



Arid
Lands
Environment
Centre



SUBMISSION TO THE DEPARTMENT OF CLIMATE CHANGE, ENERGY, THE ENVIRONMENT, AND WATER

Implementing Australia's Strategy for Nature 2024-2030

THE NORTHERN AUSTRALIA CONSERVATION ALLIANCE

22 OCTOBER 2025



THE ALLIANCE

The Northern Australia Conservation Alliance is a newly formed coalition of peak conservation organisations covering the north of Australia, comprising Environment Centre Northern Territory, Arid Lands Environment Centre, Environs Kimberley and Cairns and Far North Environment Centre.

Our organisations recognise the existential threat posed by climate change to the unparalleled natural and cultural values of northern Australia, and that solutions to this crisis must be led by communities in the north.

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A GLOBAL TREASURE

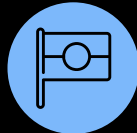
Northern Australia encompasses a third of Australia's landmass, and its cultural and natural heritage is outstanding on a global scale. Northern Australia's coast is in the top 4% of least spoiled coastlines in the world. We have the most extensive, most intact tropical savanna remaining on the planet. Some of the last free-flowing rivers in Australia are in the north. Our landscape includes savanna and rainforest, rivers and wetlands. Indeed, Northern Australia comprises one of the few very large natural areas remaining on Earth, alongside global treasures such as the Amazon rainforests, the Boreal conifer forests of Alaska, and the polar wilderness of Antarctica. Unlike in southern and eastern Australia, our natural places remain largely unspoiled by extractive industry.

Most of Northern Australia's major industries, including tourism, pastoralism and Indigenous economies rely on productive, functioning and healthy natural ecosystems. Our recreation and lifestyle, including fishing and camping, depend on our natural landscapes remaining largely intact.

The First Nations people of the north have passed on their cultural and ecological knowledge, languages and land management skills to countless generations across their homelands, and have continued to do so despite the devastating impacts of colonisation. The health and wellbeing of Country and people are fundamentally connected. Indigenous people have a relational connection to their lands – a responsibility to care for and protect it. Every inch of this country has been known and cared for by Aboriginal people for millennia. Unsurprisingly, in Australia and around the world biodiversity is highest on lands owned and managed by Indigenous People.



OUR VISION



OUR WORLD-CLASS NORTHERN AUSTRALIAN ECOSYSTEMS

are protected, flourishing and managed by First Nations people.



OUR CONSERVATION AGENDA

is embedded in federal institutional, political and legal power structures.



PEOPLE ACROSS AUSTRALIA

identify with and understand the natural and cultural values of northern Australia, and act to protect them.



THE NORTH'S FUTURE IS AT STAKE

General Feedback

Biodiversity conservation in Australia is failing, badly. Successive governments have allowed nature's decline in this country despite knowing the causes and consequences.

The Australian government and State and Territory governments are not taking biodiversity decline seriously.

There needs to be a recognition that the lack of an adequate response to biodiversity decline is due to political and fiscal reasons.

The political

Governments across the Nation have not stood up to up to big business and put in place laws that protect native plants, animals and places from destruction and pollution.

The fiscal

The investment by governments in protecting and restoring nature is woefully inadequate, instead subsidies are provided to damaging industries.

RECOMMENDATIONS FROM THE NORTH

Recommendation 1 – Australia commits to all 23 global targets of the Global Biodiversity Framework

Recommendation 2 – there needs to be a national agreement between the Commonwealth and States and Territories for Australia's Strategy for Nature 2024-2030

Recommendation 3 – include clear outcomes sought through the strategy with time specific actions and funding commitments

