enormous fires it causes are sweeping across arid lands, including conservation

[2] https://assets.pc.gov.au/2025-10/Water%20refrom%20overview.pdf?VersionId=4HZvgnWAJvJDrFyvLgTepv1suFCHO6D_

[3] https://onlinelibrary.wiley.com/doi/full/10.1002/ece3.6724

areas with no respect for boundaries. Conservation efforts in protected areas are wasted if the Commonwealth does not ensure laws and are in place to ensure buffel grass is managed on all land tenures.

Buffel grass invasion needs to be controlled at landscape scale, not just in conservation areas. It is extremely mobile and cannot be managed without tackling its continued spread on pastoral lands.

Barriers to be overcome or enabler of change

1. Buffel grass invasion specifically needs to be recognised a key environmental threatening process, with a binding Threat Abatement Plan prepared
2. The agricultural sector and commercial interests must not be allowed to dictate environmental policy when it comes to invasive species, especially buffel grass and dingo protection as is happening now (refer Target below).

2. Stop the degradation of other areas from land clearing

Clearing is rampant in Queensland and is on the rise in the Northern Territory. It seems absurd to be conserving areas, while degradation via clearing is being allowed elsewhere often on public lands leased for pastoral purposes. Laws and triggers that ensure these laws are enforced, are needed to protect native vegetation, from those who are actively and wilfully destroying biodiversity.

The risks to biodiversity from clearing is not just clearing itself. It is associated with enormous atmospheric greenhouse gas emissions, creates conditions for invasive weeds to thrive both on-site and beyond, degrades soils and leads to export of contaminants via soil and water pathways.

Land clearing is impacting matters of national and global environmental significance. It is astounding that 44% (147,705ha) of Queensland's total clearing is in the Great Barrier Reef catchment (a World Heritage Area) and 49% is in the Brigalow Belt [4], a priority place under the Threatened Species Recovery Plan.

Barriers to be overcome or enabler of change

1.Federal Government intervention to stop further land clearing by making this a protected matter under the EPBC Act is required.
2. Shifted costs of land clearing - GHG emissions, weeds, species decline needs to be borne by land clearers.

[4] https://www.qld.gov.au/environment/land/management/mapping/statewide-monitoring/slats/slats-reports/2022-23-slats-report/key-findings

Target: Eradicate or control invasive species in priority landscapes and further minimise their introduction by 2030

Background

In central Australia, buffel grass has been allowed to spread for more than 50 years. It benchmarks as the greatest invasives threat to arid and semi-arid lands[5]. It was introduced and continues to be championed by the small but influential pastoral industry and its supporters. Better control of buffel grass is urgently needed for the MacDonnell Ranges and Brigalow priority places under the *Threatened Species Recovery Plan*.

Dingoes are subject to lethal control, especially on pastoral lands despite a growing body of evidence that this diminishes ecosystem resilience[6], leads to the rise of other feral animals, does not reduce calf injury / mortality[7] and ignores their immense cultural importance[8]. In some jurisdictions like Queensland dingoes are considered an invasive animal.

I am concerned that the preamble in the discussion paper and also *Australia's Strategy for Nature 2024-2030* emphasises collaboration as key to managing invasives.

While controlling the risks from invasive species is essential, I disagree with the statement: *Australia's strong risk-based biosecurity system, including through the National Biosecurity Strategy and its National Action Plan, is preventing the introduction and establishment of new invasive species. This* is simply not true and not supported by evidence. Many invasive pasture grasses are being spread without even acknowledgement that they are weeds.

It places faith in documents that are not focused on the environment and fails to recognise the role of strong laws as key to managing invasives.

Handing control over to those who perceive themselves as benefitting from invasives' spread is an approach which should be expected to fail and in reality manifestly is failing. The failure to act on buffel invasion and persecution of dingoes is testimony to this.

