

Department of Climate Change, Energy, the Environment and Water  
John Gorton Building  
King Edward Terrace  
Parkes ACT 2600  
Via Austender submission

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Melbourne Victoria 3000

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ABN 80 637 680 310

12 December 2025

Dear Department,

**RE: Request for Information – Australian Bushland Program (ABP) Strategic Property Purchases – Schedule 2 – RFI ATM\_2025\_5448**

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to respond to Schedule 2 of the Request For Information (RFI) for the Australian Bushland Program (ABP) Strategic Property Purchases.

ALCA represents organisations that work to conserve, manage, and restore nature on privately managed land. The conservation efforts of our 22 member organisations 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. You can find a list of our members online at: <https://alca.org.au/members/>.

ALCA notes that several of our member organisations are expected to respond directly to the RFI. Our two-page submission can be found overleaf.

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## Schedule 2 – Information Request

- (a) In narrative form (maximum two pages), what are the Respondent’s views on the design of this component of the ABP as detailed in clause 2 of Part 1 of the RFI? What are the risks, sensitivities or benefits associated with the approach as proposed in these Sections? Are there barriers to Respondents delivering the activities? Are there potential amendments or management strategies the Respondent wishes the department to consider?

ALCA and other members of Australia’s 30 by 30 collaboration – The Nature Conservancy, WWF-Australia, and Pew Charitable Trusts – co-published its seminal report “*Protecting Australia’s Nature: Pathways to protecting 30 per cent of land by 2030*”<sup>1</sup>, in which we recommended a dedicated fund for conservation land purchase as one of four key pathways to deliver 30 by 30 on land (‘Pathway 1’). Specifically:

*“A dedicated federal fund for conservation land purchase, leveraged with funding from the state and territory governments, philanthropy and corporate investment, is considered a critical means of achieving a comprehensive, adequate and representative protected area system.”*

This fund was intended to replicate the highly successful Commonwealth National Reserve System Programme fund model which provided flexibility for a range of funding sources to combine and come together to maximise their collective leverage. The proposed model in this RFI appears to abdicate Federal Government leadership from a role in **coordinating the contributions from across this range of stakeholders** and instead would appear to compartmentalise stakeholders into separate ‘streams’.

Growing the National Reserve System requires a flexible, collective, collaborative funding arrangement to maximise outcomes for conservation, and this is particularly true for the dynamic nature of land purchase. Land conservancies and their philanthropic partners do not expect to be involved in every land acquisition ‘deal’ that State/Territory and Commonwealth governments collaborate on, but they are often potential contributors to opportunities that involve both the Commonwealth and State/Territory governments.

From internal discussions with its members, ALCA is confident that the proposed 33% contribution from the Commonwealth in the RFI **will not be sufficient to significantly increase Program demand or conservation outcomes**. Based on the past successful model of the National Reserve System Programme which provided two-thirds of the purchase price, ALCA is recommending that the Commonwealth must contribute **at least 50%** of the funding to stimulate reasonable demand from philanthropy, land trusts, and state governments – especially as land conservancies and state parks agencies are being expected to carry the cost of ongoing management, meaning that the Commonwealth contribution to full cost of the protected area is significantly less than 33%.

It is also worth noting that the National Reserve System Programme (with a 2:1 Commonwealth investment ratio) delivered Australia’s most significant expansion in its protected area estate.

**Recommendation 1:** A Commonwealth contribution of 33% for land purchase will be insufficient to stimulate serious demand; it must be **at least 50%**.

**Recommendation 2:** Land acquisition funding under Australia’s Bushland Program should be designed to allow for maximum flexibility to allow the involvement of a range of contributing stakeholders (as per the *Protecting Australia’s Nature* report above); there should be one model for all.

