

12 September 2025

Protected Area Strategy and Investment team
Department of the Environment, Tourism, Science and Innovation
Via email: stewardship@detsi.qld.gov.au
Cc: Environment@ministerial.qld.gov.au

Submission to Discussion Paper: *A Fresh Start for Private Protected Areas*

Dear PAS and Investment team,
Thank you for the opportunity to make a submission.

About QCC

QCC is the leading independent voice for the environment in Queensland and the peak body for the state's environmental movement, representing more than 50 community environment groups. Since 1969, we have worked to protect, conserve, and sustain Queensland's environment.

Nature Underpins Queensland's Economy

Queensland's landscapes provide clean water, healthy soils, pollination, and climate regulation—services essential for agriculture, rural communities, and regional prosperity. Yet only 8.6% of the state is formally protected, far below the 17% target and the national average. Iconic species such as koalas, greater gliders, and glossy black cockatoos rely on these habitats, which also safeguard water catchments and buffer communities against droughts, bushfires, and floods.

The recently released *Queensland State of the Environment Report* highlights declining ecosystem health, the addition of 114 new threatened species, and ongoing degradation from deforestation, climate change, and land-use conflicts.

Overview

Expanding Queensland's protected area network is the most effective way to halt biodiversity decline. QCC would welcome the Government's reaffirmation of the 17% protected area target and exclusion of OECMs from this target, as well as the national commitment to protect 30% of Australia's land and marine areas by 2030.

A strong framework for protected area expansion and management is essential to meet international commitments such as the Global Biodiversity Framework, Taskforce on Nature-related Financial Disclosures (TNFD), the Glasgow Leaders Declaration on Forests and Land Use, the Greenhouse Gas Protocol, and World Benchmarking Alliance.

Queensland once led the world in supporting private protected areas, but growth has stalled due to years of underinvestment. Without renewed commitment, we risk losing this legacy of conservation leadership.

Private Protected Areas

Spark Momentum

A 2018 report by Protected Area Solutions¹ revealed that growth in Queensland's private protected area network has slowed due to inadequate government support. Current resourcing is insufficient for effective management of large Nature Refuges (>10,000 ha) and is deterring new landholders. For Special Wildlife Reserves, existing mining and resource tenures over high-conservation-value land complicate dedication.

A well-resourced program could encourage new participants and support existing landholders to better manage feral animals, weeds, and wildlife habitat.

Recommendations:

1. Set clear targets for the expansion of both Nature Refuges and Special Wildlife Reserves.
2. Have the Minister for Environment champion protected area growth in Cabinet and set timeframes for removal of encumbrances to establish Special Wildlife Reserves and Nature Refuges.
3. Ensure the Private Protected Areas Program is expanded and receives adequate investment of \$124.4m over four years, including new stewardship incentives, increased PPA Program capacity and renewed Nature Assist grants scheme.

Addressing Systemic Barriers

Private protected areas face ongoing barriers, including:

- Limited funding to manage fire, feral animals, and invasive weeds over large areas.

¹ Protected Area Solutions (2018) Nature Refuges in Queensland. Report prepared for Our Living Outback. Available at: <https://ourlivingoutback.org.au/nature-refuges-in-queensland/> Accessed 1 September 2025.

- No ongoing financial support such as stewardship payments, land tax exemptions, or rates relief.
- Confusion over access to other nature-based income streams, including carbon and biodiversity markets.
- Limited protection from external forestry, mining, and resource interests.
- Complex and resource-intensive processes for applying for Special Wildlife Reserves.

Recommendations:

4. Consider land tax exemptions for landholders with Special Wildlife Reserves and Nature Refuges.
5. Retain the Land Restoration Fund and invest in additional extension officers and improved communications.
6. Improve DETSI efficiencies to ensure faster processing of Nature Refuge applications.
7. Provide clear guidance to private landholders on additionality tests for the eligibility of land that is already subject to carbon credits or nature credits for declaration as a nature refuge or Special Wildlife Reserve.

Other Effective Conservation Measures (OECMs)

Queensland's stock route network provides important habitat and connectivity for wildlife. QCC supports managing stock routes — particularly tertiary routes — as OECMs, rather than formal protected areas, to recognise ecological value of these routes, while recognising they may not be high priority under the CAR methodology for protected areas. .

Land already conserved through ACCUs, the Nature Repair Market, or offsets should have the option to be added to the protected area network as Nature Refuges through subsequent dedication.

Recommendations:

8. Manage stock routes — particularly tertiary routes — as OECMs, not formal protected areas.
9. Ensure Queensland's protected area targets are achieved through formal protected areas, not OECMs.
10. Enable land already protected via ACCUs, the Nature Repair Market, or offsets to be added to the protected area network as Nature Refuges.

Public Protected Areas

Queenslanders value nature: 77% want more national parks, 71% support doubling the park estate by 2030, and nearly two-thirds visited a park in the past year². Protecting additional ecosystems supports conservation and sustains communities and agriculture.

Protected areas also provide significant economic benefits, including tourism, co-financing, carbon sequestration, and management investment. National park visitation contributes \$2.7 billion annually to Queensland's economy, generating \$6.30 for every \$1 spent on park management. Nature-based recreation contributed an estimated \$18 billion (5% of GSP) in 2019³.

Government investment in land acquisition has proven effective in leveraging private-sector co-investment, with approximately \$30 million contributed since the release of the Protected Area Strategy.

Recommendations:

11. Grow public protected areas by maintaining an acquisition fund with an ongoing annual allocation of \$100 million until 2030, leveraging third-party investment.
12. Systematically review public and state-owned land to identify areas of high conservation significance, including state forests, unallocated state land, and other government-owned land.

² YouGov (2024) YouGov Poll on Queensland National Parks. Prepared for Queensland Conservation Council, 19th January 2024.

³ Driml, S., Brown R. and Silva, C. (2020) "Estimating The Value Of National Parks To The Queensland Economy," Discussion Papers Series 636, School of Economics, University of Queensland, Australia.

13. Better implement the Gurra Gurra Framework to increase First Nations rights, interests, and leadership in protected area growth, including free, prior, and informed consent from Traditional Owners.
14. Maintain adherence to the national science-based framework and CAR principles, and continue resourcing Queensland's Protected Area Strategy within DETSI.
15. Ensure greater coordination between government departments to accelerate protection and appropriately resolve competing land uses and encumbrances.

Conclusion

Queensland's natural landscapes and biodiversity are under unprecedented pressure, yet the state still has the opportunity to lead nationally and internationally in conservation. Expanding and effectively managing both private and public protected areas is critical to safeguarding iconic species, maintaining ecosystem services, and supporting regional communities and economies.

A well-resourced and strategically guided Protected Areas Program, combined with clear targets, financial incentives, and robust governance, will unlock the full potential of private protected areas, strengthen the public estate, and ensure that all landholders, including First Nations custodians, can participate in long-term conservation outcomes.

By taking decisive action now, the Queensland Government can secure the state's unique natural heritage, meet international commitments, and leave a lasting legacy for future generations.

Thank you for the opportunity to submit.

If you wish to discuss please contact Protected Areas Campaigner Nicky Moffat:
Nicky.Moffat@qldconservation.org.au and 0424 452 350.

Kind regards,



Dave Copeman
Director