Australian Land
Conservation Alliance

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The Department of the Environment, Tourism, Science and Innovation
Brisbane, QUEENSLAND 4001
Via email: bioregional.planning@detsi.qld.gov.au

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Re: Submission on the draft Brigalow Belt North Bioregional Guidance Plan

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a submission on the Brigalow Belt North Bioregional Guidance Plan (the Plan).

ALCA represents organisations that work to conserve, steward, 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.

Overarching comments

ALCA strongly supports the exploration of more strategic approaches to manage cumulative impacts and improve community consultation regarding approvals processes for wind farm developments under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Climate change exacerbates threats and is already pushing our ecosystems to the brink. ALCA supports a rapid transition to Nature Positive renewable energy. Nature Positive wind farm siting means choosing locations that avoid harm to important habitat or threatened species.

We welcome the analysis on anticipated development impact trends on Maters of National Environmental Significance (MNES) in the Plan area, and the use of modelled climate scenarios to 2090. We support the use of the *International Union for Conservation of Nature's (IUCN) Guidance on biodiversity cumulative impact assessment for wind and solar developments and associated infrastructure* to guide the approach as well as the assessment of all other regional pressures impacting on MNES in the Plan area. Below we detail some recommendations for improving the draft Plan.

Impact thresholds

ALCA welcome the development of Impact thresholds (E categories) which were developed for each protected matter based on residual risk ratings. As the Plan states:

These describe how much additional impact each protected matter can tolerate, while still achieving a net gain outcome and avoiding impacts on irreplaceable features.

ALCA recommends that the language should be more cautious, as the thresholds are estimates only. The Plan should also acknowledge the limitations inherent using existing threatened species datasets and a stronger emphasis on the need for proponents to conduct on ground assessments according to species survey guidelines (where available).

We strongly support the statement below regarding the protected matters (such as the Eungella day frog, Eungella spiny crayfish, Blackwall Range kurrajong, Mount Cooper striped skink, Star finch, and Broad Leaf Tea-tree TEC) which were assigned an E4 or E4+ category impact threshold of 'Near zero impacts':

…reflecting that they have unique ecological needs, are unable to be restored, recreated or fully offset once impacted, and are sensitive to cumulative pressures from both wind farm developments and other Plan-wide pressures. Net gain outcomes that avoid impacts on irreplaceable features are likely to be most challenging to achieve for these protected matters. Both E4 and E4+ categories typically include those protected matters with high habitat specificity and/or hydrological dependence.

They cannot absorb additional impacts, so impact avoidance is the most effective mitigation option to achieve net gain outcomes. Offsets for these protected matters are unlikely to compensate for impacts, as values cannot be fully replaced or restored once impacted. Additional targeted government and/or private investment in conservation and threat reduction for these MNES is likely to be needed in addition to near zero impact, if net gain is to be achieved.

ALCA also supports 9 specific habitat components that have an impact threshold of 'Near zero impacts' (partial E4) including for example; denning habitat for Greater gliders and Yellow-bellied gliders.

Working with local communities and siting

ALCA supports the advice regarding co-locating project components with existing infrastructure, and brownfield or disturbed areas, and around encouraging proponents and governments to engage with local communities, including First Nations peoples, from the very start of a project to ensure positive outcomes social, cultural and economic values. This is particularly important when mitigation measures could generate local work or contracting opportunities, supporting economic and community resilience values by supporting local business growth and new environmental industries.

However, we recommend amending the sentence:

Key challenges to this can include commercial arrangements, project timelines, and inflexible offset requirements – these should be adapted to allow for meaningful engagement.

Whilst flexibility regarding timelines is to be encouraged, the abject failure of offset schemes offering flexibility means that strict adherence to the Offset Standard (once finalised) must be required.

Advice. 2. Proponents should apply the mitigation hierarchy in alignment with the impact thresholds for each relevant protected matter.

