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Conservation Alliance

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Offsets Review  
Department of Environment, Tourism, Science and Innovation  
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Brisbane, QLD 4000  
Via email: [offsetsreview@detsi.qld.gov.au](mailto:offsetsreview@detsi.qld.gov.au)

6 July 2026

Dear Offsets Review team,

## **RE: Submission to the Review of Queensland's Environmental Offsets Framework**

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a submission to the Queensland Government's review of its Environmental Offsets Framework.

ALCA 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.

Together, ALCA and our members address the most pressing conservation issues across the country, by restoring endangered ecosystems, building the protected area estate, tackling invasive species, expanding private conservation finance, and deploying nature-based solutions to mitigate climate change. Collectively, ALCA's members have extensive experience in delivering and managing offsets, and we draw upon this experience in our submission. Our submission has focused on the top-level issues only.

ALCA is happy for the Government to publish this submission.

## **Recommendations**

### **The formula**

- 1. Independently review the offset formula as a matter of urgency, increasing offset payments in line with actual costs of offset delivery.**

It is well-known that the current offset formula significantly underestimates the true cost of environmental protection, management and restoration, as well as the rapid rise in cost – including opportunity cost – of land. As indicated in the Discussion Paper, significant economies of scale based on the size of an offset alone do not actually exist in practice.

**Unless the Queensland Government chooses to dramatically reduce the integrity of its environmental offsets – which ALCA strenuously recommends against – the only way to 'unlock' the Offsets Account is to adjust the offset formula to reflect real costs of delivery.**

There are a variety of reviews from other Australian jurisdictions that can be drawn upon for this review.

**The Queensland Government will know when their pricing via the formula is sufficient when most proponents start to prefer to deliver on-ground offsets rather than preferring to simply pay into the Offsets Account.**

2. Subject to the holistic findings of an independent review, include contingency margins in the offset formula (as suggested in the Discussion Paper).

### **Offsets must be 'like for like' or better**

3. Only allow 'like-for-like' or better outcomes for a protected matter. Removing like-for-like requirements altogether – or even just in certain, convenient circumstances – will only serve to ignore the reality that destroying certain types of biodiversity cannot be easily compensated for by actions elsewhere, and would only lead to further hastening the decline of Queensland's threatened species and Threatened Ecological Communities.
4. Recognising that indirect offsets can provide important contributions to the recovery of protected matters, there should still not be less restrictions on 'indirect' offsets *except where* independent scientific advice concludes that this would constitute a 'like for like or better' outcome for the protected matter.'

### **Financial settlement offsets only allowed if reasonably deliverable by Government**

5. Not accept payment into its Offsets Account (i.e. 'Financial settlement offsets') for future Government delivery of those offsets where like-for-like (or better) outcomes cannot reasonably be delivered. In practice, this means that expert scientific advice is satisfied that on-ground offsets are feasible and available *prior* to providing consent to clearance of native vegetation. Otherwise, the Government is setting itself up for failure when it accepts payment but cannot then reasonably discharge their offset obligation.

This approach will help prevent further overaccumulation of funds in the Offsets Account.

### **Financial settlement offsets as a last resort**

6. Should only allow payment into the Offsets Account in lieu of an on-ground offsets as a last resort, or, where smaller payments (only) would genuinely create greater impact as part of pooled funds instead of as standalone projects.

### **In-perpetuity protection**

7. Ensure all on-ground offsets are secured via long-term (99 years +) or in-perpetuity protection.

### **Land acquisition and effective management**

8. Ensure that that offsets delivered via the Offsets Account can include the acquisition (and contribution to acquisition) of land for conservation, whilst ensuring that there is strong integrity regarding additionality (e.g. not allowing offsetting to substitute Government budgets for acquisition of public protected areas).
9. Ensure that offsets fund effective, ongoing management of biodiversity in offset areas.

