

11 APRIL 2024

ACF Submission

Discussion Paper: Updating Australia's Strategy for Nature

The Australian Conservation Foundation (ACF) is Australia's national environment organisation. We are over 500,000 people who speak out for nature – for the air we breathe, the water we drink, the food we eat, and the places and wildlife we love. We are independent, non-partisan and funded by donations from our community.

ACF welcomes the opportunity to make a submission to the consultation on the discussion paper: Updating Australia's Strategy for Nature. Please find attached initial thoughts in the short time provided to prepare a response.

Recommendations

Recommendation 1: Include a single measurable overarching goal that the Strategy for Nature is intended to deliver, and delivery agencies are accountable to.

Recommendation 2: Ensure all proposed domestic targets are measurable and aligned with the corresponding GBF targets

Recommendation 3: Prioritise domestic 'mainstreaming' targets including a domestic target and action plan corresponding to GBF Target 15

Recommendation 4: Deliver strong national nature protection laws

Recommendation 5 : Develop a response to Target 10

Recommendation 6: Commit to develop domestic targets and action plans that correspond to all 23 GBF targets before COP17.

Recommendations.....	1
Introduction.....	2
The need for a single measurable overarching goal to provide direction for the strategy	2
Ensure all proposed domestic targets are measurable, ambitious, and aligned with corresponding GBF targets at minimum.....	3
The need for domestic targets to deliver on mainstreaming and implementation	3

Strong new nature protection laws are critical to delivering on Australia’s commitments4

Respond to a key pressure on Australian biodiversity by developing a response to Target 105

Australia’s response to the GBF must be comprehensive.....5

PRIORITY AREA 1: Effective restoration of degraded terrestrial, inland water, and coastal and marine ecosystems 5

PRIORITY AREA 3: Building a circular economy and reducing the impact of plastics on nature6

PRIORITY AREA 4: Minimising the impact of climate change on nature7

PRIORITY AREA 5: Protect and conserve 30% of Australia’s land and 30% of Australia’s oceans by 20308

PRIORITY AREA 6: Work towards zero new extinctions8

ENABLERS.....9

Introduction

When it comes to nature, few countries have as much at stake as Australia. Our ancient landscapes and unique wildlife are found nowhere else on earth.

But Australia is a global deforestation hotspot alongside places like the Amazon and Congo; 19 of our most important ecosystems from the Great Barrier Reef, to the Murray Darling River Basin, and the Australian Alps are collapsing; and we have one of the worst extinction records in the world.

As the only rich and megadiverse country that is party to the Convention on Biological Diversity (CBD), Australia should be leading the world with our response to the global biodiversity crisis and Kunming-Montreal Global Biodiversity Framework (GBF). As it stands, the proposed response to the GBF outline in the discussion paper: *Updating Australia’s Strategy for Nature* falls short. We strongly urge the government to raise the level of ambition in line with the suggestions below.

The need for a single measurable overarching goal to provide direction for the strategy

Just as the Mission to ‘halt and reverse biodiversity loss by 2030’ provides direction and certainty at the highest political level to signatories of the Kunming-Montreal Global Biodiversity Framework (GBF); Australia’s Strategy for Nature ‘the Strategy’ should likewise feature an overarching measurable goal that the Strategy’s component targets and enabling actions are intended to deliver and measurable against, and that the government is accountable for. The long-term certainty of a clear and measurable goal aligned with scientific advice and the GBF would help to ensure the Strategy’s targets as well as government policy, actions, and financial investments developed in support of the Strategy are aligned with a ‘nature positive’ outcome. Such a goal would serve a similar function to Australia’s commitment to achieve net zero emissions by 2050 and a 43% reduction in emissions by 2030. ACF is of the view that adding an overarching goal would significantly strengthen the Strategy. Australia’s goal should be aligned with the global goal to halt and reverse biodiversity loss by 2030.



