

SUBMISSION TO THE EPBC ACT REVIEW

ANON-K57V-XFA7-3

Name

Andreas Dalman

State or Territory

New South Wales

Areas of Interest

Threatened species; International obligations; Indigenous Australians; Heritage; Matters of National Environmental Significance; Environmental Impact Assessments; Great Barrier Reef; Cumulative impacts; Climate change; Compliance and enforcement; Decision making; Public participation in decision making; Biodiversity; Conservation; Commonwealth national parks; Water;

Attachment provided

Yes

Do you give permission for your submission to be published?

Yes - with my name and/or organisation (if included)

SUBMISSION RESPONSES

QUESTION 1: Some have argued that past changes to the EPBC Act to add new matters of national environmental significance did not go far enough. Others have argued it has extended the regulatory reach of the Commonwealth too far. What do you think?

The EPBC Act does not go far enough to protect the Australian environment.

Failures of the EPBC include approvals for these projects not being halted on biodiversity, water over-use, high potential for water contamination and community opposition:

- Adani Carmichael megamine
- Equinor drilling in the Great Australian Bight
- Santos' Narrabri gas project

QUESTION 2: How could the principle of Ecologically Sustainable Development (ESD) be better reflected in the EPBC Act? For example, could the consideration of environmental, social and economic factors, which are core components of ESD, be achieved through greater inclusion of cost benefit analysis in decision making?

Environment protection consideration needs to be the focus of the EPBC. The cost of environment protection needs to be much higher than the cost of doing business. Offsetting destroying a critical habitat should be very difficult, not simply plant a couple of trees somewhere else.

Socio-economic factors should play a part, but not automatically trump environment protection. For example if a new coal mine or its expansion is proposed and it will benefit the local economies and provide jobs at the expense of the environment, during the submission consideration period, eco-focused project alternatives such as for example building a solar and/or wind farm (or solar-

hydrogen extraction plant) and re-skilling the people in that community to be in a position to become employed in such a project should also be considered and potentially even co-funded by government since the outcomes would benefit communities AND the environment not one over the other.

QUESTION 3: Should the objects of the EPBC Act be more specific?

Yes. Ecology protection should be the main driver for all objects in the Act.

QUESTION 4: Should the matters of national environmental significance within the EPBC Act be changed? How?

The EPBC Act needs to strengthen the protection of our environment.

QUESTION 5: Which elements of the EPBC Act should be priorities for reform? For example, should future reforms focus on assessment and approval processes or on biodiversity conservation? Should the Act have proactive mechanisms to enable landholders to protect matters of national environmental significance and biodiversity, removing the need for regulation in the right circumstances?

Focus should be on biodiversity conservation.

Yes the Act should have mechanisms to enable landholders to protect nature but this should not mean a removal of regulation.

Pastoral stocking levels for example need to be actively monitored and enforced.

Incentives for de-stocking and increasing biodiversity should exist to encourage protection of the land.

QUESTION 6: What high level concerns should the review focus on? For example, should there be greater focus on better guidance on the EPBC Act, including clear environmental standards? How effective has the EPBC Act been in achieving its statutory objectives to protect the environment and promote ecologically sustainable development and biodiversity conservation? What have been the economic costs associated with the operation and administration of the EPBC Act?

Yes clear environmental standards are required.

These need to be markedly better than what we have now, since the current state of affairs in this country is dire.

This answers that the EPBC Act has been ineffective in protecting our natural wealth. Mass extinctions have been occurring and this trend needs to be reversed.

The economic cost of losing these species is immeasurable and dwarfs any costs to operate and administer a robust and effective EPBC Act that actually protects ecosystems.

QUESTION 7: What additional future trends or supporting evidence should be drawn on to inform the review?

The IPCC 1.5 report is clear on pathways to protect us from runaway climate disaster.

Global temperature trends need to inform the review.

Approvals for developments cannot under any circumstance ignore the 'downstream' or consequential effects of approval (in essence a coal mine or gas extraction approval cannot ignore the effect of the extracted material being burned on our carbon emission levels - will those levels exceed the targets we have agreed to - it does not matter what country those emissions occur in if

we are facilitating those countries by supplying the material we are liable).

Effects of development approvals on water quality can never be ignored since we have a scarcity of this precious asset. For example Coal Seam Gas drilling is proved to contaminate water from evidence both here in Australia and abroad. Another example is the huge volume of water a coal mine uses and contaminates during operation which needs to be taken into account and should render approval of such projects near-impossible.

