Gecko - Gold Coast and Hinterland Environment Council Assn Inc.

ABN 90 689 258 843

Gecko House, 139 Duringan Street, Currumbin, Qld 4223.
Telephone 07 5534 1412 Facsimile 07 5534 1401
info@gecko.org.au www.gecko.org.au

4th January 2013

Submission to Senate Enquiry into *The effectiveness of threatened species and ecological communities' protection in Australia*

Due Date: December 14, 2012; Extension requested to January 4, 2012

Submission made on behalf of **Gecko – Gold Coast & Hinterland Environment Council** and **Save Bahrs Scrub Alliance**

Gecko – Gold Coast & Hinterland Environment Council and **Save Bahrs Scrub Alliance** welcome this Senate Enquiry and congratulate the participants. Gecko- Gold Coast and Hinterland Environment Council Assoc. Inc. is a not-for-profit environment association founded in 1989 and has been active for the past 23 years in protecting the environmental values and ecological sustainability of the Gold Coast as well as across Queensland .The **Save Bahrs Scrub Alliance,** established in 2009, is made up of representatives from five larger environment groups who have agreed to support the important single issue of preserving the very high conservation values of Bahrs Scrub in the face of the large scale development threat posed by Logan City Council's drafting of a Net Development Plan for this valuable area.

We are grateful for the opportunity to comment on the inherent issues and to pass on the experiences of our volunteer run, community organisations without whose constant vigilance and comprehensive actions we believe environmental outcomes would be even direr than the present situation.

We contend that despite having ample access to high quality, up to date research and best practice knowledge, all levels of government in Australia have for too long delayed and avoided authentic action on our country's biodiversity crisis. Inaction and wrong action appear to be attributable to partisanship among the elected representatives holding power, for a variety of reasons including sponsorship obligations, perceived constituency pressure, and party philosophy. In short, we contend that Australia, certainly, has always had the means to address the biodiversity crisis, and the fundamental obstacle has always been political will and proper leadership.

However, we continue to hope that in this time of crisis this Government can put in place legislation which obliges right action to supersede politicization, and can further implement a community attitudinal shift, which will ensure that all Australians fully support positive action on reversing

biodiversity decline having deeply accepted the ethical and survival grounds for ensuring the resilience of our fellow species.

We wish to highlight that while our campaigns are many, ongoing and ever arising, our few victories are by far disproportionate to our many losses, and even in rare victory there is almost always compromise and loss. The psychological effect of this reality is that fatigue and disillusionment are significant factors for organisations such as ours. It is a credit to the values set of the Australian community that many organisations exist all over the nation, ensuring coverage of the entire continent, and nearly always minimally staffed by dedicated and unofficially trained volunteers whose amateur expertise and commitment can often surpass that of professionals in the field. For this reason, we call particular attention to the need to increase funding to existing environmental organisations to continue their critical vanguard role, to be able to actively educate the community in order to bring about the essential attitudinal shift referred to above, and even to support their role in species protection and research.

Since there is much to be said on reasons for the clear failure of existing systems to protect threatened species and species from moving onto the Threatened Species List, this submission has taken the approach of supplying an overview of the issues we encounter in our efforts to address biodiversity decline, with some observations and illustrative examples taken from our various campaign experiences.

We present this overview to the Committee in the hope that it will provide a deeper insight into the factors involved in addressing biodiversity decline from a community perspective, one that we believe is reliably able to prioritize the needs of flora and fauna in a non-partisan way, and operates without self-interest but much commitment.

Macro and microcosms – dualistic approach needed

Research into the needs of and threats to biodiversity illustrates that preserving biodiversity requires both umbrella and site specific approaches. Anthropogenic climate change for example is a serious threat to species survival, which is best addressed at a holistic level but is viewed by governing authorities as being 'on another page'. For instance, when the Queensland Government promotes the fossil fuel industry, there is not only a direct effect on biodiversity from exploration and extraction activity, but a more amorphous and unquantifiable impact on biodiversity and habitats from the burning of fossil fuels worldwide and locally, which increases the global warming effect. Any attempts of the QLD Government then to address biodiversity decline become meaningless at best and drastically counter-productive at worst when there continue parallel promotion and significantly greater prioritization of an industry that causes climate change which science concurs is an insurmountable and pervasive threat to biodiversity. On a secondary scale of this need for an umbrella approach, development applications requiring either total or partial vegetation clearing are considered at site level. However, authorities need to take a contextual view of the impact of site clearing on habitat provision for the general area, taking into account past, concurrent and future vegetation loss when granting or refusing development approvals. Similarly, development impacts on waterways of varying size and seasonality at site level must be considered in relation to the much larger system they feed, keeping in mind that re-routing, eradicating, piping or otherwise altering the most minor and larger watercourses alike consistently

