

Nature Repair Committee
Department of Climate Change, Energy, Environment and Water
John Gorton Building
Parkes ACT, 2600
Via email: naturerepaircommittee@dcceew.gov.au

29 July 2026

Dear Nature Repair Committee,

RE: Submission on the Nature Repair Market's Enhancing Native Vegetation Method

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a submission on the Enhancing Native Vegetation ('ENV') method under the Nature Repair Market.

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.

Our submission sets out the details of our feedback on the ENV method. However, for ease of reference we have listed our key recommendations as follows (further recommendations are included in the submission below):

1. **Method complexity:** Prioritise monitoring and review of the balance between complexity and participation for the ENV method, particularly in terms of the requirements for the Starting State Assessment and the ongoing Ecosystem Condition monitoring.
2. **Remotely sensed data and monitoring:** Evolve the Ecosystem Condition monitoring methodology over time to allow for less resource-intensive approaches, such as enabling proponents the flexibility to choose the use of drones and/or satellite imagery to complement a reduced on-ground traditional approach.
3. **Climate change:** Increase the extent to which climate change is incorporated in the ENV method, and enable additional support and flexibility to accommodate large-scale, significant climate change impacts that are beyond the control of the proponent

to manage. This will be particularly important for projects with 100-year permanence periods.

4. **Security for offsets:** Require offset-capable projects to have an on-title security mechanism in place before certificate issuance. Where long-term or in-perpetuity security is needed on privately managed land, this needs to be a conservation covenant.
5. **Improvements to Commitment to Protection:** Revise the thresholds for the security and duration indicators under the Commitment to Protection characteristic to improve its operation and make it clearer to understand. ALCA suggests that the threshold for both indicators should align – and be linked with – the establishment/execution (or similar) of the relevant security arrangement.
6. **Remit of the Suitably Qualified Person:** Review the role of the Suitably Qualified Person as a key priority for the Nature Repair Market in the next few years, including an audit of the quality of the advice they have provided for ENV projects, and the extent to which the guardrails put in place in the ENV method are working, including, and particularly for, the Threatened Species characteristic.

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

Consultation Question 1

How well does the proposed ENV method meet the biodiversity integrity standards (BIS) in relation to project impact, design and delivery in 57(1)(a) to (d) of the Nature Repair Act 2023 (the Nature Repair Act), mainly the method requires projects that:

- result in enhancement or protection of native biodiversity that would be unlikely to occur if the project was not carried out;
- avoid adverse impacts to protected biodiversity;
- are environmentally appropriate to the project area; and
- are measurable, assessable and verifiable?

If not, what gaps have you identified and what changes would you suggest to the method to ensure it meets the BIS in 57(a)-(d)?

Complexity of the ENV method

A key determinate for proponents to participate in the Market is the cost, time, and complexity of undertaking a project. ALCA appreciates the efforts of the Department to appropriately balance integrity (which often is tied to complexity) with participation. However, there is still considerable complexity in the draft method, particularly for the Ecosystem Condition characteristic Starting State Assessment and ongoing monitoring requirements. Whether the commensurate increase in integrity that results from this complexity is appropriate for the level of risk and value of the projects is uncertain, and warrants close monitoring and review to ensure the balance is right.

We also recommend Ecosystem Condition monitoring is evolved over time to allow the proponent to choose the use of less resource-intensive approaches, such as the use of drones and/or satellite imagery to complement a reduced on-ground traditional approach.

Recommendation: Undertake an early review of the balance of complexity and participation for the ENV method, particularly in terms of the SSA and the ongoing Ecosystem Condition monitoring.

Recommendation: Evolve the Ecosystem Condition monitoring method over time to allow for less resource-intensive approaches, such as the use of drones and/or satellite imagery to complement a reduced on-ground traditional approach.

Eligible activities

Eligible activities and additionality considerations

The ENV method (and the Nature Repair legislation more broadly), does not appear to specifically disallow the inclusion of activities that are already being funded at the time of project registration. And if this is the case, this represents a potential issue for additionality.

This applies to all project activities (principal and complementary) and is distinct from the current condition applied to enhanced weed and pest control that these *“Must goes beyond the activities required to be carried out under the laws of the Commonwealth, or a State or*

Territory” (e.g., Exposure Draft section 25(c) and section 26(c)). (ALCA notes that this project-level specificity is not able to be reflected in the counterfactuals, which for Ecosystem Condition are set by the method.)

