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16 Jan 2009

**Submission from  
Australian Members of the IUCN World Commission on Protected Areas  
To Australia's Strategy for the National Reserve System**

The IUCN World Commission on Protected Areas is a global expertise-based network of individuals from government, academia and non government organisations. It aims to add a science-based and apolitical voice to policy debates, to share knowledge and stimulate initiatives across sectors. Internationally, IUCN WCPA is the global leader in setting strategic directions in conservation and is the key expert advisory body on World Heritage values involving natural sites.

Within Australia and New Zealand WCPA has over 300 conservation leaders across jurisdictions. We are therefore a significant partner of the governments of Australia in achieving the goals of the National Reserve System. WCPA has been a strong supporter and advocate for the National Reserve System and fully supports the view that it is '*the premier terrestrial biodiversity conservation investment in Australia*' (p2.) Therefore WCPA warmly welcomed the government's announcement in early 2008 of substantial additional funding for this key policy area.

We are strongly supportive of many elements in the Strategy, especially greater integration of the NRS with other 'off reserve' NRM efforts. It is imperative that these components of Caring for Our Country not be seen as rivals for resources and effort but an integrated continuum of policies aimed at 'turning islands into networks'. However, the NRS has, in our view, the most critical role in securing the core lands of this broader 'whole of landscape' approach to biodiversity conservation. The urgency and importance of this direction has been accelerated by the scientific data on the implications of climate change. However, to realise this largely consensus vision requires a much sharper focus on real plans, real targets and above all a concerted cross jurisdictional effort to identify and activate bioregional priorities and the most effective responses for each level of government.

While supporting much of the Strategy, there are areas which WCPA would like to see improved so that the true intent of the Strategy to boost and guide the national reserve system can be realised.

## **OVERALL COMMENTS**

**The Strategy needs a clear message of urgency.** Science tells us we are in a race against time to try to secure some of global biodiversity in the face of formidable threats. While climate change is foremost in the public mind, it will only exacerbate existing threats. Australia has a particularly critical role as a country of unique and high diversity. Therefore WCPA believes the strategy should be couched as a national response to a true emergency. In many senses it is a national defence policy – a key policy aimed at securing assets absolutely crucial to the nation's future well being.

**The Strategy needs to relate to Australia's Commitments under the Convention on Biological Diversity.** There is scant mention of these obligations or of the specific goals of the CBD Program of Work on Protected Areas (CBD POWPA). Our unique status as a developed nation continent possessing a critical component of the world's species should put us in a clear leadership position for the implementation of the CBD. The NRS strategy must first recognise and be structured around the POWPA commitments already entered into by Australia, and secondly, lay out an strategic sequence of specific actions needed to achieve each of the commitments.

**The Strategy should better reflect the Findings and Recommendations of the Senate Report on Australia's Protected Areas.** The Strategy makes no reference at all to the year long Senate Inquiry (2007), which literally had hundreds of submissions and was therefore a substantial examination of attitudes to the National Reserve system. All of our organisations put extensive work into this inquiry (See Annexure A).

**Consideration should be given to the integration of marine protected areas.** Given that this Strategy is framed for the long term, it would be timely to set a vision for our total reserve systems. The National Reserve System should logically encompass all reserves and all Australia's efforts in all biomes to maintain its biodiversity through reserves. This would logically extend the NRS to the marine efforts of the NRSMPA program.

**The Strategy appears to fall back on, rather than build on momentum.** The recent welcome increases in Commonwealth NRS and IPA funding, plus the on going commitments of many state and territory governments, hold the promise of leveraging even more substantial funds from the private conservation sector and 'ramping up' the national conservation effort at a crucial time. However, a strong clear consensus policy direction is essential to guide this effort. It is therefore with some concern that we see the consensus 'policy' potentially replaced by a 'strategy' and the slippage of the time line pushed out by over two decades.

**The Strategy needs to enhance the Commonwealth's national leadership.** The previous *Directions for the National Reserve System (2005)* was a clear cut national policy, rather than a strategy, and had the endorsement of all levels of government. This was a substantial achievement and was supported by all our organisations although it was chronically underfunded and adopted weaker reservation targets than were already national policy at the time (the 'JANIS criteria'<sup>1</sup>). The much improved Commonwealth funding of \$180m over the next 5 years gives the Commonwealth greater capacity to encourage states and territories into accepting a tighter set of targets - this opportunity should not be lost.

