



AUSTRALIAN NETWORK for PLANT CONSERVATION INC

18th April 2014

The Director
Terrestrial Species Conservation Section
Wildlife, Heritage and Marine Division
Department of the Environment
GPO Box 787
CANBERRA ACT 2601

Dear Sir/Madam

Re. Submission to the Threatened Species Commissioner's Draft Terms of Reference from ANPC Inc.

The Australian Network for Plant Conservation Inc. (ANPC – www.anpc.asn.au) is a non-government, not-for-profit association dedicated to the conservation of Australia's native plant species and vegetation systems. Our membership encompasses more than 350 individuals and organisations, and our Management Committee includes leading conservation scientists and practitioners. We specialise in exchange of knowledge and practical experience between scientists, land managers, and conservation practitioners by:

- delivering courses and workshops related to on-ground native vegetation conservation and rehabilitation, facilitating interchange of latest findings from research and practice,
- publishing the quarterly bulletin *Australasian Plant Conservation*,
- running biennial national conferences and forums,
- producing best practice manuals and guidelines on plant conservation techniques, and
- undertaking best practice on-ground works, specialising in the translocation of threatened plant species, and associated surveys, propagation, habitat restoration, research and monitoring.

In relation to the Draft Terms of Reference for the Threatened Species Commissioner, the ANPC provides the following comments:

The ANPC considers it important to conserve the known threatened species and that the Threatened Species Commissioner's role will raise the profile of this important issue, and by so doing will also help conserve many other species. However, it is equally important that the concentration on the current known threatened species does not divert attention away from the need to conserve all of biodiversity. The existing schedules are far from a complete list of threatened entities - constrained by lack of information about even the obvious flora and fauna, and more so, when it comes to invertebrates and cryptogams, of which we barely touch the surface. There are many species still to be discovered, and even more in need of threat-risk assessments.

GPO Box 1777 Canberra ACT 2601 Australia

ABN: 70 861 480 818

Telephone: (02) 6250 9509; Fax: (02) 6250 9528; Email: anpc@anpc.asn.au

Website: <http://www.anpc.asn.au>



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One of the limitations and continuing gaps in threatened species recovery programs is the importance of capacity building and knowledge/expertise transfer. The Terms of Reference should include, or at least recognise, community capacity and knowledge transfer as distinct needs.

Scope of the Position

The ANPC, in general, supports the scope of the position as outlined in the roles and responsibilities in the draft Terms of Reference. To effectively deliver the outcomes identified, the ANPC recommends:

- consideration be given to including threatened ecological communities and key threatening processes to the scope of the position and each of the roles and responsibilities, and outcomes,
- consistency with the Australian Strategy for the Conservation of Biological Diversity and that this form part of the scope of the position, and
- consideration be given to including identification and implementation of actions that will reduce the number of non-priority and non-listed species from becoming a priority or listed as threatened species.

Aims and Objectives

The ANPC, in general, supports the aims and objectives of the draft Terms of Reference. For over 20 years, the ANPC has been working strategically, bringing partners together from the different fields of plant conservation (incl. taxonomy, genetics, seed banking, propagation, biological and ecological research and monitoring, habitat restoration, community engagement and involvement, and other expertise) to achieve long-term conservation outcomes for threatened species and ecological communities.

Roles and Responsibilities

In the short term (first 12 months):

- *identify priority nationally listed threatened species for which conservation actions are likely to be successful.*

The ANPC, in general, supports this role and responsibility. The process for identifying the priority species should be transparent. It should also be flexible enough to accommodate newly listed species and those for which there has been a change in the threat and risk of extinction status.

- *work with stakeholders to identify the highest priority actions to secure those species in the wild for at least the next 100 years*

The ANPC, in general, supports this role and responsibility.

- *identify and secure partners and funds to implement this programme of high priority actions over the longer term*

The ANPC, in general, supports this role and responsibility. It will be important that projects are properly costed to ensure actions can be implemented to achieve

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objectives. All too often, funding has been for the short term and has limited achieving long term conservation outcomes.

