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Via online submission
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Dear Nature Repair Market Methods Team,

RE: Submission on the Enhancing Native Vegetation method design

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a submission to DCCEEW's consultation on the Enhancing Native Vegetation 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 $370 million.

Responses to discussion questions

Overarching questions:

1. Will the proposed Enhancing Native Vegetation method support the objective of restoring, enhancing and/or maintaining native vegetation in modified Australian landscapes? If not, how could it best be improved?

The method may assist in restoring, enhancing and maintaining native vegetation but needs to be delivered in tandem with stronger native vegetation clearing controls in each jurisdiction. Currently, rates of native vegetation loss are much higher than gains.

Documentation that accompanies the methodology determination should underline the potential contribution from method projects to achieving Australia's restoration commitments, '30 by 30' protection commitments, and other contributions to national and global biodiversity commitments[1].

In addition, there is also an opportunity for the assessment of a project's contribution to biodiversity persistence (*5.5*) to be refined to include a project's potential contribution to Australia's '30 by 30' protection target and National Reserve System (NRS) CAR criteria (Comprehensive, Adequate and Representative). For example, projects that help restore and protect native vegetation in underrepresented bioregions could be scored more highly than restoration actions in well-represented bioregions.

[1] As per *Australia's Strategy for Nature 2024-2030*; https://www.dcceew.gov.au/sites/default/files/documents/australias-strategy-for-nature-2024-2030.pdf; (in particular, in alignment to global Targets 2 and 3 of the *Kunming-Montreal Global Biodiversity Framework*; https://www.cbd.int/article/cop15-final-text-kunming-montreal-gbf-221222)

2. Do the proposed settings for the method appropriately balance integrity (ensuring the market recognises demonstrable biodiversity outcomes that are based on evidence) with usability for project proponents? In answering this, note that users would usually be supported in developing projects under a method through the CER's website, information products, and spatial information systems like PLANR.gov.au.

ALCA has some concerns regarding the methods outlined for ecosystem condition assessment.

The indicators chosen to measure ecosystem condition are broadly similar to existing approaches that have published benchmarks, and to other Nature Repair methods under development. However, the data collection methods for some indicators (specifically, the line intercept method) would not be adequate in a number of ecosystems where shrub and tree cover is sparse to medium density.

In addition, it would be inappropriate to apply the published benchmarks for species richness if the ENV method is applied in several states. We suggest that there should be consultation with ecologists and/or botanists assisting with each Nature Repair method development. This would help achieve a more robust and consistent approach with reasonably minor changes.

Methods outlined for threatened species activities need more consideration, and a new section is needed to explain how projects will be scored and prioritised.

Specific feedback:

3. The approaches to assessing change in ecosystem condition (section 5) and the project activities (section 6). This includes any feedback on the appropriate minimum thresholds for using M and E1 transition types.

Section 5 – Project requirements

There should be a new (sub)section which articulates how projects will be scored, as has been undertaken for threatened species.

5.2.2, Starting ecosystem condition state

More guidance could be provided.2 on how to determine eligible projects where there is no transition to a different STM condition state (Table 2), i.e., where is the public and biodiversity benefit that warrants investment above and beyond existing obligations and/or expectations?

5.2.3, Restoration target states and transition types

ALCA supports the approach of defining plausible transitions and prohibiting certain transitions to guard against unrealistic projects with inflated (and largely unattainable) biodiversity gains.

We further recommend that a starting condition score of 0.5 is required for activity areas to be eligible for the Maintenance (M) transition type[2].

Related Appendix A, Table A2, Ground cover calculations:

ALCA supports the selection of indicators for measuring ecosystem condition as appropriate and comprehensive, and in general, supports the specific methods for measuring indicators as outlined in Appendix A. However, we query the validity of averaging ground cover estimates for sub-categories (A1, A2 and A3; A1a; and A4 and A5) from very different methods (point intercept and quadrats) – essentially Step 3 as outlined in Table A2 for ground cover. We recommend using the quadrat method only for this indicator (i.e., Step 2 only) as a more robust estimate of ground cover.

[2] This is consistent with the proposed eligibility criterion in the method ALCA is leading advice on, in which maintenance of ecosystem condition is permissible for all projects.