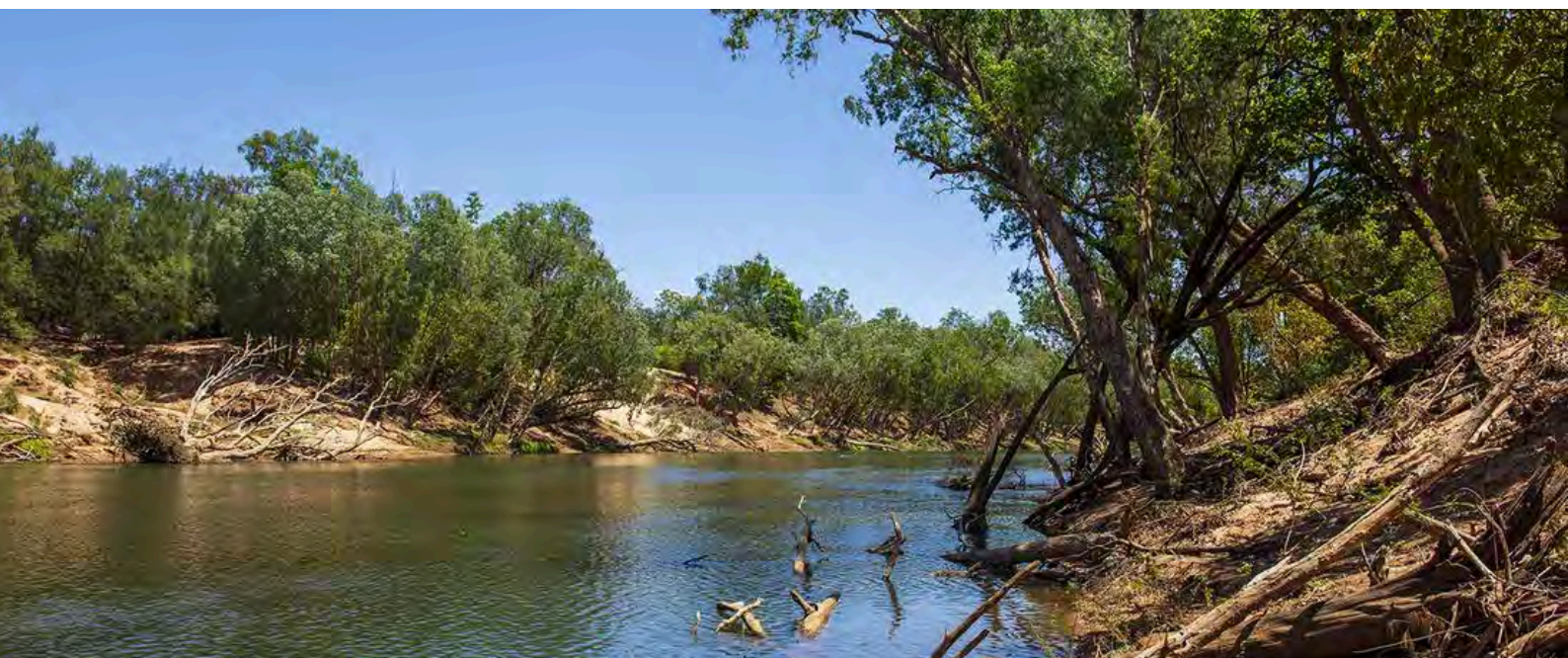
Recommendation 4 – the strategy needs a comprehensive First Nations consultation strategy that is fully funded

Recommendation 5 – undertake consultation with First Nations communities and broader civil society on an adequate conservation benchmark in Northern Australia

Recommendation 6 – provide adequate funds for conservation – a minimum of 1% of the Commonwealth budget to start off with

Recommendation 7 – a National Nature Restoration Strategy needs to be developed and an implementation budget provided by mid-2026

Recommendation 8 – develop a “Climate Change Biodiversity Outlook and Strategy” report to inform the community what climate change means for nature and how we can deal with it





Recommendation 9 - regulatory controls must be amended to explicitly prohibit clearing of critical and remnant habitat, ensuring permanent protection with no exceptions for development or land use changes.

Recommendation 10 - mandate comprehensive, independent assessments of chemical contamination in terrestrial and aquatic ecosystems with biomonitoring of the terrestrial, aquatic and marine environments, focusing on areas with threatened species.

Recommendation 11 - set robust, statutory industrial pollution regulation standards and enforceable targets to reduce pollution levels and safeguard biodiversity and community health.

Recommendation 12 - set a target to reduce chemical pollution by 50% by 2030, meeting global obligations to safeguard biodiversity.

Recommendation 13 - provide adequate resourcing for managing invasive species and implement reporting and accountability measures by all States and Territories

Recommendation 14 - all available environmental data must be made publicly available and easily accessible to support informed decision-making and enable effective conservation action.

Recommendation 15 - develop and implement a transparent process for Mainstreaming Nature in Decision-Making by governments and business

Recommendation 16 - the strategy needs to clearly outline how First Nations peoples, community members, and the environmental sector are meaningfully represented and actively involved in delivering the Strategy for Nature 2024–2030.



