

SUBMISSION TO THE EPBC ACT REVIEW

ANON-K57V-XGD3-3

Name

Ana Gracanin

State or Territory

New South Wales

Areas of Interest

Threatened species; Compliance and enforcement; Decision making; Public participation in decision making; Biodiversity; Conservation; Commonwealth national parks;

Attachment provided

Yes

Do you give permission for your submission to be published?

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

SUBMISSION RESPONSES

This submission was provided as an attachment only. The attachment is provided on the following pages of this document.

Dear Professor Graeme Samuel AC and the associated expert panel,

My name is Ana Gracanin and I am a PhD Student from the University of Wollongong. I have a degree in Conservation Biology (Honours Class 1) and my current PhD research is centred around the effects of habitat fragmentation, corridor implementation and threatened species. I have spent years searching for, and studying, rare threatened species. In particular, I've focused on the Spotted-tailed quoll (*Dasyurus maculatus*). I have volunteered 100s, if not 1000s of hours, in conducting surveys on private land and in national parks to try and find these animals so that we can monitor and ensure their long-term survival. These animals, and the amazing natural landscapes they inhabit, need protection through active conservation action and management plans.

What changes are needed to the EPBC Act? Why?

Ecologically Sustainable Development

The current environmental laws lack the power needed to ensure that species do not go extinct. The number one threat to species is habitat loss. Without habitat, species cannot exist. Section 3A of the EPBC Act defines the principles of ecologically sustainable development, however most development involves the complete removal of habitat. I fail to see how this is ecologically sustainable and we need to update this with recent scientific and evidence-based ecologically sustainable development principles, that are highly detailed and specific. We need dynamic, novel, peer-reviewed changes to project ourselves into the future of ecological living. The social, mental and physical benefits of living in nature are reason enough to implement such changes, let alone for biodiversity conservation. Biodiversity-sensitive urban design (BSUD) aims to create urban environments that make a positive *onsite* contribution to biodiversity (Garrard et al. 2018). This involves careful planning and innovative design and architecture. BSUD seeks to build nature into the urban fabric by linking urban planning and design to the basic needs and survival of native plants and animals.

For further information on BSUD: Garrard, G. E., Williams, N. S., Mata, L., Thomas, J., & Bekessy, S. A. (2018). Biodiversity sensitive urban design. *Conservation Letters*, 11(2), e12411.

Biodiversity Protection

Australia leads the world on mammal extinction. Since the EPBC Act came into operation, 7.7 million hectares of threatened species' habitat has been destroyed. The federal environmental department has been hit heavily by budget cuts, leading to extended delays and poor decision making under the EPBC Act. A new environment acts needs to give the federal government power to set binding national standards and objectives that all states must comply with.

I recommend the following changes:

- The definition of National Heritage places should be expanded to include: “Places of high biodiversity value” and “Places containing unique and threatened species”
- The federal government should retain responsibility for Matters of National Environmental Significance, and expand national oversight to:
 - More provisions are needed to allow for new Commonwealth National Parks to be brought forward and implemented by the Director of National Parks. Provide national protections for water resources and national parks and reserves.
 - Guarantee the identification and protection of critical habitats for threatened species and the mandatory implementation of wildlife recovery plans and threat abatement plans and their *guaranteed ongoing funding*.
 - Provide for emergency listings and protections for wildlife and heritage places that are subject to damaging events. Given the recent intense bush fires in 2019 and 2020, many species that are forest dependent and sensitive to fires, such as gliders and possums, will have had their populations significantly reduced. The ongoing effects of this will likely lead to many populations crashing (through genetic decline) and disappearing. Despite this, logging continues in unburnt areas that contain Koalas (<https://bit.ly/2K80MbJ>) and Greater Gliders (<https://bit.ly/3bjHnRi>). We need to update the mechanisms that trigger conservation agreements and threat abatement plans, as well as guaranteed funding each year, for each threatened species until ongoing improvement goals are met (i.e. the species has an improved conservation listing).
 - Implement controls on deforestation and mandate incentives for land managers who are willing to protect and restore natural ecosystems on their properties.
 - Ensure binding national standards are set for air and plastic pollution
- Establish an independent authority to administer national environmental law. There is inefficient regulation of many developments. Developers are required to “consider” environmental impacts but there are no consequences for not enacting on their considerations. Determining Significant Impact by a proposed action is a ‘subjective’ test: there should be clearer, specific guidelines that must be reviewed by independent experts in the relevant fields (i.e. scientists), not just by the Minister. The minister should be required to consider the suitability of the applicant (i.e. their environmental history track record). The minister should consider state-level threatened species.
- Ensure the mandatory disclosure of all decision making information and open access to environmental decision data.
- Guarantee accessible and open community consultation processes for environmental decision making.

Thank you for taking the time to read my submission. These changes are needed to ensure independent scrutiny of developments so that assessments are made fair, and not in favour of providing wealth to a handful few, at the cost of species extinction and environmental devastation. The environment as a whole is what supports life on earth. It is our time to support it now, more than ever.

I've watched firsthand deforestation and its aftermath. I've seen how climate-change induced wildfires have physically altered the landscape. I've seen places that were logged in Buckenbowra State Forest, once home to Spotted-tailed quolls and Gondwananian-like rainforests, be hit by fire. Months later, nothing has recovered, because the logging debris left behind generated so much heat that the earth was essentially sterilised. The soil contains no bacteria, no nutrients: it is a barren wasteland that will likely take hundreds of years to recover. We need to stop destroying what unburnt habitat is left, and we need more triggers in place that allow for permanent conservation land zoning to occur, for *all* threatened species.

Kind regards,



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