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Inquiry into Impact of 2025 Environment Protection Reforms
Queensland Productivity Commission
George Street QLD 4003
Via online submission portal

21 July 2026

Dear Productivity Commission,

RE: Submission to Inquiry into Impact of the 2025 Environment Protection Reforms

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to make a submission to the Queensland Productivity Commission's Inquiry into the *Impact of the Australian Government's 2025 Environment Protection Reforms*.

ALCA is Australia's peak body that represents organisations that work to conserve, steward, and restore nature on private and non-government 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.

Nature fundamentally underpins Australia's – and Queensland's – economic productivity. And yet, nature is not being taken seriously as an asset in need of serious public and private investment. Our submission outlines nature's economic importance, the accelerating decline of natural capital, and the opportunities for reform to help safeguard Queensland's nature-based productivity.

The recent *EPBC Act* (Cth) amendments provide a range of positive and negative changes to national legal protections for the environment.

Instead of focusing on the technical legislative detail of those recent amendments, ALCA has used its submission to demonstrate the economic case for increased effort and investment in protecting, managing, and restoring Queensland's nature, and that the limited additional environmental protections being afforded under the *EPBC Act* amendments should therefore be embraced rather than resisted, and should in fact be complemented by Queensland Government investment in nature to further safeguard the social and economic prosperity of its communities.

Our detailed submission is found overleaf.

Nature – a foundation of productivity – and the need for reform

Summary

- 49% of Australia's GDP is moderately or heavily reliant upon nature, and natural capital stocks are foundational to Australia's ongoing level of economic productivity and prosperity.
- However, national discussions about productivity rarely consider the impacts of the accelerating decline of Australia's nature and stock of natural capital. Historically, Commonwealth and State governments – including the Queensland Government – have failed to systematically forecast the impacts of this decline upon productivity and economic growth.
- Fundamentally, Queensland and Australia's decline in natural capital stocks can only be overcome by remedying the underinvestment in nature by business and government.
- The natural capital ('nature') investment gap is so great that structural economic reform will also be required to facilitate non-government investment in natural capital; but non-government investment should not be seen a substitute for the necessary and complementary government investment.

Why is nature so important for Queensland's productivity?

<u>Nature is essential economic infrastructure.</u>

Nature provides many quintessential examples of products – predominantly ecological services – that have positive externalities (i.e. public benefits) and are thus undersupplied by the market. Unfortunately, there are also examples where the tragedy of the commons has led to the depletion and destruction of these public benefits due to a lack of effective public regulation and public-led and coordinated investment.

The United Nations System of Environmental Economic Accounting (which "*organises and presents statistics on the environment and its relationship with the economy*"[1]) details which sectors' supply chains are most critically dependent upon nature. They include[2]:

- Cropping
- Grazing
- Forestry
- Wild fisheries
- Water supply
- Global climate regulation services (e.g. carbon sequestration)
- Local climate regulation services (e.g. urban cooling and agricultural cooling effects)
- Air filtration
- Soil and sediment retention services
- Solid waste remediation
- Water purification services
- Water flow regulation services
- Coastal protection services
- River flood mitigation services
- Nursery population and habitat services
- Recreation-related services (including tourism)
- Pollination services
- Visual amenity services
- Education, scientific and research services
- Mental health services [3]

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[1] United Nations; https://seea.un.org/content/about-seea

[2] Largely reproduced from: p154-157 (Annex 6.1), *SEEA – Ecosystem Accounting*, UN, September 2021; https://seea.un.org/sites/seea.un.org/files/documents/EA/seea_ea_white_cover_final.pdf

[3] This last item has been well-documented during the COVID-19 pandemic; see: S.M. Labib et. al., *Nature's contributions in coping with a pandemic in the 21st century: A narrative review of evidence during COVID-19*, Science of the Total Environment (Journal), 10 August 2022; https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8983608/; University of Western Australia research: J.N. Sneddon et. al, *The impact of the COVID-19 pandemic on environmental values*, May 2022, Sustainability Science (Journal); https://link.springer.com/article/10.1007/s11625-022-01151-w

Most of these goods and services provided by nature – whether as intermediate inputs or as final products – are either non-substitutable or have no close substitutes. This means that there are many supply chains that would either collapse or at least greatly struggle to adjust if our nature is not stewarded for sustainable use. Further:

> "…*sectors that have a high or very high direct dependency on nature are responsible for more than three quarters of Australia's export earnings, with resources currently accounting for 68.7% of Australia's export share and agricultural exports another 11.3%.*"[4]

The scale of productivity losses resulting from inadequate natural capital is dramatic. According to the World Economic Forum, approximately half of global GDP is either moderately or heavily reliant upon nature[5] – using the same methodology, Australia is on par with this global average, with 49% of Australia's GDP[6] – over A$1trillion – being moderately or heavily reliant upon nature. We can expect that Queensland, as the most biologically diverse state in Australia, and with a strong focus on nature-based tourism, would be more reliant than the national average.

