

Nature Repair Markets  
Department of Climate Change, Energy, Environment and Water  
John Gorton Building, King Edward Terrace  
Parkes ACT 2600  
Cc: Nature Repair Methods Team  
Via email: [naturerepairmarket@dcceew.gov.au](mailto:naturerepairmarket@dcceew.gov.au)

Level 3 349 Collins Street  
Melbourne Victoria 3000  
[info@alca.org.au](mailto:info@alca.org.au)  
[www.alca.org.au](http://www.alca.org.au)  
ABN 80 637 680 310

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Dear Nature Repair Markets Team,

**RE: Submission on the draft policy settings to enable the Market to supply environmental offsets**

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to make a submission to the Department of Climate Change, Energy, the Environment and Water's (DCCEEW) consultation on the draft policy settings to enable the Nature Repair Market to supply environmental offsets.

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 23 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 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 as part of the Nature Repair Market. Noting this, we have ensured that associated confidentiality considerations have been maintained in the preparation, input and sharing of this submission. Several of our members may make their own submissions with a greater focus on specific technical details relating to offsets and/or threatened species considerations for each of the relevant issues papers.

ALCA notes the importance of offsets integrity and will be separately providing further feedback on the recently released revised draft offset integrity standards. However, where of relevance to the issues raised in this consultation, we also reflect this feedback here.

We are happy for the Department to publish this submission.

## Key recommendations

ALCA reiterates our earlier advice that if the Nature Repair Market is to be used as an offsets market – a position which we continue to oppose – then there should be a delay of offsets being included for at least 5 years to allow market design and integrity the chance to fully resolve first. However, given that the Commonwealth is proceeding with introducing offsets into the Nature Repair Market prior to allowing it to properly establish we provide key recommendations as below, with further detail (including additional, more technical recommendations) provided in the body of our submission:

- 1. Need for a robust offset integration framework (Issues Paper 1):** The critical requirement when introducing offsets into the Nature Repair Market will be ensuring that the overarching framework design and associated systems and processes are

robust, provide integrity, and minimise complexity. This includes, for example, transparent reporting and accounting processes are established to ensure that offsets generated under the Nature Repair Market are kept separate from non-offset Nature Repair Market projects; and that inter-agency communication and feedback loops are integrated appropriately.

2. **Early review of offset operation (Issues Paper 1):** An early review is undertaken of the Nature Repair Market-offset system and its operation, for example, after the first two years of offsets being 'live' in the market. This should include not just whether the offsets program is working effectively, but also its interaction with broader market integrity and participation.
3. **Appropriate security of offsets (Issues Paper 1):** Further consideration of the Commitment to Protection (CtP) variable Biodiversity Project Characteristic (characteristic) in terms of opportunities to leverage the data required under the CtP characteristic for the purposes of assessing security considerations for offsets.
4. **Limiting discretion in the Threatened Species characteristic (Issues Paper 2):** Additional detail be made available regarding the 'guardrails' that will be applied either within the details of the Threatened Species characteristic or by methods to limit the discretion of the SQP in undertaking the decisions relating to indicators, thresholds, and counterfactuals (e.g., minimum standard threshold values). These guardrails must go beyond reliance on the qualifications and experience of the SQP and will need to be carefully developed to minimise the risks raised here while avoiding unnecessary complexity.
5. **Improving the 'high confidence pathway' for Threatened Species characteristic (Issues Paper 2):** That the 'high confidence pathway' definition and requirements would benefit from several adjustments to avoid perverse outcomes and improve confidence and clarity in outcomes and manage conflict/complexity arising around state-federal species listings and offset programs.
6. **Further consideration of the operationalisation implications of the assessment of significant reversals (Issues Paper 3):** The approach for significant reversals is based on consideration of the impact on the indicators for the applicable characteristics seems broadly appropriate, however, further consideration around the specific implementation of this and amendment of the details of the circumstances may be of benefit.
7. **Clarifying the requirement for project contributions to be declared (Issues Paper 3):** While supportive of transparency around financial or in-kind contributions to projects to allow informed consideration and decisions by contributors and buyers, the rationale for including the rule should be clarified and caution should be taken around registry scope creep, inadvertent reduction in investment in this space, and resolution of the significant ambiguity in the draft rule.

