

Department of Agriculture, Fisheries and Forestry
Canberra ACT 2601

13 December 2023

RE: Submission on the Agriculture and Land Sectoral Plan

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a submission to the Government's consultation on its Agriculture and Land Sectoral Plan.

ALCA is Australia's peak national body for private land conservation. We represent organisations that conserve, manage, and restore nature on privately managed land, either as direct stewards or in partnership with other landholders.

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

Summary

Policymakers are increasingly recognising that nature and climate are an indivisible nexus. The climate crisis cannot be solved without also solving the nature crisis by protecting existing stocks of nature – and thus the carbon it contains – supplemented with large-scale nature restoration.

In 2017, The Nature Conservancy and fifteen other institutions concluded that nature-based solutions (for climate change) “*provide up to 37 percent of the emission reductions needed by 2030 to keep global temperature increases under 2 degrees Celsius – 30 percent more than previously estimated*”¹, a finding only reinforced by subsequent studies.

In short, whilst phasing out fossil fuels will be necessary to avert the worst effects of climate change, protecting and restoring nature (and the carbon it contains) will also be absolutely necessary.

Beyond carbon, there are dramatic benefits to society, cultural, human wellbeing, food security, and, of course, biodiversity, in protecting and restoring nature. The easiest and lowest-cost way to reduce our emissions is to protect our existing natural stocks of carbon.

Privately managed land accounts for approximately 60% of Australia's land, with much of that land being used for agricultural production. This makes private land conservation a critical pathway for delivering the protection and restoration of nature (and the carbon it contains).

¹ See: <https://www.pnas.org/doi/10.1073/pnas.1710465114>

Recommendations

The climate and nature crises are twin crises with deep mutual dependencies and interlocking solutions. They are an indivisible nexus, and the climate crisis cannot be solved without also solving the nature crisis.

1. **Devise plans and policies that address the nexus of the nature and climate crises together.** Creating separate solutions only leads to greater and unnecessary opportunity costs being borne by Government and by society.
2. The mathematics of our emissions is inescapable – Australia’s emissions reduction pathway will not succeed without protecting and restoring nature (and the carbon it contains). This means:
 - a. **Land clearance of native vegetation should immediately cease**²
 - b. **Protect nature that already exists** (in accordance with Australia’s commitment to protecting 30% of our lands by 2030, as aligned with Target 3 of the UN Kunming-Montreal Global Biodiversity Framework³, and in line with the Protected Areas indicator of Australia’s National Wellbeing Framework⁴)

This could be achieved by:

- establishing a new dedicated fund for the purchase of land of high biodiversity importance to create new public, private or Indigenous protected areas
- providing direct federal support to State and Territory conservation covenant programs with an explicit focus on increase the uptake and execution of new conservation covenants to expand the protected area estate
- advancing, as a matter of priority, a protection methodology for the Government’s new Nature Repair market
- Further details – and recommendations – are available in *Protecting Australia’s Nature: Pathways to protecting 30 per cent of land by 2030*⁵

² ALCA acknowledges that some clearing may be required for critical services, and where this is required, it should always be offset with high integrity offsets, and, preferably, offsets that deliver an absolute net gain for biodiversity

³ See: <https://www.cbd.int/article/cop15-final-text-kunming-montreal-gbf-221222>

⁴ See: p44 & 48, https://treasury.gov.au/sites/default/files/2023-07/measuring-what-matters-statement020230721_0.pdf

⁵ See: https://alca.org.au/wp-content/uploads/2023/11/Report3030_FINAL_web.pdf

- c. **Restore nature** (in line with Australia's commitment to restoring 30% of degraded lands by 2030, as aligned with Target 2 of the UN Kunming-Montreal Global Biodiversity Framework⁶)
- d. **Strengthen Australia's environmental protection laws**
- e. **Ensure environmental offset regimes across all Australian jurisdictions deliver an absolute net gain in biodiversity**
- 3. Given 60% of Australia's land is privately managed, there needs to be **greater and deliberate support for private land conservation as a critical pathway** for delivering the protection and restoration of nature (and the carbon it contains)
- 4. Ensure, at-minimum, **agnostic tax treatment of the conservation sector and conservation activities**
 - a. Noting the Government's commitment to protect 30% of Australia's lands by 2030, preventing further species extinction⁷, and reducing our carbon emissions, **instigate a Treasury or Productivity Commission review into federal and state taxes upon conservation** (as aligned to Recommendation 28(d) of the *Independent Review of the EPBC Act*⁸)
 - b. **Amending Section 31.5 of the Income Tax Assessment Act 1997 to remove the qualification around material benefit** to allow conservation covenantors to meaningfully access this exemption
 - c. Extend **fringe benefit tax (FBT) concessions to conservation charities** that are currently only afforded to Public Benevolent Institutions (PBIs; i.e., charities that relieve poverty, sickness, or destitution).

