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The Hon Jaclyn Symes MP
Treasurer of Victoria
Office of the Treasurer
1 Treasury Place
Melbourne, Victoria, 3002
Via email: treasurer@dtf.vic.gov.au
cc: Minister Steve Dimopoulos MP, c/o: reception.dimopoulos@ecodev.vic.gov.au

7 February 2025

FY2025-26 Victorian pre-Budget Submission, Australian Land Conservation Alliance

Dear Treasurer Symes,

My name is Dr Jody Gunn and I write to you as the CEO of the Australian Land Conservation Alliance (ALCA), Australia's peak body for private land conservation organisations, representing organisations that work to conserve, manage, and restore nature on privately managed land. We are growing the impact, capacity, and influence of private land conservation to achieve a healthy and resilient Australia.

Biodiversity loss and climate change are two of our planet's biggest challenges. Whilst making the urgent and necessary transition to renewable energy, the opportunity to shape the future outcomes for biodiversity – upon which approximately half of the Australian economy is either moderately or highly dependent[1] – is unparalleled.

Approximately 60% of Australian land is privately managed. Delivering landscape-scale outcomes for biodiversity requires the integration of conservation upon private land, which includes productive landscapes where private land ownership dominates.

ALCA's nineteen member organisations engage in on-ground conservation at scale, either through direct ownership and management of protected areas, and/or by working with landholders – including Aboriginal and Torres Strait Islander peoples, farmers, and businesses – to protect, manage and restore their land for biodiversity.

ALCA's five recommendations are:

> **Recommendation 1**: That the Victorian Government adopt the four recommendations from the *Protecting Australia's Nature: Pathways to protecting 30 per cent of land by 2030*[2] report to significantly lift its contribution to the collective national 30 by 30 commitment, especially Recommendation 1: investing in a land acquisition fund for the purchase of land of high biodiversity importance to create new protected areas.

[1] Australian Conservation Foundation, The nature-based economy: How Australia's prosperity depends on nature, September 2022; https://www.acf.org.au/how-australias-prosperity-depends-on-nature

[2] https://alca.org.au/protecting-australias-nature-pathways-to-protecting-30-of-land-by-2030/

Recommendation 2: That the Victorian Government take up the opportunity to shape Victoria's future outcomes for biodiversity and strengthen its contribution towards protected areas for conservation as part the transition of the state forest estate out of native logging. ALCA refers you to our submission to the Government on the Future of Victoria's State Forests[3].

Recommendation 3: That the Victorian Government commit to restore and protect Victoria's nature by partnering with the private and philanthropic sector as a significant investor. Increased funding from the Victorian Government, alongside improved use of existing funding sources, can leverage further investment from private and philanthropic sectors.

Recommendation 4: Following Queensland's lead, legislate and resource enhanced protection conservation covenants to drive new, additional philanthropic investment into Victorian nature.

Recommendation 5: Release the Government's response to the Inquiry into Ecosystem Decline alongside appropriate levels of fundings to reverse the decline in Victoria's biodiversity

Context: the accelerating nature crisis

According to the World Economic Forum:

> *Human societies and economies rely on biodiversity in fundamental ways. …over half the world's total GDP – is moderately or highly dependent on nature and its services.*"[4]

Using the World Economic Forum's methodology, **approximately half of Australia's GDP has a moderate to very high dependence on nature**[5].

The Victorian Government recognises the impacts of biodiversity loss with biodiversity a declared State Significant Risk where it is noted that "*there is a risk that a critical loss in biodiversity will be irreversible and have significant negative impacts on community wellbeing, liveability, and the economy"*[6]. Whilst the $609 million invested into biodiversity and the environment by Labor governments since 2014 is welcome it is insufficient to arrest the decline in biodiversity. Indeed, the urgency to save Victoria's nature from further decline has not abated – it has accelerated.