Recommendation: Explicitly require that all project activities must go beyond any activities that are already funded or contractually obligated at the time of project registration.

Enhanced grazing

The ENV method covers a broad range of vegetation types and climate envelopes across eastern and southern Australia and south-west Western Australia. To better reflect this diversity of situations and landscape context, ALCA have previously suggested the ENV method should focus on outcomes rather than be too prescriptive and time restrictive in relation to grazing. However, given that grazing has some specific requirements built into the draft method (e.g., section 24(b) and (c)), we recommend there is a review of how grazing requirements are working at an appropriate early stage. For example, have there been any negative impacts of excluding grazing during the three-month period, or examples of overgrazing before the project registration etc.

Prohibited activities (s35)

The construction of ‘leaky weirs’ is a well-established conservation technique. Leaky weirs are permeable barriers built from natural materials such as rocks, logs, hardy plants etc, designed to partially block watercourses without completely stopping the flow. This process helps rehydrate landscapes, replenish groundwater and reduce erosion.

The ENV method should clarify that the movement of rocks or woody debris into the project area is a permitted activity for the purposes of erosion control via leaky weirs. ALCA understands that currently this type of activity (i.e., the movement of rocks and debris) is currently only permitted for habitat enhancement (s35(3)(a)).

Recommendation: Clarify that the movement of rocks or woody debris into the project area is a permitted activity for the purposes of erosion control via leaky weirs.

Alignment with existing Protected and Conserved Area requirements

For projects established under the ENV method that are existing Protected or Conserved Areas, the method should clarify that any activities carried out for a project must not contravene the requirements or intent of the Protected or Conserved Area (e.g., any requirements specified in a conservation covenant or associated covenant management plan). This could be an addition to Section 44, which requires that proponents identify and describe any covenants or other legal interests that apply to each covenant area.

Recommendation: For projects established under the ENV method that are existing Protected or Conserved Areas, the method should clarify that any activities carried out for a project must not contravene the requirements or intent of the Protected or Conserved Area.

Restoration

*Australia's Strategy for Nature 2024-2030*¹ establishes a national target of: “*Priority degraded areas (across terrestrial, inland water, coastal and marine ecosystems) are under effective restoration by 2030 to recover biodiversity, and improve ecosystem functions and services, ecological integrity and connectivity*”. Ensuring the details relating to any national priorities, principles or criteria associated with this are made available for this method and the Nature Repair Market more broadly (e.g., via PLANR), would be valuable to help guide and accelerate effective restoration action.

The ENV method requires that areas with potential for regeneration, or evidence of current regeneration, are identified as part of the Starting State Assessment. However, it is unclear what requirements are then triggered by this information. For example, it would be sensible that any areas that have high potential for regeneration, or that are already regeneration, are then required to allocate ‘revegetation through facilitated regeneration’ as a principal activity for those areas, to enable this regeneration to be appropriately supported. This would help ensure that proponents do not ignore this and instead opt for full environmental planting rather than making the most of the existing regeneration.

Recommendation: Ensure the details relating to any national priorities, principles or criteria associated with Australia's restoration target, once finalised, are made available for this method and the Nature Repair Market more broadly (e.g., via PLANR) to help guide and accelerate effective restoration action.

Climate change considerations

While climate change is required to be considered to some degree within the ENV method (e.g., as part of recommending appropriate activities), overall this appears to be fairly minimal. The responsibility for identifying climate impacts and risks on a project rests predominantly with the proponent, which is problematic when noting the current limitations of climate change forecasts. Similarly, the method seems to have minimal accommodations or flexibility to account for climate change impacts, particularly those significant impacts that are expected over the longer-term and that are likely to be outside the control of the proponent. The method also requires that all climate change impacts will be required to be rectified by the proponent – which for 100-year projects in particular could be uncertain, challenging and expensive, particularly considering the proposed approach to significant reversals set out in the draft amendments to the legislative rules, and can be expected to negatively impact on participation.

Over the long-term, climate change may result in significant changes to our native ecosystems. In some cases, these impacts may be severe enough to result in a transition to a different ecosystem. This may happen despite the management of the project area by the

¹ Australia's Strategy for Nature 2024-2030, DCCEEW, [online here](#)

proponent – i.e., it is outside the control of the proponent to prevent. The method does not appear to currently contemplate or allow for changes to the reference ecosystem/s of a project. Further consideration of this is warranted.