## Paper 1: Policy Settings to enable the Market to supply environmental offsets

### Overarching design considerations

ALCA notes, and continues to stand by, our previous advice relating to the inclusion of offsets in the Nature Repair Market, as set out in our submission to the Senate Inquiry into the *Environment Protection Reform Bill 2025* and six related bills (November 2025)<sup>1</sup>. We previously advised that the Nature Repair Market – a voluntary market still in method design phase – should not be used as an offsets market. If the Nature Repair Market is to be used as an offsets market, then there should be a delay of offsets being included for at least 5 years to allow market design and integrity the chance to fully resolve first.

The critical requirement when introducing offsets into the Nature Repair Market will be ensuring that the overarching framework design, and the associated systems and processes, are robust, provide integrity, and minimise complexity. This is particularly important given the Nature Repair Market was not originally designed to accommodate offsets – there will be additional challenges required to retrofit an existing system, as opposed to designing the ideal system. Political timelines should not take precedence over confidence in the offset architecture, neither should pushing forward to operationalise the approach within a method/s before the architecture has been properly tested.

It is not currently possible to provide feedback on the holistic operation of offsets in the Nature Repair Market because not all elements are finalised and/or available. For example, the offsets integrity standards are not yet finalised, the operation of the Threatened Species characteristic within a method has not been made available, and more broadly the Nature Repair Market itself is still very new and with considerable uncertainty around its operation (including supply and demand). Further consultation may be needed as these elements are finalised. For clarity, further (statutory or other) consultation on the Enhancing Native Vegetation (ENV) method must allow feedback on the inclusion and interaction with offsets requirements.

Noting the above constraint, examples of system framework and design considerations that are not explicitly covered in DCCEEW's issues papers are as follows.

#### a) Reporting and accounting

The processes to enable transparent reporting and accounting processes are not explicitly covered in the issues papers. Ensuring that offsets generated under the Nature Repair Market are kept separate from non-offset Nature Repair Market projects will be required. This is because the outcome of offset projects can only partially be allocated to a 'net positive' (as the remainder will be to offset development, hence neutral outcome). As such, reporting will need to be appropriately differentiated and attributed. Further consideration as to exactly how to calculate the 'positive' element of a project may also be needed.

#### b) Stacking and layering with other projects

Further clarification is also needed on 'layering' of offset projects under the Nature Repair Market. Issues Paper 1 is clear that Nature Repair Market projects that are used for offsets cannot be stacked with ACCU projects, due to the additionality requirements of the ACCU

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<sup>1</sup> <https://www.alca.org.au/news-insights/article/submission-to-senate-inquiry-in-environmental-protection-reform-bill-and-six-related-bills>

scheme. However, it is silent on whether they can be layered with other Nature Repair Market projects if they meet additionality (and other) requirements. This should be clarified.

In terms of stacking with ACCU projects, ALCA supports the additionality principles and requirements under both markets. However, further consideration of the blanket exclusion of stacking offsets with ACCU projects may be needed to explore whether exceptions to this are possible, while still meeting additionality considerations. For example, with respect to the timing/sequencing of these projects.

In terms of framework design, it will be important to ensure that roles of the National EPA and the Clean Energy Regulator are clearly established and defined, and that inter-agency communication and feedback loops are integrated. For example, if biodiversity certificates generated under the Nature Repair Market are to be used as offsets, they need to be extinguished/retired once used. Currently there is no mechanism to do this, and NEPA's role (approving offsets) and CER's role (overseeing Nature Repair Market rules) are disconnected. The risk is that an offset can be used more than once. This may require further amendments to the Nature Repair Market legislation to facilitate this.

### **c) Market integrity and early review**

It will be particularly important to ensure that the integrity of the nascent Nature Repair Market is not negatively impacted by the integrity issues that have long been associated with offsets. Noting that the Nature Repair Market is still in its early, developmental phase, and that offsets are also going through significant change (e.g., EBPC Act reforms), ALCA recommends an early review of the Nature Repair Market-offset system and its operation (for example, after the first two years). This should include not just whether the offsets program is working effectively, but also its interaction with market integrity and participation.