5.5.2, Forecasting ecosystem condition and contribution to biodiversity persistence

As noted under Question 1, ALCA suggests that the contribution to biodiversity persistence approach should align more closely with '30 by 30' priorities and criteria, as outlined in Table 2 of the *National Roadmap for protecting and conserving 30% of Australia's land by 2030*[3].

Section 6 – Project activities

It would be useful to state at the outset that project activities are working towards the achievement of the three objectives defined for this method. For example, a diagram that shows the links between the objectives, the threats and then the recommended actions would be particularly useful.

ALCA suggests that this section could also be improved by requiring proponents to use a standard conservation planning framework be used as part of project development (e.g. Conservation Action Planning) to identify and prioritise threats, and to help ensure that the project design is as consistent and effective as possible.

ALCA further notes that other project activities than those listed (see: pages 33 to 37 of the Discussion Paper) may be applicable to some ecosystems, for example, ecological thinning through many regrowth woodlands, or hydrological restoration. It would be helpful to have clarification that such activities might be eligible where they help achieve the method's objectives.

6.1, Grazing management

(The response here also addresses Discussion Paper Q5b., i.e. *Are there circumstances where grazing (section 6.1) could reasonably be introduced in circumstances where it hasn't been undertaken in the 3 years prior?*)

ALCA suggests that the method should be less prescriptive about this activity, recognising that grazing guidelines will vary substantially between regions – there is published evidence to support a range of options with respect to grazing regimes within a region, rather than a 'one-size-fits-all' approach.

While in most circumstances, elimination or reduction in grazing is likely to benefit ecosystem condition, there may be circumstances in which maintenance or reintroduction of grazing may be required, irrespective of whether the site was grazed in the last 3 years, to manage biomass or control weeds – particularly in response to climatic variation – and to increase or maintain native species richness.

The need for weed control via grazing is most likely in grassy ecosystems, with targeted grazing as a proven method to improve the condition of grasslands and grassy woodlands in moderate condition[4]. Grazing reduces the influence of annual and perennial non-native grasses and can reduce rank growth of native grasses that – again – may result in lower species richness.

As a cautionary example, exclusion of grazing under 'Bush Tender' agreements in high value native grasslands in northern Victoria led to a decline in condition following above average rainfall in 2010 and 2011, with detrimental impacts on habitat quality for threatened species such as the Plains-wanderer, Hoody Scaly-foot and numerous herbaceous plants – sites that continued to be grazed sustainably maintained condition and habitat for threatened species.

ALCA also notes that sustainable grazing may include an increase in grazing pressure in the short-term, so it is important that definitions account for spatial and temporal changes to grazing and not simply assume that 'less stock is (always) better'. Further, 'total grazing pressure' including by native species and feral herbivores also needs to be considered.

[3] https://www.dcceew.gov.au/environment/land/achieving-30-by-30/national-roadmap

[4] *Land of sweeping plains: managing and restoring the native grasslands of south-eastern Australia*. Eds NSG Williams, A Marshall and JW Morgan (2015).

4. The definition of a 'suitably qualified person' who performs an important role in the method. Are there people or scenarios that should be supported in performing this role under the method, but may be excluded by the proposed definition in (section 6.3)?

ALCA supports the proposal that the definition be open to a wider interpretation, especially to support First Nations proponents.

However, the definition itself does need to be tightened – whilst it a tertiary qualification is not strictly necessary, there does need to be clear proficiency in ecology and/or botany to:

- determine relevant classifications under the Prescribed Vegetation Classification System (PVCS), identify the vegetation community on the ground, and determine appropriate Major Vegetation Groups (MVGs);
- undertake site assessments (including species identification) to determine starting condition and appropriate forecast condition; and
- advise on appropriate activities to achieve the forecast condition. This cannot be someone who has been working in a 'profession relevant to the ENV project' if that profession does not require the necessary ecological and botanical skills. Similarly, having simply 'worked as an ecologist or botanist' in the previous 3 years does not guarantee proficiency.

In conclusion, more clarity will be needed on the skills and knowledge required.

5. Should projects only need to show that activities or project outcomes are 'beyond the requirements of law' (section 6.2)?

    a. Should there be an additional requirement specifying that activities would need to go beyond what was occurring on the land over the 3-years prior to the date of the project application?