Recommendation: Increase the extent to which climate change is incorporated into the ENV method, and enable additional support and flexibility to accommodate large-scale, significant climate change impacts that are beyond the control of the proponent to manage. This will be particularly important for projects with 100-year permanence periods.

Long-term security

ALCA has previously highlighted the importance of protection of offsets through legally secure mechanisms, notably on-title for private land. In both the current (2012) policy and new draft (2026) policy, on-title conservation covenants are explicitly recommended to ensure confidence in permanent/long-term arrangements on privately managed land. All states and territories have conservation covenants or covenant-type arrangements.

Certificates under the Nature Repair Act are not registered on the title of land and thus, to comply with clear federal policy, should only be used for offsets on private land under the Market in conjunction with a complementary covenant that is on the title. Recent legal analysis highlights the real risk that Nature Repair Market projects on private land will not continue when the proponent landowner transfers their land to a new owner or dies, due to the obligations resting with the proponent rather than the future owner of the land. This does not equate to any definition of long-term.

If the federal environmental offsetting system is to retain a high-integrity approach (as per the accompanying policy intent) and achieve real net gain, it will be important to rectify this error in the final *EPBC Act* Standard on Environmental Offsets and relevant Nature Repair Act rules. In addition – and to ensure adherence to this – the ENV method should require that long-term offset-capable projects have an on-title covenant in place before certificate issuance.

Recommendation: The ENV method to require that long-term offset-capable projects have an on-title covenant in place before certificate issuance.

Consultation Question 2

How well does the proposed ENV method meet the BIS in relation to biodiversity measurement and assessment in 57(1)(e) to (g) of the Nature Repair Act, mainly the measurement and assessment conditions for registration, certificate application and issuance, and requirements for notification, reporting and monitoring are:

- supported by clear and convincing evidence, consistent with First Nations knowledge so far as reasonably practicable, appropriate to the project area, enable adaptive management and indicate a level of certainty and confidence of biodiversity outcomes;
- transparent with respect to assumptions and level of certainty;
- conservative with projections and assumptions;

If not, what gaps have you identified and what changes would you suggest to the method to ensure it meets the BIS in 57(e)-(g)?

Counterfactuals

The approach to setting counterfactuals in the ENV method presents some risks. For the Ecosystem Condition characteristic, the default counterfactual scenario – which is applicable in the majority of cases - assumes no change in ecosystem condition in the absence of the project (i.e. static baseline). We question whether this is appropriate, particularly for projects with a 100-year permanence period. We suggest the impacts of climate change and other landscape-scale threats will mean that ecosystem condition will decline over time, and particularly over the longer term. ALCA also notes the constraints with forecasting over the longer-term (e.g. the effects of climate change can at best only be predicted out to 25 years currently), and suggest the method needs to be transparent around how these have been incorporated into the method in setting such as counterfactuals.

Additionally relating to the Ecosystem Condition counterfactuals, for projects that commit to maintaining good condition remnant vegetation (and do not contribute to an enhancement of any other characteristic), the application of the static counterfactual raises the question as to what the project benefit for these projects are. That is, they are theoretically not contributing to improvement in any characteristic. This may raise perceived integrity issues, as well as confusion around the value of these projects in the market. (We note these are likely perceived rather than real integrity issues, as ALCA suggests there will be significant work required by proponents simply to maintain Ecosystem Condition over the long-term given the impacts of climate change and other landscape-scale threats.)

Finally, the approach to establishing counterfactuals varies significantly between characteristics. For the Ecosystem Condition characteristic, the approach to setting counterfactuals is relatively coarse. It is a default static counterfactual set by the method, with some minimal exceptions for a specified increasing counterfactual. This creates consistency but doesn't allow flexibility where there may be reasonable evidence for this. In contrast, the counterfactuals for the Threatened Species characteristic are the opposite to this – resting largely in the hands of the SQP, with some guardrails and guidance. This allows site specific nuance but may risk consistency. While different approaches to establishing counterfactuals is not necessarily an issue, it does raise questions about transparency and consistency, particularly in terms of data accuracy, certainty and variability in the data used to establish

these. This is particularly important given the role counterfactuals have in calculating project scores. There should be increased transparency regarding counterfactual establishment in this regard.

