



Australian Land
Conservation Alliance

NSW Net Zero Commission
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Dear Commission,

RE: Submission to the call for evidence for Decarbonisation Pathways for NSW

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a brief submission to the NSW Net Zero Commission's call for evidence for Decarbonisation Pathways for NSW.

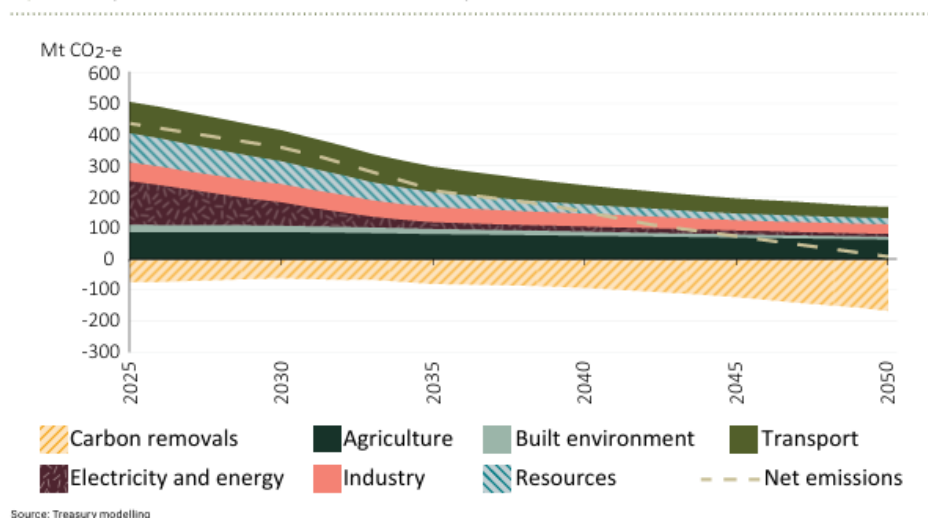
ALCA is Australia's peak body for land conservation. We represent organisations that work to conserve, steward, and restore nature on privately managed land. The conservation efforts of our 23 member organisations have influenced over 9.3% of Australia with more than 4,000 landholders; we have over 70,000 supporters and our combined annual turnover exceeds \$400 million.

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

Summary

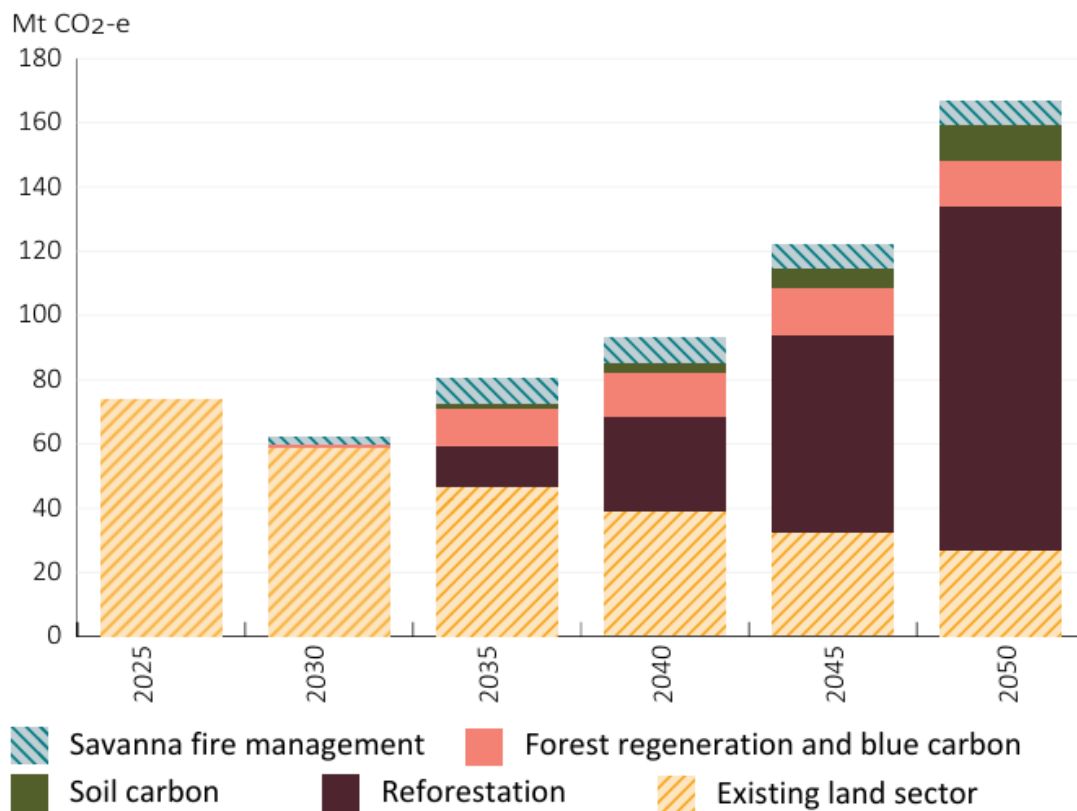
The role of nature conservation in delivering net zero for NSW and Australia is of critical importance. Revegetation continues to prove superior to all other technologies in delivering carbon sequestration ('carbon removals') at scale. Indeed, the sheer scale of the expectation upon revegetation is demonstrated by the following two key graphs from the Commonwealth's Agriculture and Land Sector Plan¹ (one of six sector plans supporting its Net Zero Plan):