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<sup>1</sup> *Nationally Agreed Criteria for the Establishment of a Comprehensive, Adequate and Representative Reserve System for Forests in Australia.*

**Stronger not weaker targets are needed to lead national action.** Although the timelines under the Direction Statement were clearly not going to be met, we would question the need to abandon this approach. The 80% comprehensiveness by 2030 'aspirational target' is a significant retreat from the leadership role that the Commonwealth needs to show at this critical point in history. To avoid the risk of slippage inherent in 'long term aspirational goals', the Strategy should include immediate development of 5 year quantitative<sup>2</sup> time bound targets that implement both our international obligations under the CBD and build on the existing consensus of the previous NRS Directions Statement.

**A crisis requires ambitious goals.** If any change is needed it is to stronger, more ambitious, targets reflecting the severity of threats and the critical role of intact ecosystems in both the mitigation agendas (holding and drawing down carbon) and the adaptation agendas (ecosystem services and biodiversity). WCPA, for example advocates '20% by 2020' - 20% of each bioregion protected by 2020 under all governance types (IPAs, private lands as well as formal reserves). A Decade of Landcare led to remarkable changes to the land degradation agenda; a Decade of Protected Areas could turn around our biodiversity losses and give our species and systems the best chance of resilience to face the threats of climate change.

**The first 5 year implementation plan should be produced concurrently with a substantially improved Strategic Statement.** The separation of targets from the Strategy is a major problem. If a clear cut path to action does not accompany, or swiftly follow, the release of the Strategy, momentum could be lost at a time where there is literally no time to lose. We would therefore respectfully ask the Minister to delay the release of any Strategic document until it is accompanied with a strong implementation plan with the jurisdictions responsible for implementing the strategy clearly outlined.

**A 'National NRS Partners Council' could enhance integrated effort.** WCPA stands ready to use its organisational strength to assist the government in meeting strong conservation targets. We would be happy to serve on a 'National NRS Partners Council' of bodies to further the partnership approach to achieving a comprehensive, adequate, representative and resilient national reserve system.

**A partnership approach is vital to realise the 'whole of landscape' approach.** The achievement of a truly integrated national approach to biodiversity conservation requires the extension of the co-operative NRS program and the systematic bioregional planning being undertaken by the States for reserve consolidation to also include development of complementary 'off park' biodiversity strategies. Joint effort between NRS and NRM bodies is needed to identify bioregional priorities and the most effective and efficient conservation responses for each level of government and other partners. The first five year program should focus on these strategies. While priority should be given to the least represented and most threatened bioregions, attention also needs to go to our most intact large areas to ensure that they maintain their quality

**Allocate tasks** While there are many Priority Actions that clearly are the responsibility of each jurisdiction to implement in their own areas of responsibility, there are also a number of actions throughout the Strategy that need a more coordinated response but where the responsibility for organizing this response is not identified; e.g., Priority Actions 1.4 and 4.2. It would be useful to specify who will be responsible for these actions or how they will be implemented (e.g. perhaps through the NRS Task Group).

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<sup>2</sup> That is, a scientifically defensible, explicit minimum percentage of current or pre-1750 regional ecosystems that needs to be reserved to meet 'comprehensiveness' and 'representativeness'. Under Australia's Strategy for the National Reserve System, reserving as little as 1 hectare qualifies as contributing to comprehensiveness and representativeness, which is clearly inadequate.



**P.9. Targets:** As stated, the WCPA is concerned at the shift to a distant 'aspirational' target of 2030 and prefers the CBD call (Target 1.1.1 (1.4.2; 4.3.2) to 'establish suitable time-bound and measurable national and regional level protected area targets and indicators'. While the CBD targets, like Australia's have not been realised the principal of setting definite measurable targets remains.

**P.10. Landscape planning approach:** 'The WCPA as a long term champion of landscape level connectivity conservation strongly endorses the 'landscape planning approach' which envisages integration of various approaches. However we would suggest a specific dot point be added:

- **National natural resource management initiatives and habitat protection measures on all tenures.**

## THEME 1. INTERNATIONAL AND NATIONAL CONTEXT

**P.14. Grammar:** All action points should start with an **active verb phrase**; there is little consistency in the document e.g. 'Active engagement in natural resources management ...' should read 'Actively engage in ...'