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[3] https://alca.org.au/wp-content/uploads/2025/01/20242412-ALCA-submission-The-future-of-Victorias-state-forests_web.pdf
[4] World Economic Forum, *Nature Risk Rising: Why the Crisis Engulfing Nature Matters for Business and the Economy*, January 2020; https://www.weforum.org/reports/the-global-risks-report-2020
[5] Australian Conservation Foundation, *The nature-based economy: How Australia's prosperity depends on nature*, September 2022; https://www.acf.org.au/how-australias-prosperity-depends-on-nature
[6] Victorian Auditor-General's Office, Managing State-significant Risks, June 2024. https://www.audit.vic.gov.au/sites/default/files/2024-06/20240627-Managing-State-significant-Risks.pdf

Victoria has a proud history of leadership on environmental matters. Landcare was started in Victoria with strong leadership from the former Premier, Joan Kirner, as Minister for Conservation, Forests and Lands. Victoria was one of the first jurisdictions in the world to legislate a net-zero emissions target.

This budget presents an important opportunity to leave a positive legacy to the next generation by making a serious investment in Victoria's nature; and recognising the important role that private land conservation plays in achieving outcomes for our environment and our communities.

Contributing to 30 by 30

Australia's network of protected areas for conservation – the National Reserve System – is the cornerstone of our national efforts to protect terrestrial biodiversity.

It stands as Australia's commitment to future generations that land and inland waters vital to the survival of our unique native species, ecosystems and associated cultural values will be protected in perpetuity. Billions of dollars in economic activity and many thousands of jobs also depends on our natural environment. However, Australia is facing one of the highest species extinction rates in the world and the state of our environment remains on a consistent downward trend.

As part of efforts to meet this challenge, Australia has signed the Global Biodiversity Framework (GBF) under the United Nations Convention on Biological Diversity and has committed to action on Target 3 by protecting at least 30 per cent of our lands and oceans for conservation by 2030 ('30 by 30').

At the October 2022 Environment Ministers Meeting, the Commonwealth, State and Territory governments committed "*to work collectively to achieve a national target to protect and conserve 30% of Australia's landmass and 30% of Australia's marine areas by 2030*"[7].

Victoria is the jurisdiction with the third lowest level of protected areas on land (only 17.6% of the State). Pew Charitable Trusts, The Nature Conservancy, WWF-Australia, and ALCA have collaborated on a seminal report, *Protecting Australia's Nature: Pathways to protecting 30 per cent of land by 2030*[8], which details four major pathways available to Australian governments to achieve its 30 by 30 commitments.

> **Recommendation 1**: That the Victorian Government adopt the four recommendations from the *Protecting Australia's Nature: Pathways to protecting 30 per cent of land by 2030* report to significantly lift its contribution to the collective national 30 by 30 commitment, especially Recommendation 1: investing in a land acquisition fund for the purchase of land of high biodiversity importance to create new protected areas.

[7] https://www.dcceew.gov.au/sites/default/files/documents/emm-communique-21-oct-2022.pdf
[8] See: https://alca.org.au/wp-content/uploads/2023/11/Report3030_FINAL_web.pdf

Recommendation 2: That the Victorian Government take up the opportunity to shape Victoria's future outcomes for biodiversity and strengthen its contribution towards protected areas for conservation as part the transition of state forest estate out of native logging. ALCA refers you to our submission on the Future of Victoria's State Forests and in particular:

a) That the Victorian Government contemplate the creation of new National Parks in the transition of Victoria's state forest estate, on the basis that not to do so would be bad policy, and also incompatible with the Government's longstanding, cornerstone environmental policy, Protecting Victoria's Environment – Biodiversity 2037[9].

b) That the protected area estate in Victoria's state forests be expanded to help meet its state, national and international obligations. If this is not done with National Parks, then other suitable protected area categories could include nature conservation reserves and conservation parks.

c) That the Victorian Government notes that protected areas are demonstrably a major driver of regional tourism and associated economic activity[10]. Compatible nature-based recreation is a significant focus for National Parks.