Recommendation 1: Include a single measurable overarching goal that the Strategy for Nature is intended to deliver, and delivery agencies are accountable to.

Ensure all proposed domestic targets are measurable, ambitious, and aligned with corresponding GBF targets at minimum

In order for the mission of the GBF to be achieved, for biodiversity loss to be halted and reversed by the end of this decade, member states' collective contributions need to deliver upon all 23 of the GBF's targets, at a minimum. The level of ambition in the GBF is already the result of considerable compromise and countries with the means to do more, such as Australia, should be seeking to exceed those minimum targets if we are to have a chance of reversing the trends identified by IPBES and the 2021 State of the Environment report. To provide appropriate direction to the agencies and actors responsible for delivering them, and so progress can be monitored, targets also need to be specific, measurable, achievable, relevant, and timebound (SMART).

ACF is concerned that many of the proposed domestic targets are not SMART. In particular the targets responding to priority areas 1, 2, 3, 4, and 6 are not specific or measurable, while the target under priority area 5 lacks the specificity of the corresponding GBF Target 3. Each domestic target is also less ambitious than the corresponding GBF target either through the failure to include numerical elements or because they respond only partially to the GBF targets, such as the priority 3 domestic target which reduces GBF Targets 7 and 16 to a circularity-based response and omits, for example, any reference to the reduction of risks from harmful pesticides contained in Target 7 or to the reduction of the consumption footprint required by Target 16.

We are particularly alarmed by the insertion of the words 'work towards' in the zero extinctions target. It is a watering down of the government's zero extinctions commitment in the Threatened Species Strategy, and the Minister's commitment to a target of no new extinctions before parties in Montreal at the negotiation of the GBF. The inclusion of the words 'work towards' allows any quantum of work done to avoid extinctions, whether effective or not, however inadequate, to be considered as achievement of the target.

More detailed concerns about the ambition, specificity and measurability of the domestic targets are outlined below in response to the discussion paper questions.

Recommendation 2: Ensure all proposed domestic targets are measurable and aligned with corresponding GBF targets

The need for domestic targets to deliver on mainstreaming and implementation

While vaguely falling under 'enablers', ACF is concerned that the critical GBF Targets under sub-heading 3. *Tools and solutions for implementation and mainstreaming* are largely ignored in the government's priority areas and no domestic targets corresponding to GBF Targets 14, 15, 17, 18, 19, 20, 21, 22, or 23 are proposed.



A key reason for the nature crisis is that biodiversity and the services it provides have not been adequately or appropriately factored into the decisions, policies, and practices of governments and businesses that rely on and impact upon nature. So-called ‘mainstreaming’ as a priority of the CBD is intended to reverse this trend.

Traditional conservation alone will not be sufficient to halt and reverse nature destruction in Australia, end extinction, or ensure the availability of ecosystem services that the [Australian economy depends upon](#). Transformative changes to the way we produce and consume goods and services are needed and financial flows must be aligned with the GBF goals, targets and mission.

As a matter of priority, and as a first step toward mainstreaming nature into business decision-making, Australia must respond to GBF Target 15 with a commitment to implement a mandatory disclosure regime that requires all large businesses and financial institutions to disclose their nature-related impacts, dependencies and risks. Notably, to align with Target 15 this must take a ‘double materiality’ approach. The Strategy should also urgently explain how Australia will address harmful subsidies in line with Target 18. While it may not be possible before COP16, the government should fully develop responses to the remaining mainstreaming targets well before COP17.

Prioritise domestic ‘mainstreaming’ targets including a domestic target and action plan corresponding to GBF Target 15

Strong new nature protection laws are critical to delivering on Australia’s commitments

The majority of the government’s priority areas and targets in the GBF can only be met with laws that are effective at protecting nature. The new laws must end the exemption of native forest logging from national environmental laws, tackle habitat loss through broadscale land clearing, and provide better protection of threatened species habitat.