impacts on the entire aquatic and marine system and the species it supports. On the other hand, threats to biodiversity also need to be considered on a site-specific level, for example by pre-empting impacts including litter, pollution, feral and exotic species, edge effects, road kill, and the like. This integrated approach to considering threats to biodiversity is lacking in the vast majority of approvals for development proposals.

Role of community groups and organisations:

Given the size of the Australian continent in relation to its population, infrastructure, and governance constraints, community environmental groups and organisations and key individuals play a significant role in biodiversity protection through activities such as monitoring, identifying, rescuing, educating and lobbying. Non-government organisations provide the backbone of environmental protection and a dollar value cannot be placed on how much is saved annually from the public purse. It is also often the case that the accumulated knowledge of these groups represents an unsurpassed resource that authorities can and should access and should pay heed to in the decision making process.

Lip service, box-ticking:

Like most environment groups, **Gecko** has contributed copiously to a variety of community consultation opportunities; given the single focus of **SBSA** outlined above, the group is engaged in community consultation with Logan City Council and often the State Government on an ongoing basis. However, the experience of community organisations and concerned individuals who expend time, effort and often even private funds on monitoring potential changes to biodiversity status wrought by government or private proposals is that so-called 'community consultation' is largely considered an obligation which can be attended to in largely cursory fashion, with minimal and often no heed to the warnings, concerns and objections expressed by individuals and groups such as ours. In short, 'community consultation' appears to be a box-ticking exercise only and from the outset the ultimate destination of a proposal is unlikely to be swerved from the original government or commercial intention.

A good example is the situation SBSA has been dealing with. Bahrs Scrub is an acknowledged biodiversity hotspot mooted for national park status in the 1980s but voted down by the QLD National Party in government. Despite the values of the Bahrs Scrub Precinct and despite community opposition on the grounds of biodiversity threat among other constraints, the previous Labor Government identified the area under the Southeast Queensland Regional Plan for investigation by the local authority for suitability as a Major Development Area to accommodate 11,000 residents. The Logan City Council doggedly went ahead with the investigation, commissioning expensive consultancy reports and inviting community input. SBSA pointed out from the outset the significant biodiversity constraints and the equally serious geomorphology, hydrology, bushfire, and visual and social amenity constraints of the Precinct, which were backed up by the various commissioned reports. However, LCC has not detoured in the slightest from the original Draft Plan for the area which they claim 'balances' the environmental and developmental needs of the area, but by any measure of common sense seriously compromises the biodiversity integrity of the area.

Furthermore, LCC has continued to hold that they are under obligation to deliver development yield from the Precinct to comply with State directives. However, SBSA has also repeatedly pointed out the stipulation of the SEQ RP that the local authority must investigate only the Precinct's potential for MDA status and that LCC has always had the right and the *obligation* to find the area **unsuitable** for development based on biodiversity, geomorphology, hydrology or amenity constraints. LCC continues to ignore this proviso despite the Precinct having not one but all of these constraints, and despite SBSA having acquired in writing and in conversation the assurance of the previous Minister that the SEQ RP can and must be interpreted as such.

Appeals to local and state elected representatives are met with delayed, no, or obscure responses which consume volunteer time, with enquiries having to be re-pursued continually and threads of conversations having to be found and re-picked up sometimes after several months delay.

Recently, the LCC Councilors have voted to accept the Bahrs Scrub Development Plan giving no further credence to the real and grave objections and concerns of SBSA, individuals, and even of consultancy reports than to announce that environmental values will be 'balanced'.

Community consultation in the Bahrs Scrub development investigation process has thus been close to meaningless.

