



**Biodiversity
Council**

Submission on Updating the Strategy for Nature

April 2023

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.

The Biodiversity Council acknowledges the First Peoples of the lands and waters of Australia, and pays respect to their Elders, past, present and future and expresses gratitude for long and ongoing custodianship of Country.

Summary of key Recommendations

The Biodiversity Council recommends:

1. that Australia take an ambitious and far more transformative approach in the formulation of its next Strategy for Nature, consistent with the purpose of Global Biodiversity Framework and the reality that Australia and the rest of the world are facing existential risks from the growing biodiversity crisis
2. the Australian Government should take a leadership role and commit at least \$6 billion per annum ongoing in the Strategy to achieve GBF goals and targets, and use this commitment to leverage the remaining necessary resources from state and territory governments and the private sector, consistent with the call in GBF Target 19 for increased funding from all sources
3. Australia should commit in the Strategy to reforming and/or repurposing a credible value of biodiversity harmful subsidies, consistent with GBF Target 18 that calls on parties to the CBD to reduce harmful subsidies by at least \$500 billion globally
4. the Strategy must at minimum explicitly include GBF Targets 1, 10, 11, 12, 14, 18, 19 and 22, and should adopt all GBF targets and enabling strategies, and only adapt those where there is a clearly stated evidence base and rationale for doing so having regard to Australia's circumstances
5. the Strategy must use SMART targets and include all elements of each GBF target, unless specific elements are demonstrably not relevant to Australia's circumstances
6. the strategy must genuinely mainstream biodiversity conservation as an overriding policy imperative, and it must be evident from the strategy that it is endorsed and supported at a whole-of-government level
7. the Strategy and its targets must be binding at a whole-of-government level, effected through reforms to the EPBC Act, with GBF-relevant provisions having primacy over other legislation
8. the Australian Government should consider urgent, deeper, and more comprehensive forms of engagement with other departments, experts, practitioners, and stakeholders to ensure a credible NBSAP is developed.
9. the Australian Government has misinterpreted GBF Target 3 (30 by 30) and needs to develop better strategies and explicit metrics for improving representation and management effectiveness within Australia's National Reserve System.

Introduction

The Department of Climate Change, Energy, the Environment and Water (DCCEEW) is conducting consultation with stakeholders on updating the Strategy for Nature, which is Australia's National Biodiversity Strategy and Action Plan (NBSAP) under the Convention on Biological Diversity (CBD).

DCCEEW convened a series of three workshops with stakeholders in March 2024. Participants were provided with a 20-page discussion paper immediately prior to the workshop.

The Biodiversity Council is concerned by the lack of urgency, ambition, and credibility in the approach being taken to updating the Strategy for Nature.

The revised strategy must be ambitious and transformative

Notwithstanding three decades of commitments and action under the CBD, the world is facing a biodiversity crisis, alongside the climate crisis; crises that represent existential threats to nature, humanity, and civilisation.

Australia is part of the global biodiversity crisis. Australia is a megadiverse continent supporting 7.8 per cent of the world's described species, with and more than 90 per cent of our vascular plants, frogs, and reptiles, and more than 80 per cent of our mammals, being endemic (Chapman 2009; UNEP 2020). The 2021 SOE report found that Australia's biodiversity is declining, and the number of threatened species is increasing. On most measures since the prior report, our biodiversity is either in no better condition and is deteriorating or is in worse condition and is still deteriorating. The Threatened Species Index www.tsx.org.au, Australia's primary indicator for tracking EPBC Act listed species, shows an annual decline in the abundance of threatened species by 2-3% per year, on average, since 2000. We are a long way from being nature positive.

Not only is Australia one of the only 17 megadiverse countries, it is one of only two on that list that are also wealthy developed countries, the other being the United States. Australia should therefore be world leading in its ambitions to deliver against the goals and targets of the GBF.

In 2010 in Nagoya, Japan, the tenth Conference of the Parties (COP) to the CBD (including Australia) adopted the Strategic Plan for Biodiversity 2011-2020, including the Aichi Biodiversity Targets. Parties to the CBD are required to make biodiversity strategies and action plans (NBSAPs), and to report on progress.