IMPLEMENTATION PLAN FEEDBACK

17 Global Biodiversity Framework Targets dropped

The Global Biodiversity Framework (GBF) includes 23 global targets (by 2030) and 4 long-term goals (by 2050). As a signatory, Australia committed to meet all of them. Yet the Australian Government has chosen to omit several targets altogether and only commit to 6 national targets.

For example, GBF Target 18 calls for phasing out government subsidies that harm biodiversity, such as native forest logging and fossil fuel extraction. The Biodiversity Council estimated the Australian Government currently spends more than 3% of the federal budget (\$26.3 billion) on these harmful subsidies—funding that could instead protect and restore nature.

Recommendation 1 – Australia commits to all 23 global targets of the Global Biodiversity Framework

- No Clear Accountability Framework – recycling a failed approach
- The draft plan's own explainer states it "will not be prescriptive or exhaustive in defining the actions required to achieve Australia's targets." Instead, it suggests each government and stakeholder should develop their own plans. This approach has failed.
- The National Biodiversity Conservation Strategy 2010-2030 failed to achieve nine out of ten interim targets. The only success was the number of Australians involved in conservation efforts.
- A primary reason for this failure was lack of coordinated effort and unclear responsibilities between jurisdictions.

AN APPEAL FROM NORTHERN AUSTRALIA

- It is unacceptable to repeat an approach that has demonstrably failed. All jurisdictions and stakeholders must be held fully accountable with coordinated actions to achieve biodiversity outcomes.
- If the Australian Government is genuinely committed to stopping and reversing biodiversity loss, this Strategy must clearly state, define, monitor, publicly report, and fund all necessary actions to achieve every GBF target Australia signed up to.

Recommendation 2 – there needs to be a national agreement between the Commonwealth and States and Territories for Australia's Strategy for Nature 2024-2030.

- Lack of Comprehensive Strategy
- The plan lacks a comprehensive framework mapping how time-specific actions will lead to outcomes and achieve national targets. Outcomes are confused with actions. Funding, monitoring, and evaluation methods remain unclear. The level of urgency and ambition is inadequate—many targets are too modest given the scale of biodiversity loss, accelerating extinctions, and climate change impacts.

Recommendation 3 – include clear outcomes sought through the strategy with time specific actions and funding commitments

- First Nations Partnerships unclear
- The plan states that "to the extent desired by First Nations peoples," Traditional Knowledge systems, cultural practices, and stewardship principles can be recognised and integrated. However, it provides no detail on how it will consult or partner with First Nations people, nor how it will adequately fund this work. The plan must clearly outline consultation and partnership processes, with dedicated funding.



SOLUTIONS FROM THE NORTH

Recommendation 4 – the strategy needs a comprehensive First Nations consultation strategy that is fully funded

Grossly Inadequate Funding

- The Australian Government has not committed the funding needed to implement the plan. To adequately fund nature conservation, the federal government needs to invest at least 1% of the annual federal budget (around \$7 billion), in addition to leveraging state and private contributions. Current investment is only 0.06% of the annual federal budget—less than one-tenth of what is required.

Protect and Conserve 30% of Land and 30% of Marine Areas by 2030

- There is potential to prioritise quantity over quality. Instead, the focus needs to be on areas of highest biodiversity and conservation values to avoid the potential of meeting the target on paper while failing to protect or restore biodiversity. There needs to be robust scientific evidence and transparency on whether 30% is an adequate threshold to stop and reverse biodiversity loss.
- In Northern Australia, the target for conservation needs to be much higher given the opportunity to secure the largest, most intact tropical landscape in the world.
- The plan lacks clarity on funding for effective management of these areas, which is crucial to drive and maintain conservation outcomes. It also ignores the systemic drivers of biodiversity loss—logging, fossil fuel extraction, and agricultural clearing. Protection is meaningless if destructive activities continue in the remaining 70%.
- The plan must protect First Nations rights to access traditional lands and set targets for how much of the 30% will be jointly managed with First Nations communities.

Recommendation 5 – undertake consultation with First Nations communities and broader civil society on an adequate conservation benchmark in Northern Australia

**Recommendation 6 – provide adequate funds for conservation – a minimum of 1% of the Commonwealth budget to start off with
Restore Priority Degraded Areas by 2030**

- The Strategy must commit to strengthened regulatory controls with improved stakeholder consultation, inclusive knowledge systems, adaptive management, and increased funding to restore ecosystems and build climate resilience.
- Restoration initiatives must be SMART (Specific, Measurable, Achievable, Relevant, Time-bound) with proper evaluation and adaptive management to ensure delivery.
- The plan must create incentives for private landholders to protect and restore native vegetation through grants and state-supported covenanting arrangements. Community conservation groups need long-term funding to scale up habitat restoration projects, not short-term grants that undermine effectiveness.