ALCA notes that on page 77 the advice states:

> *High restoration potential areas could be used as a starting point for offset investigations. These areas are likely to provide significant opportunities for co-benefits to multiple protected matters and maybe particularly useful when considering strategic or coordinated offsets.*

However, the advice on this page fails to mention that proponents should be looking for 'like for like' offsets for the affected MNES as this is likely to be a key requirement in the *EPBC Act* Environmental Offset Standard (once finalised).

Advice 15. Proponents and regulators should implement adaptive management of aerial collision and entanglement risks for projects where birds and bats are known to fly at rotor swept heights.

ALCA strongly supports the need for "*proponents and regulators* [to] *set clear thresholds for acceptable collision risk, and specify procedures that activate should thresholds be exceeded*" (page 86). However, this advice needs to be more specific regarding implementing best practice curtailment as technologies advance. This may include smart curtailment such as including radar, thermal/infrared cameras, visual detection cameras (like IdentiFlight) or acoustic detectors. Increasing the visibility of infrastructure to warn bird species of its presence, installing acoustic deterrent devices, adjusting turbine height and configuration of electricity transmission lines.

First Nations Consultation

We acknowledge the Queensland Government outreach detailed in attachment one which included contacting relevant First Nations peoples and groups including Traditional Owners, Elders, Indigenous Prescribed Body Corporates (PBC's), Native Title holders, associations, companies and community organisations and the use of an Aboriginal-owned creative and communications agency to support First Nations outreach and to support culturally appropriate engagement.

We encourage the Queensland Government to continue outreach and to give greater prominence in the Plan to ensure genuine Free, Prior and Informed Consent (FPIC) from all Traditional Owner groups, consistent with the Australian Government's FPIC Guidelines and Australia's commitments under the United Nations Declaration on the Rights of Indigenous Peoples.

Important Conservation Areas

We welcome the mapping of Important Conservation Areas. The draft Plan would benefit from providing more details regarding how irreplaceable features were determined. We note that whilst the conservation of areas of high endemism or species richness are important, this does not necessarily mean that areas outside of ICAs are not of equal, or greater importance to affected MNES.

We note that Important Conservation Areas (ICAs) are defined within the Plan as "Locations that contain irreplaceable features important to protected matters (e.g., wetland complexes, high densities of hollow bearing trees, riffle zones) and connectivity pinch points.

ALCA recommends that the plan should also include critical habitat and habitat critical to survival for all relevant MNES as well as referencing relevant conservation documents (Conservation Advices, Recovery Plans). The use of the term 'sensitive' habitat instead of terms defined in the EPBC Act is likely to lead to confusion.

We note that site-based values include World and National Heritage areas and Ramsar wetlands, which are internationally recognised for their importance. Key Biodiveristy Areas (KBAS) that have been nominated (or meet criteria) for relevant MNES based on the *IUCN Global Standard for the Identification of Key Biodiversity Areas* should also be included. KBAs are globally significant sites for conservation where species and ecosystems occur in globally important numbers or extent.

Watson et al[1] provide a review on the type of areas that need to be prioritised when implementing Target 3 of the Global Biodiversity Framework (GBF). They show that data is available for 12 distinct biodiversity conservation and ecosystem service elements that can be mapped and, if conserved, will help meet the broad intention of Target 3 and contribute to Goal A of the GBF.

Representative Protection Areas

ALCA note that the representative protection analysis purports to identify areas 'where protection of existing habitat could most benefit MNES, with results show the top 30% of areas that are representative of MNES values outside existing protection'. The methods factsheet further states that:

> *Representative protection analysis aligns with Australia's national target to conserve 30% of the landmass by 2030, with representative protection areas covering 30% of the remaining land in each subregion after excluding existing protected areas.*

However, the Global Biodiversity Framework (GBF) 30 by 30 Target specifically references 'areas of particular importance to biodiversity'. The Target must also contribute to Goal A of the GBF so that the 'extinction of known threatened species is halted, and, by 2050, the extinction rate and risk of all species are reduced tenfold'.

Protection of existing habitat that will most benefit threatened species should therefore prioritise habitat that is critical to survival of these species. Recent analysis of Australia's network of protected areas shows, between 2010 and 2022, though the amount of land under protection nearly doubled, this expansion has done little to help our most at-risk animals, plants, and ecosystems.

