



# Hunter Bird Observers Club

Affiliated with BirdLife Australia

Hunter Bird Observers Club Inc  
PO Box 24, New Lambton, NSW 2305  
[www.hboc.org.au](http://www.hboc.org.au)

ABN 62 415 889 446

Department of Climate Change, Energy, the Environment and Water

GPO Box 3090

Canberra ACT 2601

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## **Draft National (OECMs) Framework.**

We thank DCCEEW for the opportunity to provide feedback on this draft proposal and due to time constraints have only provided comment on limited points of the draft OECM's framework. This draft only came to our notice through the online journal "The Conversation" on 13 April 2024. As you would be aware most voluntary organisations only meet once a month whilst a framework of this complexity takes many months to prepare.

### **Introduction**

Whilst we agree that OECM's may be useful in supplementing biodiversity conservation measures we are concerned that their use will dilute Australia's commitment to a 30% domestic target for protection. This concern is further strengthened by the reduction of the proposed management time to 25 years. The non-binding nature of the proposed agreements also leaves them open to modification by legal, contractual and political mechanisms weakening the usefulness of inclusion in Australia's target. Further potential political resistance created by a change of government leaves the whole target vulnerable without strong legal tenure agreements.

OECM's should only be a supplement to permanent reservation of at least 30% of Australia. Priority should be given to OECM's being used to provide green corridors and linkages to permanently reserved sites to facilitate biodiversity movement and genetic interchange. Australia already has an extinction crisis due to political lack of interest. Maintenance of fragmentation of large permanent reserves is the best ally to extinction significantly aided by political lack of interest in resolving the crisis.

### **Long Term Protection**

Australia's Strategy for the National Reserve System 2009–2030 defined "long-term management" as *"ideally this should be in perpetuity but, if this is not possible, then the minimum should be at least 99 years" for areas to be included in the National Reserve System.*

In 2021, the Australian Government joined the High Ambition Coalition for Nature and People and committed to its target to protect 30% of the earth's lands and seas by 2030 (30 × 30 protection target). The purpose of this commitment was to achieve long-term conservation of nature.

The over-arching legal and legislative framework impacting land tenure in this country including mineral and petroleum rights remain the property of the Crown i.e. state governments. In an increasingly resource hungry world pressures on OECM tenure will increase putting at risk the continuation of long term management unless the minimum is firmly set as 99 years or more.

In addition OECM's of 25 years may not be adequate for realisation of recovery plans under the Environment Protection and Biodiversity Conservation Act 1999. Land owners early withdrawal from agreements may put at risk budgetary expenditure on recovery plans and ultimately on the survival of species.

The non-binding nature of proposed agreements gives the opportunity for early withdrawal and subsequent associated issues of failure. How does that impact on the 30% commitment?

Added to those concerns is the increasing reliance on NGO's to purchase, support and manage land for conservation and long term survival of species. These NGO's often rely on donations and bequests to manage significant conservation property holdings leaving long term survival uncertain both for the system and the biodiversity. Change in political direction and human population pressures will add to the uncertainty.

## **Funding**

As governments have shown reluctance to provide adequate funding for purchase and positive management of permanently protected areas the points above cast uncertainty on any reliance on a system of OECM's to support large scale biodiversity assets.

We have concerns that governments current conservation funding will be more widely spread across the sector with the formation of numerous OECM's. The influence of large agri businesses in the mix heightens concerns that financial resources may be absorbed by the expansion of OECM's to the detriment of permanently protected areas.

## **Conclusion**

OECM's should have long term tenure of at least 99 years, be permanently protected against political interference in case of an environmentally hostile government, and be supplementary to permanently reserved sites. Priority should be given to the use of OECM's as green corridors and linkages to existing permanently reserved sites to facilitate movement of biodiversity and genetic interchange. Without those safeguards this proposal may be seen just as a means to achieve a commitment of the 30% target.

## **References**

- The Conversation. 11 April 2024
- Other Effective Area-Based Conservation Measures (OECMs) in Australia: Key Considerations for Assessment and Implementation - James A. Fitzsimons 1,2,3,\* , Thalie Partridge 1 and Rebecca Keen 1

Submission prepared by T. Kendall for the Conservation Sub-Committee  
Hunter Bird Observers Club Inc. 17 April 2024

## **About the Hunter Bird Observers Club**

Hunter Bird Observers Club Inc. (HBOC) was established in 1976 and currently has a membership of 400 members. Although the Club is based in Newcastle NSW membership includes members from other areas in NSW and from interstate.

### **Aims of HBOC**

*to encourage and further the study and conservation of Australian birds and their habitat;  
and*

*to encourage bird observing as a leisure-time activity.*

**Activities** include monthly regular outings, evening meetings, camps and field studies. HBOC promotes systematic field studies which include regular surveys by volunteers from the membership.

**All data** gathered from field studies are entered into the national bird record database administered by BirdLife Australia; Birddata <https://birddata.birdlife.org.au/>. Data are used to underpin conservation issues and HBOC promotes systematic surveys and data collection.

**HBOC** has a long history of working in collaboration with local councils, national parks and other state agencies, industry and schools.

For more information go to [www.hboc.org.au](http://www.hboc.org.au)