



Australian Land  
Conservation Alliance

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20 March 2026

Dear Koala Management Team,

**RE: Submission on the South East Queensland Koala Conservation Strategy 2026-2036**

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to make a submission to the Queensland Department of the Environment, Tourism, Science and Innovation (DETSI) consultation on the development of a South East Queensland (SEQ) Koala Conservation Strategy 2026-2036.

ALCA is Australia's peak body that 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.

ALCA is happy for our submission to be published.

## Summary

As per the Commonwealth's most recent State of Environment Report, "[p]rotected areas are widely considered the most effective way to protect biodiversity. They generally support higher species richness and abundance than comparable areas that are not protected."<sup>1</sup> Expanding the network of protected areas is the most effective way of arresting the ongoing decline of Queensland's biodiversity – **including koalas**. Protection of existing koala habitat should be the highest priority; followed by restoration with a focus on restoring connectivity between remnant habitat.

Queensland Government's reaffirmation of its commitment to its 17% protected areas target is a necessary and welcome step towards supporting the long-term protection and management of koala habitat.

There is a substantial unrealised potential for private protected areas – Nature Refuges and Special Wildlife Reserves (SWRs) – to contribute to protection and management of koala habitat, especially in landscapes dominated by privately managed land. Where a Nature Refuge may not be feasible or appropriate, private protected areas can be supplemented by *Land Title Act 1994* voluntary covenants used for conservation (which do not have protected area status but still provide a level of legal protection). They are used extensively by local governments in South East Queensland, and also by the SEQ Land For Wildlife program<sup>2</sup>.

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<sup>1</sup> *State of the Environment Report 2021*, Commonwealth Government; <https://soe.dcceew.gov.au/biodiversity/management/management-approaches> ; also: Gray CL, et. al. (2016). Local biodiversity is higher inside than outside terrestrial protected areas worldwide. *Nature Communications* 7:12306.

<sup>2</sup> <https://www.lfwseq.org.au/>

However, the same issues that limit the expansion of private protected areas more generally are acting as a handbrake on the uptake of formal protections for koala habitat.

ALCA's submission focuses on top-level, protection-focused issues – various ALCA member organisations may make submissions that address the more detailed elements of the Discussion Paper.

ALCA is happy for our submission to be published.

## Recommendations

### Recommendation 1: Progress land tax exemption

Queensland is the only remaining Australian state that levies land tax on landholders with conservation covenants (Nature Refuges, Special Wildlife Reserves, and *Land Title Act 1994* covenants). The Queensland Government has an opportunity to significantly expand the public environmental, social and economic benefits that are provided by covenants to all Queenslanders by exempting them from land tax, aligning its policy settings with the other states of Australia.

The imposition of land tax on conservation covenants is a significant impediment to new landholders becoming involved in formally protecting koala habitat and other biodiversity on their land. In Victoria, the most recent state government that introduced a land tax exemption for covenants, landholder interest in covenants increased by 135% (i.e. over double) in the year following the commencement of the exemption.

The Government should introduce a land tax exemption for land protected under Nature Refuges, *Land Title Act 1994* voluntary conservation covenants, and Special Wildlife Reserves (SWRs). Full details on the policy rationale and benefits to an exemption can be found in ALCA's Policy Note on *Queensland's opportunity to exempt conservation covenants from land tax* (available online<sup>3</sup>).

### Recommendation 2: Restart landholder grants to maintain Private Protected Areas

The Nature Refuge Landholder Grant is critical in providing support to Nature Refuge landholders to undertake projects that protect and enhance significant natural and cultural values. The last standard grant round was in 2022 – it needs to be restarted as a matter of urgency to maintain the Private Protected Areas network.

### Recommendation 3: Targeted Departmental resourcing

The private protect areas team within the Department of the Environment, Tourism, Science and Innovation (DETSI) must be provided with more staffing resources, specifically to:

- remove the current bottleneck in processing new Nature Refuges which is preventing the effective contribution of Private Protected Areas to the koala habitat; and
- scale up the programmatic support for Nature Refuge landholders – specifically, providing advice and assistance on how to more effectively manage Nature Refuges to improve koala habitat and other biodiversity.

<sup>3</sup> [https://alca.org.au/wp-content/uploads/2025/07/ALCA-Policy-Note\\_Land-Tax\\_Final-070725.pdf](https://alca.org.au/wp-content/uploads/2025/07/ALCA-Policy-Note_Land-Tax_Final-070725.pdf)

#### Recommendation 4: Partner with Land for Wildlife programs

Land For Wildlife (LFW) is a valuable entry-level national scheme that provides landholders with access to a community of practice and expert support and advice. There are LFW programs all over Australia, with the most developed program in Queensland being Land for Wildlife South East Queensland<sup>4</sup>. The State Government should seek to partner with and support the LFW programs across Queensland, with an aim to help transition LFW landholders into Nature Refuges where their properties are appropriate for the Private Protected Area network.

#### Recommendation 5: Continue the Land Restoration Fund

The Land Restoration Fund (LRF) has been a highly successful program supporting environmental outcomes on privately managed land by harnessing carbon credits.