### **d) Differences in EPBC Offset and Nature Repair Market scheme requirements**

ALCA understands that, going forward, developers in need of an offset will have three options: undertake the offset themselves, buy an offset from the Nature Repair Market (or other scheme), or pay the Restoration Contributions Holder to find an offset on their behalf. It can reasonably be assumed that developers will look for the cheapest, easiest offsets for their needs. If offsets under the Nature Repair Market come with additional eligibility or other requirements (and hence additional cost), this will likely be a disincentive for buyers, who would then look to the other options for their offsets. This would negate the primary reason for introducing offsets into the Nature Repair Market (i.e., to increase offset supply) and poses a real risk to the value – or need – for their inclusion. ALCA recommends that this issue is given specific consideration.

### **e) Implications of including state-listed threatened species and TECs**

The draft Threatened Species characteristic proposes to include both federal and state-listed threatened species and Threatened Ecological Communities (TECs). For jurisdictions like Victoria where there is no state-based offset program relating to Victorian listed threatened taxa or communities, this suggests that projects focused on Victorian-listed species that are not also listed at the federal level will not be eligible for high-confidence pathway offsets (they will only be eligible for the voluntary, high confidence pathway projects). Clarification of this will be needed, as will other similar considerations relating to eligibility differences between offsets and nature repair programs. (See also our feedback in Issues Paper 2 - Consideration of state versus federally listed threatened species and TECs.)

## Security of offsets – implications for the Commitment to Protection characteristic

Issues Paper 2 identifies the Threatened Species characteristic as the key market element for incorporation of offsets into the Nature Repair Market. Based on the current architecture of the Nature Repair Market, ALCA considers this to be a reasonable and appropriate approach, as most offsets in Australia are for threatened species and threatened ecological communities (TECs). (We also note that the complexity of the characteristics, and their interaction with methods more generally has resulted in confusion and uncertainty among stakeholders. Adding the offsets element to the Threatened Species characteristic comes with the risk of exacerbating this.) However, the issues papers do not contain detail on offset requirements relating to security.

The draft offset integrity standards outline eight principles, of which one is related to security of the offset, namely that 'offset activities are committed and the offsets site is protected and managed to prevent its loss and degradation', and that secure protection is required via suitable mechanisms to ensure that the offset activity will be delivered and, if relevant, maintained for the duration of the impact. In ALCA's earlier submission on the draft standard for environmental offsets, we recommended:

- that permanent impacts should be offset by permanent protection, including long-term effective management. Further, the maintenance period for offset activities with permanent impacts should at least be 99 years to align with National Reserve System standards.
- that it would be helpful for the standard to clarify that secure protection can – and should – include protected areas, as per the National Reserve System Strategy (i.e. public, private, and Indigenous protected areas). This is not only because of the importance of the National Reserve System to biodiversity conservation in Australia, but also because of the quality and length of legal security they bring over a wide range of land tenures.

ALCA understands the draft CtP characteristic will consider the legal or other effective protection of project lands and may include indicators that assess and secure the security and duration of this protection. We recommend further consideration of the CtP characteristic in terms of opportunities to leverage the data required under CtP for the purposes of assessing security considerations for offsets. Further to this, the Protect and Conserve method (currently under development) may also have a role in this space, as it is proposed to include additional requirements relating to the level of protection of project lands.

We also suggest that reliance only on the security afforded by the Nature Repair Market (e.g., permanence periods and compliance requirements) may not be sufficient for offset security requirements. Additional security measures should be used for offsets, particularly noting the uncertainty surrounding security of project outcomes as a result of the (inevitable) transfer of project lands over long permanence periods. (Note we differentiate the security of the 'outcome' as compared to the security of the investment in the outcome which may be covered by civil penalties, etcetera.)

## Paper 2: Supporting threatened species and threatened ecological communities in Nature Repair Market projects

As noted above, ALCA generally supports the approach of utilising the Threatened Species characteristic to enable offsets projects under the Nature Repair Market. We also recognise the inherent challenge and complexity in developing a characteristic that must: 1) work across all eligible methods, across all jurisdictions, and for all listed species and communities; and 2) balance this complexity and integrity with simplicity to ensure proponents and buyers can readily participate. On this basis, we appreciate the way in which the draft characteristic has attempted to balance these considerations.

That said, we have identified several areas that we suggest would benefit from further consideration and/or amendment to reduce risks and increase integrity.

