

General Comments**A. Biodiversity Strategy first please**

We note the two key page 1 statements that :

- “When finalised, *Australia’s Biodiversity Conservation Strategy* will provide an overarching national policy framework for other more specific national policy frameworks, such as this one.”
- The NRMCC has requested *Australia’s Native Vegetation Framework* be aligned with above.

Australia’s Biodiversity Strategy is therefore a logical pre-requisite to completing our submission.

B. Whole-of-Australian-Government management of Native Vegetation (including Forests)

Please ensure that BRS data and Australia’s next *State of the Forests Report* and are fully compatible with other Australian Government Agency monitoring, evaluation and reporting on native vegetation.

Latest information systems on all Native Vegetation should include full *Forest Carbon* reporting via NCAS (Australia’s National Carbon Accounting System), relating to REDD (Reducing Emissions from Deforestation and Degradation) and FullCAM (Full Carbon Accounting Model for Ecosystems).

Have standard *Native Vegetation Groups* been agreed across all Australian Government Agencies?

Major native vegetation group headings published by BRS in 2010 are;

1. Acacia forests and woodlands
2. Callitris forests and woodlands
3. Casuarina forests and woodlands
4. Eucalypt low forests and woodlands
5. Eucalypt tall forests
6. Mallee woodlands and shrublands
7. Other shrublands
8. Rainforests and vine thickens

Key Questions**(a) Vision**

Great Vision statement - but we suggest adding the word ‘carbon,’ after ‘environmental’ (values).

(b) Principles

It needs a sentence derived from the Copenhagen Accord which acknowledges the key carbon role.

(c) Goals ; Goal 3. Current version’s narrow use of the word ‘markets’ infers Australians will only do the right thing in terms of minimizing GHG emissions if a market-based-mechanism makes it profitable. This immorally exempts responsibility for our State Forests.

Better options need to *include both*:

3(a) Minimise GHG emissions via Land-Use Management and REDD

3(b) Maximise carbon sequestration and related benefits of carbon markets.

Other goals seem appropriate (before we are able to relate them to Biodiversity)

(d) Outcomes

Outcomes seem reasonable, although as noted, they need to be integrated / de-duplicated under the umbrella of Australia’s forthcoming Biodiversity Strategy.

Fire outcomes for Goal 3 (bullet point 3) may justify their own specific goal.