



**TASMANIAN
CLIMATE
COLLECTIVE**

Tasmanian Climate Collective Submission on the Threatened Species Strategy Discussion Paper

[Tasmanian Climate Collective](#) (TCC) offers this submission in our ongoing efforts to support the necessary actions required to mitigate and adapt to climate change in the face of the overwhelming deluge of scientific advice, misinformation, vested interest lobbying and other factors.

TCC is a group of committed organisations and individuals from across lutruwita, Tasmania who advocate for evidence based action on climate change. The Collective is made up of climate action, social and environmental groups and grassroots organisations. Tasmanian Climate Collective has no political affiliation and is composed of scientists, farmers, doctors, teachers, nurses and other concerned citizens calling for more action on climate change and a just transition for all Tasmanians.

TCC makes numerous submissions to inquiries such as this in our efforts to improve the chance of a safe, healthy and fair Tasmania. As a 100% volunteer run organisation, this takes many hours from many people. Even then, our submissions compete with those made by paid employees and lobbyists of powerful industries with vested interests. The David vs Goliath nature of our efforts takes a huge toll on our volunteers who would rather be giving their time to other causes, such as schools, sports, community care, etc. The excessive influence of lobbyists, political donors and powerful industries with vested interests currently prevents politicians and decision makers from acting on the best advice of independent experts in the interests of all Tasmanians. Before we address the consultation questions, we would like to make a single clear recommendation:

Recommendation: Politicians and other decision makers in the Tasmanian government should directly consult independent scientific experts, act on their advice and adequately resource implementation.

[Tasmanians](#) are concerned about climate change and looking for more ambitious, sector based climate policies. The failure of successive governments to act on the best scientific advice has left Tasmanians with worsening climate and ecological crises. Tasmania's current climate and energy transition policies do not yet reflect the advice of [climate scientists](#) and [policy experts](#).

Tasmania has been [plagued by concerns](#) about excessive influence of powerful vested interests. Tasmanians are [increasingly concerned](#) about our democratic processes and this is becoming a [major political issue](#).

The role of TCC and other concerned citizens should not be to provide expert evidence based advice. Our role is to demand that the Tasmanian government listen to and act on the advice of independent scientific experts, rather than the advice of high greenhouse gas emitters and their industry associations. In a properly functioning democracy, where decision makers have not been "captured" by vested interests, our role should be redundant.

1 Introduction

Thanks for extending the deadline beyond the busy festive period. This is much appreciated. TCC welcomes the discussion around a new Threatened Species Strategy. It is definitely due after almost 24 years of the current strategy.

One aspect of the current strategy that is of great interest to our group is the key role that the broader Tasmanian community was meant to play in ensuring threatened species thrived. It is good to see that a similar concept has been proposed as part of the Objectives in the proposed Strategy – through fostering and facilitating “*a shared responsibility*”.

It is unfortunate that more detail was not included in the Discussion Paper, as it makes it difficult to comment on the design of a new strategy without a good understanding of the failings of the current strategy.

The “Reflections on progress” section creates the impression that little has been accomplished in the way of reducing the plight of threatened species in Tasmania since publication of the current strategy:

- There are almost 4 times more endangered species (227 vs. 58, Discussion Paper pg. 10) today than there were in 1999.
- The total number of (known) threatened species has increased by almost 7% (686 vs. 642, Discussion Paper pg. 10).
- A majority of threatened species (60%) do not have a listing statement (Discussion Paper pg. 11). The current strategy document states that “*listing statements are required by legislation for all listed species*”.
- The Discussion Paper mentions 47% of threatened species having a listing statement or a recovery plan (Discussion Paper pg. 11).

However, because there hasn't been a State of the Environment Report since 2009 it is impossible to know the true state of our threatened species at this time.

