

Lake Eyre Basin Secretariat  
Department of Climate Change, Energy, the Environment and Water  
Online submission; cc: [lebsecretariat@agriculture.gov.au](mailto:lebsecretariat@agriculture.gov.au)

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Dear Secretariat,

**RE: Submission on the draft Lake Eyre Basin Strategic Plan**

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a submission to the Federal Government's consultation on its draft *Lake Eyre Basin* (LEB) *Strategic Plan*.

Please note that ALCA is happy for this submission to be published in full.

**About the Australian Land Conservation Alliance**

The Australian Land Conservation Alliance is the peak national body representing organisations that work to conserve, manage and restore nature on privately managed land. We represent our members and supporters to grow the impact, capacity and influence of private land conservation to achieve a healthy and resilient Australia. Our eleven members are:

- Australian Wildlife Conservancy
- Biodiversity Conservation Trust NSW
- Bush Heritage Australia
- Greening Australia
- Landcare Australia
- Nature Foundation
- Queensland Trust for Nature
- South Endeavour Trust
- Tasmanian Land Conservancy
- The Nature Conservancy Australia
- Trust for Nature (Victoria)

ALCA member land conservation efforts have influenced over 3 million square kilometres with more than 4,000 landholders. We have over 70,000 supporters and our combined annual turnover exceeds \$260 million. Together ALCA and its members address some of the most pressing conservation issues across the country, including restoring endangered ecosystems, building the protected area estate, tackling invasive species, expanding private conservation finance, and funding and using nature-based solutions to tackle climate change.

Through their active land management, ALCA member organisations are deeply embedded in rural communities and economies, providing jobs, securing significant regional investment, and safeguarding remaining native habitat, with its many positive spill-over effects for community, wellbeing, and food security. We seek to demonstrate the role and value of private land conservation as a cornerstone of the Australian economy.

Some ALCA members are statutory entities; the views expressed in this submission do not necessarily represent the views of the Government administering those statutory entities.

## Summary

Collectively, ALCA members manage 6 properties within the Lake Eyre Basin. Those properties include:

In South Australia:

- Boolcoomatta (Bush Heritage Australia)
- Witchelina (Nature Foundation)

In Queensland:

- Ethabuka (Bush Heritage Australia)
- Pilungah (Bush Heritage Australia)
- Pullen Pullen (Bush Heritage Australia)
- NAPCo pastoral estate (in partnership with Australian Wildlife Conservancy)

ALCA works with governments and community to deliver the highest of quality biodiversity outcomes for the Lake Eyre Basin and beyond. A healthy Basin can support thriving ecological communities and underpins thriving human communities.

## Recommendations

1. In keeping with the Government's election platform to "*protect the ecological health of the rivers, floodplains, wetlands, lakes and channels of the Lake Eyre Basin and [to] cooperate with the governments of the Northern Territory, South Australia, Queensland and New South Wales to protect the ecological sustainability of the Basin.*"<sup>1</sup>, the sustainability of environmental protection outcomes should be prioritised as the foundation of the LEB Strategic Plan. This includes other considerations such as oil and gas exploration, mining, drilling, and fracking.

It should be noted that without ecological sustainability, the long-term sustainability of all other economic activities in the Basin is unlikely to be achieved.

2. In accordance with Recommendation 1 above, the vision in the Plan should instead read: "*Protecting the ecological sustainability of the Basin for the benefit of the community.*"
3. The impact from resource extraction from the Basin has the potential to have a strategic impact on both the ongoing ecological and long-term economic sustainability of the Basin<sup>2</sup>. The Plan needs to provide clear high-level guidance on what actions will be taken (rather than 'could' or 'may be' taken) to squarely address any strategic threats.
4. LEB governance arrangements should be reviewed prior to the adoption of the LEB Strategic Plan.
5. The LEB Ministerial Forum should be re-formed and convened prior to the adoption of the LEB Strategic Plan, with outcomes at that Forum shaping and informing the content of the Plan.

<sup>1</sup> See: *ALP National Platform*, 2021;

[https://parlinfo.aph.gov.au/parlInfo/download/library/partypol/8047450/upload\\_binary/8047450.pdf;fileType=application%2Fpdf#search=%22library/partypol/8047450%22](https://parlinfo.aph.gov.au/parlInfo/download/library/partypol/8047450/upload_binary/8047450.pdf;fileType=application%2Fpdf#search=%22library/partypol/8047450%22)

<sup>2</sup> See: R. T. Kingsford and A. J. D. Waldron, 'Oil and gas exploration and development in the Lake Eyre Basin: distribution and consequences for rivers and wetlands, including the Coongie Lakes Ramsar Site', *CSIRO Publishing*, CSIRO, 2022; <https://www.publish.csiro.au/MF/MF22063>

6. All the objectives listed in the Plan describe what the objective is without providing at least high-level guidance on how the objective will be achieved. The attempts to provide guidance are couched in the language of 'can', 'should', 'scope exists to' and 'requires / will require' rather than in the active language (such as 'do' and 'will / will be') common to strategy. If the proposed actions are not known, then this should be revisited through wider consultation to inform a rewritten draft.
7. The draft Plan seeks to devolve most of its content into two, five-year implementation plans. It would be more effective to include the overarching detail on implementation into the draft Plan and then require that the 10-year Strategic Plan be reviewed after 5 years.

This approach would also encourage the adoption of more action-oriented language in the Strategic Plan as detail on implementation will, by necessity, require that the intended strategic actions are also articulated.

8. Section 3 of the draft Plan would benefit from providing guidance on how the plan will deliver on its objectives and from being rewritten into simplified and direct language.

Thank you again for the opportunity to comment on the draft *Lake Eyre Basin Strategic Plan*. ALCA looks forward to ongoing engagement with the LEB Secretariat as it progresses this work.

**Australian Land Conservation Alliance**