The most recent Nations State of the Environment report drawing upon Kearney 2018[9] (see graphs below) provides stark evidence of the concerns I raise. It shows (see figure):

1. Invasives management is failing - invasives are the greatest threat to threatened taxa
2. Agriculture activity is the third biggest threat to threatened taxa and also a key cause of ecosystem modifications - the agricultural sector cannot be relied upon to protect the environment.

[5] https://onlinelibrary.wiley.com/doi/full/10.1002/ece3.6724
[6] https://onlinelibrary.wiley.com/doi/abs/10.1111/emr.12035
[7] https://www.researchgate.net/publication/352290891_Lethal_control_reduces_the_relative_abundance_of_dingoes_but_not_cattle_production_impacts
[8] https://hsi.org.au/wp-content/uploads/2023/10/dingo-declaration-FINAL-A3.pdf
[9] https://soe.dcceew.gov.au/biodiversity/pressures/threats-and-key-threatening-processes

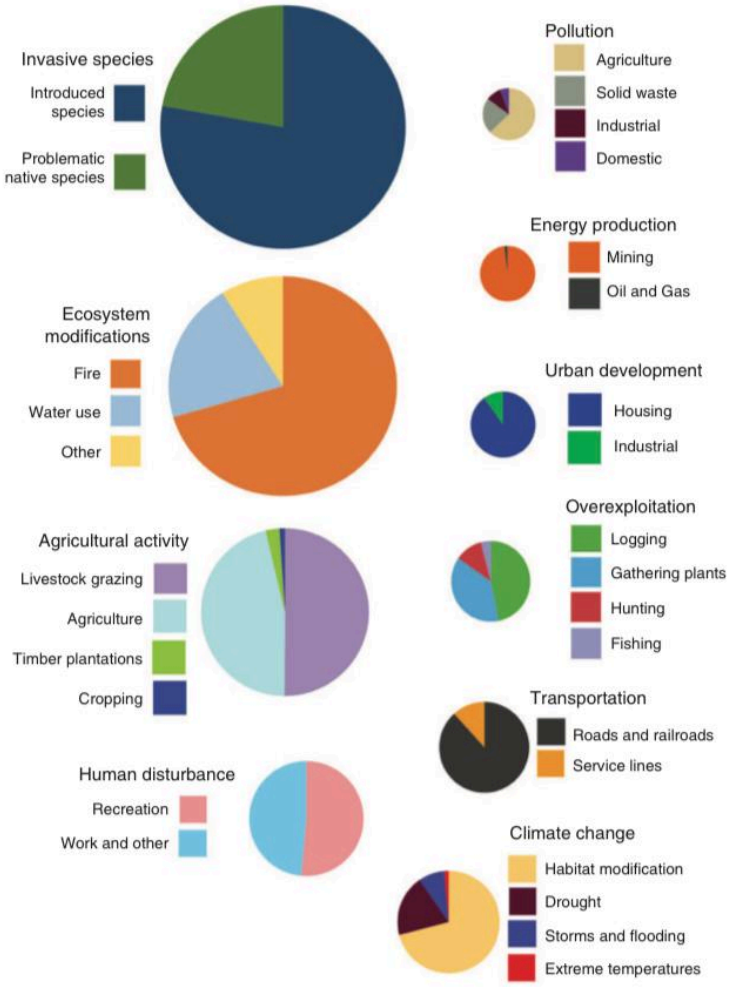

Fig. 1. The prevalence of threats to Australian threatened taxa ($n = 1533$). Each chart is scaled according to the number of EPBC Act–listed taxa listed as being affected by each threat category (e.g. Urban development). Each pie chart segment represents a subclass threat (e.g. Housing). We removed threat categories that impacted <20 taxa (e.g. Geological events) and subclass threats that impact <5 taxa (e.g. Renewable energy) as they were too small to be displayed effectively. See Table S3 available as supplementary material for further details.