Volunteerism:

The fact that community environmental groups and organisations must function largely through a volunteer workforce with no civil authority is a considerable obstacle to their multiple roles played in assisting with biodiversity protection. While there are many positives for the organisation and the individual from volunteering, there are also negatives which impact upon the effectiveness of the community role:

- Constant change of staff/helpers, often with minimal notice
- Erratic nature of skills base
- Lack of communication at organizational and individual levels
- Personal expense; engagement with processes cost-prohibitive
- Litigation risk (real and perceived)
- General continuity challenges, for example in role handover, knowledge transfer, follow-up
- Lack of voice or authority to comment; 'outsider' status

Ear continually to the ground:

Another factor in community ability to comment on biodiversity loss potential projects or decisions is again related to the volunteer, outsider nature of the community in relation to authority procedures. Hearing about development applications, government reports, draft proposals, strategies, or polices that are available for community consultation is too often haphazard, dependent on strong networks or local residents catching sight of signs or local newspaper notices of development applications. It is unknown how many proposals and approvals slip under the radar, the first indication of an approved

project being when vegetation clearing has commenced or been completed. It is also difficult for the community to keep up with all submissions on regional or larger scale discussions, especially when the natural environment is fundamental to such a broad range of issues from trying to ensure a local parcel of native vegetation is retained to endeavoring to have the precautionary principle exercised on very large scale impacts such as those caused by the coal seam gas industry. Also, some issues beyond a community organisation's immediate coverage can be highly relevant to our campaigns and pursuits and also relevant to our parallel goal of best practice for all biodiversity.

The law is the law – unless it's open to interpretation

Gecko and **SBSA** have repeatedly found that the result of trying to operate even within the environmental legislation that we have is far from a guarantee of success or appropriate outcome for biodiversity protection. Interpretation of environmental policy or legislation can be extremely broad, loose or selective. An SBSA example is the case of LCC having the right to find the Bahrs Scrub Precinct unsuitable for development on any grounds of constraint as outlined above, because ultimately Councillors were able to vote to approve the Plan according to their opinion. Significant biodiversity loss will therefore be the result because our legislative decision making rests not on science but on personal bias.

Environmental legislation is not comprehensive enough in relation to the most recent concerns of the science and conservation community and presently lacks a climate change or water trigger. There exists no mechanism to act with speed and rigor on science warnings, and a failure to require action on or properly define mitigation. Wording of policy, law and regulation can be weak and ambiguous, allowing broad and irresponsible interpretation and poor practice.

Also, policy in Queensland at least takes the perspective of conserving diversity through a representative ecosystems approach, which can translate into less protection for the sum of biodiversity across the state with reduced funding and designation of conservation areas. In addition, across all levels of government exists a perspective of de-prioritisation of so-called 'common' vegetation and fauna. This perspective fails to acknowledge the importance of support species for the more rare or threatened species, the loss of which places increased pressure on at-risk species. This perspective exposes a further issue for conservation practice as species must be pushed close to the brink of extinction before the first semblance of protection is granted through Threatened Species listing. This perspective also tolerates species extirpation, solely justified by the existence of the species elsewhere in the state or nation. Listing of a threatened species is often at species population rather than individual level and is also dependent on the recognition of crisis by community individuals and public campaigns. Not only is this necessity unsatisfactory in the requirement for constituency pressure before action is taken for protection, but the reliance on community expertise makes for a hit and miss situation for species that are less well known, unpopular, or not yet discovered.

Democratic right to prevent or express objections to projects that threaten biodiversity is far too dependent on financial capacity. The court process allows wealthy project proponents to persist in their

application for previously rejected proposals and to override Council decisions. Lobbying by large interests gains greater sway amongst legislators; because of corporate financial ability to hire sustained, more and highly skilled legal support, as well as the sheer size of some projects being viewed as having significance to the overall economy of an authority, court decisions tend towards favourable outcomes for project proponents. Laws are presently mooted to discourage community objections to development applications further with the threat of being obliged to pay the winner's costs. Freedom of information principles are also impeded by wealth considerations as costs for accessing documents are very prohibitive for the average income level.

Changes of government and subsequent ideology and political affiliation with lobbying interests can swiftly negate any and all hard won achievements of the conservation movement through repealing of legislation and abolition of programs and services. The present situation in Queensland is illustrative of this process as the new LNP Government acts to remove the Office of Climate Change, abolish solar industry funding, repeal the Wild Rivers Act, abolish the Waste Levy, remove so-called 'Greentape' to facilitate development approval, allow the culling of flying foxes and a long, ongoing list of actions undoing the previous government's environmental moves. Strong community support for proper conservation would be some guarantee of protection against the vagaries of our necessary democracy, but achieving such support is constrained by a lack of community education mechanisms and an often disinterested or actively oppositional media, such as the Gold Coast Bulletin which openly promotes irresponsible commercial developments and derides the values and knowledge of environmentalists.