Recommendation: increase the level of transparency regarding counterfactual establishment, particularly in terms of data accuracy, certainty and variability in the data used to establish these.

Threatened Species

ALCA are pleased to see that regular monitoring of threatened species is now required as part of the Threatened Species characteristic. That is, there will need to be direct monitoring and population estimates for the threatened species, including for species tick species (section 82). This is important in enabling a better understanding of the realised benefit to the threatened species of each project, as well as the improvements in habitat suitability as a result of threat management and habitat enhancement indicators.

Incentive for proponent to commit to the 'species tick'

Given the 'species tick' option is separate to the calculation of the Threatened Species characteristic and is also not directly to a project's biodiversity certificate (e.g., the species tick could be applied after a certificate has already been sold), it is not immediately clear what the incentive is for a proponent to commit to this. As noted above, monitoring of threatened species populations, while extremely important, can be time consuming and expensive. Without a direct translation of how this effort translates into increased certificate value for a proponent there may be low uptake of this, which appears both a lost opportunity as well as unnecessary complexity in the characteristic/method.

Recommendation: Clarify or improve the benefits to a proponent of committing to the 'species tick' for a threatened species.

Effective management of threatened species threats

The proposed approach to scoring outcomes under the Threat Management characteristic is concerning as it appears to set a very low bar. The approach is defined as:

Schedule 9, 6 Value of the threat management indicator at a time

*(1) For this section [the] sic. relevant threat is **managed** if there is a threat management activity in place in 1 or more activity areas to address it.*

Effective threat management requires monitoring of the threat itself, e.g. if foxes are the threat, monitoring of the fox numbers over the course of the project should be required to determine if the actions are having the required impact on the threat.

In contrast, the current approach suggests that if fox control was carried out in one activity of a large project, this would still count as being effectively managed, even if the fox had a distribution across the whole project area and there was no evidence that fox numbers had declined as a result. This is not a logical approach.

While not recommended, if this approach to scoring threat management is used (not recommended), it should at least be amended such that the required activity/activities to address the threat have been/are being carried out to their full extent across all relevant activity areas. Otherwise, there is a risk of substandard monitoring which may pose substantial integrity risks.

Recommendation: Improve the assessment of effective threat management to incorporate monitoring of the threat itself, rather than assessing the implementation of actions. If threat management actions are used to assess threat management, the standard should be lifted such that the required activity/activities to address the threat have been/are being carried out to their full extent across all relevant activity areas.

Commitment to Protection Characteristic

a) Overall score for the Commitment to Protection characteristic

The scoring table in the Exposure Draft Schedule 10 section 5, sets out the 'score for the commitment to protection characteristic'. This table indicates that a 100-year ENV project with a biodiversity certificate as its only form of security would score 'very high', which is only one category below 'benchmark' for a project with an NRS equivalent protection in place. This does not appropriately reflect the significant difference in security between these two types of projects, particularly noting the concerns that have been raised regarding long-term security of biodiversity certificates. It also reduces the incentive for proponents to increase their level of commitment to protection to the benchmark level.

Recommendation: The 'medium' score for the security indicator should be reduced from 'very high' to 'high' for the '99+years' and 'ongoing/enduring' duration indicators (as per edits in ~~strikethrough in bold~~ below).

Duration	0 years	1-9 years	10-24 years	25-49 years	50-98 years	99 + years	Ongoing/ enduring arrangement (Benchmark)
Security							
Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Low score	Nil	Low	Low	Low	Low	Low	Low
Med Score	Nil	Low	Medium	Medium	High	Very high	Very High
High Score	Nil	Low	Medium	High	High	Very High	Very High
Benchmark	Nil	Medium	High	High	Very High	Very high	Benchmark

b) Threshold values of the Commitment to Protection indicators

The threshold for the security indicator is set out in Schedule, section 9 as:

(1) The threshold value of the security indicator are the values of that indicator calculated on the basis of the existence of the ENV project as a security arrangement.

(2) The threshold value of the duration indicator is the permanence period of the ENV project.

Note: An ENV project will reach the threshold value on registration.

ALCA understands this to mean the threshold for the security indicator is simply the registration of the ENV project. While this is a clear and simple threshold, it does appear to create a risk that projects that opt to increase their Commitment to Protection beyond this (e.g., via a covenant) do not have any compliance around whether the project actually achieves execution of the covenant (note also our comments in this submission relating to lack of compliance around forecast values).