Discussion surrounding the reasons for the failings of the current strategy is effectively non-existent in the Discussion Paper, other than to mention the complexity of the monitoring and evaluation framework. How can we be sure we are developing a more robust Strategy – that will achieve its objectives (like the flourishing of our threatened species) – without a genuine discussion around the issues affecting the current strategy and why these issues weren't highlighted sooner?

The current strategy clearly calls for regular reviews. From the current strategy:

“*Periodic review of the Strategy will be required to ensure that it is being implemented, that it is achieving its intended outcomes, to optimise its effectiveness, and to adapt to altered circumstances*” (Threatened Species Strategy, pg. 30).

Given this, issues with the complexity of the Strategy should surely have been captured before now.

While not directly mentioned in the Discussion Paper, it is assumed that the current Strategy did not receive the level of funding required for it to function properly. The 2000 strategy noted that the *“level of funding needs to be increased to meet the objectives of this Strategy”* (Threatened Species Strategy, pg. 29) and this is a fear for the proposed new strategy.

Increased resourcing is required to effectively meet the stated objectives of the proposed Threatened Species Strategy.

Another concern surrounding the proper functioning of the proposed Strategy is the influence of politics on threatened species outcomes. There are clearly conflicts of interests for governments when faced with the prospect of choosing species over profit/business interests. As such, there is a need for new legislation that allows an independent body – free from political interference – to oversee the application of the Threatened Species Strategy.

New and updated legislation is required to ensure independence from government interference.

2 Consultation Questions:

2.1 Question 1

Question: What key elements in the 2000 Threatened Species Strategy should be considered when developing the new Strategy?

The current Threatened Species Strategy contains a lot of good elements. It is a pity that the Discussion Paper didn't consider key elements of the current strategy in a more meaningful way.

2.1.1 The role of the community

One key aspect, for a community-run group like ours, is the central role that the community was meant to play in the current strategy. “Community participation” was the first of seven primary mechanisms to be used *“to integrate threatened species conservation across all sections of the Tasmanian community”* (Threatened Species Strategy, pg. 1).

The current strategy stated: *“Responsibility for conservation of threatened species and their habitats rests with everyone in the community”* (Threatened Species Strategy, pg. 4). Additionally, the strategy stated, *“community pride in and ownership of the conservation of species which are threatened will be a key factor in the success of the Strategy”* (Threatened Species Strategy, pg. 24.).

While there are some community groups that play a role today, many groups that try to take ownership are shunned by those charged with protecting threatened species. Groups like

Forestry Watch, The Tree Projects and Blue Derby Wild all face uphill battles in trying to protect our threatened species.

It should be noted that where community groups are expected to take on specific projects or responsibilities, those projects should be fully funded. The long-term responsibility and allocation of extended funding should be considered in the planning. The community shouldn't be expected to do everything without being properly resourced. It is of the utmost importance that threatened species initiatives are well-resourced.

A new strategy should look to include the role of the community and enforce it as envisioned in the current Strategy.

2.1.2 Use of broad indicators

The indicators described in the current strategy have obviously been found to be overly complex upon review. However, they attempted to offer a comprehensive account of the state of Tasmania's threatened species. They also included indicators that measured:

- support from the broader community.
- the levels of resourcing being received.
- the implementation of the strategy.

The revised Strategy should consider including broad indicators to ensure effective implementation.

2.1.3 Regular revision

The current Strategy calls for periodic revision. This should also be carried over to the new Strategy. And implemented regularly.

Regular, periodic revision should be built into the new strategy.

2.2 Question 2

Question: Are there any key threats to Tasmania's native species that may be missing, and why are they important?

2.2.1 Climate change

It is good to see that climate change has been included in the proposed revision. While it was discussed in the current Strategy, it was not considered among the major threats.

Climate change should be made central to the revised plan as it will have a significant impact on threatened species - with increased levels of fire, flooding and higher water temperatures increasing current pressures.

