



Conservation Council SA

Protected Area Policy Unit
Department for Environment and Water
81-95 Waymouth Street
Adelaide SA, 5000
Via email: DEWProtectedAreaManagement@sa.gov.au
Cc: ParksandWildernessCouncil@sa.gov.au; OfficeoftheDeputyPremier@sa.gov.au

30 August 2025

Dear Protected Area Policy Unit,

RE: Submission on Land-based Protected and Conserved Area Strategy

Conservation Council SA welcomes the opportunity to provide a submission on the draft Land-based Protected and Conserved Area Strategy.

Conservation Council SA is South Australia's independent, non-profit, and strictly non-partisan peak body for the environment. We represent over 45 of South Australia's environment and conservation organisations and their approximate 90,000 members.

Recommendations

Recommendation 1: Conservation Council SA strongly supports the inclusion of the importance of the CAR principles in the Strategy and encourages additional references to this critical element where possible to further reinforce its importance.

Recommendation 2: There should be an extra guiding principle that highlights South Australia's commitment to contribute to the achievement of the national '30 by 30' target, as agreed to at the October 2022 Environment Ministers Meeting¹, as follows:

"Contribute to the achievement of the national target to protect and conserve 30% of Australia's landmass by 2030."

Recommendation 3: Given biodiversity exists across all areas of land in greater or lesser amounts, depending on the land use, proportion of remnant habitat, etc., it is unclear what the value is of first guiding principle without adding more specific detail. One approach that would align with the Strategy and the *Strategy for the National Reserve System*² would be to target areas that fulfil the CAR principles (comprehensive, adequate, representative – named 'CARSS' in the draft Strategy), as follows (suggested edits in **bold**):

"Target areas that protect biodiversity and conservation values and deliver a CARRS."

¹ <https://www.dcceew.gov.au/sites/default/files/documents/emm-communique-21-oct-2022.pdf>

² <https://www.dcceew.gov.au/environment/land/nrs/publications/strategy-national-reserve-system>

Recommendation 4: Where the Strategy references conserved areas (such as in the strategy priorities), it does not currently align with the National OECMs framework as it indicates that conserved areas are not able to be formally designated. Yet, the National Framework actually states that they can be “*secured through legal or other effective means*”³. Whilst ‘formal’ has not been defined in the draft Strategy, using the ordinary meaning of the word, formal ordinarily includes via legal means (e.g. statute, regulation or statutory instrument, contract, etc.) and there are other effective means that could still be ‘formal’ designations (e.g. a document of administrative policy from SA Water that provides a list of all conserved areas on SA Water land). It would be hard to think of examples of conserved areas that were ‘informal’, as this may imply that the spatial boundaries are not known, agreed, or fixed.

The language throughout the document needs to be updated to remove the use of ‘informal’ / ‘formal’.

Recommendation 5: Further to Recommendation 4 above, the description of conserved areas also does not reference that they need to be long-term (i.e. in-perpetuity or 99+ years). The Strategy should utilise the relevant language in the National OECM Framework, as follows:

“Consistent with Australia’s Strategy for the National Reserve System, long-term management arrangements for Conserved Areas should ideally be in-perpetuity, but if this is not possible, then the minimum should be at least 99 years.

Where there are underlying legal or land tenure restrictions or other constraints to securing in-perpetuity conservation, there should be a formal or legal commitment of at least 25 years coupled with a long-term conservation management commitment of at least 99 years.”

Recommendation 6: As advocated by the Conservation Council SA (and also the SA Nature Alliance), the South Australian Government needs to create a dedicated land acquisition fund that can partner with the Federal Government’s \$250m Saving Australia’s Bushland Program.

Many other State jurisdictions have such a dedicated fund. Without it, South Australia will be very unlikely to be able to leverage our State’s share of this Federal funding.

Recommendation 7: Conservation Council SA supports the development of enhanced conservation covenants as appears to be envisaged in the action to “*Develop options for an expanded suite of private land covenants for improving conservation outcome*”. Essentially, enhanced conservation covenants are Heritage Agreements that exclude mining, with the relinquishment of existing mining tenements negotiated with tenement holders. The Australian Land Conservation Alliance has published a Policy Note on the value of these covenants⁴.

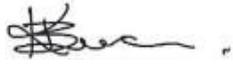
Recommendation 8: Conservation Council SA strongly urges that SA align its public protected areas legislation (specifically, the *National Parks and Wildlife Act 1972*) with the rest of the country and extinguish mining rights at the creation of all public protected areas. Conservation Council SA notes that this does not preclude section 43 proclamations from occurring after the creation of the park if the state public interest genuinely overrides the protection of biodiversity, but that mining should not be allowed to continue in newly created public protected areas simply by default.

³ p37, <https://www.dcceew.gov.au/sites/default/files/documents/national-oecm-framework-2024.pdf>

⁴ <https://alca.org.au/alca-policy-note-enhanced-protection-conservation-covenants/>

The Conservation Council SA is happy to discuss this submission further with Protected Area Policy Unit; if you require further information, do not hesitate to contact our organisation at ChiefExecutive@conservationsa.org.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Kirsty Bevan', with a small flourish at the end.

Kirsty Bevan
Chief Executive