Land clearing needs to be discouraged as much as possible, and the trend of broad scale clearing as we have been seeing in NSW and QLD needs to be reversed and closely monitored and high penalties imposed when done illegally, even if the law is later changed (which should actually not happen if we are serious about protecting our land for future generations).

QUESTION 8: Should the EPBC Act regulate environmental and heritage outcomes instead of managing prescriptive processes?

Yes. Positive (conservation/regeneration) environmental and heritage outcomes should be the drivers of the EPBC. Prescriptive processes smack of rubber stamping and corruption and should be abolished. Every project should be assessed on its merit and how it can improve environment and heritage outcomes. Offsetting typically fails the equivalence test and ought not be used to justify diminishing environmental and heritage values/outcomes.

Remove uncertainty = if environment and/or heritage is put at risk = no.

QUESTION 9: Should the EPBC Act position the Commonwealth to take a stronger role in delivering environmental and heritage outcomes in our federated system? Who should articulate outcomes? Who should provide oversight of the outcomes? How do we know if outcomes are being achieved?

Yes, a properly designed EPBC should take a stronger role in delivering environmental and heritage outcomes in our federated system.

Outcomes to be jointly articulated by the federal and State Environment minister, clearly outlining what environment/heritage benefits will be.

Oversight to be provided by a committee formed from members of independent environment and heritage groups (e.g. Aboriginal Elders, ACF, Wilderness Society, AMCS, Friends of the Earth etc..) should oversee and have power to critique outcomes and refer breaches to enforcement authorities. Reports to be created and tracked against the stated outcomes.

Outcomes are being achieved if no referrals for breaches have occurred and can be measured from collating the regular reports from the oversight committee.

QUESTION 10: Should there be a greater role for national environmental standards in achieving the outcomes the EPBC Act seeks to achieve? In our federated system should they be prescribed through:

- **Non-binding policy and strategies?**
- **Expansion of targeted standards, similar to the approach to site contamination under the National Environment Protection Council, or water quality in the Great Barrier Reef catchments?**
- **The development of broad environment standards with the Commonwealth taking a monitoring and assurance role? Does the information exist to do this?**

Expansion of targeted standards to serve as a minimum benchmark allowing the States and Territories to go further if they desire.

I believe that development and continual review of broad environmental standards to guide the EPBC decision making process would be valuable to provide a framework for more specific consideration of individual projects. This needs to be done in close consultation with community and traditional owners.

QUESTION 11: How can environmental protection and environmental restoration be best achieved together?

The Act should have equal focus on conservation and restoration. Restoration in one area not to be used to give up conservation of another.

Yes there should be incentives for proactive environmental protection (e.g. graziers de-stocking more than required to let the land recover).

Success will make itself known. If Nature is brought back into balance droughts will be less, deserts will start to become grasslands and eventually forests. See Mulloon Farms and NSF practices of Peter Andrews - the evidence speaks for itself. Similarly in coastal areas erosion will become less and fish, animal and plant stocks will replenish.

Indigenous land management practices should be seen as the golden standard. Traditional burning should become the template for hazard reduction burning everywhere (State Forest, National Park, your back yard). We should try to diversify our agriculture and pastoralism to Australian species and eventually move almost exclusively to those species since they are adapted to our continent.

QUESTION 12: Are heritage management plans and associated incentives sensible mechanisms to improve? How can the EPBC Act adequately represent Indigenous culturally important places? Should protection and management be place-based instead of values based?

Yes. Indigenous culturally significant places need to be represented in the act. This should include that consultation with Indigenous representatives who are well informed and not financially induced by any project seeking approval is mandatory with the penalty for interference by any project being its immediate rejection. Broader Australian community response should also be measured and taken into account because Indigenous heritage is the heritage of this land for all of us who are here and will be into the future.

I think a set of overarching values needs to exist for protection management, however these principles to be used in tandem with the location itself and the history and stories Indigenous representatives attribute to the location.

QUESTION 13: Should the EPBC Act require the use of strategic assessments to replace case-by-case assessments? Who should lead or participate in strategic assessments?

A strategic assessment framework for conservation and heritage values should exist to assist the case-by-case assessments. The framework should not replace case-by-case assessments. Strategic assessments to be led by Indigenous representatives and with the participation of community representatives from city and rural areas. Companies seeking approval should have minimal if any involvement in this part of the process unless their main driver is one of regeneration.