Figure 6 Projected emissions under the Baseline Scenario, by Sector



¹ <https://www.agriculture.gov.au/agriculture-land/farm-food-drought/climatechange/ag-and-land-sector-plan>

Figure 9 Projected sources of land-based sequestration under the Baseline Scenario



Note: The 'Existing land sector' category refers to the existing net sink, including emissions reductions and sequestration being generated from existing ACCU projects. The decline in this category reflects the ageing of existing vegetation and the related decline in the ability to sequester carbon. The category does not include the sequestration from new sequestration projects incentivised through the Safeguard Mechanism. The sequestration volumes for reforestation, forest regeneration and blue carbon, soil carbon, and savanna fire management represent new sequestration projects in the Baseline Scenario.
Source: Treasury modelling

Despite the immense expectations of the land sector – and, specifically, the conservation sector – to deliver carbon sequestration through reforestation and other conservation efforts, our sector receives relatively minimal support to deliver on these public policy goals. Indeed, total NSW Government expenditure on biodiversity conservation – let alone environmental restoration specifically – is so opaque that expert analysis commissioned by the Australian Land Conservation Alliance cannot confidently predict its quantum:

“New South Wales... invest in biodiversity, but the published figures in annual reports are only available at a high level that combines objectives out of the scope of the Nature Spend Tracker... This degree of aggregation limits the ability to isolate the biodiversity share with confidence.”²

Protection of existing biodiversity – and the carbon stocks that habitat contains – is also critically important if we are not to go further backwards in achieving our net zero ambitions.

The Commonwealth notes that:

“More than one-quarter of Australia's above ground biological carbon stock, some 20 million hectares of international Kyoto forest, lies in our protected areas. This part of

² p16, <https://www.alca.org.au/news-insights/article/nature-spend-tracker-insights-report>; for datasets, see: <https://www.alca.org.au/news-insights/article/nature-spend-tracker>

our Kyoto forest accounts for 1.5 billion tonnes of carbon, equal to 5.5 billion tonnes of carbon dioxide - more than the total emissions produced by Australia in a decade.”³

ALCA is not aware of the NSW Government having undertaken specific accounting of the carbon sequestered in NSW protected areas. This should be a priority.

Alongside Queensland, NSW is a land clearance hotspot in Australia, and this needs to be urgently addressed. Further, despite its commitment to collective delivery of the Commonwealth ‘30 by 30’ target⁴ (protecting 30% of Australia’s lands by 2030, as aligned with the Global Biodiversity Framework under the UN Convention on Biological Diversity⁵), NSW is the second lowest achieving jurisdiction in the country, with only 10.44% of the State in protected areas for conservation (CAPAD, 2024⁶). Noting that it has a heavy lift ahead of it to achieve the national protection target, ALCA has called on the NSW Government to commit to protecting 20% of its lands for conservation (and by extension, protecting the carbon sequestration), by 2035.

In addition, ALCA encourages the Commission to investigate and appreciate the value of investing in nature-based solutions for adaptation and mitigation to climate change – an approach that is well-recognised by the Commonwealth:

“Investing in nature-based solutions for adaptation and mitigation to climate change provide multiple benefits including:

- *protecting biodiversity and threatened species,*
- *contributing to climate mitigation through carbon sequestration,*
- *making communities more resilient to climate change,*
- *contributing to food security, and*
- *supporting businesses reliant on healthy ecosystems such as fishing, tourism and agriculture.”*

Recommendations

1. Explicitly recognise the importance of conservation (i.e. environmental protection, management, and restoration) in the delivery of emissions reduction and climate change adaptation and mitigation. Further, it should recognise the alignment with actions in the Government’s *Plan for Nature*⁷.
2. Noting that the Government Budget and agency annual reporting in NSW is highly opaque compared to other Australian jurisdictions, dramatically increase public transparency by disaggregating this reporting in such that the expenditure on biodiversity conservation – and environmental restoration, in particular – can actually be tracked. Measuring current effort that contributes to carbon removals is a critical first step to assessing the Government’s contribution to – and other support for – land-based carbon sequestration.
3. Urgently elevate and deliver on NSW’s contribution to Australia’s 30 by 30 commitment – recognising that NSW is far behind all other states (other than

³ <https://www.dcceew.gov.au/environment/land/nrs/about-nrs/australias-protected-areas>

⁴ <https://www.dcceew.gov.au/sites/default/files/documents/emm-communique-21-oct-2022.pdf>

⁵ <https://www.cbd.int/article/cop15-final-text-kunming-montreal-gbf-221222>

⁶ <https://www.dcceew.gov.au/environment/land/nrs/science/capad/2024>

⁷ <https://www.nsw.gov.au/departments-and-agencies/cabinet-office/resources/nsw-plan-for-nature>

Queensland), ALCA is calling on the NSW Government to protect 20% of its lands by 2035. This must include expanding protected areas in the eventual transition of NSW's state forest estate.

4. Urgently halt – and then reverse – the high rates of land clearance in NSW.
5. Undertake a research project into how much carbon is sequestered in the protected area network in NSW, to assess the importance of protected areas in delivering on the net zero in NSW.
6. Investigate the value of delivering nature-based solutions to climate change mitigation and adaptation.

Thank you again for the opportunity to provide submission to NSW Net Zero Commission's call for evidence for Decarbonisation Pathways for NSW.

Australian Land Conservation Alliance

About the Australian Land Conservation Alliance

The Australian Land Conservation Alliance is the Australia's peak body for land conservation, and represents organisations that work to protect, steward and restore nature on private and non-government 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 members 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 our members address the most pressing land 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 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.