National Farmers Federation

Nature Repair (Enhancing Native Vegetation) Methodology Determination

November 2025

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.

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EXECUTIVE SUMMARY

The National Farmers' Federation (NFF) welcomes the opportunity to comment on the proposed Enhancing Native Vegetation (ENV) methodology developed by the Nature Repair Committee. This marks the second detailed methodology released for consultation as part of the broader framework for participation in the Nature Repair Market.

The Nature Repair Market is a Federal Government initiative designed to promote environmental stewardship and support land management practices that improve biodiversity outcomes. The scheme establishes a national, voluntary marketplace through which individuals and organisations can implement Nature Repair projects and generate tradable biodiversity certificates.

As key stakeholders, the agricultural sector plays a central and critical role in ensuring the success of this initiative. The NFF strongly supports the Government's vision for market-driven solutions to enhance biodiversity while recognising the need to ensure practical implementation, regulatory clarity, and financial sustainability for agricultural participants. The NFF reiterates our position that the Nature Repair Market must be accessible and developed in a manner that maximises participation for landholders across the agriculture sector. This is a result achieved through the development and accreditation of a broad number of outcome-driven methodologies supported by appropriate administrative requirements. This approach will support metrics outlined in the Federal Government endorsed NFF 2030 Roadmap[1], including that the *"net benefit for ecosystem services is equal to 5% of on-farm revenue"* can be met. **In recognition that more options are a positive outcome for landholders, the NFF expresses our in-principle support for the development of a methodology for enhancing native vegetation, so long as shortfalls to the procedures are addressed.**

Currently, the proposed methodology for enhancing native vegetation falls short of Government's intended vision and aspiration of a Nature Repair Market. There are several instances where significant improvements can be made across methodology sections to drive voluntary participation and reduce the administrative burden on landholders. Our comments are articulated in the proceeding pages of this submission.

1 National Farmers' Federation: 2030 Roadmap: Australian Agriculture's Plan for a $100 Billion Industry

PROJECT ELIGIBILITY REQUIREMENTS

The NFF understands the Enhancing Native Vegetation (ENV) method will apply to projects that restore, enhance and/ or maintain native vegetation in modified landscapes of eastern and south-western Australia. The proposed methodology states that projects must sit wholly inside one or more eligible regions defined by the Interim Biogeographic Regionalisation for Australia (IBRA) landscape classification framework that reflects "intensive-use landscapes that have historically experienced widespread clearing and thinning of native vegetation". As was raised by the NFF in concern to the *Replanting Native Forest and Woodland Ecosystems method*, the use of IBRA in determining eligible regions for the Nature Repair Market is subjective and without basis. There is no rationale or methodology provided to support the list of sub-regions defined by the IBRA Framework that the Nature Repair Committee has classified as being "intensive use landscapes". The NFF understands that over 400 sub-regions have been delineated in IBRA Version 7.0, thereby making it very difficult to decipher the specific sub-regions that have been classified as eligible project areas. It is also important to recognise that not all specified sub-regions reflect intensive-use landscapes. There is a lot of variability across the terrestrial landscape and applying a broad category at a sub-regional scale cannot be viewed as an appropriate approach.

Project area

As a result of the criteria used to determine eligible project areas, the opportunities for enhancing native vegetation through the Nature Repair Market have been significantly constrained. There are broad areas in northern Australia where farmers are actively restoring, enhancing and maintaining native vegetation. If the Nature Repair Market's purpose is national participation, eligibility cannot be restricted to a narrow section of agricultural landscape. Whilst the NFF understands the rationale that basing eligibility on sub-regions reflecting intensive-use landscapes could ensure activities are generating the greatest *'Nature Repair'* outcomes, the classification of these sub regions is flawed. An expansion to grazing/ native-pasture areas that aren't classified as "intensive-use landscapes" must be considered for the market to be representative. Additionally, the requirement for a project to sit wholly inside one or more eligible regions is an unnecessary restriction. A percentage basis for project eligibility, or a case-by-case determination, will ensure that projects otherwise well suited to the market will be considered.

Inclusions

The NFF acknowledges the ENV method will focus on primarily terrestrial habitats, and a list of eligible Native Vegetation Information System (NVIS) Major Vegetation Groups (MVGs). There is no confirmation that grazed native vegetation / grassy woodland / open woodland on farms that is mapped an NVIS MVG will be eligible under the market. Derived native pastures and partly modified paddocks with native ground cover should not be excluded just because they've been grazed for decades. These are areas of significant agricultural production. Grazed native vegetation is Australia's largest land-use class; excluding it removes the main landscapes where nature persists on farms and makes national participation unattainable. Importantly, there are significant opportunities through managed improvement in these areas. Enhancing the vegetation under grazing establishes

corridors, links remnants, widens riparian buffers and reduces edge effects. These are all critical for birds, small mammals and pollinators. Ecological connectivity delivers much richer benefits than a single, isolated area of vegetation. Another concern is the potential for inaccuracy within NVIS MVGs. The method must allow areas of native vegetation to be included if they are verified on-ground by a suitably qualified person, even if they are not correctly identified in the MVG base mapping. We appreciate this adds a burden of administration to the project proponents; however, it is a necessary safeguard. Service support will need to be included inside PLANR so farmers don't bear the cost of correcting government mapping.