QUESTION 14: Should the matters of national significance be refined to remove duplication of responsibilities between different levels of government? Should states be delegated to deliver EPBC Act outcomes subject to national standards?

No. More checks and balances makes for less corruption. The EPBC Act should act as a minimum baseline that States can improve on as far as protecting environment and heritage values.

QUESTION 15: Should low-risk projects receive automatic approval or be exempt in some way?

- **How could data help support this approach?**
- **Should a national environmental database be developed?**
- **Should all data from environmental impact assessments be made publicly available?**

No exemptions.

The environment is changing and the way approvals are handled needs to reflect this.

Anything that threatens water supply/water table/rivers = no.

All EIS data to be publicly available. The public should have more than one opportunity to have a say in the process. For example if a project is approved and someone in the public discovers some undesirable environmental impact/contamination this should be sufficient to start a process to freeze operations and either have remediation undertaken immediately and/or the project closed.

QUESTION 16: Should the Commonwealth's regulatory role under the EPBC Act focus on habitat management at a landscape-scale rather than species-specific protections?

Both are important and to properly protect a species the habitat management is essential. For example in this bushfire season so much habitat has been destroyed that the EPBC Act should have the power to halt approved projects that have not commenced which would result in habitat clearing in adjacent areas or similar areas where displaced/rescued animal populations can be re-housed. Landscape impactful projects which are operating should be given incentives to scale back, move ore wrap up operations to make way for recovery and regeneration activities.

A credits-based incentive system applicable to companies that run projects may help industry to initiate calls for these types of actions.

QUESTION 17: Should the EPBC Act be amended to enable broader accreditation of state and territory, local and other processes?

The EPBC Act should signify the minimum baseline best practice in environment and heritage protection. As such it would do well to conduct regular (annual or biennial) reviews against other practices of higher standard to determine if they should be added to the Act. The aim over time should be to improve and harmonise protection standards across all of the country.

QUESTION 18: Are there adequate incentives to give the community confidence in self-regulation?

No. Environment protection self-regulation has a poor record and should not be promoted as a solution.

If companies do the right thing and follow regulation this should be noted (credits system) and possibly assist with easier processes for them, but only if they behave. If not their credit to be reset and added scrutiny to apply.

QUESTION 19: How should the EPBC Act support the engagement of Indigenous Australians in environment and heritage management?

- **How can we best engage with Indigenous Australians to best understand their needs and potential contributions?**
- **What mechanics should be added to the Act to support the role of Indigenous Australians?**

I am in support of Indigenous self-determination so ultimately feel this question is for them to answer (determine).

My thoughts on what may be suitable include:

Get in touch with Indigenous elders from different cultural groups and have them organise listening groups in their communities. From those groups nominated representatives to meet all together in a symposium and present and listen to each other and environment ministers from all tiers of government.

Indigenous knowledge arising from the symposium to be crafted into the Act with their involvement in this process to sort out differences and determine if different rules apply for different cultural lands or whether an overarching principle can be crafted/agreed upon.

Consultation with Indigenous Australians needs to be integral to the act.

The act needs to also include clauses to guard against corruption or inducement of Indigenous voices by companies who wish to gain approval for projects.

QUESTION 20: How should community involvement in decision-making under the EPBC Act be improved? For example, should community representation in environmental advisory and decision making bodies be increased?

Community involvement in decision-making under the EPBC Act has been woeful and has typically been ignored with impudence in favor of big business and off-shore interests who habitually lie about the financial and jobs benefits to Australians.

Community representation in environmental advisory and decision making bodies definitely needs to be increased. There also needs to be a system of 'pressure valves' implemented in legislation which detail the revoking of approval even after the commencement of a project after a serious breach of conditions or damage to environment and heritage sites and values.

Any contamination to water tables or waterways would be obvious triggers.

Any member of the public discovering poor practices or breaches is another.

Indigenous people should never be disallowed on their ancestral lands, if they are there and see damage to their cultural heritage or land values this is another trigger.

QUESTION 21: What is the priority for reform to governance arrangements? The decision-making structures or the transparency of decisions? Should the decision makers under the EPBC Act be supported by different governance arrangements?

Both are important, but I think transparency is ahead by half a length on this one.