**P.14. United Nations International Year for Biodiversity** This theme should commit to a national initiative linking the NRS with the 2010 United Nations International Year for Biodiversity. The UN has invited member states to consider establishing national committees to plan for the Year, and has encouraged Member States and other stakeholders to take advantage of the Year to increase awareness of the importance of biodiversity by promoting actions at the local, regional and international levels.

If agreed, this initiative could be cross-referenced in Theme 6 and be developed as part of the priority action 6.1 concerning the development of a communication plan to increase awareness and understanding of the objectives and achievements of the NRS. It may also be necessary to cross-reference to the proposed new/updated national strategy for the conservation of Australia's biodiversity.

### **P.14. Human Rights Context**

At the October 2008 World Conservation Congress, Australian government representatives provided the following statement for the record: *Australia has not yet adopted the UN Declaration on the Rights of Indigenous Peoples. Australia has stated it intends to adopt the Declaration after it has consulted with indigenous organizations, other jurisdictions in Australia and other players.*

Given this important commitment and the long term strategic nature of the Strategy, the document should include a reference to Australia's intention to ensure the National Reserve System demonstrates compliance with international human rights standards that are relevant to protected areas, Indigenous Australians and the broader community.

**P.15 1.5 Role of NRS:** Suggest rewording to make intent clear.

**'Promote greater recognition of the role of the NRS and its contribution to fulfilling international, national, state and territory policies, ...'**

### **P.15. NRS standards involve both security of tenure and management effectiveness**

This heading suggests it will be followed by a clear definition or set of standards as to what is or is not part of the NRS and what constitutes effective management. However neither issue is clearly set out. The standards are set out on page 31 – this at least should be cross referenced. The management effective 'standards' of the NRS appear to be missing

entirely. Or does Table 4 on page 39 constitute them; if so it needs labeling as such and cross referencing.

**PP.15-17 IPAs** The section emphasizes 'security of tenure', but goes on to include IPAs which are not 'secure tenure' in the normally accepted meaning. The statement on p17, that 'IPAs have highlighted the need for specific consideration of indigenous cultural issues in application of NRS standards, both in terms of definitions of secure tenure and in the resourcing and effectiveness of management' accurately identifies a challenge but there is no meaningful resolution. It is important to note that globally WCPA strongly supports varied governance and community conserved areas. Given that IPAs meet IUCN definitions for a protected area and are working well, caution must be exercised in increasing 'security' if it would undermine hard won rights and actually discourage indigenous communities from contributing their lands.

**Also see comment on IPA questions p.32.**

#### **PP.17-18 IUCN PA Management Categories**

Various WCPA experts on IUCN Categories refute the statement that the IUCN PA Management Categories separates PAs on the basis of 'simplicity or complexity'. We would suggest this phrase be dropped and that the sentence, '**Very often the different categories reflect historical, cultural and governance differences.**' be added at the end.

### **THEME 2 PROTECTED AREA DESIGN AND SELECTION**

**P.22. Strategic approach** – make grammar consistent with all action verbs.

#### **P. 22. 2.1 Develop landscape scale conservation plans for priority IBRA bioregions**

WCPA strongly supports the development of detailed plans but suggests an additional dot point.

- ***Within identified bioregional priorities identify and allocate the most effective and efficient conservation responses for each level of government to maximise the effectiveness of actions and resource use.***

#### **P.23. 2.2 Viability, not just rarity**

The statement that jurisdictions should place extra weighting on IBRA bioregions with less than 10% protection when adding to NRS is supported but WCPA believes there is an important caveat, namely viability. This is particularly crucial in the context of climate change which may change the previous concepts of adequacy.

**P.26. Recognition of freshwater systems** The WCPA is very supportive of the greater emphasis being given to freshwater ecosystems in this Strategy and agrees with the statement that consideration needs to be given to freshwater systems in all water sharing plans, whether within or outside reserves.

### **THEME 3. PROTECTED AREA ESTABLISHMENT**

**P.30. 3.4 State/Territory involvement IPAs** 'Develop agreements that provide for the relevant state and territory governments to be involved in the establishment of private and Indigenous Protected Areas'. WCPA strongly supports IPAs and believes they will be long term and critical contributors to the national biodiversity effort. We therefore welcome the greater involvement of state and territory partners in both the declaration and management of IPAs. However, as this direction may have budgetary implications, these should be properly considered in Commonwealth /state financial allocations.

