

Nature Repair Market team  
Department of Climate Change, Energy,  
the Environment and Water John Gorton Building  
Parkes ACT, 2600  
Via email: [naturerepairmarket@dcceew.gov.au](mailto:naturerepairmarket@dcceew.gov.au)

4 November 2024

Dear Nature Market Repair team,

**Re: Submission on the Ecological Knowledge System (EKS)**

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide high-level commentary on the proposed Ecological Knowledge System (EKS) for the Nature Repair Market.

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.

The land conservation efforts of ALCA's nineteen 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 \$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.

Please note that ALCA is happy for this submission to be published in full.

ALCA iterates three top-level principles to help guide the Government's contemplation of methods and other Nature Repair Market architecture, namely – and noting the tensions between them – balancing the following three objectives:

- High integrity;
- High quality; and
- Low transaction costs.

Further, in providing recommendations, ALCA notes that the Nature Repair Market is still in a nascent stage of the development, and that our views (and the views of our members) will develop further as the different elements of the market infrastructure mature.

## High-level comments

ALCA is generally supportive of the outlined approach in the EKS for maintaining information and supporting decision-making as it relates to ecosystems conservation.

We note however, that:

- The EKS is currently focussed on supporting the first method of the Nature Repair Market. A plan should be developed and communicated to provide clarity and certainty on how further methods will be supported by the EKS.
- The EKS recognises there are some instances where there is not sufficient data or information available. A plan should be developed to address data and information gaps.
- The EKS states: “*where regional STMs are not available, greater emphasis or effort may need to be placed on on-ground assessment and verification of the ecosystem state, ecosystem condition and the parameters in the transition causal chains*”. The EKS should provide further clarity on when on-ground assessment and verification will be required.
- ALCA welcomes the exploration of how First Nations data and knowledge can interact with the EKS. However, it is not clear if this framework will be delivered in time to support the first Nature Repair Market method in development<sup>1</sup>, and if not, clarity should be provided around how Indigenous knowledge will be used to support this first method.
- There is no mention of Environment Information Australia in the EKS material. Clarity should be provided regarding the relationship between the EKS and Environment Information Australia.

Thank you again for the opportunity to provide a submission on the proposed approach in the EKS.

**Australian Land Conservation Alliance**

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<sup>1</sup> See: <https://app.converlens.com/climate-au/nature-repair-committee-method-consultation>

## 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
- Nature Foundation
- Nari Nari Tribal Council
- Northern 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.