

Nature Repair Market Methods Team
Department of Climate Change, Energy, Environment and Water
John Gorton Building
King Edward Terrace
Parkes ACT 2600
Via email: naturerepairmarketmethods@dcceew.gov.au

Level 3 329 Collins Street
Melbourne Victoria 3000

info@alca.org.au

ABN 80 637 680 310

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Dear Nature Repair Market Methods Team,

RE: Submission on the Protect and Conserve method design

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a public submission to DCCEEW's consultation on the Protect and Conserve method design.

ALCA represents organisations that work to conserve, manage, and restore nature on privately managed land. Our member conservation efforts have influenced over 9.3% of Australia with more than 4,000 landholders; we have over 70,000 supporters and our combined annual turnover exceeds \$400 million.

ALCA has been engaged by DCCEEW to provide ongoing, detailed advice and method-related materials on the private-land component of the Protect and Conserve method. Noting this, we have limited our public submission to five top-level design principles.

Design principles

1. Integrity is guaranteed via protected area or conserved area status

The integrity of the method rests upon ensuring that projects under the method achieve (and are able to achieve) either protected area or conserved area status – consistent with the requirements of the *Strategy for Australia's National Reserve System*¹ and the *National OECMs Framework*² respectively. This includes the delivery of ongoing, effective management.

2. Reduce complexity

Any complexity in the method beyond what is required to achieve integrity (as above) will drive higher transaction costs and should be avoided or minimised to the extent that is legislatively possible. Reducing complexity in the method must also include harmonisation, where possible, with existing conservation covenanting programs that are approved by the Federal Environment Minister. Effective harmonisation would ensure that covenanting agencies retain responsibility for covenanting decisions and processes, in accordance with method requirements.

¹ <https://www.dcceew.gov.au/environment/land/nrs/publications/strategy-national-reserve-system>

² <https://www.dcceew.gov.au/environment/land/achieving-30-by-30/conserved-areas/national-oecms-framework>

3. Protected areas to have a facilitated pathway

The current method design provides a ‘default’ pathway for conserved areas and not for protected areas. Protected areas that are achieved with the assistance of State-based authorities or in accordance with their requirements must have a clear and facilitated pathway in the method.

This means that, in addition to harmonising with existing covenanting program processes as per Recommendation 2 above, the method should also reduce or remove barriers and disincentives to their uptake wherever possible (also see Recommendation 4 below). This could include, for example, considerations associated with timing of biodiversity certificates for protected areas compared to conserved areas.

4. The method should clearly signal the premium value of protected areas

The method needs to ensure it includes signals to the market about the premium value of projects that deliver protected areas, as compared to projects that deliver conserved areas. Currently, this is being transmitted through the Commitment to Protection variable Biodiversity Project Characteristic.

Further, whilst not an issue for the method design, signalling the premium value of protected areas can also be supplemented via:

- the approach taken to government procurement via the method – i.e. demonstrating a clear appreciation of the premium value of protected areas; and
- the investment strategy for the Nature Repair Market currently under development (as committed to by the Commonwealth Government in October 2024³).

5. Multiple certificates will be necessary

The *Nature Repair Act 2023* does not preclude multiple biodiversity certificates being issued for projects. Projects under the Protect and Conserve method should be issued a ‘protection’ certificate, and also a ‘management’ certificate after every 5 years of management.

Expecting commercial arrangements outside of the market to account for the challenge of a single upfront certificate would be imprudent way to attempt to account for 100 years of project risk, especially as the extent of that risk is impossible to estimate at or near the beginning of the project. Unless this approach can be accommodated, it is unlikely that significant numbers of commercial operators will enter the market – and especially not the wide range of landholders that have a lower financial capacity to tolerate risk.

Thank you again for the opportunity to provide feedback to the consultation on the Protect and Conserve method design. ALCA and its members look forward to continuing to engage with DCCEEW to finalise the development of the method.

Australian Land Conservation Alliance

³ See: <https://minister.dcceew.gov.au/plibersek/speeches/speech-australian-land-conservation-alliance-conference>

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 twenty-one members are:

- Arid Recovery
- Australian Wildlife Conservancy
- Biodiversity Conservation Trust NSW
- Biodiversity Legacy
- Bush Heritage Australia
- EcoGipps
- GreenCollar
- Greening Australia
- Landcare Australia
- Nari Nari Tribal Council
- National Landcare Network
- Nature Foundation
- North Australian Indigenous Land and Sea Management Alliance
- NRM Regions Australia
- Odonata
- Queensland Trust for Nature
- South Endeavour Trust
- Tasmanian Land Conservancy
- The Nature Conservancy Australia
- Trust for Nature (Victoria)
- World Wildlife Fund - Australia

ALCA member land conservation efforts have influenced over 9.3% of Australia with more than 4,000 landholders. We have over 70,000 supporters and our combined annual turnover exceeds \$400 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.