- *guide a process of reform to simplify and streamline the statutory recovery plan process*

The ANPC, in general, supports the intention of this role and responsibility. The recovery planning achievements, over the last 25 years needs to be acknowledged. Threatened species recovery is usually complex and to achieve long-term outcomes requires a long-term commitment. For this reason, a Recovery Plan, is a document that transcends the turnover in staff and community members, and has information that anyone can look at and see what the issues are, what needs to be done and what they can do. The ANPC does not consider the Recovery Plan preparation stage as the issue, but the implementation of the Recovery Plan process that needs to be strategically managed, for example, identify areas where feral animal or weed control will have maximum benefits for actions in many recovery plans, rather than each plan implementing weed control.

In the medium to long term (1 – 5 years):

- *advise on and direct conservation actions in priority national threatened species recovery programmes in collaboration with the programme coordinators*

The ANPC, in general, supports the intention of this role and responsibility.

- *building on government, non-government and community-based threatened species initiatives, develop a strategic approach to threatened species conservation, including a prioritisation framework for species and conservation actions*

The ANPC, in general, supports the intention of '*building on government, non-government and community-based threatened species initiatives, [to] develop a strategic approach to threatened species conservation*'. In relation to prioritisation of species and actions, the ANPC does recognise the need to strategically allocate available resources to best effect, but also notes that there is no single agreed methodology for doing so. The ANPC would like to see an approach to biodiversity that avoids treating any species as, or leads to the assumption that any species are, expendable. The conservation agencies have a particular leadership role in efforts to prevent extinctions. It is important that they are seen positively portraying our ability to be successful, with community support, in conserving biodiversity, not only a small proportion of species that have been identified as a priority.

- *work closely with the Threatened Species Scientific Committee to strengthen the connection between the statutory listing and recovery planning processes and the implementation of conservation actions.*

It is not clear what the intention of this role is. The Scientific Committee makes its listings based on the nominations, and provides information about the species, its

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threats, and recommendations for actions to reduce threats. This information then, subject to funding, forms part of the recovery plan for that species. The ANPC recommends that this be clarified in more detail in the final Terms of Reference.

- *identify opportunities for longer term funding models, including co-investment and partnerships, to support the threatened species conservation action programme*
The ANPC suggests that the roles of the Commissioner should also include:
 - establishing comprehensive linkages with the non-government biodiversity conservation sector,
 - ascertaining the needs of that sector for sustained activity and growth in capacity to contribute to conservation knowledge and actions,
 - identifying changes in the cultural and institutional arrangements of government which would assist the development of the above, as well as assist government engagement with this sector (including funding cycle issues where this is a factor in the relationship to government).
- *monitor the effectiveness of priority conservation actions and report to the Minister and to the public.*

The ANPC, in general, supports the intention of this role and responsibility.

Program Outcomes

- *implementation of conservation actions for priority nationally listed species*

The ANPC would like this program outcome to be quantifiable, ie. will all actions for all priority species be implemented, or for some species, or high priority actions for all species etc.

- *priority threatened species are secured in the wild for at least the next 100 years*
The ANPC would like the term 'secured' to be defined in the Terms of Reference. We will not know if the actions implemented to secure the species in the wild for at least 100 years were successful for at least 100 years. Therefore, it may be more achievable to have an outcome that reflects the life of the program, eg *actions have been successfully implemented to provide long-term security to all priority threatened species.*

- *more integrated, complementary threatened species conservation efforts at a national level*

The ANPC supports this project outcome, and assumes it will encompass strategic funding of projects from different portfolios that serve the same outcomes. It is unclear whether this outcome is to benefit all threatened species or just priority threatened species.

- *targeted, practical and cost effective investment in threatened species conservation actions*

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The ANPC would like greater specificity in this outcome. For some species, strategic management of actions for cost-effectiveness can be achieved, but for other species, costs will be species specific. It is unclear whether this outcome is to benefit all threatened species or just priority threatened species.

- *clear and accessible public reporting on effectiveness of threatened species conservation actions*

The ANPC supports this project outcome.

- *a more strategic approach to threatened species conservation to better inform government policy and planning.*

It is unclear what the intention of this role and responsibility could be. The ANPC recommends that this be clarified in more detail in the final Terms of Reference.

Thank you for this opportunity to contribute to the Draft Terms of Reference for the Threatened Species Commissioner. The Australian Network for Plant Conservation would be interested in providing further comment on this process – please add us to your stakeholder list accordingly.

For contact with the ANPC, please phone our national office on (02) 6250 9509 or email anpc@anpc.asn.au.

Yours faithfully,

Jo Lynch
Business Manager