Those laws must be enforced by an independent and well-funded EPA to make decisions on individual projects, and enforce compliance.

Effective new laws with appropriate standards and an independent well-resourced body able to make good decisions and enforce them, will increase transparency and trust in the way decisions are made, help to mainstream nature into decision-making, and support Australia’s contribution to all of the targets in the GBF.

Recommendation 5: Deliver strong national nature protection laws



Respond to a key pressure on Australian biodiversity by developing a response to Target 10

The government should signal its intention to develop a domestic target corresponding to Target 10 as a matter of priority. The development currently underway of an agriculture sector net zero pathway is a positive start, but action needs to be expanded to explore what the pathway for an Australian agriculture sector aligned with the global 'nature positive' goal would look like. Over half of the Australian land mass is used for agriculture, and the sector has a significant impact on nature and a high direct dependence on ecosystem services. It will not be possible to end extinction, halt and reverse nature destruction, or even deliver net zero in Australia without significant focus on agricultural sustainability. Australia's response to Target 10 should include a commitment to deliver an agriculture and land sector plan aligned with the 'nature positive' global goal before COP17. Work on an agriculture sector pathway should complement the net zero sector pathway and the UN declaration on sustainable agriculture, resilient food systems, and climate action Australia signed at UNFCCC COP28

Recommendation 5: Develop a response to Target 10 aligned with the mission to halt and reverse biodiversity loss by 2030

Australia's response to the GBF must be comprehensive

At a minimum, halting and reversing nature destruction and achieving the mission and goals of the GBF requires commitment and action by all states on all 23 targets of the GBF. While prioritisation is necessary, ACF is disappointed that Australia has only proposed 6 domestic targets. The Strategy should include a commitment to develop domestic target responses to all 23 GBF Targets prior to COP17 and to expand the list of priority areas.

Recommendation 6: Commit to develop domestic targets corresponding to all GBF targets prior to COP17

ACF responses to the discussion paper questions

PRIORITY AREA 1: Effective restoration of degraded terrestrial, inland water, and coastal and marine ecosystems

GBF Target 2:

Ensure that by 2030 at least 30% of areas of degraded terrestrial, inland water, and coastal and marine ecosystems are under effective restoration, in order to enhance biodiversity and ecosystem functions and services.

Proposed Australian target:

30% of priority degraded areas under effective restoration by 2030.

What do you think of this target? Does this target appropriately apply GBF target 2 to the Australian context? If not, what needs to be included or removed from this target to improve the national focus?



The proposed target represents only a partial response to GBF Target 2 and does not reflect an appropriate level of ambition. GBF Target 2 requires that *at least 30% of all degraded areas* are under restoration. Clearly if all parties only ensure ‘priority’ areas are under restoration then the global target cannot be met. Because ‘priority degraded areas’ is not defined it is not clear what proportion of Australia’s degraded lands would be under restoration or which degraded landscapes would be condemned to remain so. It is also not clear that the domestic target includes terrestrial, inland water, coastal or marine ecosystems.

The domestic target should be amended to precisely the same wording as GBF Target 2.

What additional action needs to occur for Australia to reach this target? Any barriers to overcome or opportunities to harness? How could the enablers of change (environmental data; mainstreaming biodiversity considerations into decision-making; and equitable participation in nature related decisions) contribute to this target?

For this target to be effective it needs to be clarified, preferably line with the response to the above question. The state of the environment report found more than half of Australia’s lands are degraded. Identifying which 30% of that half-or-more of Australia should be prioritised for restoration should be a consultative and science-based process. Appropriate funding will need to be allocated, noting the Wentworth Group of Scientists estimated \$2bn per year was needed to restore 30% of degraded terrestrial landscapes by 2050. While private investment may deliver some proportion of restoration, public funding is critical. A large proportion of funding and resources should go to First Nations-led restoration programs and should incorporate capacity-building that can assist with ongoing restoration beyond 2030, noting that the job of restoration will not be done by the end of this decade.