Australia made its most recent NBSAP under the CBD in 2019 in the form of 'Australia's Strategy for Nature 2019–2030.' While the current strategy visually linked its goals and actions to the Aichi targets, it did not include any specific and measurable national targets. The biodiversity chapter of the 2021 SOE report noted the Strategy for Nature 'has been met with some criticism, mainly because progress measures lack detail and specific measurable targets' and stated 'it is difficult to envisage how progress against the strategy will be assessed, how the strategy will support reporting against international targets, or how it will guide and drive actions to improve the state and trend of biodiversity in Australia.' Coffey et al. (2023, p. 924.) were more direct: 'Australia's [current] strategy with its non-binding and non-time bound vision, goals, and targets and scant coverage of implementation seems to be more crafted to manage public expectations than about effective biodiversity governance.'

Surely, the new Australian Government would wish to make a more credible NBSAP and avoid such criticisms.

Given these weaknesses, it is unsurprising that none of the Aichi Targets were fully met globally or in Australia.

Progress against the Aichi targets at a global scale was formally assessed for the final time in the fifth Global Biodiversity Outlook report. The report found that, of the 20 targets, 14 targets were not achieved, and six targets were only partially achieved.

Australia made its sixth report to the CBD in 2020, also its final report against the Strategic Plan for Biodiversity 2011-2020. Australia's report is disappointing. It assesses progress only in generalised terms and through example case studies. The biodiversity chapter of the 2021 SOE report reflects on Australia's sixth report: 'other than an increase in the coverage of the National Reserve System, progress against most [Aichi targets] was, at best, partial.'

Given the poor framing of the Aichi targets, poor implementation globally, inadequate resourcing—and the resulting ongoing biodiversity loss—there are growing calls for more urgent and transformative action (Dasgupta 2021; Díaz et al. 2019; Grumbine & Xu 2021; IPBES 2019; Leadley et al. 2022; Narain et al. 2022; Perino et al. 2022; World Economic Forum 2020b, 2020a, 2023).

The growing international consensus on the need for urgent and transformative action has culminated most recently in the Kunming-Montreal Global Biodiversity Framework (GBF), adopted by 196 nations in December 2022 under the CBD.

The GBF is far broader in its scope and ambition relative to pre-2020 arrangements. It sets more ambitious goals and more specific numerical targets. The GBF places the need to 'catalyze, enable and galvanize urgent and transformative action' as its core purpose, and notes 'success requires political will and recognition at the highest level of government.'

In addition to signing up to the GBF, the former Prime Minister, alongside 63 other global leaders, signed the Pledge for Nature (2020), which sets out urgent actions as part of the UN Decade of Action to achieve Sustainable Development. The pledge recognises the 'benefits of restoring natural resources outweigh the costs ten-fold, and the cost of inaction is even higher.'

Australia needs urgent and transformative action in substance, not just in rhetoric.

Australia cannot afford a minor updating of its NBSAP, it cannot afford only incremental, unambitious reforms, and it cannot afford to ignore the multi-billion shortfall in the financial resources needed for effective GBF implementation.

The Biodiversity Council therefore submits it is vital that Australia take an ambitious and far more transformative approach in the formulation of its next NBSAP.

The strategy must commit adequate resourcing – GBF Target 19

Unless Australia (i.e. the Australian Government first and foremost; state and territory governments; and the private sector) makes material commitments to increasing funding to meet the multi-billion-dollar shortfall in biodiversity conservation funding, all else this strategy is trying to achieve will fail, continuing the status quo of failure to date.

Some peer-reviewed articles provide credible estimates of funding required. Mappin et al. (2022) calculated the overall costs of achieving Target 2 to restore 30 per cent of degraded terrestrial ecosystems through cost-effective restoration, without affecting intensive agriculture and urban areas in Australia: a cost of approximately AU\$2 billion per annum for 30 years to restore 13 million hectares. Elton & Fitzsimons (2023) suggest, while noting further research is required to better quantify the level of investment needed, that a substantive uplift in funding in the order of hundreds of millions of dollars per annum (until 2050) is required to achieve Target 3 of the GBF in Australia. Wintle et al. (2019a) estimate funding needs for species recovery in Australia using US benchmarks at AU\$1.69 billion per year at 2018 levels.