Recommendation 7 – a National Nature Restoration Strategy needs to be developed and an implementation budget provided by mid-2026

Minimise Climate Change Impacts on Biodiversity

- All state and Territory EPA environmental impact assessments must assess vegetation clearing and greenhouse gas emissions against Paris Agreement targets. Without this, we cannot credibly claim to be minimising national climate impacts on biodiversity.
- Serious concerns exist about whether the proposed strategies will effectively build resilience against escalating climate threats—droughts, heatwaves, and sea level rise. Large-scale restoration projects risk harming nature if they rely on monocultures or non-indigenous species rather than supporting diverse, resilient ecosystems.
- Climate change is a primary driver of biodiversity loss. This Strategy cannot succeed in isolation—biodiversity goals must be integrated with broader climate mitigation and adaptation efforts, including forest protection and nature-based carbon sequestration.

- The Strategy must incorporate First Nations and local knowledge to ensure management practices are informed by Indigenous Traditional knowledge and customs, are appropriate for Australia's diverse landscapes, are adequately monitored and evaluated, and supported by the communities who manage them. Like all initiatives within the Strategy, these must be adequately funded to be successful for First Nations and local communities and the environment.

Recommendation 8 – develop a “Climate Change Biodiversity Outlook and Strategy” report to inform the community what climate change means for nature and how we can deal with it

Specific comments related to targets

Target 4: No New Extinctions

To halt the decline of threatened species and ecological communities, the Strategy must ensure full funding and implementation of strong, enforceable Recovery Plans for all threatened species and ecological communities, updated at least every five years, and more often if necessary.

These plans need legal powers to protect species from threatening processes as soon as they become evident, not after populations have collapsed, and regardless of where these species live.

The 2025 West Australian Auditor General's report exposes the scale of current failures: more than two-thirds of WA's threatened ecological communities are ineffectively monitored and protected, with 72% showing little progress. Recovery plans were either interim or outdated, with none approved by the environment minister. The Auditor General found WA's DBCA lacks the resources and planning to meet its obligations, has no TEC strategy, and cannot demonstrate if current activities align with long-term conservation goals.

This failure persists despite a \$2.4 billion state operating surplus. This is unacceptable and demonstrates why strong federal oversight and accountability are critical.

Regulatory controls must be amended to explicitly prohibit clearing of critical and remnant habitat, ensuring permanent protection with no exceptions for development or land use changes. Without this, we cannot credibly commit to preventing extinctions while continuing to destroy the habitats species depend on for survival.

Recommendation 9 - regulatory controls must be amended to explicitly prohibit clearing of critical and remnant habitat, ensuring permanent protection with no exceptions for development or land use changes.

Target 5: Reduce Pollution by Increased Circularity and Closed Loop Approaches by 2030

Recommendation 10 - Mandate comprehensive, independent assessments of chemical contamination in terrestrial and aquatic ecosystems with biomonitoring of the terrestrial, aquatic and marine environments, focusing on areas with threatened species.

Recommendation 11 - Set robust, statutory industrial pollution regulation standards and enforceable targets to reduce pollution levels and safeguard biodiversity and community health.

Recommendation 12 - Set a target to reduce chemical pollution by 50% by 2030, meeting global obligations to safeguard biodiversity.



