

Implementing Australia's Strategy for Nature 2024-2030

October 2025



The National Farmers' Federation (NFF) is the voice of Australian farmers.

The NFF was established in 1979 as the national peak body representing farmers and more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

The NFF represents Australian agriculture on national and foreign policy issues including workplace relations, trade, and natural resource management. Our members complement this work through the delivery of direct 'grass roots' member services as well as state-based policy and commodity-specific interests.

NFF Member Organisations



17 October 2025

NBSAP Taskforce
Department of Climate Change, Energy, the Environment, and Water
GPO Box 2013
Canberra ACT 2601

Via Email: nbssecretariat@dcceew.gov.au

RE: Implementing Australia's Strategy for Nature 2024-2030

Dear NBSAP Taskforce,

Introduction

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission to the Department of Climate Change, Energy, the Environment, and Water (DCCEEW) to provide feedback on the Discussion Paper to inform Australia's Strategy for Nature 2024-2030. This document is Australia's *National Biodiversity Strategy and Action Plan* and it will guide collective action (through Governments, business, NGOs, and communities) toward achieving Australia's international commitments under the Convention on Biological Diversity. It is also a continuation of initial work and consultation conducted in April 2024. The NFF submission to the *DCCEEW Updating Australia's Strategy for Nature 2019-2030* public consultation is attached at Attachment 1 and should be read as background in conjunction with this document.

Australian biodiversity has been on a downward decline trajectory for several decades. It is therefore important that measures are taken to arrest the decline, and objectives are established to benchmark and track progress. NFF supports the proposed Outcomes for the six Targets and three Enablers of Change outlined in the Discussion Paper. We understand that these priorities outline a range of potential pathways toward their achievement rather than prescriptive steps/actions, and that implementation will be conducted through Governments and stakeholders with direction and guidance from the Commonwealth. This strategic and broad approach is supported as it provides much needed flexibility toward achievement.

NFF makes the following comments on items of materiality below.

Outcomes for Targets

Target: Priority Degraded Areas Are Under Effective Restoration By 2030

Priority degraded areas (across terrestrial, inland water, coastal and marine ecosystems) are under effective restoration by 2030 to recover biodiversity, and improve ecosystem functions and services, ecological integrity and connectivity.

As stated in our initial submission, NFF supports the notion of restoring degraded landscapes, however, restoration action must not come to the detriment or expense of agricultural production. Outcome 3 recognises that on-ground action should be conducted in partnership with or support landholder participation – this is supported by NFF.

Degraded landscapes are often situated in farming areas with limited yet notable productive capacity and output. As such, the restoration of degraded agricultural landscapes risks compromising the availability of land for productive use and has the potential to create perverse socio-economic outcomes to the sector. There is an emerging view that renewable energy and transmission infrastructure development projects should prioritise degraded agricultural land over other viable alternatives. For the reasons above, this approach is not supported. We also note that there remain unanswered questions as to how 'priority degraded areas' will be defined and by whom.

Target: Protect and Conserve 30% of Australia's Landmass and 30% of Australia's Marine Areas By 2030

Protect and conserve at least 30% of Australia's terrestrial and inland water areas, and marine and coastal areas by 2030, especially areas of particular importance for biodiversity and ecosystem functions and services, ensuring protected and conserved areas are ecologically representative, well connected and effectively managed, recognising and respecting the rights of First Nations peoples.

NFF understands that there is an approximate shortfall of 5.31% under the target to protect and conserve 30% of Australia's landmass. Progress towards this target cannot come at the expense of agricultural land, and we note that this was the position of the former Minister for the Environment and Water. It is also critical that Protected and Conserved Areas are subject to strict and ongoing management obligations to safeguard biodiversity benefits and ensure they do not become neglected, increasing the risk of bushfires and/or serving as safe havens for invasive species that threaten neighbouring agricultural production. This is recognised under Outcome 4. Management obligations should be a requirement or condition of Commonwealth funding provided through the *Australian Bushland Program* (\$250 million over five-years from 2025-26). There is also a shared role for State and Territory Governments to play in supporting such obligations whether that be through co-investment or through targeted programs within their respective jurisdictions.

NFF recognises the role Indigenous peoples have and continue to play in this regard through biodiversity conservation work undertaken in Indigenous Protected Areas. We seek to ensure continued and increased funding to support management outcomes across the entire National Reserve System.