Drawing on these figures would suggest the total cost to meet targets 2, 3 and 4 and Goal A of the GBF would be about \$5 to \$6 billion per annum over the period to 2050. The total cost to deliver all aspects of the GBF (adding in management of invasive species, sustainable agriculture, pollution control, etc.) is likely therefore be in the order of \$10 billion per annum to 2050. Both the public and private sectors should contribute to the total cost, consistent with the GBF's call in Target 19 for increased funding from all sources.

For a more fulsome exposition of the funding required to deliver against the GBF in Australia, see the Biodiversity Council's [2024/25 Pre-budget Submission](#).

The Biodiversity Council submits that the revised NBSAP must include a material uplift in funding consistent with Target 19 of the GBF, consistent with the evidence on the level of funding required, and consistent with the purpose and objectives of the GBF and the Sustainable Development Goals.

The Australian Government should take a leadership role and commit at least \$6 billion per annum ongoing and use this commitment to leverage the remaining necessary resources from state and territory governments and the private sector.

The strategy must commit to reforming biodiversity harmful subsidies – GBF Target 18

The revised Strategy for Nature must respond to GBF Target 18 that calls on parties to the CBD to reduce harmful subsidies by at least \$500 billion globally. The Biodiversity Council's [2024/25 Pre-budget Submission](#) makes a recommendation on this issue.

Reforming and repurposing biodiversity harmful subsidies in Australia would achieve positive biodiversity outcomes and there is ample scope to free sufficient fiscal resources for the funding needed to achieve GBF and other important socio-economic objectives.

All GBF targets must be included

As was done in the last strategy, it is no longer credible for Australia to cherry pick targets from the GBF.

The discussion paper circulated by DCCEEW envisages only six targets mapped to seven GBF targets. It also proposes three enablers—concerned with mainstreaming, data, and participation—consistent with some but not all the enabling strategies embedded in the GBF.

The GBF itself emphasises the need for its four outcome goals and 23 action-oriented targets to be integrated and implemented in full. Leadley et al. (2022) demonstrate quantitatively how vital it is that the targets and goals of the GBF be treated as an indivisible whole and implemented promptly and comprehensively.

The Strategy for Nature must adopt all GBF targets and enabling strategies, and only adapt those where there is a clearly stated evidence base and rationale for doing so having regard to Australia's circumstances. A small number may require less implementation emphasis in Australia where our current institutional and policy arrangements are more mature.

Some of the so far overlooked targets are vital for inclusion. The Biodiversity Council submits that the Strategy for Nature must include and deal appropriately with at least the following additional key targets (summarised):

- Target 1: participatory integrated biodiversity inclusive spatial planning and/or effective management processes addressing land and sea use change
- Target 10: sustainable agriculture, aquaculture, fisheries and forestry
- Target 11: nature's contributions to people
- Target 12: enhance green spaces and urban planning for human well-being and biodiversity
- Target 14: mainstreaming or integration of biodiversity conservation across planning systems and all sectors
- Target 18: reforming or repurposing biodiversity harmful subsidies
- Target 19: increasing financial resources from all sources.
- Target 22: Ensure Participation in Decision-Making and Access to Justice and Information Related to Biodiversity for all

The strategy should also deal with all the capacity building, enabling, educative, transparency, inclusiveness, and equity objectives built into the GBF.

The strategy must use SMART targets

The framing of the six targets circulated in the consultation materials is inadequate. The six proposed targets lack ambition, specificity and certainty; are inappropriately qualified or limited; and variously do not include all elements of the seven GBF targets relevant to Australia's circumstances they are supposedly addressing.