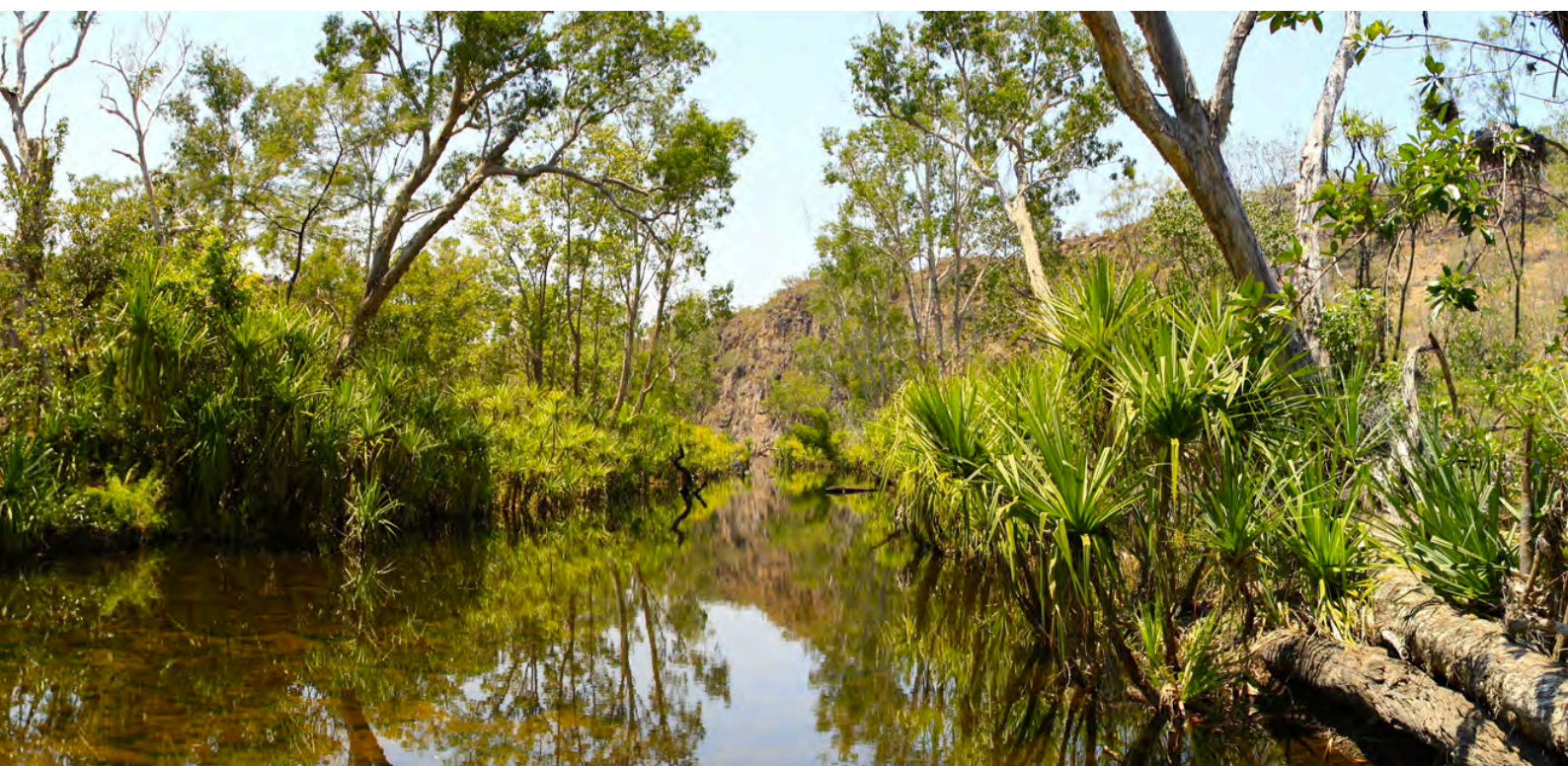
Target 6: Invasive Species

Invasive species (flora and fauna) have major impacts and pose a major threat to biodiversity.

The Australian Invasive Species Council cites science that found invasive species are Australia's leading cause of animal extinction.

In 2019, scientists from the Threatened Species Recovery Hub – a consortium of universities and other bodies investigating endangerment and extinction – undertook a comprehensive analysis of Australia's extinction record. Shockingly, they found invasive species were the main cause of most Australian animal extinctions – 45 of 100 extinctions, while habitat loss accounted for 36. Hunting was the main cause of 6 extinctions, livestock grazing 4, modified hydrology 4, and other ecosystem modifications 3. Climate change, fire and pollution had each caused one extinction.

Invasive species directly impact 82% of all Australian threatened species (Australian State Of the Environment 2021). Despite this, the Strategy lacks detail and adequate resourcing for on-ground work for weeds and invasive species control, monitoring, and evaluation of activities - this all needs ongoing funding, technical support, clear mechanisms and reporting, and accountability. (See more below)