**3.5 Private PAs** The text reads 'Apply the National Framework for Protected Areas on Private Lands to facilitate cost-effective and consistent approaches to covenanting and enhance incentives for participation in property planning, including through market-based instruments and tax measures.' While WCPA strongly supports conservation initiatives on private lands and the direction of this statement, it is not aware that this document has been circulated or reviewed by key stakeholders.

**PP. 30/31 3.8** 'Revise guidelines for establishing the National Reserve System to address issues related to adequacy such as climate change, aquatic ecosystems, landscape integration and water availability'. This point is agreed and should be incorporated into the standards.

**P.31. 3.9 No loss of land rights** 'Investigate suitable security mechanisms for conservation of inalienable Indigenous titles and private protected areas, with a view for strengthening the standards for inclusion of protected areas in the National Reserve System' – supported but it is very important that the history of indigenous struggles for rights over land is fully recognised and that any attempt for greater security is not perceived as a diminution of hard won rights. The IPA system is currently working very well. Proper long term resourcing is the most critical issue for security.

**P.31. Standards for inclusion in the National Reserve System** The six standards are supported but an additional phrase is suggested for the first dot on p.32 and an additional dot point is suggested.

- The area must contribute to the comprehensiveness, representativeness and adequacy of the National Reserve System **and be large enough and adequately buffered to have a prospect of long term viability.**
- **The area must be 'adequate' after proper consideration of climate change, aquatic ecosystems, landscape integration and water availability.**

We suggest these additions to combat the notion that any addition to the NRS is useful when in fact isolated small or high climate change vulnerable reserves are a questionable investment.

#### **P. 32. Questions - Indigenous Protected Areas**

The text states, 'In Australia, Indigenous Protected Areas are **declared in perpetuity** by Indigenous communities.' To WCPA's understanding this is not correct nor is it the language of the department. The agreement can be terminated at any time.

It goes on to state 'Additional legal security can be provided over Indigenous Protected Area declarations through contractual agreements or **conservation covenants** under relevant legislation, which would bring such areas into the 'legal means' category'. The scope for and legality of covenants over indigenous land title needs to be clarified.

#### **P. 33. Faint praise for Protected Areas on Private Lands (PAPL)**

The text reads, 'Protected areas on private lands are small in their total area and small as a percentage of the National Reserve System (less than 10 per cent)'. This and later text are a rather grudging, qualified acknowledgement of a globally significant partner to government and one likely to have increasing importance to Australian conservation. WCPA suggests a more enthusiastic acknowledgement of varied governance models.

**P.33. What is a PPA??** Under the heading Protected Areas on Private Lands (PAPL) it mentions 'covenanting arrangements on private land'. It is not clear if it is proposed to include such measures as 'private protected areas'. IUCN *Guidelines for applying*

*protected area management categories* is not clear on size criteria, but to date in Australia the term PPA has only been used for substantial whole of property initiatives rather than small scale covenants. If it has been decided to deem all covenanted land 'PPAs', this is a significant policy shift which should be discussed with stakeholders. Any area deemed a PPA must meet the IUCN definition of a protected area

*A clearly defined geographical space, recognised, dedicated and managed, through legal or other effective means to achieve the long-term conservation of nature with associated ecosystem services and cultural values.*

**P. 34.** The text reads, 'To complement the nationally agreed criteria for National Reserve System Protected Areas on Private Lands, a national framework is being formulated to provide strategic guidance and ensure that appropriate planning and management support systems are in place.' WCPA would ask, when were the criteria nationally agreed? Have they been released? We would like to flag our interest in formulating the framework.

#### **THEME 4. PROTECTED AREA PLANNING AND MANAGEMENT**

The overall objective of ensuring that protected areas have effective planning and management systems in place in order to meet appropriate standards of management is strongly supported. The concept of adaptive management is also vital to changing circumstances. There are however a number of areas in which the thematic actions could be substantially improved or extended.

**Consolidate management effectiveness sections.** Relevant international and NRS goals and standards are referred to in the Key Direction but are not then further referenced in detail apart from the Principles for assessing management effectiveness in Table 4. In reality, accepted international or national standards for planning and management are not collected in one place or easily referenced for such a purpose. NRS standards are also referred to on p.15 but the only other explicit documentation of standards in the Strategy relates only to a limited set of issues concerning inclusion of areas within the NRS System (pp.31 and 32).