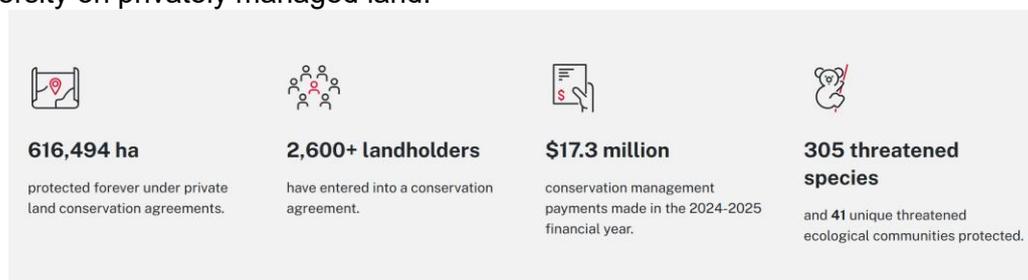
- a. The LRF program should be continued; and
- b. Wherever possible, LRF projects should seek to advance Private Protected Areas as part of the project.

#### Recommendation 6: An independent statutory conservation trust

The Queensland Government should legislate the creation of an independent statutory entity whose purpose would be to partner with private landholders wanting to permanently protect, manage and restore biodiversity across Queensland. This could be undertaken via a range of mechanisms, but predominantly through conservation covenants and could be expected to include incentive payments for landholders to target the conservation of high-value and threatened biodiversity.

Such a trust would need to be provided with sufficient capital endowment to ensure it can sustain a substantive capacity to deliver conservation (i.e. protection, management, and restoration) of Queensland nature through the return on this capital. This endowment could be provided as a once-off or built over time, such as over the Budget forward estimates. Exemplar models in other states include the Biodiversity Conservation Trust NSW<sup>5</sup> and Trust For Nature Victoria<sup>6</sup>, both of which are State Government not-for-profit statutory entities.

The recent achievements of the Biodiversity Conservation Trust NSW in driving the uptake of private protected areas have been truly transformative and act as a shining example of what is possible where there is the political will to make a serious capital investment – \$700m – in supporting landholders through in-perpetuity annual stewardship payments to protect biodiversity on privately managed land:



Source: Biodiversity Conservation Trust NSW, 2026<sup>7</sup>

<sup>4</sup> <https://www.lfwseq.org.au/>

<sup>5</sup> <https://www.bct.nsw.gov.au/>

<sup>6</sup> <https://trustfornature.org.au/>

<sup>7</sup> <https://www.bct.nsw.gov.au/private-land-conservation-outcomes>

Where appropriate, a Queensland independent statutory conservation trust could partner with existing Department resources and external partners such as the Federal Government, private sector, environmental not-for-profits and land conservancies, domestic donors and international philanthropic trusts, to further magnify its impact, including with targeted protection of koala habitat.

ALCA would be pleased to discuss further details on how such a trust could be designed and constructed, including facilitating discussions with the Biodiversity Conservation Trust NSW and Trust For Nature Victoria.

### **Recommendation 7: Council rate rebates**

A range of local councils in Queensland offer a rates rebate for land under Nature Refuges, but it is not consistently applied across the State. ALCA is aware that local council rates are raised by landholders as the biggest frustration they face, and the cost they would most like to address. Whilst more politically complex than removing land tax (see Recommendation 1 above), the same rationale applies. The Queensland Government should either reduce or remove local council rates from all conservation covenants and ensure that local councils are compensated appropriately.

### **Recommendation 8: Planning restrictions**

Planning and zoning restrictions are hampering and preventing private land conservation. The challenges are complex, ranging from unwieldy requirements in some local planning schemes, and difficulties in moving former agricultural land into ecological restoration.

For example, ALCA is aware of examples of former sugarcane or other unviable agricultural land zoned as 'rural' which prohibits ecological restoration without costly and lengthy rezoning or planning scheme amendments. Being able to diversify income streams is critically important to rural communities where income from agriculture is becoming increasingly marginal.

- a. The State Government should ensure that all Local Planning Schemes at least allow for the possibility of conservation to occur in all local government areas; and
- b. Ensure that Queensland includes land use codes relevant to Private Protected Areas in its planning system.

### **Recommendation 9: Prevent logging in new Nature Refuges**

Queensland is the only Australian jurisdiction that allows logging to occur within protected areas. Nature Refuges are for the protection of biodiversity, and their management agreements should not be formulated to accommodate private logging as this runs directly counter to their protection purpose.

However, it is recognised that there is a historical legacy in Queensland where some Nature Refuge agreements have allowed logging in certain circumstances. ALCA therefore recommends that logging be disallowed in all new Nature Refuges.

Thank you again for the opportunity to provide feedback on the development of a South East Queensland (SEQ) Koala Conservation Strategy 2026-2036.

ALCA would be happy to facilitate engagement of ecologists from across our organisational membership for a workshop on the review of Koala Habitat Map methodology and other data and mapping efforts.

**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-two member organisations 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)
- Wildlife Bank
- 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.

You can find out more about ALCA online at: [www.alca.org.au](http://www.alca.org.au).

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.