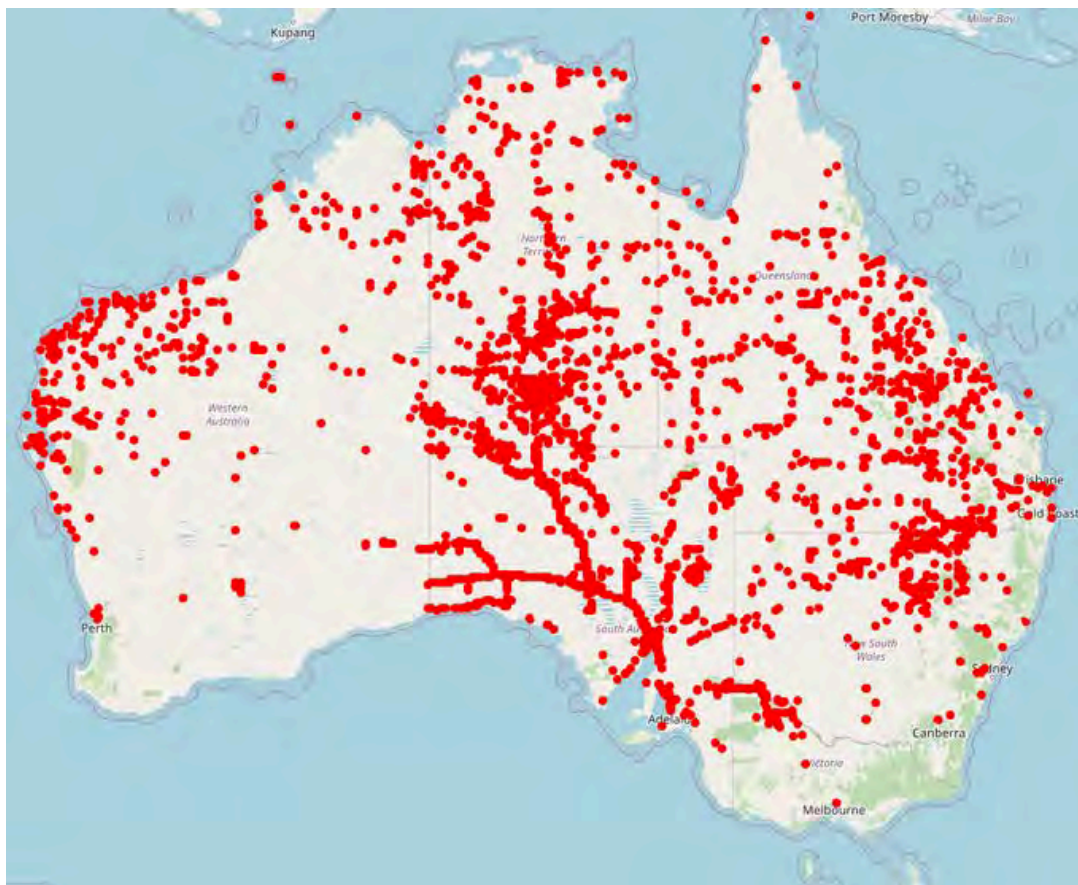


Recommendation 13 – provide adequate resourcing for managing invasive species and implement reporting and accountability measures by all States and Territories

An example on the failure of managing invasive species

Buffel Grass Invasion: land clearing by stealth across inland Australia

We welcome the target to ‘eradicate and control invasive species in priority landscapes and further minimise their introduction by 2030’. This target must include coordinated and strategic actions to slow and stop the spread of buffel grass across inland Australia. Buffel Grass invasion is landclearing by stealth across the arid and semi-arid lands and is resulting in catastrophic consequences to Australia’s nature and First Nations cultures.



We are witnessing buffel grass transform the identity of inland Australia; the red centre is turning green, then yellow before it goes up in flames. Vegetation along our inland rivers and creeks, mulga woodlands, sandplains and native grasslands are increasingly replaced by a monoculture of buffel grass. Stands of 500-year old river red gums have been turned to blackened posts, landscapes transformed and dozens of threatened species are at risk of extinction.

Buffel grass is the greatest invasive species threat to environments and cultures across the arid and semi-arid lands. Sacred sites are overgrown and under threat of fire, bushfood and hunting practices suppressed, access to Country impacted, and the health of Country in freefall in affected areas. Important animal and plant species lost, waterholes and springs choked and intergenerational knowledge sharing undermined.

Buffel grass has impacts well beyond the boundaries of the pastoral estate. It has destroyed homes and scorched National Parks. Aboriginal Land, Indigenous Protected Areas, Crown Land, and the rights and interests of Native Title Holders are majorly impacted by buffel grass invasion. The spread of buffel is a human health and safety issue; buffel grass puts lives at risk, affecting the physical, mental and social health of inland communities. Addressing buffel grass invasion has become an obsession for countless people across the arid lands.