PRIORITY AREA 3: Building a circular economy and reducing the impact of plastics on nature

GBF Target 7:

Reduce pollution risks and the negative impact of pollution from all sources, by 2030, to levels that are not harmful to biodiversity and ecosystem functions and services, considering the cumulative effects, including: reducing excess nutrients lost to the environment by at least half including through more efficient nutrient cycling and use; reducing the overall risk from pesticides and highly hazardous chemicals by at least half including through integrated pest management, based on science, taking into account food security and livelihoods; and also preventing, reducing and working towards eliminating plastic pollution.

GBF Target 16:

Ensure that people are encouraged and enabled to make sustainable consumption choices including by establishing supportive policy, legislative or regulatory frameworks, improving education and access to relevant and accurate information and alternatives, and by 2030, reduce the global footprint of consumption in an equitable manner, including through halving global food waste, significantly reducing overconsumption and substantially reducing waste generation, in order for all people to live well in harmony with Mother Earth.



Proposed Australian target:

[Expand/grow/maximise/increase] the circularity of Australia's economy by 2030, to reduce the impact of pollution and habitat destruction.

What do you think of this target?

None of the proposed options – expand/grow/maximise/increase – are specific and measurable. It is good practice to set numerical targets and the government should take that approach by proposing measurable targets that correspond to the reduction of impacts from *all sources* of pollution, as referenced in GBF Target 7, to levels that are not harmful to biodiversity or ecosystem services. In particular Australia's domestic target should include a commitment to reduce nutrients lost to the environment and the harmful impacts of pesticides and hazardous chemicals by half, respectively. It would be appropriate to prioritise a reduction in the *use* of harmful chemicals and pollutants. While plastic pollution is an important matter, the focus on plastics at the expense of other pollutants is a partial and insufficient response to GBF Target 7.

The proposed domestic target also makes no reference to enabling consumers to make sustainable choices, a central component of GBF Target 16. It should. It should also include a specific and measurable reference to reducing the Australian consumption footprint.

It is also unclear why it is proposed to combine responses to Targets 7 and 16 into one domestic target. While they are complementary, as all targets are intended to be, ACF advises that the Strategy should consider responding to Targets 7 and 16 discretely.

PRIORITY AREA 4: Minimising the impact of climate change on nature

GBF Target 8:

Minimise the impact of climate change and ocean acidification on biodiversity and increase its resilience through mitigation, adaptation, and disaster risk reduction actions, including through nature-based solutions and/or ecosystem-based approaches, while minimising negative and fostering positive impact of climate action on biodiversity.

Proposed Australian target:

Embed climate change adaptation into decision-making by 2030, to support increased resilience of biodiversity.

What do you think of this target?

What are key considerations for embedding climate adaptation into decision-making? Noting this is related to one of the enablers of change (mainstreaming biodiversity considerations into decision-making).

What challenges do you foresee in integrating climate change and biodiversity policies, and how might we best overcome these?



PRIORITY AREA 5: Protect and conserve 30% of Australia's land and 30% of Australia's oceans by 2030

GBF Target 3:

Ensure that by 2030, at least 30 percent of terrestrial and inland water areas, and of marine and coastal areas, especially areas of particular importance for biodiversity and ecosystem functions and services, are effectively conserved and managed through ecologically representative, well-connected and equitably governed systems of protected areas and other effective area-based conservation measures, recognising indigenous and traditional territories, where applicable, and integrated into wider landscapes, seascapes and the ocean, while ensuring that any sustainable use, where appropriate in such areas, is fully consistent with conservation outcomes, recognising and respecting the rights of indigenous peoples and local communities, including over their traditional territories.

Australian target:

Protect and conserve 30% of Australia's land and 30% of Australia's oceans by 2030.

What factors should inform where we focus our efforts to achieve the 30% target on land?