Decision makers under the EPBC Act should not be taking any moneys from any companies seeking approvals or groups that represent those companies under any circumstance.

If this is discovered that decision-maker is to be stood aside for that particular project's decision.

QUESTION 22: What innovative approaches could the review consider that could efficiently and effectively deliver the intended outcomes of the EPBC Act? What safeguards would be needed?

I think the regulatory approach is appropriate, it just needs reviewing more regularly with an immutable principle to always seek to improve and never water down conservation outcomes.

Safeguards are not needed if there is a regulatory approach, otherwise you need a whole new body to assess compliance/performance and another to enforce.

QUESTION 23: Should the Commonwealth establish new environmental markets? Should the Commonwealth implement a trust fund for environmental outcomes?

Trust fund for environmental outcomes sounds positive, as long as it excludes any spending on fossil fuels of any kind or anything that decreases environment and/or heritage value.

QUESTION 24: What do you see are the key opportunities to improve the current system of environmental offsetting under the EPBC Act?

I oppose the concept of environmental offsetting. If an area is deemed too sensitive or too high value to approve a development then the development should be rejected.

In lower value areas offsetting should be sought to cover loss of carbon sinks and should exceed the area being destroyed (150% for example).

QUESTION 25: How could private sector and philanthropic investment in the environment be best supported by the EPBC Act?

- **Could public sector financing be used to increase these investments?**
- **What are the benefits, costs or risk with the Commonwealth developing a public investment vehicle to coordinate EPBC Act offset funds?**

Public sector financing could be investigated.

Strong anti-corruption measures need to be in place and this is the risk. As a minimum a Federal ICAC needs to exist, and I mean public hearings, prosecutions, can call witnesses they want not Scotty from marketing's kangaroo court version which would not have even been able to look at sports reports 2019-20.

QUESTION 26: Do you have suggested improvements to the above principles? How should they be applied during the review and in future reform?

"Effective Protection of Australia's environment

Protecting Australia's unique environment and heritage through effective, clear and focussed protections for the benefit of current and future generations."

This one is ok.

"Making decisions simpler

Achieving efficiency and certainty in decision making, including by reducing unnecessary regulatory burdens for Australians, businesses and governments."

This one is not ok. The words are ok, but the application has been to rubber stamp some very damaging projects. What about the burdens of environment groups and the public trying to have damaging projects halted? This group needs to be represented and protected in this clause. I would add "... and properly listening to and considering community input."

"Indigenous knowledge and experience

Ensuring the role of Indigenous Australians' knowledge and experience in managing Australia's environment and heritage."

Ok, but I would add the word "is central" before "..in managing..." so it reads: "Ensuring the role of Indigenous Australians' knowledge and experience is central in managing Australia's environment

and heritage."

"Improving inclusion, trust and transparency

Improving inclusion, trust and transparency through better access to information and decision making, and improved governance and accountability arrangements."

Personally I would like it if we all voted on every development proposal (say through a smart phone app). This principle reads ok, but is poorly implemented. The public needs more weight to decision-making, definitely more than some overseas company. This should be reflected in the statement.

"Supporting partnerships and economic opportunity

Support partnerships to deliver for the environment, supporting investment and creating new jobs."

Again, sounds ok, but is rarely implemented in the order that it is written (the environment first, above all other considerations), also the jobs need to be Australian ones. I would re-write as follows: "Support partnerships to deliver for the environment, creating new Australian jobs and supporting investment."

"Integrating planning

Streamlining and integrating planning to support ecologically sustainable development."

Again sounds ok, but I cannot say that any high profile projects I have heard about in the last 10 years pass the test of ecologically sustainable.

QUESTION 27: Is the EPBC Act delivering what was intended in an efficient and effective manner?

No.

QUESTION 28: How well is the EPBC Act being administered?

Not well.

QUESTION 29: Is the EPBC Act sufficient to address future challenges? Why?

No. It fails to account for the effects of a warming climate and many projects have not been assessed on the basis of the emissions they will contribute to the planet from extracted material, nor the taxing demands on our most precious resource - water.

QUESTION 30: What are the priority areas for reform?

Climate change needs to be considered for every project approval, including indirect and long-term impacts.

Community opposition/submissions must have more weight - in some cases they have not been considered at all despite being large in number opposing for some projects.

QUESTION 31: What changes are needed to the EPBC Act? Why?

More protection.