With up to 68 percent of the continent climatically suited to buffel grass, buffel invasion represents not only an ecological catastrophe, but a major economic problem. Buffel grass wildfires are affecting infrastructure and logistics, tourism, the arts, incurring significant health costs, as well as inhibiting emerging economies in biodiversity conservation and carbon.

Buffel grass is internationally recognised as one of the greatest threats to arid and semi-arid environments, as well as savanna grasslands. Internationally significant conservation areas in Australia are at risk, from Kati Thanda Lake Eyre to Uluru-Kata Tjuta, Watarrka and the Tjoritja MacDonnell Ranges in the Northern Territory to Queensland's channel country, the Great Sandy Desert and Pilbara in Western Australia, the Victorian Mallee, The Great Victoria Desert and Anangu Pitjantjatjara Yankunytjatjara Lands in South Australia and north-west New South Wales, iconic landscapes and environments across diverse soil and climatic types are at existential risk. The world's oldest river, the Lhere Pinta Finke River is covered and degraded by buffel grass and cattle. The current management of these nationally significant sites is unacceptable. Buffel grass also inhibits the ecological restoration of affected areas across inland Australia.

Mparntwe Alice Springs and dozens of remote communities are surrounded by unsafe fuel loads, which remain a significant risk to public safety - these buffel fuel loads are a disaster waiting to happen. Buffel grass fires are deadly. Buffel grass was implicated in the Maui wildfires in Hawaii in August 2023 that resulted in over 100 fatalities. Buffel fires have already destroyed dwellings in the Alice Springs area, resulting in emergency evacuations from the Larapinta trail and is a significant risk factor for dozens of remote and very remote communities, homelands and outstations across the arid and semi-arid lands.

Learning from history

This Nature Strategy must support decisive action on buffel grass. Decades have already been lost. Nearly 40 years ago, in 1987, Northern Territory Government ecologist, Penny Van Oosterzee warned in a newspaper opinion piece in the Centralian Advocate that:

“there is growing concern amongst the scientific community of the impact of buffel grass, that in the long run the buffel grass band-aid may not be terribly healthy. Buffel grass is here without its pests and natural diseases. It is a grass suited to this environment. It therefore has open-slather to take over and change the environment. It does this by out-competing other plants for the limited amount of moisture in the soil. Young native seedlings, therefore, cannot survive and their numbers decline. The real worry though is that once established, buffel does so well that it moves into natural habitats such as creek forages. This, combined with the fact that it is a fire hazard, results in fire sensitive natives... being obliterated”.

This reality has borne true. After decades of denial, suppression, neglect and finger-pointing, millions of hectares have been invaded, transforming native grasslands, woodlands and river systems into a monoculture of fire promoting buffel grass. The inertia and malaise which has inhibited buffel grass management in a targeted and strategic way across affected and at risk inland areas must be resisted. There are exciting opportunities to improve buffel grass management and to do this we must learn from the mistakes of history, be brave and be based in evidence. Nature across inland Australia requires it. The buffel grass crisis is not going away and we must act strategically to stop the spread of buffel into new areas that are at risk.

Pros and cons of buffel grass

About 30 years ago the area around Alice Springs airport was badly scalded due to over-grazing.

It was barren and during hot, dry winds dust was whipped up and blown over the town.

Buffel grass, an exotic Mediterranean grass, was introduced to cover the bare ground.

The ground was ripped and the buffel grass seeds scattered in the furrows.

The circular patterns that this procedure created are still visible from the air.

Despite the buffel grass reputation — as an easy grass to establish — considerable effort was involved to get the buffel going.

The only real justification for planting it appeared to be that it was better than bare ground.

But perhaps the same effort, using native grass species instead, could have produced a richer environment and, more importantly, one that would have approached the natural state of the area where about 10 different types of grasses as well as numerous species of shrubs flourished.

There is an increasing availability of native grass seed, such as mulga grass, which is also nutritionally much richer.

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The real worry though is that once established, buffel does so well that it moves into natural habitats such as creek frontages.

Introduced
to cover
bare land





This, combined with the fact that it is a fire hazard, results in fire sensitive natives such as mulla and stony wattle, *Acacia victoriae* being obliterated.

Native animals, such as Bilbies which require a rich natural creek fronting habitat will be disturbed and will not survive in a homogenized landscape of buffel grass.

(The Conservation Commission is trying to re-introduce the Bilby-prone areas).

In growing much faster than native grasses, buffel uses up the limited resources in the soil. The plant itself, however, remains nutritionally poor — you can't get anything for nothing.

And this lesson is being painfully learned in Western Australia.