Economics and sustainability advisory firm, Cyan Ventures, has, at length, detailed the case for investment in nature by Australian governments in its 2025 report: "*Nature Economics: Analysis of the case for Australian Government investment in nature*"[7]. As that report concludes, "Australia's nature is critical economic infrastructure"; that "[d]*espite contributing more to the economy than mining or finance, nature receives disproportionally little federal funding*"; and that "***nature spending would boost productivity growth by over 40% and is unlikely to contribute to inflation.***"

Australia faces an insurance protection gap for natural disasters, with "*catastrophe losses over the decade 2014–2023 at US$12 billion, or one-third of the estimated US$37 billion cost of natural catastrophes over that period.*"[8] The role of intact, well-protected and well-managed nature in helping to mitigate a variety of natural disasters has been well-documented[9].

As the Insurance Council of Australia concludes in their October 2024 report, *Advancing Resilient Nature Positive Insurance in Australia*:

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[4] p4, *The nature-based economy: How Australia's prosperity depends on nature*, Australian Conservation Foundation, September 2022; https://www.acf.org.au/news/how-australias-prosperity-depends-on-nature

[5] *Nature Risk Rising: Why the Crisis Engulfing Nature Matters for Business and the Economy*, World Economic Forum, https://www.weforum.org/publications/nature-risk-rising-why-the-crisis-engulfing-nature-matters-for-business-and-the-economy/

[6] As above n4.

[7] Thompson F, Chau S, Nguyen M (2025). Nature Economics: Analysis of the case for Australian Government investment in nature. Cyan Ventures and 30 by 30; https://30by30.org.au/wp-content/uploads/2025/08/30by30_Nature_Economics28Online29-compressed.pdf

[8] *Insurance Catastrophe Resilience Report 2023–24*, Insurance Council of Australia, August 2024; https://insurancecouncil.com.au/wp-content/uploads/2024/08/21100_ICA_Catastrophe-Report_Print-2024_Final-spreads.pdf; also: http://www.swissre.com/risk-knowledge/mitigating-climate-risk/natcat-protection-gap-infographic.html#/country/Australia

[9] *Nature-based solutions can help reduce the impact of natural hazards: A global analysis of NBS case studies*, Debele et. al, Science of The Total Environment, Volume 902, 2023; https://doi.org/10.1016/j.scitotenv.2023.165824; *Good practices for increasing the application of ecosystem-based adaptation and nature-based solutions for disaster risk reduction: Volume II*, 2024/SC/DRR/07, UNESCO; https://unesdoc.unesco.org/ark:/48223/pf0000391788

“*While the connection may not be immediately obvious, insurance and nature are intertwined on many fronts. Insurers underwrite and invest in industries reliant on natural resources and ecosystem services, and climate change and nature loss are exposing insurers to increased risk… There are connections between insurance and nature everywhere… Insurance companies are directly dependent on nature through their operations, and indirectly through their policyholders’ and investees’ dependencies, which directly affects the risks and returns associated with insurance policies and investment portfolios.*” [10]

Australia’s accelerating natural capital decline

However, nature-based solutions (NbS) to climate-related challenges – including escalating natural disasters – have not yet become a Federal Government priority. Government investment in NbS to-date has been minimal and incidental, with ASIC yet to even provide guidance for corporate entities who seek to voluntarily make nature-related financial risk disclosures[11]. The Queensland State Government has made modest policy improvements upon the Federal approach with its successful Land Restoration Fund that “*expand*[s] *carbon farming in the state by supporting land-sector carbon projects that deliver additional environmental, socio-economic and First Nations co-benefits.*”[12]

Indeed, Australia and Queensland’s stock of natural capital only continues to decline. As noted by the Federal Government’s own most recent State of the Environment Report (2021):

“*Overall, the state and trend of the environment of Australia are poor and deteriorating as a result of increasing pressures from climate change, habitat loss, invasive species, pollution and resource extraction… Our inability to adequately manage pressures will continue to result in species extinctions and deteriorating ecosystem condition, **which are reducing the environmental capital on which current and future economies depend**. **Social, environmental and economic impacts are already apparent.***”[13]

