



I N L A N D
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Submission to Biodiversity Conservation Act review

Introduction

The Inland Rivers Network (IRN) is a coalition of environment groups and individuals concerned about the degradation of the rivers, wetlands and groundwaters of the Murray-Darling Basin. It has been advocating for the conservation of rivers, wetlands and groundwater in the Murray-Darling Basin since 1991.

Member groups include the Australian Conservation Foundation; the Nature Conservation Council of NSW; the National Parks Association of NSW; Wilderness Australia; Friends of the Earth; Central West Environment Council; and Healthy Rivers Dubbo.

IRN welcomes the opportunity to submit comments on the Biodiversity Conservation Act in regard to the significance of functioning and biodiverse ecosystems needed to promote and maintain the health of inland rivers, wetlands and groundwater sources.

The key focus of this submission is the failure of the *Biodiversity Conservation Act 2016* (BCA) to meet a 'fit for purpose' analysis.

We are very concerned that the review of Part 5A and Schedules 5A and 5B of the *Local Land Services Act 2013* (LLS Act) has been separate to this review when it was explicit to be undertaken conjunctively.

The Land Management and Biodiversity Conservation reforms conducted by the previous NSW State Government have resulted in a significant increase in the loss of biodiversity and loss of direction for total catchment management that is critical for healthy waterways and their dependent ecosystems.

Submission

1. Catchment Management

It appears that the community effort involved in developing Catchment Action Plans to improve landscape scale management of biodiversity, soils, riparian and wetland vegetation and other matters that impact on river flow and water quality has been sidelined and ignored.

The BCA and LLS Act must be improved to recognise and promote the significance of total catchment management for best practice long term management for sustainability including water.

The ongoing decline of inland rivers has been caused by the piecemeal approach to catchment management. Recent fish kills in the Darling/Baaka, decline of waterbird numbers across the Murray-Darling Basin and human settlement water stress during drought are indications of poor management of water regulation, planning decisions and biodiversity conservation.

Connectivity of water sources through the landscape including with groundwater dependent ecosystems and terrestrial vegetation is a critical issue that must be included in all decision-making processes.

A wholistic approach is needed to solve these problems, particularly in regard to climate change. Legislative instruments must ensure that catchment management decisions link with delivery of river/wetland health essential to underpinning human wellbeing.

2. Biodiversity Offsets

IRN does not support that Biodiversity Offset Scheme as identified in the BCA. There is a major disjunct between the NSW planning assessment and approvals process and commitments under various national and international treaties aimed at protecting biodiversity, including water ways.

Many ecosystems cannot be offset particularly those supporting water dependent species, providing groundwater recharge or base flows to river systems. These important landscape elements are not recognised or adequately protected under the BCA.

3. Halting extinctions

The BCA must be improved to meet current national and international ambitions to reverse the biodiversity extinctions crisis. The objects must require an *improvement* in the condition of biodiversity including water dependent species such as native fish, waterbirds and other freshwater species relying on inland water sources.

For more information on this submission contact inlandriversnetwork@gmail.com

Yours sincerely

Brian Stevens
Secretary