Present environmental laws are essentially designed to facilitate rather than arrest development and even the presence of a valuable species or important landscape feature is no guarantee of conservation. At state and federal levels alike, legislation favours a development outcome and enables destruction through inbuilt features such as those further outlined below.

Improper perspective on ecological imperative

Proper perspective makes for effective legislation. National and state environmental laws are not strong or comprehensive; nor do our laws prioritise nature or acknowledge its intrinsic value in relation to human need and in its own right. After decades of struggle by conservation minded citizens and considerable biodiversity loss, our country has at last adopted a **shallow ecologism** perspective, recognizing the value of natural environments and other species to our own survival needs. However, appropriate **deep ecology** is nowhere evident in legislation or in training of legal professionals with little to no recognition of species' and systems' intrinsic and mutual rights to existence regardless of their 'use' to humanity, and even the shallow ecologism perspective is not consistently and laterally applied by authorities.

Government agencies and elected representatives demonstrate an ongoing flawed belief that environmental values can be managed and balanced with human expansion. While this is plausible in theory and to a certain extent, in actuality planners and decision makers have consistently got the

balance wrong, as evidenced by the ongoing and even hastened biodiversity decline and the extinction crisis.

Local area development plans notoriously fail to implement best practice on biodiversity protection and climate change adaptation/mitigation despite having access to high quality information. The Bahrs Scrub Net Development Plan for example, while claiming to be based on state of the art, best practice urban design principles, allows for edge effects, litter and pollution, feral predatory animals and other known human neighbor impacts on the inadequate and unprotected areas designated as Environmental Management Areas or other environmentally constrained areas within the Precinct, with no funding source identified for Council purchase and thus increased assurance of protection of these EMAs. Wildlife Movement Corridors are of sub-standard width and route allowance, often compromised along the way, leading to 'nowhere' and not properly monitored or regulated when going through private properties. The proposed Bahrs Scrub Precinct is fragmented by an increased road network with the inevitably increased likelihood of roadkill. While larger waterways are moderately protected, the myriad smaller watercourses will be subject to alteration, impacting on the nearby failed Albert River.

Proper perspective on the value of the environment would dramatically transform the poor decisions made that result in biodiversity decline, and our organisations support the adoption and transition to the constitutional recognition of the rights of nature as proposed by the international Earth Jurisprudence movement (http://www.gaiafoundation.org/earth-centred-law) and presently recognised by countries such as Ecuador or to a lesser extent, New Zealand.

Lack of a deep ecology perspective or even a shallow ecology perspective is starkly evident in the present QLD Government decision to reverse the previous Labor Government policy and allow culling and relocation of flying foxes despite the unequivocal scientific evidence of this species' vital role in the fertilization of rainforest and subsequently the oxygen cycle. Many other examples of a lack of even a shallow ecology perspective in legislative decision making can be supplied.

Lack of larger contextual perspective

The conservation merits or otherwise of individual projects are considered in isolation with little taking into account of habitat loss in adjacent areas or the larger context. Conversely, approval may be given for proportional clearing within a site conditional on some vegetation being retained; however, further applications to clear an additional proportion of the original retained vegetation may be subsequently approved years later. This blinkered approach inevitably and logically leads to piecemeal loss or 'death by a thousand cuts' as vegetation continues to disappear within suburbs, local authorities, the state and across the continent.

Lack of requirement for best practice

Although copious and costly reports are required by authorities into potential constraints posed by the geomorphology, hydrology, flora and fauna, scenic or social amenity features of a project seeking approval, the precautions and recommendations of these reports appear often to be overlooked or granted cursory attention in the approval process.

There further appears to be a lack of high standard required of consultancy, particularly in environment reporting. Human understanding of the complexities of an area in supporting species is dependent on considerable rigor of research. However, the reality is that official environment data is not comprehensive and in many cases inferior to knowledge possessed by the community: in regard to koala populations in South East Queensland, for example, the Australian Koala Foundation possesses far more comprehensive species mapping than the State or local agencies.