Partnering to invest in nature

The Victorian Government's current levels of investment in nature, whilst welcome, are currently not sufficient to meet the level of the challenge to put Victoria on a path to nature positive. The Victorian Government should consider new funding for nature alongside better targeting of existing funding sources for nature including the use of the Municipal and Industrial Waste Levy and the Parks and Recreation Trust Account. In addition, the Victorian Government should consider how it can utilise Green Bonds to increase funding for nature. The Victorian Government demonstrated leadership when it issued its first Sustainability Bond in 2021 though there are currently no funds raised to support projects aligned to the Green Project Category "Environmentally sustainable management of living natural resources and land use"[11].

Recommendation 3: That the Victorian Government commit to restore and protect Victoria's nature by partnering with the private and philanthropic sector as a significant investor. Increased funding from the Victorian Government, alongside improved use of existing funding sources such as Municipal and Industrial Waste Levy (MIWL), and Parks and Recreation Charge (PRTA), specifically targeted at private land conservation, can leverage further investment from private and philanthropic sectors.

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[9] https://www.environment.vic.gov.au/__data/assets/pdf_file/0022/51259/Protecting-Victorias Environment-Biodiversity-2037.pdf

[10] https://www.tra.gov.au/content/dam/austrade-assets/global/wip/tra/documents/tra-domestic-visitor-profiles-national-parks.pdf

[11] See: https://www.tcv.vic.gov.au/images/TCV_Sustainability_Bond/TCV_Sustainability_Bond_Framework.pdf

This should include:

- **a)** A significant allocation of funding towards private land conservation consistent with Recommendation 1 above.
- **b)** The reinvigoration of the Nature Fund. The Nature Fund was a positive initiative by the Victorian Government that leveraged private and philanthropic investment to important projects for nature, with many of these projects delivered by the private land conservation sector. The Nature Fund is an investment vehicle that should be retained and scaled so the Victorian Government can partner with the private and philanthropic sector, and take advantage of any future Federal co-investment to deliver much needed conservation projects on private land. We estimate that **an annual investment by the Victorian Government of $40 million could leverage at least an additional $80 million from private and philanthropic sources**[12]. This new funding could be allocated from the additional revenue generated from the increase of around $140 million per year in the Municipal and Industrial Waste Levy (MIWL)[13]. This fund source currently supports the delivery of Protecting Biodiversity[14] and given the need to increase funding for nature in Victoria, $40 million should be allocated to the Nature Fund on an ongoing annual basis.
- **c)** The Victorian Government should investigate how the Nature Fund could be utilised to support projects through the emerging Nature Repair Market and thus further establish Victoria as a leader in environmental action.
- **d)** Invest in transferring the Land for Wildlife program from DEECA to a suitable private land conservation partner to allow the program to be reinvigorated and to thrive through establishing partnerships with philanthropic organisations and individuals. Land for Wildlife is a voluntary wildlife conservation program which acknowledges and recognises private landowners who are managing and or restoring habitat for wildlife on their property. The program currently supports over 5,000 properties across 536,000 hectares of private land in Victoria. In Tasmania, Land for Wildlife was transferred from the Tasmanian Government to ALCA member the Tasmanian Land Conservancy (TLC). This has enabled the program to thrive as the TLC has been able to source philanthropic funding to support its growth.
- **e)** Increased and continued funding for the Landcare Facilitator Program (VLFP), consistent with requests from the Landcare sector, to support the continued work of Landcare Facilitators and Landcare Regional Coordinators across the state. This program which as a depth of support across the Victorian community is critical to supporting private land conservation right across Victoria and funding for it must be continued.