### Issues with proposed approach for setting indicators, thresholds, and counterfactuals

The indicators, their thresholds, and associated counterfactuals are absolutely critical to defining and monitoring project outcomes and rewarding achievement via certificate issuance. These are complex concepts and are best developed utilising multiple lines of evidence and review by relevant threatened species experts to verify and provide confidence. Getting one or all these wrong will impact both the conservation outcomes and the integrity of the Nature Repair Market.

The paper proposes that, 'due to the bespoke nature of threatened species and Market projects', project proponents via the Suitably Qualified Person (SQP) would identify appropriate indicators, their associated thresholds, as well as the counterfactual for each indicator. **ALCA has significant concerns with this approach.**

Designing the Threatened Species characteristic such that there is heavy reliance on the SQP – without further verification or review – to make these critical decisions is risky, noting that method are also likely to have high requirements that sit with SQPs, and the Threatened Species characteristic further compounds this vulnerability.

We are aware that section 18.3(b) of the *Biodiversity Assessment Instrument* allows for project proponents to determine the threshold value for each indicator for a characteristic for the project, other than a culturally significant entity. However, we suggest it is inappropriate – and potentially a conflict of interest – for a proponent to identify thresholds for indicators. That is, it would be inappropriate for a proponent to advise the Regulator as to when the Regulator should be satisfied when the proponent is likely to achieve the forecast value. This would incentivise the proponent setting thresholds lower than they should be, to reduce responsibility, and to reduce the time for issuance of certificate. There needs to be strict guardrails placed around this process to ensure proponent discretion is minimised.

Further, if every project under every method has a different set of indicators, this may impact or reduce the ability to consistently compare projects, which is a key purpose of the characteristics.

Counterfactuals are a key part of Nature Repair Market projects as they enable the calculation of project benefits – obviously also a key component of offsets. The approach set out in the

TS characteristic appears to be significantly different than that used for other characteristics, and with significantly more discretion. This may influence how proponents and buyers interact with projects in the Nature Repair Market and may also impact the credibility and comparison of projects. Further detail on counterfactuals for the Threatened Species characteristic is needed. This should include clarification as to whether all counterfactual options will be allowed (increasing, static, declining), or if these will be limited either by the characteristic and/or the relevant methods. Similarly, further detail regarding how consistency and accuracy in terms of the approach for determining the counterfactual will be ensured, and how risk/uncertainty will be managed.

ALCA suggests the following options to resolve or mitigate these risks:

- Further detail should be made available regarding the ‘guardrails’ that will be applied either within the details of the Threatened Species characteristic or by methods to limit the discretion of the SQP in undertaking the decisions relating to indicators, thresholds, and counterfactuals (e.g., minimum standard threshold values). These guardrails must go beyond reliance on the qualifications and experience of the SQP, and will need to be carefully developed to minimise the risks raised here while avoiding unnecessary complexity.
- Additional national or other applicable data to be utilised or invested in, to enable the development of tools to reduce reliance on SQP decision-making.
- The Threatened Species characteristic (and/or methods which enable this characteristic) could specify a list of generic indicators under each of the indicator themes (habitat condition and/or threat management) for proponents to select from, to reduce risk of inappropriate indicators and improve consistency between methods.
- Methods must draw on Recovery Plans and/or Conservation Advice for relevant species (where available) to identify indicators and management actions. Only high priority actions that are relevant to the project location and are achievable within the project setting and timeframes should be allowed.
  - Where Recovery Plans or Conservation Advice for a species/TEC are not available, the government should invest in developing these as a priority.
- Requiring review and endorsement of the indicators, thresholds, counterfactuals by the Clean Energy Regulator or another relevant third party may also be required.

### **Threatened Species characteristic – other details**

In addition to our overarching concerns with the approach to setting indicators, thresholds and counterfactuals (above), we offer the following more detailed advice regarding specific elements of the draft Threatened Species characteristic.

#### **a) Using ‘Listing Status for each Species’ as a Scoring Factor**

The listing status for each species is currently proposed to be included as a scoring factor for the Threatened Species characteristic, on the assumption that the status stays the same over the life of the project and/or because project activities cannot result in a predictable change in the status. While ALCA agrees this to be generally the case, there may be instances in which the project is good enough it could alter the status of a threatened species, especially for small range endemics.

Given this is generally the exception, and it may be difficult to predict in advance, this could instead be something that can be added to the register if there is a compelling case that the project has achieved it. Further consideration may be needed, as this may be complex to validate in reality.