Noting the security indicator is essentially a binary indicator (a project either has a security arrangement in place, or it does not), we have previously suggested that establishment/execution of the nominated security arrangement should be the threshold for this indicator, as this will ensure the security arrangement is in place before a certificate is issued.

On the duration indicator, we suggest the current wording may need tweaking as it appears ambiguous. It could be interpreted that the permanence period must be completed in order to reach a threshold for the project. We suggest the duration threshold should align with the security threshold, such that once the security arrangement is in place, the thresholds for both indicators are met.

Recommendation: Revise the thresholds for the security and duration indicators under the Commitment to Protection characteristic to improve its operation and make it clearer to understand. ALCA suggests that the threshold for both indicators should align – and be linked with – the establishment/execution (or similar) of the relevant security arrangement.

c) Incentivising Commitment to Protection

The intent of the Commitment to Protection characteristic is to recognize, value and incentivise projects that enhance the protection level of the project land. However, this seems to be negated by the 'note' in Schedule 10 section 3, which states in reference to the security associated with the ENV project establishment:

Note: It is expected that, for most ENV projects, it will be the only security arrangement.

This appears unnecessary and may reduce the uptake of additional forms of protection if this expectation is more broadly communicated to proponents.

Recommendation: Remove the note in Schedule 10, section 3 that states: “*Note: It is expected that, for most ENV projects, it will be the only security arrangement.*”

Contributions to national and global biodiversity commitments

The method presents a potential pathway for contributing to Australia's national and global environmental commitments, including our restoration and '30 by 30' commitments as part of *Australia's Strategy for Nature 2024-2030*.

However, despite previous recommendations by ALCA to this effect, the method does not appear to identify or promote projects (and their associated restoration and protection activities) that contribute to these commitments. For example, scoring a project higher that contributes to Australia's '30 by 30' protection target and are undertaken in under-represented bioregions, in alignment with the National Reserve System and CAR criteria (Comprehensive, Adequate and Representative). This is a lost opportunity.

Consultation Question 3

How well does the proposed ENV method meet the BIS in relation to information on the Register and certificates in 57(1)(h) and (i) of the Nature Repair Act, mainly that the method requires claims made about projects in certificates and on the Register to be evidence-based and reasonably certain with respect to projections and outcomes.

If not, what gaps have you identified and what changes would you suggest to the method to ensure it meets the BIS in 57(h) and (i)?

Achieving forecast values

In the ENV method (and presumably for all other methods that are/will be developed under the Market), forecast values are not themselves mandatory compliance targets that must be achieved before a biodiversity certificate can be issued. Rather, they are the project's predicted long-term outcomes (within the 25-year project outcome period) and are used for project design, monitoring and adaptive management. The key regulatory trigger for certificate issuance is generally the achievement and maintenance of the prescribed **threshold values**, not the forecast values.

The project outcome for an ENV project means its biodiversity outcome, as specified by the restoration target states for each activity area **and the forecast values of the applicable characteristic indicators** (as specified in the definitions in the methodology explanatory material, p13). However, if there is no requirement or guarantee that each project will achieve its forecast value, this raises integrity concerns regarding how outcomes will be reported. The outcomes claimed should either be the threshold values or the highest value above each of these that is achieved for each indicator – both of which have evidence of achievement.

Recommendation: Outcomes that are reported or claimed for projects should be the value that can be demonstrated to be achieved (e.g., the threshold values). The forecast values should not be used if they have not been achieved.

Role of the SQP

Managing environmental markets requires methods that balance the dynamic between being very prescriptive (and easier to regulate) through to more project-centric with very broad method guidance, and a higher reliance on auditing and regulation. In our opinion, the inherent complexity of ecological systems and their interface with cultural, social and market drivers more readily lend itself to the latter approach.

Overall, the method appears to get this balance about right – particularly in terms of the degree of optionality applied to the characteristics, and to the principle and complementary project activities. However, to do this, the ENV method relies heavily on 'suitably qualified persons' (SQP) to manage project-level specificity, complexity, and integrity.

The SQP is responsible for undertaking/certifying many of the key aspects of each project, including the ecosystem assessments, project activities, and ongoing monitoring. While the SQP must have appropriate expertise and experience, there appears to be no or minimal additional oversight or verification of the advice they provide. It is ALCA's understanding that

the CER is not responsible for this verification. Nor is it appropriate to expect that public scrutiny of the register will fill this gap. This appears to be a vulnerability in the ENV method (and in any other method that uses SQPs in the same way and to the same extent). Further, the risks associated with this approach appear to sit entirely with the proponent rather than the Department, which is likely to result in reduced participation.

