Biodiversity Council

Submission to the Delivering Tasmania's Threatened Species Strategy

30 April 2026

About The Biodiversity Council

The Biodiversity Council brings together leading experts including Indigenous knowledge holders to promote evidence-based solutions to Australia's biodiversity crisis. The Council was founded by 11 universities with the support of Australian philanthropists.

Introduction

The Biodiversity Council welcomes the opportunity to provide feedback on the Delivering Tasmania's Threatened Species Strategy (the Draft Strategy).

Our understanding

The Draft Strategy is intended to be a strategic framework that helps align existing activities, investments and responsibilities for threatened species and guides future actions by government and non-government organisations.

The Draft Strategy has three parts - a vision statement, two guiding approaches and four strategic pillars.

The guiding approaches are prioritisation and collective effort. The four strategic pillars are: protect and restore, partner and engage, building knowledge, and getting the systems right. Each pillar has three long-term aims.

Feedback is specifically sought on whether the Draft Strategy adequately reflects real-world experience and how it can be translated into on-ground action.

The Biodiversity Council supports the broad direction of the Draft Strategy but we are concerned about the lack of a measurable anchor objective for prioritisation (and the prioritisation framework in general), and that the current strategy does not seem to have been formally evaluated to inform development of the new strategy.

Our key concerns are outlined below.

Key concerns

1. **The Draft Strategy lacks detail on the prioritisation process**

The Biodiversity Council supports prioritisation frameworks to guide conservation of threatened species. However, the Draft Strategy lacks detail about how priorities will be determined, when this will occur and who will be involved. This issue is compounded by the lack of anchor objective (see concern 2).

The Draft Strategy states that:

"*Priority threatened species, the most significant threats to focus on, and priority places where multiple species and threats overlap, will be identified through the priority setting process.*"

This is reflected in the three aims under Strategic Pillar 1 'Protect and Restore:

1. Priority threatened species populations are secured or recovered, and declines are halted.
2. Impacts from priority threats are proactively managed.

3. Priority places and habitats are effectively managed.

This is problematic because “managing threats" and "protecting habitats" are means, not ends. In program logic they would be "Intermediate Outcomes". If a strategy treats "Managing Threats" as an objective in its own right, a manager could successfully spend $5 million on deer control (achieving Aim 2) even if the species that the deer were negatively impacting continues to decline.

Hawkins did a prioritisation of actions for Tasmanian threatened species using the methodology outlined by Joseph et al (2008) and successfully deployed by NZ and NSW. It is essential this seminal work is revisited and utilised.

There is a potential conflict of objectives between protecting places and protecting species. Place prioritisation may be weighted towards ecosystem services, landscape connectivity, representative samples, access and recreation, public awareness, iconic landscapes etc. These factors may be important for a broader environmental strategy, but should not confuse a strategy that is for threatened species. Protecting priority places as an equal aim to threatened species conservation may result in political or social preferences overriding conservation objectives. The ‘places’ element should be removed from the threatened species strategy.

Designing a priorisation framework around two different objectives is likely to result in sub-optimal outcomes for both. In a robust framework, Aims 2 and 3 should be subordinated to Aim 1.

Recommendation 1: *The Biodiversity Council recommends that*

- *“priority places” be removed*
- *“priority habitats” and “management of priority threats” be identified as means of achieving recovery of threatened species, not aims in their own right.*

Recommendation 2: *The Biodiversity Council recommends that the Tasmanian Government commits to consultation on the prioritisation framework with global experts.*

2. Prioritisation requires an ‘anchor objective’

A key issue is that the Draft Strategy lacks an ‘anchor objective’, a specific, high priority target that serves as the central reference point for prioritising actions and assessing performance.

The vision in the Draft Strategy - “A future where Tasmania’s species are resilient and thriving, ensuring a legacy of rich biodiversity for generations to come” - is aspirational and subjective. It lacks the defined parameters to be useful as an anchor objective. Terms like 'resilient' and 'thriving' are currently undefined, preventing the development of a measurable baseline or a cost-effectiveness framework for prioritisation.

Victoria's biodiversity strategy has a Statewide target that can be used as an anchor objective for its priorisation framework - "A net improvement in the outlook across all species by 2037, as measured by Change in Suitable Habitat" where change in suitable habitat is "the increase in likelihood that a species will persist at a location in 50 years time, in response to sustained management of relevant threats".[1] In practice this means that Victoria's priorisation tool, Strategic Management Prospects, determines what actions delivered in which locations will deliver the greatest net improvement in species persistence at the least cost.[2]

Tasmania could also set a Nature Positive target[3] using the Threatened Species Index (TSX). For example, the target could be to recover the TSX for Tasmania to 1.0 relative to a 2000 reference year.

These objectives are different to the Australian Government's commitment under Target 4 of the Global Biodiversity Framework of 'no new extinctions'.