### **b) Potential benefit pathway – balance of complexity versus benefit**

While we acknowledge the rationale for including the potential benefit pathway (i.e. to provide a lower confidence, lower effort option to flag potential outcomes for threatened species as a result of the project). However, it adds complexity, by design it has lower confidence, and doesn't add to the TS characteristic score (or in turn the associated project certificate).

We recommend further consideration as to the relative benefit of including what is essentially a lower confidence approach, versus the benefits in removing this option to increase simplicity and focus focusing on high confidence/high integrity outcomes only.

### **c) High confidence pathway – definition/requirements**

We note the approach for high confidence projects, namely that there must be high confidence in species presence and that the project activities will deliver a measurable and attributable benefit to that species, may present a barrier to projects on species which are not well understood, which may further compound this lack of data. Balancing this with further investment by government in species that are lacking key information about their presence and/or management requirements would help resolve this.

We further propose that the criteria for high confidence projects includes allowance for well-designed species reintroduction programmes. Such projects would be ineligible if it was a strict requirement that the species was present at the site prior to the project. One approach to address this would be for the policy to adopt the language in Fig. 1 of the consultation paper “...*the species does occur in the project area or would be likely or intended to occur in the project area as a result of project activities*”.

Consideration of whether a specified timeframe should be included in the definition and/or guidance around high confidence in species presence. The current approach implies that it requires high confidence the species will be present in the project area *at some point in the future*. Specifying a timeframe for this, e.g., ‘within the project period’, may increase confidence and integrity of the threatened species outcomes.

We acknowledge the rationale for not mandating monitoring of the threatened species for a project (i.e., that presence/abundance may be impacted by factors outside of the proponent's control). However, we suggest that for high confidence pathway projects, monitoring of the threatened species should be mandatory as part of reporting (but not required for issuance of certificate for the reasons above). This would provide important information regarding the impact of these projects (and hence the method and offset), and information more broadly relevant to informing the knowledge and management of the species going forward.

Finally, we note that if the ‘green tick’ approach is utilised for species presence/absence and abundance, further detail and guardrails are included to ensure this option is used with appropriate rigour and transparency and avoids greenwashing concerns.

### **d) Threshold versus forecast values for each indicator**

Under the Nature Repair Market, certificates can be applied for once threshold values have been reached for all indicators relevant to a project. However, we understand that it is for each

method to identify what, if any, monitoring and compliance relating to whether the project actually achieves its forecast scores for each indicator within the permanence period. If this is the case, this is an issue for the market design and may be more so for offset projects under the Nature Repair Market, where the calculation of net positive gain will need to account for what the project has been designed to achieve, and what it achieves in reality. Using the forecast value may not be appropriate for the reason above, depending on individual method requirements.

#### **e) Consideration of state versus federally listed threatened species and TECs**

While noting that detail is not provided in the issues papers regarding how state listed versus federally listed species and TECs are scored under the Threatened Species characteristic, we suggest that further consideration given to issues arising in this regard, including:

- the relative priority of state versus federal listings, and how a different listing status for the same species at the state/federal level is dealt with;
- how differences in data availability across jurisdictions are managed; and
- how biases based on edge of range are considered for state listed species etc.

#### **f) Ensuring no additional burden on non-offset Threatened Species projects**

The finalisation of the Threatened Species characteristic should ensure that additional, non-critical project requirements are not required of proponents that are not allowing/eligible for an offset project. This aligns with the overall market intent of simplicity and removing barriers to participation.

#### **g) Characteristic versus method determining Threatened Species actions**

Finally, ALCA is interested in better understanding how the Threatened Species characteristic will be embedded in different methods. In particular, whether the intent is that each method will specify the eligible activities for projects under the method, of which some of these will be relevant to threatened species outcomes. Or in contrast, whether the intent is that additional activities will be added to the project on top of method activities specifically for the Threatened Species characteristic (the draft characteristic implies this); in which case, the characteristic would seem to be operating more like a method in its own right. Further consideration of the implications of either option would be useful.

## Paper 3: Rules to support Market integrity and administration

### Significant reversals

ALCA generally supports the approach that a significant reversal is based on consideration of the impact on the indicators for the applicable variable Biodiversity Project Characteristics, and agree that anchoring the reversal test in these indicators ensures the approach is objective, transparent and directly linked to project outcomes. Similarly, we also generally support the prescribed circumstances for significant reversals, on the basis that all three circumstances must be met for this to constitute a significant reversal (assumed but not explicit in the issues paper).