The common practices of environmental consultancies, contracted by authorities and project proponents alike, do not appear to be of the highest standard to ensure properly informed decision making by authorities or courts. Consultancies are commonly known to base their assessments of site features on desk-top studies, sometimes drawn from old, deficient flora and fauna mapping, or google mapping which can even be out of date; on-site surveys are very poorly conducted with consultants attending the site for alarmingly limited periods of mere hours on a single day, ignoring factors such as nocturnal and seasonal movements. Consultants also tend to be under-trained in the recognition of flora and fauna species, sometimes better informed were there deference to local, amateur enthusiasts. This deficiency is also attributable to a raft of factors which include inadequate funding for flora and fauna surveys; poor standards, perspectives and philosophy of training curricula; and the much larger crisis in taxonomy. Finally, investigation of the impact on and relation to the larger environment context beyond a site again appears to be little attended to and not a required focus in the compilation of reports.

Gaps in research application are not confined to biodiversity mapping, identification and description. Despite the universal acceptance of international science on climate change, including the human causation link, authorities and elected representatives remain under-informed and even mis-informed about this gravest and most urgent threat to the human way of life. At the very least, authorities should be required to commission micro-climate change effects that can be anticipated and prepared for to contend with the impacts on local areas related to specific, smaller scale natural characteristics, such as studies recently completed for Tasmania. Authorities and courts should be actively and immediately pursuing best practice on climate change adaptation and mitigation both in development approval processes and in highly precautionary regulating for existing development. Instead, authorities are supporting projects such as ports, high-rise construction on coastal sands, large scale, fossil fuel support infrastructure and general urban expansion, which not only endanger human communities but result in mass vegetation removal and thus habitat destruction. In Queensland, with the abolition of its Office of Climate Change, knowledge and funding access on this vital issue is critically limited. Community support for research funding and action on climate change is further imperiled by the ideological convictions of elected representatives who continue to incite public resistance to acceptance of the science, especially in relation to the anthropogenic causal factor in climate change. Finally, mitigation of climate change is gravely out of reach with the zealous pursuit of fossil fuel industry in Queensland; for example, consumption of all coal earmarked for extraction in Queensland will contribute to average global temperatures rising by 6 degrees, a circumstance that makes a mockery of all present conservation attempts and gains by eradicating the majority of present species.

Environmental laws at present have little to no potential to deal with climate change mitigation or adaptation impacts apparent from development factors. The threat to species common and rare from

climate change is acknowledged to be real and impending and the most significant crisis biodiversity now faces. Apart from the vital and intricate connections a healthy natural environment has with the wellbeing and functionality of human society, there exists a moral imperative for humanity to rapidly ensure biodiversity resilience to climate change.

Reliance on offsets

The conservation movement generally rejects and condemns the fundamentally flawed, unsatisfactorily applied, and generally damaging practice of offsetting recommended to address the numerous and considerable environmental constraints identified by commissioned technical studies and upon which many environmental approvals heavily rely.

The concept of offsetting of flora and fauna is flawed from the outset particularly if the objective (as stated in Australian and Queensland biodiversity strategies) is a net *gain* in biodiversity. Since the planet and its flora and fauna are finite, loss of one area of habitat vegetation will always and only be loss even if vegetation in another area is regenerated in compensation. Offsetting practice also allows for the retention of existing vegetation in compensation for lost vegetation on the proposed site for development. Retention of a vegetated site as offset cannot be viewed as a *gain* in habitat or species representation by any reasonable interpretation.

Another flaw in the offsetting concept, even if properly conducted, is that vegetation regeneration takes several decades to reach optimum value as species support. The loss of or pressure on species in the interim contributes to the general decline of Australian biodiversity. Further, the original composition of the site cannot be known precisely in terms of species and landscape features, and thus cannot be replicated on a compensatory site.

In addition to the difficulties of replicating a site earmarked for destruction, are other unknowable aspects such as how the ecosystem/s of the developable site would have changed and evolved in the medium to very long term future, and whether all the species can return and regenerate; similarly, nor can the survival and evolution of the site's linked landscape features (such as waterways for example) be accurately assessed along with the viability of the species those subsequent landscapes support.

Beyond the conceptual level, the offsetting practice is flawed in implementation. Ideally, the compensatory site should be located, purchased, assessed, and fully regenerated (or at the very least, re-planted) before clearing of the developable site commences. Without this stipulation, the replacement site cannot be regarded as allowing for equilibrium in species existence, let alone for a net gain in biodiversity. However, many instances exist of large and small scale projects commencing, reaching completion and functioning for years without even locating a compensatory site; this situation is so repeatedly the case in practice that a public enquiry is warranted.