[12] Estimate is based on levels of co-investment from previous round of the Nature Fund: See https://www.environment.vic.gov.au/nature-fund
[13] See: Victorian Budget 2024-25 *Harmonise the waste levy with NSW and South Australia*
[14] See: Sustainability Fund, *2023-24 Sustainability Fund activities report*

f) Utilising the Parks and Recreation Trust Account (PRTA) to support private land conservation. The PRTA distributed $195 million in 2022-23 and $182 million in 2023-24[15] with a closing cash balance of $227 million. Within the boundaries of the PRTA, which is essentially greater metropolitan Melbourne, opportunities to further support private land conservation should be further considered. This should include support for the purchase of properties with significant biodiversity values that could be included as part of Victoria's contribution to 30 by 30 alongside. This should be alongside investment to support the management of existing nature reserves within metropolitan Melbourne. As per the *Water Industry Act 1994,* PRTA funds can be disbursed for the following purposes:

- Management and control of open space, parks and waterways, within the metropolitan area, for the purposes of conservation, recreation, leisure, tourism and navigation; and
- Acquisition of land by the Crown in the metropolitan area for the purpose of conservation, recreation, leisure or tourism.

Enhanced protection conservation covenants

Enhanced protection conservation covenants ('enhanced covenants') exclude extractive activities like mining from land otherwise dedicated to conservation. They are especially valuable when substantial investments are required to establish, manage, and rehabilitate environmentally and culturally significant land. They provide a level of protection required for many external parties to invest in conservation, especially major international philanthropic foundations, offering opportunities to dramatically leverage government funding for nature.

Queensland is currently the only Australian jurisdiction to offer enhanced protection conservation covenants, where they are known as Special Wildlife Reserves[16]. However, the New South Wales Government has also publicly committed to implementing enhanced covenants.

Further information on the benefits and opportunities provided by enhanced covenants can be found in ALCA's Policy Note on our website[17].

> **Recommendation 4**: Following Queensland's lead, legislate and resource enhanced protection conservation covenants to drive new, additional philanthropic investment into Victorian nature.

[15] See: https://www.deeca.vic.gov.au/our-department/parks-and-reserves-trust-account
[16] More information on Special Wildlife Reserves (SWRs) can be found online at: https://www.qld.gov.au/environment/parks/protected-areas/private/special-wildlife-reserves and by contacting the Queensland Government via swr@des.qld.gov.au
[17]See: https://alca.org.au/wp-content/uploads/2023/12/ALCA-Policy-Note-Enhanced-protection-conservation-covenants_November-2023-2.pdf

Respond to the Parliamentary Inquiry into Ecosystem Decline

The 2021 Parliamentary Inquiry into Ecosystem Decline included several recommendations that the government should consider and respond to. The inquiry includes several recommendations relevant to private land conservation that the government should consider.

Responding to this inquiry in an appropriate way, with appropriate funding, would send a clear signal that this government is serious about nature and doing all it can to mitigate its own state significant risk of '*Poor economic and environmental outcomes because of biodiversity loss*'[18].

> **Recommendation 5**: Release the Government's response to the Inquiry into Ecosystem Decline alongside appropriate levels of fundings to reverse the decline in Victoria's biodiversity.

Thank you again for the opportunity to provide the Government with a 2025-26 Pre-Budget submission, and to detail the opportunity available to the Government to partner with the private land conservation sector to deliver urgent and important outcomes for nature.

ALCA and its member organisations look forward to ongoing engagement with the Government to maximise the social, economic, and environmental benefits that can be delivered by a strong private land conservation sector.

Australian Land Conservation Alliance

[18] See: https://www.audit.vic.gov.au/sites/default/files/2024-06/20240627-Managing-State-significant-Risks.pdf

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 nineteen members are:

- Arid Recovery
- Australian Wildlife Conservancy
- Biodiversity Conservation Trust NSW
- Bush Heritage Australia
- EcoGipps
- GreenCollar
- Greening Australia
- Landcare Australia
- Nari Nari Tribal Council
- 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.