Since 2010, the amount of protected land that's home to threatened species has only slightly increased – in fact, this figure rose by an average of just 3%. The species with arguably the most need of protection, those listed as Critically Endangered species, have a lower proportion of species achieving adequate representation inside the NRS (14.0% compared to 17.6% for Endangered and 25.2% for Vulnerable).

1 Watson, J. E. M., Venegas-Li, R., Grantham, H., Dudley, N., Stolton, S., Rao, M. et al. (2023) Priorities for protected area expansion so nations can meet their Kunming-Montreal Global Biodiversity Framework commitments. Integrative Conservation, 2, 140–155. https://doi.org/10.1002/inc3.24

As of 2022, there were still 160 species (11%) considered 'gap' species with <1% of their range in the NRS. Species listed as Critically Endangered had the highest proportion of gap species (20.4%), followed by Endangered (12.0%)[2].

Bioregional Plans should therefor direct protection towards not only area that are high in biodiversity, but specifically target the habitats of species on the brink of extinction.

Other comments on the interactive tool that would improve clarity

Overall, the tool is useful and mostly clear and user-friendly. In addition to the comments above, it would be good to have greater clarity around decision that were made regarding data selection and links to data sources. It is unclear why there has been exclusion of TECs identified under national system in the analysis.

It would also be helpful to understand how the tool has accounted for large buffers of some species in the Species of National Environmental Significance Models – as including these could lead to large biases in overestimation of biodiversity significance.

It would be useful to include data sources in the final model, as it is unclear what data sources (especially the "landscape context") were used for which specific inputs in the analysis and this could have impacts on how the results are interpreted. We would like further information on what circuit - based connectivity tool was used to analyse connectivity.

The legend in the spatial conservation analyses uses the term 'cover', however it is not clear of what type of cover that it. Whilst it is explained in another document, a link to the relevant part of the document or a summary sentence would aid in understanding. Similarly, there a heading in the table 'analysis cover %'. A description of what this means is needed.

ALCA recommend a brief definition of what the analyses objectives mean and how this is measured. At the very least a link to relevant part of supporting documents should be provided. Finally, the table on the Irreplaceable features page has a column on 'Supporting reason' where a link to the description of decision codes could be provided.

Cumulative Assessment

The Bioregional Plan would benefit by have a 'living document' component (like the interactive tool), where cumulative impact assessments are regularly updated by mapping approved developments (of all types) including the assessment of likely impacts and conditions, as well as real-time changes in MNES and current threats based on available government datasets. Proposals under consideration should also be mapped. This would vastly improve the accuracy of information for decision-makers and the community.

Monitoring, Evaluation, Reporting and Improvement

ALCA strongly support the development of a *"Monitoring, Evaluation, Reporting and Improvement Framework (MERI Framework) that will accompany the Plan and monitor the efficiency and*

[2] James E. M. Watson, Ruben Venegas Li, Michelle Ward, James A. Fitzsimons, Hugh P. Possingham, Marc Hockings, Fiona Leverington, Hedley Grantham, Samantha Vine, Jody Gunn, Rachel Morgain, Brendan Wintle, Carly N. Cook. *Beyond area: Evaluating Australia's contribution to Aichi Target 11 and implications for 30 × 30*. **2026**. Conservation Science and Practice 8 (4). doi.org/10.1111/csp2.70256

effectiveness of the Plan to achieve it's objectives". To do this well the objectives must be measurable. The current objectives of "Protecting MNES: To support net gain outcomes for MNES ins a way that avoids impacts on irreplaceable features" is laudable but it is not measurable. A clearer objective would be: "Net gain for each MNES in the Plan area".

The MERI Framework must include performance measures, more detail on monitoring arrangements to ensure information drives improvement for the next iteration of the Plan.

ALCA and its member organisations look forward to continuing to engage with the Queensland Government on the development of the bioregional guidance planning.

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

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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.

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.