Regarding Outcome 3, it is stated that "*exploring additional opportunities, such as cultural covenants and Indigenous Land Use Agreements (ILUAs), will support achieving the 30 by 30 target*". While NFF understands that the intention of this document is to outline a direction toward achievement rather than prescriptive steps/actions for Governments and stakeholders to adhere to, this language raises concerns.

NFF is aware of several instances where State Governments have negotiated ILUAs with Indigenous parties without notification, visibility, or involvement of affected non-Indigenous stakeholders in relation to third-party projects or activities. This practice undermines the transparency and collaborative intent of the ILUA process, which is designed to be negotiated in good faith between all parties. There is a risk that the above language in Outcome 3 could be interpreted by jurisdictions as endorsing Government-led ILUA formulation that exclude non-Government stakeholders (i.e., agricultural proponents), thereby compromising the integrity and trust in the ILUA framework.

We therefore recommend the inclusion of guidance that ILUA's are to be negotiated directly between proponents and Indigenous parties. Where appropriate, Governments should focus on providing equitable funding and engagement support to all stakeholders to facilitate agreement making including for agricultural proponents who often lack the capacity or resources to participate effectively. While it is appropriate that Indigenous parties receive dedicated support, the absence of equivalent assistance for non-Indigenous parties promotes inequitable outcomes and undermines the integrity of the ILUA process.

Although this Strategy is focussed on nature outcomes, NFF recognises that ILUAs can act as one pathway for enabling private-sector involvement in achieving the 30% target for land by 2030. This could be achieved for example through Future Acts that deliver nature-based outcomes such as Savanna burning projects under the Australian Carbon Credit Units Scheme or projects emerging under the developing Nature Repair Market. A balanced and equitable resourcing approach toward supporting ILUA agreement making is therefore essential to ensure all parties can engage on equal footing and benefit from shared prosperity while also contributing to nature outcomes (dependent on the type of the Future Act).

Target: Eradicate or Control Invasive Species in Priority Landscapes and Further Minimise Their Introduction By 2030

Minimise and mitigate the impacts of invasive species by eradicating or controlling established invasive species in priority landscapes and places; and further minimise the introduction and establishment of new invasive species, to maximise threatened species recovery and protect biodiversity and related cultural heritage values.

As stated in the Discussion Paper, prevention and preparedness is seen to be the most cost-effective option for managing threats while nationally coordinated Threat Abatement Planning provide a strong foundation to identify, prevent, and prioritise management of emerging and established invasive species. While NFF acknowledges the importance of cost-effectiveness, it is also important to put the issue of biodiversity decline into perspective. Feral cats alone kill approximately two billion native animals each year and State of the Environment Reporting confirms that invasive species are a major driver of national biodiversity decline. In this context, we need to focus on the value delivered for dollars spent and not just the overarching dollar figure.

From the NFF perspective this is the low hanging fruit. Well-designed financed and delivered programs that significantly mitigate or eradicate high impact predators, across the landscape and tenures, have an immediate positive impact on biodiversity. This should be prioritised.

There is an urgent need to ensure Threat Abatement Plans are adequately resourced with a focus toward achieving nationwide eradication. It is our view that investment should be aligned with the scale and distribution of ecological harm. For example, the Commonwealth has committed only \$60 million over four-years toward feral cat management. Prioritising public funds based on impact is essential toward ensuring biodiversity gains are maximised in accordance with broader international commitments.

Target: Minimise The Impact of Climate Change on Biodiversity

Minimise the impact of climate change on biodiversity and increase its resilience through mitigation, adaptation and disaster risk reduction actions, including by embedding climate change adaptation in all relevant decision-making, and through nature-based solutions and/or ecosystem-based approaches, while minimising negative and fostering positive impacts of climate action on biodiversity.

As the Department is aware, the *National Adaptation Plan* and the six Sectoral Decarbonisation Plans underpinning the Commonwealth's broader *Net Zero Plan* were published in late-September. As this Discussion Paper was published ahead of this announcement, the language underpinning the three Outcomes under this Target as it relates to carbon storage on land are outdated and should be adjusted to reflect current Commonwealth policy.