Nature faces chronic underinvestment from State and Federal Governments – and business – with Australia’s Federal environment budget being only 2% larger now than it was 10 years ago, despite 10 years of economic growth that averaged ≈2.4% *annually*[14]. Using the framework of analysis provided in the Commonwealth’s *State of Environment Report* (2021), the estimated Commonwealth expenditure on biodiversity was approximately $530m in the 2025 Federal Budget and $474m in the 2026

[10] *Advancing Resilient Nature Positive Insurance in Australia*, Insurance Council of Australia, October 2024; https://insurancecouncil.com.au/wp-content/uploads/2024/10/ICA_Nature-Insurance-Report.pdf
[11] Noting there is a now a legislative head of power that can regulate such nature-related disclosures in future; see: s296A, *Corporations Act 2001* (Cth); https://www.legislation.gov.au/C2004A00818/latest/text/2
[12] https://www.qld.gov.au/environment/climate/climate-change/land-restoration-fund/about/overview
[13] Overview – Key findings, *State of the Environment Report 2021*, Government of Australia, 2021; https://soe.dcceew.gov.au/overview/key-findings
[14] Question on Notice #SQ22-00066, Budget Estimates, 15 November 2022, Environment and Communications Committee, The Senate; https://www.aph.gov.au/api/qon/downloadestimatesquestions/EstimatesQuestion-CommitteeId8-EstimatesRoundId19-PortfolioId46-QuestionNumber155

Budget[15] – well less than 0.1% in each Budget. Further, Cyan Ventures concludes that Federal Government investment levels are "…*only about 30% of OECD investment levels and less than 8% of the estimated annual need*."[16]

ALCA has undertaken analysis of public (as well as private and philanthropic) expenditure on nature in its Nature Finance Tracker[17], which estimates the Queensland Governments' FY2526 nature expenditure at $103m, a mere 0.1% (tenth of a percent) of the total Queensland budget expenditure of $100bn in FY2526.

Compounding this further, Federal nature negative Government subsidies – subsidies that actively support activities that significantly harm nature and our natural capital stocks – are estimated at $26.3 billion[18] – 4% of the Federal Budget – approximately 50 times the Commonwealth's biodiversity (i.e. nature positive) expenditure. ALCA has not undertaken analysis of subsidies at the Queensland Government level.

The Queensland Government can address the investment gap by:

1. When investing in nature, leveraging that funding by partnering with environmental charities, major philanthropic foundations, and – where it aligns with the public interest – private enterprise.
2. Redirecting nature-negative subsidies into nature investment.
3. Remove land tax on conservation covenants (i.e. nature refuges) – Queensland is the only remaining State to apply land tax to private landholders with conservation covenants, despite the clear public benefits to private investment in land conservation [further details available in ALCA's Policy Note, *Queensland's opportunity to exempt conservation covenants from land tax*[19]].
4. Adopt and progress the recommendations in ALCA's submission to the Queensland Government's consultation on private protected areas[20]

Businesses can address the investment gap by:

1. Assessing their nature risk exposure and taking action – and making investments – to mitigate those risks;
2. Making voluntary nature-related risk disclosures; and

[15] Analysis by the Australian Land Conservation Alliance; see: @10m30s to 16m0s – https://www.youtube.com/watch?v=PtKjH03R7nM&ab_channel=AustralianLandConservationAlliance; also see: https://www.youtube.com/watch?v=qnLPOgU3ieM
[16] p4, as above, n7
[17] https://www.alca.org.au/news-insights/article/nature-spend-tracker
[18] *'Nature-negative' – the federal government subsidies harming biodiversity*, Biodiversity Council [Paul Elton], October 2024; https://biodiversitycouncil.org.au/news/nature-negative-the-federal-government-subsidies-harming-biodiversity
[19] https://cdn.prod.website-files.com/696821837f978f01d3b07031/69e0172a79a9cc1a4c54dd42_ALCA%20Policy%20Note_Land%20Tax_Final%20070725.pdf
[20] https://cdn.prod.website-files.com/696821837f978f01d3b07031/69d736c053c50d7db7a2cb9f_20250910%20ALCA%20submission%2C%20Queensland%27s%20private%20protected%20areas_web.pdf

3. Adopting an integrated approach to climate and nature – for example, procuring biodiverse carbon credits when acquitting climate obligations, or otherwise adopting Nature-based Solutions.

Recognising the key connections between nature and Country, the Queensland governments and businesses can:

4. Collaborate and partner with the land conservation and Indigenous land management sectors to realise their business' and State ambitions for nature, and management of nature-related risks.

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 private and non-government 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 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 deploying nature-based solutions to mitigate and adapt to 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.

You can find out more about ALCA online at: www.alca.org.au.

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.