Australia's Strategy for Nature 2024-2030 references the *Australian Weeds Strategy* as guiding response to invasive weeds. This is a strategy published by DAFF and is a product of the Invasive Plants and Animals Committee. It was prepared in line with the Intergovernmental Agreement on Biosecurity (IGAB). This is ultimately the responsibility of the Minister for Agriculture and reflects this. Environmental input is via Environment and Invasives Committee which is subordinate to the National Biosecurity Committee, which still contains equal agricultural representation, is chaired by the Queensland Department of Primary Industries Member and contains observers with commercial agriculture industry interests.

As already noted agriculture is frequently the source of invasives e.g. buffel grass, gamba grass, cane toads. This sector frequently has a vested interest in not acting in the environmental interest.

For example the NT Cattlemen's Association is actively opposing buffel action. This leads to knock-on effects. For example natural resource management groups like Territory NRM are absurdly still sitting on the fence rather than advocating for action on buffel. This is inevitable without Federal laws to establish the guardrails for industry and community collaboration. Without such guardrails those with greatest power will exert too much influence.

While it was heartening that *Australia's strategy for Nature 2024-2030* has singled out buffel grass invasion as a threat, it is scandalous that buffel continues to be allowed to be planted in most states and the Northern Territory.

Invasive threats will not be resolved without a fundamental shift in biosecurity arrangements to protect the environment in situations when it comes up against the agricultural sector's priorities.

Government bodies with responsibility for environmental outcomes, need to be able to establish the standards for management of environmental invasive threats free from industry interference. Without legal standards "collaboration" is more properly described as corruption.

Comment on specific questions

1. **Do the outcomes represent the main areas where action should be focused to achieve this target or enabler of change?**

No. missing outcome and I object to Outcome 1 in current form.

Outcome 1 - I object to Outcome 1 'stronger collaboration across government and sectors improves invasive species management' as it is written. Collaboration without the guide rails of environmental laws and regulation is misguided and dangerous. The evidence from state of the Environment Reporting highlights current governance arrangements are failing the environment.

What is needed?

New outcome - ***"proper invasives governance structures that ensure environmental laws and policies are decided by those with responsibility for the environment and free from outside interference.***

Barriers to be overcome or enabler of change

- Ensure that those with responsibility for environmental outcomes are in a position to create effective environmental laws, regulations and policies.
- Ensure binding laws and regulations are in place for major invasive threats.
- Buffel grass invasion specifically needs to be recognised as a standalone key environmental threatening process, with a binding Threat Abatement Plan prepared.
- The National Biosecurity Committee membership, which is currently subject to review, needs to be balanced with stronger environmental and First Nations representatives and industry observers excluded.

- The Productivity Commission should be requested to review environmental biosecurity governance arrangements and propose a model that can ensure vested interests are not able to interfere.

Modification of Outcome 1.

Rewrite this to remove the possibility of vested interests (e.g. agriculture interests with a stake in spreading invasives, commercial interests with a stake in pesticides over other approaches/ ineffective management) participating in decision making on invasives regulation.

Outcome 4 - Research

Two new research focuses are needed:

1. Ending 1080 use as it is inhumane;
2. Research into a biological control for buffel grass.

I am very concerned that 1080 is an inhumane poison which has been normalised in influential subcultures as a tool for ongoing management.

Turning a blind eye to inhumane treatment is unacceptable and must be stopped. Even if some may argue a 'least harm' justification for 1080 poison use, this defence falls down if it is used on an ongoing basis without an endpoint in mind.

Based on my previous comments regarding buffel grass, the necessity for researching a biological control for buffel grass are self-evident.

Barriers to be overcome or enabler of change

- Research prioritised to develop humane alternatives to 1080.
- Strategies that use inhumane approaches need to be banned, especially and most urgently those that involve inhumane methods on an ongoing basis.
- Greater focus on the enablers of ecosystem resilience in objective 7 "Reduce Threats and Risks to nature and build resilience. This should include establishing the role of dingoes as a keystone species to be protected.

Thank you for considering this submission.

Kind regards,

Adrian Tomlinson

I acknowledge I live and work on unceded Central Arrernte lands, the sovereignty of which was never ceded.