The *Agriculture and Land Plan* outlines a pathway for the sector to reduce its net-GHG emissions and maintain food and fibre production obligations while contributing toward net-zero and broader international emissions reduction commitments. The Plan, which is now Commonwealth policy, has been informed by the Toowoomba Principles outlined by Minister Bowen and Minister Watt (agriculture capacity). It is grounded by three strategic objectives as summarised:

1. *Australian producers remain global leaders in low-emissions food and fibre production. Action cannot come at the expense of food security.*
2. *Government must support diverse landscapes that balance agricultural production, carbon storage and nature repair. Multiple priorities and land-uses need to be considered in growing carbon storage on land.*
3. *Decarbonisation must deliver real benefits for regional communities, producers and land managers, including First Nations peoples to enable a fair and orderly transition for regional, rural, and remote communities.*

NFF recognises that nature-based carbon offsets, specifically vegetative sinks, are likely to become the easiest pathway explored by Safeguard Mechanism entities to reduce emissions. This is reflected in the Commonwealth's *Net Zero Plan* which identified scaling-up carbon removals to balance residual emissions (presumably by the land sector) as one of five priority decarbonisation actions.

As stated in our initial submission, the intersection between offsets and agriculture is a point of concern to the NFF. Offsets in an agricultural landscape risk compromising the availability of productive land. Any mechanism must focus on less productive (or most suitable) land for establishment. Otherwise, offsets will create perverse social, economic, and environmental outcomes to the sector and natural environment. On this point, we reiterate that the *Agriculture and Land Plan* clearly states that climate action must not come at the expense of food security and that land-use priorities are considered when

growing carbon storage on land. These principles must inform implementation under this Strategy and be clearly articulated upfront within the Target.

Outcomes for Enablers of Change

Ensure Equitable Representation and Participation in Decisions Relating to Nature, Particularly for First Nations Peoples

This document must also recognise and value the knowledge and practices of agricultural landholders who manage over 50% of Australia's landmass as vital to informing planning, management, and on-ground conservation of Australia's native flora and fauna. Utilising First Nations knowledge in land management are important attributes. They need to be viewed in collaboration and conjunction with contemporary farming practices that are already contributing to sustainable and resilient landscapes.

Ensure Environmental Data and Information Are Widely Accessible and Support Decision-Making

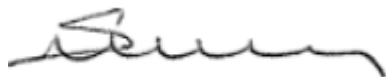
Environmental data and information are critical for the effective protection of Australia's biodiversity. As stated in our initial submission, *Environment Information Australia* will play a critical enabling role in this process. Building trust is the first impediment toward data sharing, and there also needs to be robust privacy agreements to ensure a free flow of information can be achieved. Considerations for appropriate incentives or reward structures to incentivise data sharing should also be a key priority, alongside effort to ensure data is consistent, comparable (i.e., speaks the same language), and easily accessible. NFF recognises the importance of ensuring data is regularly updated from a variety of sources as referred to under Outcome 2. However, we also emphasise the need for mechanisms to ground-truth environmental data and enable it to be challenged where outcomes are incorrectly mapped or misrepresented (which is a prevalent issue for landholders). For reference, the NFF submission to the *Nature Positive Tranche 2 Senate Inquiry* (Page 12) outlines several issues in the mapping and identification of threatened species and ecological communities by landholders. That submission is attached at Attachment 2.

Monitoring, Evaluation, and Reporting

It is our understanding that the first reporting period is scheduled for February 2026 to be followed by a reporting period in 2029. NFF supports the need for national reporting under the Global Biodiversity Framework to be aligned with State of the Environment Reporting which we understand the frequency of which may be adjusted to a biennial basis through reforms to the *Environment Protection and Biodiversity Conservation Act 1999* and legislation to officially establish *Environment Information Australia*. We encourage broader discussion with the Nature Positive reform process to ensure this alignment can be achieved.

Please do not hesitate to contact Warwick Ragg, General Manager, Natural Resource Management, via e-mail: WRagg@nff.org.au at the first instance to progress this discussion.

Yours sincerely,



SU MCCLUSKEY

Interim Chief Executive

Attachments List

1. *NFF Submission to DCCEEW: Updating Australia's Strategy for Nature 2019-2030.*
2. *NFF Submission to the Nature Positive Tranche 2 Senate Inquiry.*



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Leading
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