<sup>1</sup> Fitzsimons J, Picone A, Partridge T, Cornish M, (2023). *Protecting Australia’s Nature: Pathways to protecting 30 per cent of land by 2030*. The Nature Conservancy, WWF-Australia, the Australian Land Conservation Alliance and the Pew Charitable Trusts; [https://alca.org.au/wp-content/uploads/2023/11/Report3030\\_FINAL\\_web.pdf](https://alca.org.au/wp-content/uploads/2023/11/Report3030_FINAL_web.pdf)

**Recommendation 3:** The Program’s ability to move quickly to commit funds will be critical – land acquisition is often subject to the whim of quick movements in property markets and commercial negotiations.

At the industry briefing, ALCA was surprised to hear that the purpose of the RFI was – to paraphrase – ‘discover the demand’ for conservation land acquisition. The Program is not separate from demand – **it stimulates demand**. Demand will be stimulated much more effectively if the total available funding pool is known to applicants, and the total funding allocation matches the ambition and need. Great effort is required to put together a land acquisition, and uncertainty as to whether funding is even available will lead stakeholders to doubt whether they should try and participate in the Program.

**Recommendation 4:** The Commonwealth should not consider the design choices that are made in the Australian Bushland Program to be independent from the demand – the contribution – it can reasonably stimulate from the private land conservation sector.

**Recommendation 5:** The Commonwealth should declare how much funding is available via the Strategic Property Purchases component of the Australia’s Bushland Program to help firm demand.

**Recommendation 6:** Build in flexibility around the 2030 deadline to guarantee permanent protection. Allow flexibility if permanent protection actions spill past June 2030. A 5% holdback may not ensure covenants are in place for late-stage purchases. Permit final payments post-2030 for realistic time to enable the protection mechanism post purchase (e.g. national park, conservation covenant).

**Recommendation 7:** With reference to Principle 7 of Australia’s *National OECM Framework*, the Program must not progress OECMs except where a formal Protected Area designation is not possible<sup>2</sup>.

**Recommendation 8:** Maps being produced for national priority areas for protection should not be too granular, and not at the property scale, so as to avoid inflating land price expectations for landholders. ALCA recommends that no maps be produced for public release at lower than IBRA subregion level.

**Recommendation 9:** The Commonwealth should not ‘rule out’ particular land or land use categories from potential participation in the program – criteria for appropriate land should be fundamentally based on biodiversity value, connectivity, and contribution to a comprehensive, adequate, representative (CAR) National Reserve System.

**Recommendation 10:** The Program design should support the principles of self-determination and free prior and informed consent (FPIC) for Australia’s First Nations peoples. Further, the Program should facilitate the contribution of Aboriginal and Torres Strait Islander organisations to 30 by 30 in ways that maximise access and management, in alignment with the UN Declaration on the Rights of Indigenous Peoples, and as articulated in Target 3 of the UN Convention on Biological Diversity’s Global Biodiversity Framework<sup>3</sup>.

**Recommendation 11:** The Commonwealth should explicitly clarify whether projects under the Australian Carbon Credit Unit (ACCU) Scheme or Nature Repair Market that may be subsequently undertaken on land acquired under the Program would, or would not, be expected to fall foul of ‘additionality’ requirements in those markets; to the extent it is legally possible, such projects should be allowed.

**Recommendation 12:** The Department should convene a roundtable with ALCA, relevant ALCA member organisations, and other potential participants in the strategic property purchases component of the Australian Bushland Program, to discuss how the program can be designed to maximise our collective opportunity to deliver 30 by 30 on land in Australia.

<sup>2</sup> Page 14, ‘Principle 7 – Protected Area Consideration’;

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

<sup>3</sup> <https://www.cbd.int/article/cop15-final-text-kunming-montreal-gbf-221222>

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Thank you again for the opportunity to provide a response to the RFI. ALCA and our member organisations look forward to assisting with the development of program that delivers effectively for the future of Australian nature, and on our collective national and global commitments to protecting 30% of Australia's land for nature by 2030.

If you have questions regarding this submission, please do not hesitate to contact ALCA via [michael@alca.org.au](mailto:michael@alca.org.au) (Mr Michael Cornish, Policy Lead).

Yours sincerely,



**Dr Jody Gunn**

**CEO**

**Australian Land Conservation Alliance**

## 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.