### **Legislate the mitigation hierarchy**

10. Amend the *Environmental Offsets Act 2014* and Queensland Environmental Offsets Policy to make explicit reference to the need to adhere to the mitigation hierarchy when applying for consent to clear native vegetation. This is a common approach in other State jurisdictions, as well as the proposed approach in the Federal Government's revised draft National Environmental Standard for Matters of National Environmental

Significance (MNES)<sup>1</sup>, specifically, *Principle 1—Actions appropriately apply the mitigation hierarchy*. This would more explicitly ensure that proponents are required to take all reasonable steps to reduce their impacts upon Queensland’s biodiversity and reduce the accumulation of funds in the Offset Account. In addition to the Federal approach cited above, useful exemplars have been provided below for reference –

The **International Union for Conservation of Nature (IUCN)** is the international standard setter on conservation matters. Their Policy on Biodiversity Offsets<sup>2</sup> describes the mitigation hierarchy as follows:

#### Mitigation hierarchy

The mitigation hierarchy comprises:

- a. **Avoidance:** measures taken to avoid creating impacts from the outset, such as careful spatial or temporal placement of elements of infrastructure, in order to completely avoid impacts on certain components of biodiversity. This results in a change to a ‘business as usual’ approach.
- b. **Minimisation:** measures taken to reduce the duration, intensity and / or extent of impacts that cannot be completely avoided, as far as is practically feasible.
- c. **Rehabilitation / restoration:** measures taken to rehabilitate degraded ecosystems or restore cleared ecosystems following exposure to impacts that cannot be completely avoided and / or minimised.
- d. Compensation or **Offset:** measures taken to compensate for any residual significant, adverse impacts that cannot be avoided, minimised and / or rehabilitated or restored.

The mitigation hierarchy for the **South Australian Government’s native vegetation offset scheme** within section 3(4) of the recently enacted *Biodiversity Act 2025 (SA)* is as follows:

- (4) For the purposes of this Act, a reference to the *mitigation hierarchy* is a reference to an order of priority to be applied in relation to the clearance of native plants as follows:
  - (a) *avoidance*—measures must be taken to avoid clearance of native plants;
  - (b) *minimisation*—if clearance of native plants cannot be avoided, measures must be taken to minimise the duration, intensity and extent of the impacts of the clearance on biological diversity to the fullest possible extent (whether the impact is direct, indirect or cumulative);
  - (c) *rehabilitation or restoration*—measures should be taken to rehabilitate ecosystems that have been degraded, and to restore ecosystems that have been destroyed, by the impacts of clearance of native plants that cannot be avoided or further minimised;
  - (d) *offset*—where required under this Act, any adverse impact on native plants or ecosystems that cannot be avoided or minimised must be offset by the achievement of a significant environmental benefit that outweighs that impact.

<sup>1</sup> [https://storage.googleapis.com/files-au-climate/climate-au/p/prj3c29ec6704a54d4dd6342/page/Exposure draft MNES standard legislative instrument.pdf](https://storage.googleapis.com/files-au-climate/climate-au/p/prj3c29ec6704a54d4dd6342/page/Exposure%20draft%20MNES%20standard%20legislative%20instrument.pdf); consultation webpage: <https://consult.dcceew.gov.au/national-environmental-standard-for-matters-of-national-environmental-significance-mnes>

<sup>2</sup> [https://iucn.org/sites/default/files/2022-06/iucn\\_biodiversity\\_offsets\\_policy\\_jan\\_29\\_2016\\_0.pdf](https://iucn.org/sites/default/files/2022-06/iucn_biodiversity_offsets_policy_jan_29_2016_0.pdf)

The mitigation hierarchy for the **NSW Government’s biodiversity offset scheme** is contained within section 6.3A of the *Biodiversity Conservation Act 2016* (NSW), as follows:

**6.3A Avoid, minimise and offset hierarchy**

For the purposes of the biodiversity offsets scheme, the *avoid, minimise and offset hierarchy* is the principle that avoiding, minimising and offsetting the impacts of actions on biodiversity values be approached as follows—

- (a) the proponent of the action first takes all reasonable measures to avoid the impacts of the action on biodiversity values,
- (b) after taking all reasonable measures under paragraph (a), the proponent then takes all reasonable measures to minimise the impacts that have not been avoided,
- (c) having taken the measures under paragraph (b), the proponent then takes biodiversity conservation measures under the biodiversity offsets scheme to offset or compensate for any residual impact on biodiversity values.