ACF recommends the Australian target wording be updated to clarify that the 30% of land and of oceans protected will include terrestrial and inland water areas as well as coastal areas and will be ecologically representative and well-connected, in line with the GBF Target 3. In addition, the following actions are recommended:

Reinstate the National Reserve System Programme by 2024, to help guide and meet the 30% target across terrestrial, inland water, coastal and marine areas. The expansion of the protected areas network should be supported by a substantive acquisition fund and guided by a scientifically robust framework and the principles of comprehensive, adequate, and representative (CAR) to help ensure minimum representative samples of all bioregions and ecosystems in Australia.

In partnership with state and territory governments, systematically review the natural and cultural values of Crown land (including state forests, unallocated land and other government-owned tenures) and identify areas of conservation importance consistent with CAR principles.

Increase investment and expansion of Indigenous protected areas to meet Traditional Owner demand and ensure there is long-term and secure funding.

Expand and elevate permanent private land conservation, removing barriers and providing incentives that allow for private investment in conservation to be leveraged from non-government sources.

PRIORITY AREA 6: Work towards zero new extinctions

GBF Target 4:

Ensure urgent management actions to halt human-induced extinction of known threatened species and for the recovery and conservation of species, in particular threatened species, to significantly reduce extinction risk, as



well as to maintain and restore the genetic diversity within and between populations of native, wild and domesticated species to maintain their adaptive potential, including through in situ and ex situ conservation and sustainable management practices, and effectively manage human-wildlife interactions to minimise human-wildlife conflict for coexistence.

Australian target:

Work towards zero new extinctions.

Where should efforts be focused to help meet this target?

What do you think will increase community support for actions to prevent species extinctions?

As mentioned above, ACF is alarmed by the insertion of the words ‘work towards’ in the zero extinctions target. It is a watering down of the government’s zero extinctions commitment in the Threatened Species Strategy, and the Minister’s commitment to a target of no new extinctions before parties in Montreal at the negotiation of the GBF. The inclusion of the words ‘work towards’ actually changes the nature of the target from one focused on an outcome (zero new extinctions) to one focussed on an activity (“work”). This allows any quantum of work done to avoid extinctions, whether effective or not, however inadequate, to be considered as achievement of the target. The words ‘work towards’ should be deleted.

To deliver the target of ending extinctions the following actions are recommended:

Support Australia’s zero extinction target with increased investment, and greater integration across jurisdictions, local planning schemes, and national protected areas and restoration programs.

Ensure strong and effective legal protection for threatened species and their habitat under Commonwealth, State and Territory laws, including “up front” prohibitions on unacceptable impacts, and suitable powers of emergency intervention.

Ensure species recovery plans are prepared promptly and include species-specific recovery actions that are well funded and implemented.

Ensure the threatened species listing process is timely, with urgent uplisting of species at high risk of extinction and regular assessments conducted of progress and relevant conservation actions.

Prohibit the broadscale clearing of native vegetation. Offsets should be a last resort and should be excluded as an option where proposed actions would result in the loss of important threatened species habitat.

ENABLERS

Enabler 1: Mainstreaming biodiversity considerations into government and business decision-making, including in financing, policies, regulations and planning processes.



What are the current barriers, and potential solutions, to mainstreaming biodiversity considerations into decision-making across government, financial institutions and business?

Businesses and financial institutions that do not already have advanced sustainability reporting approaches are not motivated to voluntarily report impacts, dependencies, or risks related to nature, especially those businesses with the most significant impacts. In a voluntary system, early adopters are penalised if they report their impacts when competitors do not. Directors' legal duties may lead to risk assessment but not impact disclosure while it remains voluntary. Likely, only businesses already leaders in sustainability reporting or have significant exposure to the EU market will begin mainstreaming nature into decision-making effectively without mandatory requirements.

Australia's legal frameworks and compliance regimes are also weak, and nature is not valued by the financial system, meaning that business-as-usual often disregards impacts and dependencies on nature with little cost to the business.