As identified in our previous submission² on the Department's 'Nature Repair Market: Ongoing Development' consultation, the role of the SQP is particularly extensive as part of the Threatened Species characteristic requirements, and as such this has even higher integrity concerns. For offset-capable projects, additional scrutiny will be required – at least by the National Environmental Protection Authority, if not the Clean Energy Regulator.

Integrity considerations also arise from the scenario in which the SQP is the same as the project proponent (or is a member of the proponent organisation). While this makes sense from a simplicity and financial perspective to enable SQPs to be one and the same as the proponent where they meet the SQP definition, it does suggest the potential for conflict of interests.

On a related matter, the number and capacity of potential SQPs to meet market demand is uncertain and may require further consideration by DCCEEW to stimulate and support this critical aspect of the market. If availability of SQPs is constrained, this has potential to drive project costs up, which will impact participation rates. Further to this, guidance may also be required to address likely questions arising regarding insurance for SQPs, particularly noting their critical role and concerns around costs associated.

Recommendation: Increase resources within the Clean Energy Regulator that have environmental management and threatened species expertise. These resources would not necessarily have a formal verification role but could then be used to help with early identification of any project issues.

Recommendation: Review the role of the SQP as a key priority for the Nature Repair Market in the next few years, including an audit of the quality of the advice they have provided for ENV projects, and the extent to which the guardrails put in place in the ENV method (and the Threatened Species characteristic) are working.

Recommendation: Ensure there is an additional layer of verification of SQP advice for offset-capable projects, whether within the market or as part of the external offset scheme infrastructure.

² [ALCA Submission](#) on DCCEEW Consultation - Nature Repair Market: Ongoing Development, May 2026

Consultation Question 4

Are there any other matters you think the committee should know in response to the proposed ENV method?

Incentive to undertake a 100-year permanence period

Given that project outcomes should be achieved within 25 years, there appears to be minimal benefit to the proponent for then maintaining these for the next 75 years, relative to the costs. Might be worth further consideration and review of projects to see if this is the case (i.e. if proponents largely opt for 25 years).

Duplication with P&C method

The ENV method appears to have a substantial degree of duplication with the existing 'Replanting Native Forests and Woodlands' method, and the proposed 'Protect and Conserve' method. For example, the Replanting method and the ENV method both allow revegetation of cleared land, in approximately the same geographic areas, for a period of 25 or 100 years. Similarly, the ENV method and the proposed Protect and Conserve method appear to both allow good condition native vegetation along the eastern and southern coastal and inland areas, to be maintained for 100 years, along with enhanced Threatened Species outcomes and enhanced Commitment to Protection (e.g., via establishment of a protected or conserved area).

This is surprising given the Department previously flagged proposed changes to the Protect and Conserve method to avoid duplication with the ENV method ([Nature Repair Market Protect and Conserve method – Revised Scope](#), p2)³. This duplication may cause confusion in the market regarding the appropriate method to use for a given activity – in which case further guidance is required. It may also reduce the relevance of some methods, if all the activities from one method can more simply, cheaply, or flexibly be undertaken by another method. This precedent may result in similar outcomes to the ACCU scheme where only a handful of methods ended up being well-used from the 26 land-based methods originally approved. A proliferation of methodologies that are not regularly used results in increased regulatory burden and reduced market demand signals. Consideration of this will help maximise the efficiency of method development.

ALCA have previously recognised there are pros and cons to narrow versus broad method scopes, and have indicated – reiterated here - that a clear and consistent approach to scope and duplication amongst methods is imperative, and currently missing from the Market framework.

Recommendation: Ensure a clear and consistent approach to scope and duplication amongst Nature Repair Market methods to help maximise the efficiency of method development and reduce regulatory burden and amplify market signals.

³ [Nature Repair Market Protect and Conserve Method – Revised Scope](#), 02 June 2026, DCCEEW

In Closing

Thank you again for the opportunity to provide a submission on the on the Enhancing Native Vegetation Method under the Nature Repair Market.

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)
- World Wildlife Fund – Australia
- Wildlife Bank Trust

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.

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. 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.