Secondly, the compensatory site's landscape features and its endemic vegetation (either existing or to be planted) should be identical to the values of the developable site, a stipulation known as 'like for like'. Again, however, the reality is quite different, with compensatory sites selected only because of expediency, bearing little to no similarity to the values of the developable site, especially in the case of

highly specialized and uncommon ecosystems, such as that of Bahrs Scrub. This is largely because of a range of factors. The greater proportion of development is occurring along the coast, previously limited to the South East Queensland region, which is the most biodiverse region in the Southern Hemisphere. Such diversity is partly the result of diverse soils, some of which cannot be found outside the region, and is therefore, irreplaceable. Cost is also a very significant factor with coastal land values far greater than those inland where vegetation and geomorphology differ. The Gold Coast situation is illustrative of this reality, attributable to the uniqueness of regional vegetation and landscape coupled with over-development in the region from untrammeled (and ongoing) population expansion: availability of 'like for like' is no longer possible for offsetting of Gold Coast projects.

The fact that 'like for like' is not required in offsetting is also related to the slow progress in total environment valuation science (TEV), which would more clearly reveal the real economic worth of vegetated areas in their inter-relationship with social systems such as food and water security or carbon sequestration. Until such economic science is reliably available, 'like for like' offsetting cannot be genuinely sourced or appropriately remunerated.

Thirdly, even the most conscientiously applied offset is no assurance of biodiversity conservation since there is no permanent protection of the compensatory area. Even after years of conscientious regeneration, sites once earmarked as offsets can be approved for development, rendering the entire practice a mockery of conservation principles, government policy and legislation. Further, monitoring of the ongoing health and survival of a regenerated or retained compensatory area is not ensured by legislation; given the expense of regeneration and maintenance in light of factors such as climate change weather variations or human neighbor impacts, offsets are not even guaranteed survival.

Fauna offsetting often involves relocation, which is an unconscionable and ultimately ineffective practice. Common sense dictates what government endorsed practice does not, which is that animals are difficult to catch, are heavily stressed and injured in the process of capture, and further at risk of sickness, injury or death in transport. Once released into the new location, animals compete with existing populations for food and other resources. Furthermore, only particular species are selected for relocation, resulting in the loss of a far greater and unknown number of species.

On the whole, it is clear that offsetting is the resort of legislative inability to properly protect biodiversity while development remains the priority. Offsetting only has value if it is retrospective to existing projects and involves regeneration of existing degraded sites. As it stands, offsetting is little more than a box-ticking exercise which gives a project the appearance of conservation to appease public disquiet, while the actuality is far from the truth. In fact, the concerns over offsetting as a contributing factor to biodiversity decline are so great that a public enquiry is warranted.

State population accommodation pressures

There has been little overt recognition of the impact of pressures caused by population expansion and the need to make informed decisions to regulate those impacts. Research into carrying capacity at local and national level is needed in order for state governments to make appropriate decisions about where to direct expanded population accommodation. However, in QLD, we have only seen a reactive

approach to planning from government, with coastal shires continually required to take their share of what has been very high numbers of people relocating, especially to Southeast Queensland initially but in later years to coastal shires further north as well. This demand on local shires has caused considerable loss of biodiversity. Urban and industrial expansion to serve a rapidly growing population not only impacts on biodiversity through habitat loss from vegetation clearing but through the raft of well documented impacts such as fragmentation, roadkill, pollution and litter, feral species invasion, domestic pet attack, edge effects, and dramatically reduced resistance to climate change. At no point do either state or local authorities appear to acknowledge that coastal shires may already be at or beyond carrying capacity; in fact, despite all appearances that regions such as the Gold Coast and other SEQ shires are straining under population burden and rapidly losing their natural character, the trend of present governments is to step up development pressure, and to remove so called 'Greentape' to fast-track and reduce the cost of development. This approach is based on a misguided view that economic boom times can be re-achieved through a return to an era that, ironically, gave rise to the grave environmental crises the present era is faced with and which cannot support further vegetation loss. Sound economic and environment related science should guide important decisions such as urban planning rather than the bias, ambitions, or electoral commitments of non-expert, inexperienced elected representatives who are often satisfying a political agenda that impedes or precludes objectivity. Given the present system, it is too often the case that the high quality knowledge accessible by government department staff in relation to the pros and cons of population density is sidelined in favour of political imperatives.