Setting an anchor objective based on preventing extinctions is likely to result in priorisation of different actions than if the anchor objective is maximising species persistence at least cost. Minimising the probability of extinction of Tasmania's most at-risk endemic species is likely to require species-specific actions such as captive breeding and genetic management. In contrast, Victoria's approach to maximising persistence prioritises landscape-scale threat management actions that benefits many species, but perhaps not the most at-risk.

In addition to supporting priorisation, a measurable anchor objective allows progress to be tracked and improves accountability.

Recommendation 3: *The Biodiversity Council recommends that the Draft Strategy set an anchor objective.*

3. The Draft Strategy lacks detail about the problem and how it will learn from past approaches

The Draft Strategy is intended to replace the current Threatened Species Strategy ('the 2000 strategy). The 2000 strategy identifies the six processes that are having the greatest impact on threatened species and provides quantitative information on the number of species affected, as well as descriptions of how these processes impact threatened species. For instance, the 2000 strategy describes how particular invasive species impact vulnerable

[1] See: https://www.environment.vic.gov.au/biodiversity/choosing-actions-for-nature/the-science-of-strategic-management-prospects

[2] See: https://www.environment.vic.gov.au/__data/assets/pdf_file/0022/603562/Protecting-Victorias-Environment-Biodiversity-2037_Technical-background-tools.pdf

[3] As defined by the Nature Positive Initiative: https://www.naturepositive.org/app/uploads/2024/02/The-Definition-of-Nature-Positive.pdf

ecosystems, and the species and regions most impacted by native vegetation clearance. This contextual information helps frame why particular actions were chosen in the 2000 strategy.

While a detailed description of all threats and the species that they impact may be more appropriate for a technical supplement, the Draft Strategy should identify the most significant threats to Tasmania's threatened species and outline the types of interventions that are most appropriate for responding to them (e.g. government programs on public land, landholder partnerships, regulation etc.). It is important to assess the likely contribution that particular intervention type makes to the overall objective in the Draft Strategy. For example, if the vast majority of threatened species occur on public land and the objective is to maximise their persistence then investing in direct government delivery of on-ground actions should be a greater focus than engaging and partnering with private landholders.

The Draft Strategy does not appear to build on the 2000 strategy. There doesn't appear to be any analysis of whether the actions were delivered and to what standard, or whether performance indicators were met. A crude evaluation could have used the existing readily available Threatened Species Index.

Evaluation of actions in the 2000 strategy would be particularly informative for themes that overlap with the Draft Strategy. For instance, "Involving the community" and "Working with Land Owners, Land Managers and Industry" in the 2000 strategy directly relates to the "Collective effort" guiding approach and "Partner and engage" pillar in the Draft Strategy. Understanding the effectiveness of past engagement programs could help inform design and scoping of the Partner and Engage pillar.

"Research and Monitoring" in the 2000 strategy directly relates to the "Building Knowledge" pillar in the Draft Strategy. Analysis of the information gathered as part of research and monitoring taken since 2000 would help determine data and knowledge gaps (Aim 1 in the "Building Knowledge pillar).

The "Getting the systems right" pillar would benefit from a broader evaluation of what has happened in the past and where things sit now. The following questions could support this analysis: What are the most significant threats to Tasmania's threatened species? Has this changed from when the 2000 strategy was developed? What species have improved in conservation status and what have declined? How successful were previous approaches to addressing threats? Did they work? Why or why not? Are there changes in the broader context that necessitates a change in approach?

Recommendation 4: *The Biodiversity Council recommends that the Tasmanian government publish an evaluation of the 2000 Strategy and use the findings to inform implementation of the Draft Strategy.*

4. The Draft Strategy should include a Program Logic

A well-designed Program Logic forms a foundation for measuring progress (through the use of indicators) and understanding which areas are successful, and which need improvement. The Draft Strategy should include a program logic which includes:

- Vision
- Overall outcome (i.e. the anchor objective)
- Intermediate outcomes (i.e. the Aims under the Pillars)
- Outputs and Activities with measurable indicators and targets
- Inputs.

Impact pathways should be mapped to show how the components relate to each other, how they will lead to change in the overall outcome, and the underlying assumptions. This would enable monitoring and evaluation which can lead to improvements to the approach. For instance, if intermediate outcomes are not sufficiently contributing to the overall outcome, the activities sitting beneath them could be redesigned, the targets could be adjusted to be more ambitious, or new targets and activities could be developed. A useful summary of the components of a program logic has been prepared by the Queensland Treasury. The Federal Department of Climate Change, Energy, Environment and Water has also produced program logics for Regional Delivery Partners and Indigenous Protected Areas, that may be helpful.

Recommendation 5: *The Biodiversity Council recommends that the Draft Strategy includes a Program Logic.*