**P.39. Add a specific Priority Action** to provide for a collaborative project across jurisdictions to establish an agreed set of management standards for NRS properties.

**Consolidate Actions relating to management effectiveness monitoring, assessment and reporting.** They are currently split across themes 4 and 5. It is suggested that these be consolidated in Theme 5.

**P.39. Principle 3** in Table 4 should refer to the 'IUCN World Commission on Protected Areas' not the 'World Congress on Protected Areas'.

**P.39. Priority Action 4.5** is very vague and does not provide a useful guide to action. A stronger statement about adequate resourcing of management to meet appropriate standards (see comment 1) would be more useful. This would also then go some way towards addressing the Senate Enquiry Recommendation 15 concerning funding for protected area management.

#### **Page 41. Shared management**

It is appropriate that the challenges inherent in shared or joint management approaches on Indigenous land are identified. WCPA supports the need for 'Practical lessons learned from experience must be shared with other reserve managers to improve management overall' but also believes that the strategy should include a strong statement that on-going equitable sharing across cultures of perspectives and learnings offers the best prospect of good outcomes. This was strongly emphasised by

the indigenous attendees at the Australian Protected Areas Congress on the Sunshine Coast in November 2008.

## THEME 5. SCIENTIFIC MEASUREMENT AND REPORTING

The Key Direction and Strategic Approaches are supported. It is important that the best available information is not only made available to managers but is actually used in planning and decision making. National and international research in this area has shown that it is often not availability, but application, of scientific knowledge that is the major problem.

All material relating to management effectiveness monitoring, assessment and reporting should be consolidated in this Theme.

**P.44. Priority Action 5.1** is strongly supported but should be strengthened by more explicitly requiring public reporting of the core dataset (as recommended in the Senate Enquiry report).

**Priority Action 5.2** addresses the information needs for both protected area design and also the on-going assessment of management effectiveness. Adding the phrase 'to support systematic conservation planning' at the end of the action is confusing and should be omitted as this phrase is generally used in the literature to refer to protected area design only.

Comprehensive assessment of management effectiveness requires more than just the biological information referred to in the text. The text in the action could be divided into two dot points – one addressing the information needs for protected area design (systematic conservation planning) and the second addressing adequate monitoring to support comprehensive assessments of management effectiveness. This may then be able to subsume **Priority Action 5.7** that also addresses management effectiveness assessment.

**Public Reporting** There is a need to strengthen the text in relation to public reporting on management effectiveness - this should be specified as a requirement for all NRS reserves.

**Priority Action 5.8** is not clear – priorities and short-term targets for what?

## THEME 6. STRENGTHENING PARTNERSHIPS AND COMMUNITY SUPPORT

WCPA strongly supports an inclusive approach to the national conservation effort and recommends an additional **6.4 Jurisdictions should be encouraged to consider the development of ParkCare programs, such as exists in the ACT. Such partnerships involve Government, NGOs and community groups in caring for protected areas<sup>3</sup>.**

**P. 48. Communication Plan Caution** The key direction and strategic approach are generally supported. However the second dot point, 'A national communication plan is used to explain the role, composition and importance of the National Reserve System to engender primary stakeholder and broader public support' requires caution. A great deal of time and money could be used to little effect unless this plan is very well targeted. We believe this reinforces the need for a National Council of similar body of NRS partners who would be the key drivers of such a strategy.

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<sup>3</sup> In 2008 it won the Habitat Conservation/Protection of the Environment category in the 2008 Keep Australia Beautiful ACT Sustainable Cities Awards.

We are aware of research into public attitudes to protected areas being undertaken by The Nature Conservancy which might be very useful to the Commonwealth.

**Priority Action 6.2 National NRS Partners Council** The WCPA supports a 'National NRS Partners Council' of bodies to further the partnership approach to achieving a comprehensive, adequate, representative and resilient national reserve system. This would be a higher level body than suggested in the text and go beyond 'the review and evaluation of the implementation of this Strategy' to encourage active partnership of many elements of Australian society in deliver the long term vision.

Yours sincerely

A handwritten signature in cursive script that reads "Penelope Figgis".

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