1 planet no option 2

QUESTION 32: Is there anything else of importance to you that you would like the review to consider?

Think about what your great grand children would have wanted you to put in the legislation.

ATTACHMENT

Additional information was provided as an attachment to this submission. The attachment is provided on the following pages of this document.

Dear Professor Samuel and Independent Review Panel,

I would like to make a submission into the 2019-2020 Independent Review of the EPBC Act. This submission will cover:

- The failure of the EPBC Act to protect our native wildlife from extinction and endangerment
- The lack of funding to protect Australian ecosystems
- Necessary reforms of the EPBC Act

I live in Earlwood, NSW, a suburb in the Inner West of Sydney and work at the University of Technology Sydney. I was born in Adelaide, SA, and lived in North Adelaide until I was 5 years old. When my parents separated, with my mother I moved to Italy for 11 years thereafter, living in a small medieval village in the North of Italy surrounded by mountains and forests and just 12 km from the beaches of the Riviera. I travelled back to Adelaide once a year to see my father and on those visits I was always struck by how unique the Australian landscape, flora and fauna are. A few of those visits during Australian summer time I spent on Kangaroo Island where family friends own a property and their own tract of beach facing the Southern Ocean. The hundreds of wallabies, koalas and kangaroos were truly a joy to behold. I am so saddened by the recent devastation wrought on that island by the current fire season.

My trips back to Australia always imprinted in me the power and beauty of this Great Southern Land. From the clean, un-crowded white-sand beaches to the seemingly endless desert plains to the eucalypt forests to the rainforests both wet and temperate, we truly have it all and uniquely ours – like nowhere else on Earth.

On my return to Australia from Italy we settled in the Adelaide Hills in Crafers in a house my mother bought which was the only one to survive the Ash Wednesday fires. With my school friends we would routinely walk down the fire trail at the end of our cul-de-sac and experience the rugged Australian bushland and see native animals in the landscape.

The majestic eucalypt in the front yard was one of the prime reasons my mother purchased that property and the outlook over the twinkling lights of Adelaide was magical, particularly on warm summer nights.

My mother now lives on a property in country NSW. She is a performer who creates and performs in Nature and she introduced me to outdoor music and performance festivals in the bush which I continue to enjoy more than any other venue for celebrating existence. When she moved to the property the lake it looks out on had water in it and thousands of birds from pelicans to eagles would grace its skies and shores. In subsequent decades the lake would dry up and re-fill each 3-4 years, but for the last 10 years it has been a large flat paddock with a distant puddle forming when the scarce rains have come. This is climate change in action.

Deep appreciation of Nature has been a touchstone for me throughout my entire life, at times the only thing that has made any sense, definitely worth protecting above all else since we are an inextricable part of it and we can separate from it about as successfully as separating from our own heart, lungs (physical body) which is not at all without doing ourselves fatal harm.

That the koala, our iconic animal, is facing down the barrel of extinction starting even before the horrific fire season due to habitat loss from unabated land clearing all across this country is a national disgrace and proof that the EPBC has failed systemically for many years now. There are those lining up now following the disastrous devastation of the fires trying to commandeer burned land to clear permanently and others who want protected land everywhere cleared now in the name

of hazard reduction. Both of these courses of action are unacceptable as they sound the doom bell for countless animal and plant species and do not follow the science of hazard reduction best practice.

I had the opportunity to attend a session on Natural Sequence Farming (NSF) by Peter Andrews at Mulloon Farms in NSW, just outside Bungendore. I learned there that before white settlement and broad scale land clearing (cutting down trees) Australia was a land of floodplains and much vegetation and water in the landscape held there by the vegetation like a sponge. Peter Andrews faced many battles with legislation to implement his now proven methods of NSF (thanks in part to the ongoing Mulloon project) such as slowing water courses through strategic earth works and planting species like weeping willows in key locations to trap soil and moisture rather than letting it wash away. Peter Andrews is no greenie, having come to his method from pragmatic measures to improve horse farming. NSF offers a clear way to combat desertification which is something that Australia desperately needs, now more than ever with droughts going for many years and the Murray-Darling river system in crisis evidenced by the massive fish kills and lack of environmental flows. Protecting the environment should come before everything else. If the river is healthy then there will be water for farming. Crops like cotton and rice have no place in Australia, no matter how efficient their water usage is.