In practice, this means that environmental charities struggle to attract talent when compared with other organisations in the charity sector, let alone the wider workforce, with average salaries being significantly less than in PBIs for equivalent roles⁹, which undercuts our sector's ability to deliver carbon sequestration at scale
 - d. Reverse the university funding penalties upon environmental studies implemented under the 2020 Job Ready Graduates package

⁶ As above n3

⁷ See: <https://www.dcceew.gov.au/environment/biodiversity/threatened/publications/action-plan-2022-2032>

⁸ See: <https://epbcactreview.environment.gov.au/resources/final-report/chapter-8-planning-and-restoration/84-government-effort-alone-not-enough>

⁹ ALCA would be happy to facilitate a salary benchmarking exercise with its members to further evidence this claim

- e. In Queensland, provide a land tax exemption for conservation covenants ('nature refuges'), the last State jurisdiction to levy land tax upon such covenants
 - f. Provide local government rebates for land with conservation covenants
5. **Preference, subsidise or support conservation activities to maximise public value** (i.e. maximise social profit¹⁰)
- a. For example, **the Government's carbon market procurement efforts should be delivered to maximise public value** (i.e. maximise social¹¹ profit), rather than lowest cost abatement.

Significant public resources are currently being invested by Government to deliver lowest cost abatement of greenhouse gas emissions in the public interest. However, there are large opportunity costs in supporting carbon projects only according to the lowest cost and without considering other public benefits that could also be available, particularly intergenerational benefits for our shared natural environment
 - b. **Support research and development into the integrated delivery of conservation** (i.e. carbon protection and restoration) **and agricultural production** (in line Australia's commitment to Target 10 of the Kunming-Montreal Global Biodiversity Framework¹²), including **monitoring and evaluation** and **standardised approaches to data collection and reporting**
 - c. **Support for capacity development of the private land conservation sector** to engage more effectively in climate mitigation and adaptation
6. The *Carbon Credits (Carbon Farming Initiative) Act 2011* should be amended to allow for **a verification framework for co-benefits via regulation**, including environmental co-benefits.

The following paragraphs from the Independent Review of ACCUs are particularly pertinent here:

"Recommendation 13. The CER [Clean Energy Regulator], in consultation with market participants and stakeholders, should develop procedures to support transparency of different project characteristics and types of co-benefits associated with ACCUs..."

Where a co-benefit is claimed, the proponent should use an appropriate method, verifying the claims made in relation to the co-benefit, and provide evidence to the CER before the claim can be published."

¹⁰ Social profit equals social revenue minus social cost

¹¹ Ibid.

¹² As above n3

As articulated in the Independent Review, such a verification framework would focus upon ensuring transparency regarding proponents' methods, co-benefit claims, and any supporting evidence, but would not go so far as to design or formally detail co-benefit methodologies, nor provide any explicit or implicit Government guarantee of the claimed outcomes, thus letting the market decide based on the evidence these transparency requirements would help provide.

Managed appropriately, biodiversity certificates under the Nature Repair market could be a recognised tool for delivering transparency for environmental co-benefits under such a verification framework.

Thank you again for the opportunity to contribute to the Government's consultation on the Agriculture and Land Sectoral Plan. ALCA and its members look forward to ongoing engagement with the Government to deliver the Plan and to urgently scale up our efforts to address the crises facing nature and climate.

If you have questions regarding the submission, please do not hesitate to contact ALCA via michael@alca.org.au (Mr Michael Cornish, Policy Lead).

Yours sincerely,



Dr Jody Gunn
Chief Executive Officer
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 seventeen members are:

- Arid Recovery
- Australian Wildlife Conservancy
- Biodiversity Conservation Trust NSW
- Bush Heritage Australia
- EcoGipps
- GreenCollar
- Greening Australia
- Landcare Australia
- Nature Foundation
- NRM Regions Australia
- Odonata
- Queensland Trust for Nature
- South Endeavour Trust
- Tasmanian Land Conservancy
- The Nature Conservancy Australia
- Trust for Nature (Victoria)
- World Wildlife Fund - Australia

ALCA member land conservation efforts have influenced over 3 million square kilometres with more than 4,000 landholders. We have over 70,000 supporters and our combined annual turnover exceeds \$325 million. Together ALCA and its members address some of the most pressing conservation issues across the country, including restoring endangered ecosystems, building the protected area estate, tackling invasive species, expanding private conservation finance, and funding and using nature-based solutions to tackle 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.