**Protected Areas**

- 11. Include all types of Protected Areas as a way of legally securing an offset area on land; this should include, for example, Special Wildlife Reserves, which is currently omitted this list in the Queensland Environmental Offsets Policy<sup>3</sup>.
- 12. The multiplier (i.e. loading) for *Protected Areas* should be consistent at 10x across all Protected Area types – currently they range from 5 to 10. There is no clear policy reason why different protected areas should be treated differently under the Queensland Environmental Offsets Policy Offsets Policy.

The relevant parts of the current ‘Matters data table’ from the Policy<sup>4</sup> has been reproduced below:

Category	Sub-Category	Multiplier
<i>Protected areas</i>	National park	10
<i>Protected areas</i>	National parks (scientific)	10
<i>Protected areas</i>	National parks (Aboriginal <i>land</i> )	10
<i>Protected areas</i>	National park (Torres Strait Islander <i>land</i> )	10
<i>Protected areas</i>	National park (Cape York Peninsula Aboriginal <i>land</i> )	10
<i>Protected areas</i>	Special wildlife reserves	8
<i>Protected areas</i>	Conservation parks	5
<i>Protected areas</i>	Resources reserves	5
<i>Protected areas</i>	Nature refuges	5

**Investigate structured market-based solutions to offsets**

- 13. Other State jurisdictions – most notably New South Wales – have adopted government-regulated market-based solutions which, whilst slow to mature, have helped to deliver more efficient outcomes for on-ground offsets.

Queensland should investigate the potential for market-based solutions to help deliver high integrity, efficient, in-perpetuity, on-ground offsets outcomes.

<sup>3</sup> p21-22, Queensland Environmental Offsets Policy (EPP/2015/1658, Version 1.17)

<sup>4</sup> p40, Queensland Environmental Offsets Policy (EPP/2015/1658, Version 1.17)

### **Previous reviews still relevant**

14. In addition to an independent review of the offsetting formula and the similar reviews of formulas from other jurisdictions (see: Recommendation 1, above), give regard to the findings and recommendations of the 2019 Review of Queensland's Environmental Offsets Framework<sup>5</sup>; the 2023 Native Vegetation Scientific Expert Panel Report<sup>6</sup>; the 2021 National Environmental Science Program (NESP) Guidance for estimating the benefits and costs of biodiversity offsets using expert elicitation<sup>7</sup>; and other relevant reviews.

### **Convene on-ground conservation organisations to assist with reform**

15. As noted in our introduction, ALCA's submission has focused on top-level issues. However, we are willing to help support the Department's exploration of environmental offsets reform by convening ALCA's member organisations operating in Queensland – many of which are involved in environmental offsetting, both in Queensland and interstate – to help work through specific issues related to our expertise.

ALCA and its member organisations look forward to continuing to engage with Queensland Government to progress reforms to its environmental offsetting system that delivers for business, communities, and their environment.

### **Australian Land Conservation Alliance**

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<sup>5</sup> The *Consultation and Response Report* is available online: [https://www.qld.gov.au/data/assets/pdf\\_file/0008/141020/review-qld-env-offsets-framework-report.pdf](https://www.qld.gov.au/data/assets/pdf_file/0008/141020/review-qld-env-offsets-framework-report.pdf); no doubt other documentation exists within Government.

<sup>6</sup> [https://environment.desi.qld.gov.au/data/assets/pdf\\_file/0025/324574/expert-panel-report.pdf](https://environment.desi.qld.gov.au/data/assets/pdf_file/0025/324574/expert-panel-report.pdf)

<sup>7</sup> [https://www.nespthreatenedspecies.edu.au/media/atsidzbc/5-1-guidance-for-biodiversity-report\\_v7.pdf](https://www.nespthreatenedspecies.edu.au/media/atsidzbc/5-1-guidance-for-biodiversity-report_v7.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 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 Trust
- 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 the most pressing conservation issues across the country by restoring endangered ecosystems, building the protected area estate, tackling invasive species, expanding private conservation finance, and deploying nature-based solutions to mitigate 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 spillover 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.