Funding for environment protection is cut year on year and when there is money it seems to always go to areas that benefit some private enterprise or another over the environment, effectively perverting the whole reason for the funding in the first place. This is a failure of governance and seriously impacts Australia's ability to ensure that the natural wealth we have now will be available inter-generationally. A case in point is the LNP cutting funding to National Parks because those places are seen as impediments to business development, all the while expecting that the work the rangers do for bushfire prevention is unaffected (how could it not be affected?) More funding for rangers and ecology protection and regeneration means more jobs. Well-funded ever expanding (year-on-year) programmes to get more indigenous and other unemployed or under-employed Australians into forestry would have positive social as well as economic benefits.

Australia is in a unique position to harness the renewables sector, which is the future of energy generation, and these projects and the re-skilling of workers in sunset fossil fuel industries are the type of partnerships the government needs to support ("supporting partnerships to deliver for the environment, supporting investment and creating new jobs"). Leadership, a strong future vision and political appetite for meaningful pragmatic change is beyond the EPBC document and sadly severely needed in our political landscape right now.

Australia needs to take a serious look at how we can survive for the next decades and into the future. The answers are not to cut down all trees out of fear of bushfire and in the name of jobs and growth and watch countless iconic and lesser known unique Australian species join the extinct lists.

The answers lie in the past, not the past of European settlers (my ancestors), but the past of indigenous owners, the holders of knowledge of this great land. We need their insights into how to find and retain water in our drying landscape, including de-stocking and moving away from industrial-scale farming to smaller free-holdings. Free-range and organic permaculture operations should be encouraged and prioritised over the destructive agribusiness model that competes with nature rather than working with it. This could be through a Federal financial bonuses and penalties system, which long term would bring the prices of free-range and organic below those of ecologically harmful farming methods. Pastoral land use needs to be policed, much like our fisheries, allowing the land to recover rather than be overstocked year on year. Destroying a healthy environment

needs to have a cost higher than the cost of doing business to discourage its destruction without a second thought.

We are in a unique position that we could morph the face of Australian farming and pastoralism. Why not foster and build a uniquely Australian cuisine based on Australian plants and animals learning from the indigenous and taking the knowledge forward fused with our rich multi-cultures? These plants and animals are acclimatised to our conditions and, done correctly, such an industry could become a prestigious and valuable export for Australia.

Traditional burning of country needs to be legislated to be the only method used for hazard reduction, since it prioritises the needs of the ecosystems over hysteria (e.g. burn x% of all National Parks) and done in the right way such that native animals can escape easily and at the right times so the regrowth is correct (done improperly hazard reduction burning can actually promote regrowth of non-native or fuel-rich species rather than really providing any benefit) it will yield the best results to protect ecosystems from decline and settlements from uncontrollable blazes.

The term of reference regarding the removal of 'red tape' ("making decisions simpler, including by reducing unnecessary regulatory burdens for Australians, businesses and governments") really has no place in the redesign of the EPBC as a driving principle. The driving principle needs to be the protection of natural wealth with the simplicity and reduction of unnecessary burden in favour of ecological protection rather than the other way around. If a development proposal risks a water catchment, one or more species becoming endangered or extinct then it is a hard no = simplicity. If a development risks increasing climate stress through increased carbon emissions such as a new coal or gas mine then this will place an unnecessary burden on the environment here and abroad so the project needs to be denied.

We are not in the 80s any more where resources are seemingly unlimited and consequences so far away there is no need to consider them.

We are in a new age where we are past excuses and rhetoric, and yet I hear them each day as I groan in despair. The whole world is watching and we need to do more than our bit so we can ask other countries to do the same lest we have any chance at all of saving our world and ourselves in the process.

I am disappointed that the current mass extinction threat in Australia is not being dealt with and I expect the Australian Government to:

- a. Reform our failed national environment laws so that all our native species and the habitat critical for their survival are strictly protected;
- b. Establish an independent Environment Protection Agency to act as watchdog over the system and ensure our laws are properly enforced;
- c. Establish an independent National Environment Commission with the authority to ensure we take a national approach to protecting threatened species and to publicly report every year on the impact of conservation action and funding, and show clearly whether native species are recovering;
- d. Ensure that sufficient money and resources are put in place so that species that are on the brink of extinction can recover; and
- e. Ensure a central role for community, with guaranteed rights and participation in planning and decision-making

Thank you for your consideration of my submission.