The conservation estate

Across Australia, the national parks and other levels of protected lands which constitute the conservation estate are disproportionate to international standards and to the type, uniqueness and diversity of the continent's flora and fauna and landscapes. Despite being home to one of the last major wild areas on the planet, as well as the most biodiverse area in the Southern Hemisphere, Queensland's conservation estate remains behind that of the rest of Australia, with no plans or allocation of funding from the present government to ameliorate this circumstance. The term 'national park' is a misnomer as these are actually designated and controlled by state agencies which are historically less stringent on conservation than they are enthusiastic about potential income and job creation from development projects. The present Queensland Government is also diluting the integrity of national parks by allowing recreational activity including horse-riding, shooting and trail bike riding in national parks due to powerful single interest lobbying and the lure of commercial gain. National parks would be better created and managed were they truly under control of federal agencies.

The 'Taxonomic Impediment'

Throughout the world as in Australia, the discovery of new species goes on, but the identification and full description of species remains constrained by the paucity of professionals in the field of taxonomy and the rigor of the discipline itself since one taxonomist can spend a lifetime describing a single species or continuing the work of another. Even among the raft of known species, full understanding of behaviours, needs and interactions is mostly limited. Worldwide, there is a taxonomic impediment to

proper biodiversity management. Popularizing and heightening the status of taxonomy as a profession would attract more students to the field, and utilizing the expertise of amateur enthusiasts would go some way to addressing this fundamental but little acknowledged challenge to biodiversity protection.

Failure of political leadership

In extremely challenging times of threatened total environmental collapse, biodiversity decline and extinction crisis, and deadly anthropogenic climate change, Australia has generally demonstrated a slowness to heed the warnings of science or to take up the economic opportunities afforded by the need to change. The states have been even more tardy in their responsibility to attend to the medium to long term needs of the human community and the natural systems upon which we depend. In general, Australian political representatives have failed to take climate change seriously and truly build resilience or mitigate future more drastic impacts for biodiversity. Although there have been tokenistic demonstrations of understanding, there remains a failure to take science warnings seriously: the biodiversity strategies of the Queensland and federal governments 'make all the right noises' but are basically toothless and are not implemented as policy across departments. Political leaders and elected representatives have shown an unwillingness to educate public opinion on the necessity of biodiversity and natural system protection for human survival and in some cases, have actively promoted mis-information in this regard as evidenced by the appallingly ignorant public statements in recent times and ongoing, attempting to discredit climate change theory; or the failure to be truthful about the impacts of large scale projects such as the coal seam gas industry. A similar lack of necessary initiative is evident in the failure to make a proper assessment of continental and/or regional population carrying capacity with instead a blind insistence on the outdated concept of economic growth through population increase, which has been shown to be unsustainable. Elected representatives have further failed to adopt a sustainable economy approach and creatively turn biodiversity protection into a lucrative pursuit.

Gecko and SBSA present this overview of the social factors inherent in the biodiversity crisis Australia is facing in the heartfelt hope that it will assist this Senate Enquiry to bring about the urgent changes required to achieve genuine conservation which is in the interests of species and systems that share this probably unique planet as well as our own survival interests. We wish the Committee well in the complex challenges ahead and ensure our continued support.

Summary of points raised:

1. Improper perspective on ecological imperative
2. Legislative failure
3. Legislative decision making rests not on knowledge but on personal bias
4. Lack of larger contextual perspective; piecemeal effect ('death by a thousand cuts')
5. Lack of requirement for best practice
6. Offsetting and relocation as flawed concepts
7. De-prioritization of common landscape features, ecosystems or species
8. Representative ecosystems approach

9. Taxonomy crisis
10. National parks
11. Lack of high standard for consultancy reporting
12. Bias towards financial capacity
13. Dependence on community action for objections to individual projects and overall planning schemes
14. Financial, staffing or time constraints to community action
15. Developer ability to re-apply for previously rejected projects
16. Lack of mechanism to act with speed and rigour on science warnings
17. Lack of climate change trigger
18. Lack of water trigger
19. Changes of government
20. Perceived triviality and inconvenience of stringencies, or 'Greentape'
21. Lack of funding (such as for research; species survey/mapping) to properly inform judgments or trigger laws
22. Lobbying bias
23. Slow and perilous process of nominating species as threatened
24. Poor community education and community support for action
25. Media bias and sensationalism
26. Community and political resistance to research findings
27. Population growth and carrying capacity
28. Lack of political will and true leadership in crisis

Thank you for the opportunity to comment on these important matters.

Yours sincerely,

Lois Levy. OAM

President.