2.2.2 Decisions guided by incomplete knowledge

It is important to ensure that “*incomplete knowledge*” is not used to negatively impact threatened species. The precautionary principle should be implemented to ensure that unknown implications can’t be used to potentially increase pressure on threatened species.

2.3 Question 3

Question: Do the proposed Vision, Objectives and Guiding Principles provide a sound foundation for the Strategy and Implementation Plan? If not, why not? Are there any important elements missing and, if so, what are they?

2.3.1 Vision:

The draft Vision needs to aim higher. While the proposed vision looks to “*create pathways to recovery*” for threatened species, it should instead be looking to ensure there are no more extinctions.

2.3.2 Objectives:

We definitely want to see threatened species flourishing in the wild – as per the first objective.

The new objective on fostering and facilitating a “shared responsibility” is most welcome. However, as mentioned previously, the current Strategy had a focus on community participation that appears to have largely been ignored. We hope that this objective is taken more seriously.

2.3.3 Guiding Principles:

It is good to see collaboration being included as a guiding principle. This needs to actively include/welcome broader community participation.

We note that transparency is mentioned as part of the “Effective” principle. Transparency should be considered a key guiding principle. The Tasmanian public has begun to more regularly call for transparency in decision-making. Part of making decisions more transparent would be the introduction of an independent body to oversee its implementation.

The final guiding principle, “Accountable”, is also important. Regular reporting and evaluation is needed. This could be linked with regular State of the Environment reporting.

2.4 Question 4

Question: How important are each of the prioritisation principles proposed above? Should they be weighted with some being more important than others? Are there any important principles missing and, if so, what are they?

Focus should be placed on pre-emptive strategies. We need to be looking at actions that can help our threatened species before things become too urgent, and we need to stop other species becoming listed. The lack of action around saving valuable blue gum habitat, which

is underrepresented in the state's Reserve Estate and critical to the survival of the swift parrot, is a good example. It appears like action is only taken at the last moment, when species, like the orange bellied parrot are right on the cusp of extinction. More proactive action is needed from the revised Strategy.

With specific species in mind, it is important to maintain a focus at the species-level. While an ecosystem approach will have some benefits - particularly reducing cost - it is easy to overlook and miss impacts occurring to individual species. A much better approach is to provide the necessary resourcing so that a species-approach can be implemented.

2.5 Question 5

Question: Do you think the proposed Prioritisation Framework and Strategic Priorities are appropriate? What would you add or change?

- The precautionary principle needs to be incorporated into the revised strategy.
- There needs to be a focus on new legislation that does a better job of protecting threatened species. This could move away from a focus on voluntary compliance, incorporate the precautionary principle and reconsider the role of the government.
- Adequate resourcing is absolutely fundamental to the functioning of any Threatened Species Strategy. Ensuring adequate resourcing should be considered a strategic priority.
- Definitely supportive of discussion around collaboration. We would like to see more focus on whole-community collaboration, like that in the current Strategy.

2.6 Question 6

Question: What work are you or your organisation undertaking, or planning to undertake, that aligns with the proposed objectives and strategic priorities, and what opportunities are there for your organisation to partner to deliver priorities over the next 5-10 years?

Nothing to add.

2.7 Question 7

Question: What research and innovation priorities could support Tasmanian threatened species management over the next 5-10 years?

Nothing to add.

2.8 Question 8

Question: What would encourage you to support and invest in threatened species management?

Seeing communities being actively invited and involved in threatened species activities.
Making the broader community feel welcome in this area.

2.9 Question 9

Question: Do you have examples of cost-effective management and protection tools that you believe would be worth exploring in Tasmania? Are any of the proposed emerging approaches more or less suitable to Tasmania?

Caution is needed when considering the use of carbon credit schemes which may impact threatened species. While it is vital that we reduce the levels of carbon dioxide in the air quickly, this need should not further increase the pressure on threatened species.

Similarly, offsetting habitat loss should only be used when no other option is available. And needs to come with strict requirements regarding long-term implementation.