Practically, it will be difficult to determine what is beyond the requirements of the law, given the varying level of statutory obligations between jurisdictions. One approach could be to set minimum standards, as per the proposed duty of care framework in Earl et al (2010)[5].

Section 6.2. should also set out how land already being managed as protected areas (e.g. covenants, IPAs, etc.) would need to articulate the additional activities being delivered (as per the project activities wording on page 33 of the Discussion Paper).

    b. Are there circumstances where grazing (section 6.1) could reasonably be introduced in circumstances where it hasn't been undertaken in the 3 years prior?

See response to *6.1, Grazing management*, as above under Question 3.

6. How use of fire could be incorporated in the method, drawing on the options presented in section 6.4.1.

ALCA supports the adoption of Option 3, that burning is tailored to individual projects rather than trying to be too prescriptive, which would likely lead to perverse outcomes.

Further, there should be consideration of third-party verification and/or endorsement of the fire plan.

[5] *Social acceptability of a duty of care for biodiversity*, G. Earl, A. Curtis, C. Allan and S. McDonald, 2010; https://researchoutput.csu.edu.au/ws/portalfiles/portal/8780264/PostpubPID23025.pdf

7. The potential method settings for the capability to support threatened species characteristic, which covers both threatened species and threatened ecological communities.

ALCA supports the inclusion of this variable biodiversity characteristic as optional and note its alignment with Criterion 1 in the '30 by 30' priorities summary (Table 2, in the *National Roadmap for protecting and conserving 30% of Australia's land by 2030*[6]).

However, we note the need for caution in using databases such as the Protected matters Search Tool that would likely be utilised to determine starting states; if this Tool is used, there should be direction that only 'known' or 'likely' habitat is used.

The outline of the starting state assessment process for threatened species is appropriate, though noting that producing a consistent relative measure of a site's importance is complex. For example, having suitable habitat or increasing the suitability of habitat for a threatened species that is currently absent is no guarantee that the health of the species will improve over time.

Developing indicators other than those that relate to ecosystem condition is equally complicated by the fact that these may need to be species-specific or site-specific indicators. Dealing with this complexity and determining benchmark values may need to be led on a case-by-case basis by the suitably qualified person, in conjunction with respected species experts.

If multiple threatened species are present then it is likely that there would need to be indictors for each species unless there are, say, threats in common which are being used as a surrogate indicator (e.g., the cat population affecting threatened mammals and/or birds).

It may be that a risk assessment approach – i.e. likelihood and impact – could be developed to deal with the complexity of these challenges.

Further comments

Section 3.2, Alignment with the Replanting method

ALCA supports the dot-point on projects involving the enhancement and/or maintenance of remnant vegetation and that the desired changes in ecosystem condition can be subtle (also page 12). This could be addressed by allowing adaptive management practices for projects with smaller increments of change, as often the greatest improvements can occur when management activities respond to the changes seen on the ground (e.g. higher rainfall leading to erosion issues and increased weed loads), and to issues that may have not been present or predictable when project targets are set.

Further, project targets should be allowed some flexibility in timing and adaptive management practices to respond to changes in on-ground condition.

This adaptive management would likely require a process in PLANR for when mapping layers do not match on what is actually on site. Mapping of vegetation types is very valuable, however it is known that the boundaries are often not precisely accurate, and this could become a problem especially when different MVG boundaries do not reflect what occurs on site.

[6] https://www.dcceew.gov.au/environment/land/achieving-30-by-30/national-roadmap

Section 6, Project Activities

ALCA recommends that the definition of 'Enhanced pest control' is expanded to include the exclusion of pests, for example, through the use of conservation fencing (for example, feral predator-proof fencing).

Section 8.5, Commitment to Protection characteristic

ALCA supports the inclusion of this characteristic for projects that enhance condition (E1, E2 or E3 transition types) but cautions that having two methods that have the same fundamental aims (increasing protection of good quality (condition score >0.5) habitat without further enhancement) introduces confusion and unnecessary complexity into the Market. We recommend that projects that are entirely of transition type M in good quality (condition score >0.5) habitat are diverted to the Protect and Conserve method. This would simplify and streamline projects and enable a fair comparison across projects and methods.

Thank you again for the opportunity to provide feedback to the consultation on the Enhancing Native Vegetation method design. ALCA and its members look forward to opportunities to continue to engage with DCCEEW in the development of the final method.

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 $370 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.