For example, the target 'Work towards zero new extinctions' is unmeasurable, not timebound, and of extremely low ambition. It walks back commitments already made by the Government to achieving zero new extinctions, made by the Minister for the Environment, and affirmed in the Australian Government's Threatened Species Action Plan. GBF Target 2 is to ensure at least 30 per cent of degraded ecosystems are under effective restoration by 2030. The proposed target '30% of priority degraded areas under effective restoration' implies a less ambitious goal by introducing the filter 'priority.' The Strategy must include targets that do not undermine the level of ambition of targets in the GBF, and existing commitments of the Government.

The current targets read more like headings. At the consultation session, officials claimed that concise targets are needed for ease of public understanding and communication purposes. The

Biodiversity Council suggests the use of short target headings (for ease of communication) followed by more detailed and formal expression of the national targets.

Given the seriousness of the global biodiversity crisis and the thorough processes through which the GBF targets have been developed globally, the NBSAP must include targets that contain all elements of all GBF targets (unless demonstrably not relevant to Australia).

The NBSAP must use SMART targets: targets that are Specific, Measurable, Assignable, Realistic, and Time-related. For a more comprehensive approach to the setting more ambitious and credible targets see Maron, Simmonds & Watson (2018).

The strategy (Priority Area 5) has misinterpreted GBF Target 3

The strategy states that “In October 2022, [Australia’s environment ministers committed](#) (ahead of COP15) to work collectively to protect and conserve 30% of Australia’s landmass and 30% of Australia’s marine areas by 2030 (‘30 by 30’). This set the domestic target for this element of the GBF.

Implementation of this target is underway. Currently, 48% of marine areas and 22% of land areas are protected in Australia. An additional 8% of land (equivalent to 60 million hectares) needs to be protected or conserved to meet our 2030 target.”

GBF Target 3 states that the 30% protected area is “effectively conserved and managed through ecologically representative, well-connected and equitably governed systems of protected areas and other effective area-based conservation measures”. The current commentary surrounding this target largely ignores representativeness, which means that every kind of species and habitat needs to be represented at the 30% level, the kind of representation that was aimed for in the Great Barrier Reef rezoning in 2004 (at the 20% level). Further the system must be well-managed and connected. Additionally there are concerns in relation to the adequacy of protection measures across Australia’s network of marine protected areas, where 75% is considered only ‘partly protected’ (Roberts et al 2020).

Hence, any notion that we have met target 3 in the ocean is a false claim – and meeting the land-based target will require substantially more than 8% of the land to fill representation gaps. Further, the government urgently needs a credible definition of “other effective area-based conservation measures” plus metrics quantifying adequate management.

The strategy must genuinely mainstream biodiversity conservation as an overriding policy imperative

The strategy cannot pay lip service to the concept of mainstreaming biodiversity conservation at a whole-of-government level.

To deliver on the GBF’s conception of transformative action, the strategy will only be credible globally and nationally if it includes steps to reform policy settings in portfolios beyond that of the environment that are the key direct and indirect drivers of ongoing biodiversity loss. It must be evident from the strategy that it has been endorsed and is supported at a whole-of-government level, not just within environment portfolios. This will necessitate transformative change in

traditional governance to support the necessary transformative governance of biodiversity and sustainability needed to achieve mainstreaming (IPBES 2019).

Australia's NBSAP needs targets that are binding, time-bound, and measurable and crafted to drive effective biodiversity governance and action. This should be achieved via reforms to the EPBC Act to embed binding GBF/NBSAP targets; and the reformed Act's GBF-relevant provisions should have primacy over other legislation.

The strategy should be refined via deeper stakeholder engagement

The GBF was adopted by Australia in December 2022 and Australia's revised NBSAP is due to the CBD Secretariat ahead of the 16th meeting of the COP to be held in Columbia from 21 October 2024. The Biodiversity Council is concerned by the brevity of the consultation conducted to date.

Given the little time remaining to finalise a strategy that can pass through governments' approval processes, the Biodiversity Council suggests that DCCEEW should consider urgent, deeper and more comprehensive forms of engagement with other departments, experts, practitioners, and stakeholders to ensure a credible NBSAP is developed.

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