



Submission *writing tips*

ESA Policy Working Group

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Acknowledgement of Country



I acknowledge the Yolngu people of North East Arnhem land where this presentation was created. I wish to pay my deepest respects to the Yolngu leaders, Elders and their ancestors, and I extend that respect to all First Nations people across Australia. I deeply appreciate the ongoing care and protection of our beautiful lands and waters, managed by Aboriginal people since time immemorial.



Today's talk...

- The biggest submission writing pitfalls to be aware of
- A step by step of what I did when drafting the SA Biodiversity Act submission
- End with some final advice





**Not realising the government
wants you to agree!**

**Don't copy consultation
materials back into the
submission.**

WEASEL WORDS!!!

1. Submission writing pitfalls!

(not the good kind!)

Weasel words...

“Say what you mean and mean only what you say. No legal fudges. It gives everyone certainty and increases trust in a regulatory system.”

- Peter Burnett, ANU

Weasel words weaken good policy by reducing regulatory effectiveness and reducing the statutory power of the Bill.

Weasel words = BAU ☹️





Pre 2014 Requirements for Methodology	Post 2014 Requirements
• <i>endorsement</i> by an expert committee (established under the Act) • <i>compliance</i> with integrity standards	• minister must <i>have regard</i> to the expert committee advice and to whether the method complies with the integrity standards
• expert committee must be <i>satisfied</i> that a method meets the integrity standards	• expert committee must <i>have regard</i> to the integrity standards
• methodologies <i>must</i> be supported by peer-reviewed scientific results	• Methodologies must be supported by ‘clear and convincing evidence’ which <i>may</i> include peer reviewed science
• no provision for the minister to give directions to the expert committee	• minister may <i>direct</i> the committee to have regard to specified matters when giving advice
• no more than 2 of the expert committee members can come from CSIRO	• no limit on using experts from CSIRO

Example from Peter Burnett’s Sustainability Bites Blog: Weasel Words

Developing a Biodiversity Act for South Australia

Community consultation report

2. SA Biodiversity Bill example

1. Groundwork - read consultation materials, read past submissions. Took notes on what key concerns were in first round.
2. Read SA Guidance Document - highlighting changes from first round of submissions.
3. I looked to see if the early concerns had been resolved, referring back to the Bill.



Developing a Biodiversity Act for South Australia

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4. I drafted our responses addressing these key concerns, structured using the key sections in the Guidance doc.
5. My time was up - sent it to the lovely ESA Policy group to take over!
6. Final review - went to Pep for approval





3. Final advice

**If you want to write
good submissions,
read submissions!**

Look at submissions from individuals and organisations that you hold in high esteem, see how they write submissions. Compare Minerals Council vs Biodiversity Council.

**Make clearly stated,
concise, actionable
recommendations**

Always include clearly stated, concise, actionable recommendations, directly relevant E.g. SA Biodiversity Bill – we explicitly addressed the weasel words and provided stronger alternatives.

**It's good to care
and write with
emotion**

We really care and this really matters.

“Our nature is precious and we must protect it” vs “Ongoing rapid decline of biodiversity loss...”



3. *Final advice (for ESA)*

Well-written submissions from independent experts and independent scientific groups have the most influence in policy making. As such, ESA has a powerful voice and therefore an important responsibility for us to engage in this process.

Raising our profile with government and strengthening relationships with government is another way to make our submission more impactful.

Thank you!

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