On a lot of the sheep grazed WA coastal plains, where buffel has been introduced, a physical break in the wool occurs where the sheep have switched over from grazing the more palatable but limited native grasses to buffel.

The break results from a phosphorus deficiency in the wool and severely affects the income resulting from that wool.

During the drought, while the plant itself stays alive, the foliage of the buffel grass dies away so that chest stores — the initial reason for planting buffel grass at the airport — still result.

NORTRAS
AGENTS FOR ATCO TRANSPORTABLES

5 Man Truck bodies with ground	\$4000
Kitchen Drives	PCDA
Stone Batters for a 2m	\$4500
Living Curbs with pavers & top	\$10 000
2 Mobile Accommodation Units, full Road camp	\$4000 on

PHONE 52 1699

● Buffel grass ... an exotic Mediterranean grass.

Figure. Penny Van Oosterzee article in the Centralian Advocate 22nd May 1987

SPECIFIC COMMENTS RELATED TO ENABLERS OF CHANGE

Enablers of Change

1. Accessible Environmental Data (GBF Targets 1 & 21)

Many people, organisations, and stakeholders outside government work tirelessly to protect Australia's biodiversity.

Recommendation 14 – All available environmental data must be made publicly available and easily accessible to support informed decision-making and enable effective conservation action.

2. Mainstreaming Nature in Decision-Making (GBF Targets 14 & 15)

There must be a transparent process for how nature is 'mainstreamed' into government and business planning, financing, policies, and regulations. The effectiveness of this must be evaluated against clear KPIs and timelines, with monitoring openly accountable to all stakeholders. Vague commitments without measurable accountability are insufficient.

Recommendation 15 – develop and implement a transparent process for Mainstreaming Nature in Decision-Making by governments and business

3. Equitable Representation and Participation (GBF Targets 22 & 23)

The Strategy must include a publicly available engagement and participation strategy that clearly outlines how First Nations peoples, community members, and the environmental sector are meaningfully represented and actively involved in delivering the Strategy for Nature 2024–2030.

SPECIFIC COMMENTS RELATED TO ENABLERS OF CHANGE

Too often, those who have dedicated years—sometimes decades—to protecting and restoring nature are excluded from decision-making. This includes grassroots communities and local environmental groups whose contributions are vital, ongoing, and deeply informed by place-based knowledge. The only interim target met by the previous National Biodiversity Conservation Strategy 2010-2030 was the number of Australians participating in conservation activities—demonstrating the level of interest and concern Australians have for our environment. This concern must be reflected in both the ambition and actions set by this Strategy, which are currently seriously lacking.

Communities, including First Nations people and the environmental sector, are not only deeply affected by biodiversity loss and climate change—they are key contributors to the knowledge, action, and innovation required to address these crises. Their leadership, expertise, and lived experience must be acknowledged, respected, and embedded in the Strategy's implementation.

Recommendation 16 – the strategy needs to clearly outline how First Nations peoples, community members, and the environmental sector are meaningfully represented and actively involved in delivering the Strategy for Nature 2024–2030.

THE ENVIRONMENT CENTRE NT

The Environment Centre NT (ECNT) is the peak conservation organisation in the Northern Territory.

Working hand in hand with communities across the Territory, we have courageously and successfully defended our iconic landscapes. We want a positive future for the Northern Territory with abundant nature, a safe climate and just economy that supports community aspirations and wellbeing.

ARID LANDS ENVIRONMENT CENTRE (ALEC)

Arid Lands Environment Centre (ALEC) is Central Australia's peak environmental organisation,

defending Australia's iconic desert country for over 40 years. We are a strong and trusted voice for the protection of arid lands, creatures and communities. We work tirelessly toward our vision: healthy futures for arid lands and people.

ENVIRONS KIMBERLEY

Environs Kimberley is the peak environmental NGO for the Kimberley region in far north-west Australia,

and is dedicated to looking after the health of the land and waters of the region. We do this through advocacy and on-ground cultural and natural resource management projects.

THE CAIRNS AND FAR NORTH ENVIRONMENT CENTRE (CAFNEC)

The Cairns and Far North Environment Centre (CAFNEC) has been advocating for the protection of nature in north Queensland since 1981.

We work to protect the environment by enhancing the capacity of local groups and community members to act for conservation, strengthening networks within FNQ, facilitating region-wide cooperation to identify and coordinate action on issues of regional significance and when necessary, engaging in campaigns that are strategically important for the region.

