FOUNDATION FOR A RABBIT-FREE AUSTRALIA (RFA)

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Draft No Species Loss – A Biodiversity Strategy for South Australia

Submission by Foundation for Rabbit-Free Australia Inc.

Background to RFA

The Foundation for Rabbit-Free Australia (RFA) is a non-profit entity whose purpose is to encourage research into and communication about the immediate and long-term effects of the European wild rabbit on Australia's natural environment and its natural resource base used for primary production. RFA was formed in 1990 and, prior to the release of rabbit haemorrhagic disease (calicivirus) (RHD) in Australia, was actively promoting research projects in most of the states and the Northern Territory. During the latter part of the 1990s and early in this century, RFA concentrated on building up its funding base as a result of reduced investment by governments into rabbit research for control purposes.

RFA is also concerned with the complacency of many land managers, both government and private, with respect to rabbit control following RHD, which was particularly successful in the rangelands but less so in the higher rainfall areas. We do not want to see rabbit numbers increasing again as they did following the initial success of myxomatosis in the 1950s through similar complacency.

(*RFA's Strategic Plan is attached for your interest. It provides an insight into the Foundation's proposed directions to address its concerns during next five years.*)

Relevance of this strategy

RFA welcomes the opportunity to make a submission on the draft biodiversity strategy, given the importance of maintaining and enhancing, where feasible, South Australia's wide range of genetic resources and biodiversity — much of which is threatened by rabbits.

We now comment on some key areas of the strategy, with particular reference to:

Document structure

The strategy is intrinsically a Government initiative to be driven by Government. If community and industry buy-in is to be achieved, RFA believes that the Government's commitment to the strategy could be presented at the start of the document to lend a sense of capability to the strategy. To this end, Strategic Area 4 "Coordinating and integrating within the natural resource management sector" (page 48) could be re-titled to reflect the Government's role and presented as the first strategic area.

Indeed, a more apt title can be borrowed from "Desired outcomes for 2030" second dot point (page 48): "Government-led integration and coordination of biodiversity conservation policy and management initiatives".

This could lead logically to the other strategic areas in the following order:
Strategic Area 2 "Raising community awareness and participation"
Strategic Area 3 "Conserving South Australia's biodiversity"
Strategic Area 4 "Addressing the impacts of climate change"
Strategic Area 5 "Improving information, knowledge and capacity"

RFA notes that the document opens with a plethora of background material and figures, in fact, the first 31 pages. We are concerned at the risk of confusing readers and advise that complex material could be presented as an addendum or in a separate document. In addition to being accessible, this document will be more concise. Should the authors feel that such background is necessary to explain or justify the language used, they could opt for simpler language. For example, rather than justify the use of three biomes, remove the supporting argument and discuss in terms of arid/semi-arid, agricultural and marine, terms with which most practitioners and policy-makers are familiar.

The RFA believes that a strategy should commence with the situation, that being biodiversity decline. Then, through gap assessment, the document should lead to the strategic areas. By promoting good works and populating the document with many positive pictures, the document sends the message that the present situation is acceptable and doesn't warrant a biodiversity strategy.

Protected areas

Many of RFA's views on protected areas are encapsulated in the submission to the Commonwealth's Senate Environment, Communications Information Technology and the Arts References Committee "Inquiry into Australia's national parks, conservation reserves and marine protected areas" (2006).

Understandably, the strategy projects the expansion and maintenance of the protected area system as the mainstay of biodiversity conservation (Strategic Area 1 "Conserving South Australia's biodiversity", page 36). While ecosystem representation is important, RFA believes that future declarations of protected areas should be made only after management needs for the land have been assessed and adequate funds have been set-aside for that purpose.

RFA believes that inadequate funding for effectively targeted park management continues to compromise proper stewardship of protected areas, a situation likely to worsen with additions to the protected area system. In effect, "protected area" is not always synonymous with "protected" as the strategy would have readers believe. This problem is not only about the quantum of funding governments may provide. It can be created also by the methods of funding and the inherent inflexibility of systems providing recurrent funding on an annual basis, with the strictures

that annual funding can bring. RFA recommends including a statement on funding provision as part of the Government's commitment to the strategy.

Achievability of targets

RFA acknowledges that the strategy is not intended to deal with specifics such as rabbit damage. Rabbit damage, however, does serve to illustrate how unrealistic are some targets. The impact of rabbit grazing is insidious by nature; rabbits, even at low densities, tend to remove certain species and leave less palatable ones, and may thereby dictate floristic structure with little evidence of their impact to the casual observer.

Our point then, regards Strategic Area 1 Target 4 "Threats to biodiversity are managed, whereby…significant existing threats are managed (contained, suppressed) by 2011" (page 37). RFA believes there is little chance of achieving that target with respect to the threat posed by rabbits to arid zone ecosystems, and little likelihood of achieving it on any significant patch of country within the agricultural zone. The target is unrealistic without a caveat regarding a massive investment in research–in the case made for rabbits–to find and introduce new biological control agents.

Although a more generous timeline, our point about achievability stands also for Strategic Area 1 "Desired outcomes for 2030", namely
…priority degraded habitats are restored, increased in area, improved in ecological condition and better connected, and
... existing threats are mitigated effectively.

Research and development

As indicated above, RFA notes the need for research on new approaches to managing threats. Strategic Area 3 Target 18 (page 46) states, "A State research program to identify and fill gaps in scientific knowledge and understanding of biodiversity is developed and implemented, by 2011." RFA recommends including a statement on research into new pest animal and weed technologies that conveys the same importance given to research into climate change impacts (Target 14 page 42).

Adaptability

RFA believes that a strategy should be dynamic and able to adapt to changing circumstances. For an example, we indicated above that research is essential for managing pest impacts. Resource limitations inevitable lead to priority setting–if research is ranked low, it will not be funded. How would the strategy deal with this change in circumstance? No research, no potential for new pest animal control technologies, no capacity to achieve the target of managed impacts. Presenting the targets in an autonomous fashion without identifying the links between them engenders inflexibility. In addition, Part 5 "Implementation, monitoring and review of performance" (page 57) presents reviewing, but does not provide a mechanism for when targets are not likely to be met.

Further comment

The need to include examples of conservation measures forming Part 3 "Biodiversity conservation in South Australia" (incidentally, the title of this part doesn't reflect its purpose) is debatable, depending on the intended readership. RFA note with interest the use of *Caulerpa taxifolia* as an example of key threatening process management (page 30). There is little doubt about the pest potential of this weed, but it is not a key threatening process and, with good management, it will not be. It strikes the RFA as odd that, outside of climate change and human

activities such as land clearance, rabbit grazing alone is arguably the single greatest threat to biodiversity in South Australian terrestrial ecosystems yet does not rate a specific mention within the strategy.

Please do not hesitate to contact me if the authors wish to discuss RFA's views further.

We wish the (*authors/Department*) well with this much-needed strategy and look forward to the final document.

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Date 2006