That said, the following amendments or suggestions would improve these.

The first circumstance, 'one or more indicators for an applicable Characteristic has fallen below its threshold value' is quite a low bar and may pick up a lot of projects that are simply experiencing a temporary, natural dip in a single indicator. This would then create unnecessary administration as it would trigger further consideration of the risk of significant reversal. This may be particularly relevant to the Ecosystem Condition characteristic, which is generally likely to have a suite of several indicators which may naturally fluctuate to some degree over time. Similarly, for projects where the threshold value is the same or very close to the starting state (i.e., for projects that are maintaining the value of an indicator/characteristic).

Building on this concept, Issues Paper 3 refers to fire and drought as potential causes of significant reversals. Fire, drought, and floods etc are (at least to some extent) part and parcel of ecological condition. ALCA understands that the State and Transition models which underpin the Nature Repair Market are supposed to include details of ecological condition in various "states" of endogenous disturbance, and this is one of their great strengths. However, significant reversals would still be possible from exogenous disturbance, such as invasions, disease, extreme climatic events and management failures. So, the challenge for significant reversal thresholds/conditions will be to pick up the changes that go beyond natural fluctuations, events, and expressions of this, to those that are exogenous, significant in nature, and require additional undertakings by the proponent. The current conditions for significant reversal may require further consideration and revision to ensure this.

Allowing the rules to detail the principles for each consideration, with further details provided within each method, may allow more nuance. The methods could then consider aspects such as extending the timeframe at which this applies (e.g., one or more indicators has fallen below its threshold value for [e.g.,] two consecutive reporting periods), or allowing more flexibility regarding the number or type of indicators that triggers consideration of significant reversal may be needed. Inclusion of the concept of ensuring indicators are managed within a 'range of permissible values' as part of this circumstance may also be relevant here, however, further consideration is needed on this and/or other potential solutions.

The third circumstance, that 'the CER has not extended the project's permanence period after the reversal', should be amended to 'the CER cannot extend the project's permanence period...' as this would better align with the policy intent that a relinquishment notice is a key integrity safeguard intended to be used only as an option of last resort.

Further consideration of the monitoring and reporting requirements as a result of this approach is needed, to ensure that any additional reporting is minimised, noting the need to keep project burden for proponents as low as possible.

### **Test for certificate equivalence requirements**

While the proposed criteria seem generally appropriate, the approach presumes that there is a supply of equivalent certificates available in the Nature Repair Market, which in reality, and particularly in the short-term, may be unlikely. This means that the compliance approach will instead rely heavily on civil penalties, which is undesirable for a nature positive perspective.

In addition, further consideration is needed to ensure there is an equitable allocation of risk between proponent, the SQP, the project developer/service delivery provider (if applicable), and the buyer in the event of significant reversal.

### **Recording contributions to Market projects on the Biodiversity Market Register**

ALCA is generally supportive of transparency around financial or in-kind contributions to projects, such as is proposed under the new rule in this regard. However, the rationale for including this rule should be clarified, noting that we understand that contributions to a project (after project registration, not before registration, as this would likely impact on additionality requirements) are not currently prohibited or regulated in any way under the Nature Repair Market legislation, and as such may represent registry scope creep. Clarifying the intent will help to determine whether a blanket requirement in the rules is the most appropriate approach.

We suggest the key element will be to ensure that entities that wish to contribute to a project are at the very least are aware that the activities they are investing in are part of a Nature Repair Market before they invest, so they can make an informed decision as to whether they invest (in the knowledge that the proponent may also be able to gain financial return through selling the certificate).

Transparency around project contributions may also be useful to help better understand price discovery of project certificates. For example, a project that has received substantial contributions may be able to sell a project at lower price than a project that has received no contributions and requires a higher certificate price in order to at least recover costs.

However, we are aware there are concerns that this approach could inadvertently reduce or undermine investment in this space, and that addressing the significant ambiguity in the draft rule would undoubtedly create additional complexity and burden on participants to resolve.

## Closing Comments

Thank you again for the opportunity to provide feedback on the draft policy settings to enable the Market to supply environmental offsets.

**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-three 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
- Rainforest Rescue
- 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.

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.