Australia has not undertaken macroeconomic analysis of risks to Australia's economy stemming from our dependence on ecosystem services and changes to the state of nature, or natural capital, that would affect the availability of those services. It is apparent that Treasury and Australian agencies responsible for prudential regulation have not engaged with the issues associated with the rapid decline in biodiversity and the state of the environment, outside of a climate change context. Those economic agencies and government departments should be engaged in the development of Australia's response to the nature crisis broadly and to the 'mainstreaming' sections of the GBF.

What are the solutions and how can these be implemented across Australia's priority areas?

Target 15 implies the introduction of laws to require mandatory disclosure of nature-related impacts, dependencies and risks. The government should describe its plans and a timeline to implement a mandatory disclosure regime that aligns with Target 15 and begin consultation as soon as possible. While it would take some time to finalise and implement, clarifying that Australia fully intend to comply with the commitment under Target 15 would send an important signal to business and financial institutions that the mainstreaming of nature into business and government decision-making is a priority.

The design of a disclosure regime in Australia should emulate the European Union's Corporate Sustainability Reporting Directive (CSRD) which is itself closely aligned with the GBF and takes an approach that elevates citizens and consumers as stakeholders in a disclosure framework, unlike some frameworks which narrowly focus on investors. Consultation on the design should be undertaken with the Global Reporting Initiative, which has released a biodiversity topic standard. Reference China stock exchange commitments.

Australia should also outline its plans to introduce a comprehensive environmental and economic accounting system that provides detailed, regular, relevant and up-to-date environmental information that can be used to inform environmental decision-making. While nature can be mainstreamed into decision-making with existing data, more granular and accessible data aligned with the SEEA accounting system will ease the burden for business and government agencies.



The Australian Treasury, in cooperation with the Reserve Bank, prudential regulators, and Australia's independent experts in environmental economics and accounting should begin to conduct an economy-wide nature-related risk assessment to identify potential sources of physical and transition risk stemming from changes to the state of nature. This would allow for an assessment of sector-by-sector exposure to nature related impacts and dependencies and associated risks and opportunities. It would also allow for ecosystem prioritisation, identifying key ecosystems and services on which economic and social activities depend, that could inform Australia's protection and restoration programs alongside information on non-economic biodiversity values. This action, along with the introduction of a SEEA-based accounting system, would be a credible initial response to GBF Target 14.

The above agencies and departments should also take a more holistic view of the economy, such as via the new Wellbeing Framework (Measuring What Matters).

The introduction of strong national nature protection laws that protect biodiversity and ecosystem services, will also be necessary to ensure nature is mainstreamed into decision making by business and government agencies.

Enabler 2: Ensuring environmental data and information is widely accessible and supports planning

What are the current barriers to ensuring environmental data and information is widely accessible, and supports biodiversity protection planning?

To effectively assess, disclose, and reduce biodiversity risks, what specific data do businesses need from regulators to overcome data limitations?

What are the solutions and how can these be implemented across Australia's priority areas?

As Professor Graeme Samuel's review of the EPBC Act noted: the collection of environmental data is highly fragmented and there are significant information gaps. What data is available is often not accessible, presented in a useful format, or relevant to decision-making. Investment in data collection and an environmental and economic accounting system to organise it should be a priority and a commitment in response to GBF Target 14.

Priority should be given to establishing an effective vegetation mapping system that incorporates early (near-instant) detection of land use change, accurately monitors and verifies forest and non-forest loss on an annual basis, and distinguishes between human-induced and natural loss. The lack of an effective vegetation monitoring system is a barrier to businesses and financial systems embedding nature into decision-making and more importantly a barrier to setting targets to reduce impacts.

Contact: Nathaniel Pelle, Business and Nature Lead, Australian Conservation Foundation,
nathaniel.pelle@acf.org.au