The NFF is also concerned by the ambiguity of the ENV method's approach to restoring, enhancing and/ or maintaining native vegetation. The method should explicitly state that a single project may include multiple activity types and condition classes within one registered area, provided they are clearly mapped and monitored. Clarity that a single project may encompass areas under restoration, enhancement and maintenance within the same project boundary will ensure that landholders aren't forced to register multiple micro-projects for different activity types, increasing administrative and monitoring costs without improving outcomes.

PROJECT REQUIREMENTS

The NFF understands that all projects under the Nature Repair Market will be required to measure and assess a change in ecosystem condition as a result of project activities. Unfortunately, the proposed baseline and monitoring framework replicates the same administrative and cost burden the NFF identified in the *Replanting Native Forest and Woodand Ecosystems methodology*. Requiring baselines benchmarked against an "undegraded reference ecosystem," verified by a "suitably qualified person," and calculated through NBAS/EKS tools may be scientifically sound, but in practice it is consultant-intensive, travel-heavy and cost-prohibitive for many landholders. The ENV method extends these duties beyond plantings into remnant and mosaic vegetation, further increasing the number of plots and field visits on farms.

Monitoring

To maintain integrity without reproducing these barriers, the NFF recommends a tiered baselining framework: a Level 1 farmer-led assessment using PLANR outputs and geotagged photos for low-risk or small projects, escalating to Level 2 ecologist sign-off only where complexity or risk warrants it. Existing PLANR/EKS benchmarks should be accepted as "fit for purpose" references where available, rather than requiring customised field calculations for every project. These changes would uphold transparency and consistency while substantially reducing the time and cost burden for smaller producers.

The NFF also cautions that the proposed stratification rules risk complexity and fragmentation. Under the ENV method, each activity area may contain only one Major Vegetation Group (MVG) and must maintain a uniform starting condition across both dominant and subsidiary strata. For mixed paddocks and mosaics where woodland strips, scattered trees and native pasture co-exist, this requirement would multiply the number of plots, monitoring points and forms without improving ecological accuracy. To maintain ecological rigour while restoring workability, the NFF recommends permitting single-project management

units that can hold multiple NVIS associations within the same MVG, and support different target states under one registration. This approach would allow unit-level reporting while maintaining project-level auditing and registration. It would preserve data integrity and alignment with EKS, avoid unnecessary fragmentation, reduce consultant time, and keep participation feasible for smaller and mixed-enterprise farms.

Furthermore, under the ENV method, all lands proposed to be included in an activity area must be assigned a reference ecosystem using a prescribed vegetation classification for the project location (via PVCS/NVIS in PLANR). While the requirement to rely on prescribed vegetation maps and verify them through both virtual and on-ground assessment is understood, it will be challenging and costly for many landholders. The NFF considers it the responsibility of the Department and CER to ensure these mapping and classification tools are accurate and user-friendly, and recommends that detailed verification support be provided through publicly funded advisory positions rather than adding another cost layer for proponents.

The ENV method proposal to assess ecosystem condition using thirteen indicators across canopy, mid-storey and ground layers contributes to the complexity of project management. The requirement for extensive on-ground data collection and frequent monitoring resembles a significant administrative and cost burden. The NFF urges for the number of monitoring points and transects to be reduced to ease administrative pressure on landholders. While the thirteen-indicator suite is ecologically robust, it is data-heavy and consultant-driven. To keep participation viable, the NFF recommends DCCEEW publish the full ENV NBAS settings together with minimum sampling requirements and clear rules for remote-sensing or photo-point substitution. Fillable templates for plot sheets, photo-point protocols and summary tables should be embedded directly in PLANR, allowing proponents to generate compliant documentation without additional consultant hours. This approach would retain methodological integrity while ensuring smaller projects and mixed farming systems can deliver credible, auditable results at proportionate cost.

The proposed monitoring schedule – every three years from commencement for remnants, twice within five years after reaching threshold, and every five years thereafter for permanence – places an unreasonable financial and logistical burden on smaller landholders. The NFF recommends risk-based auditing and flexible reporting to reduce cost, noting that frequency should scale with project risk and complexity. Applying that principle here, the ENV method should adopt tiered monitoring intervals: low-risk E1 maintenance or light-enhancement projects could be assessed every five years, while higher-risk E3 or early-stage restoration projects could be monitored more frequently until stability is demonstrated. Audit and monitoring windows should also be aligned with ACCU methods to allow a single field visit where projects are stacked.

While requiring proponents to set counterfactual scenarios for each stratum and forecast ecosystem condition over a 25-year period ensures methodological consistency, it adds unnecessary complexity and cost for smaller landholders. As already outlined in the *Replanting Native Forest and Woodand Ecosystems method* submission, the NBAS and EKS tools must be fully supported and usable before commencement to minimise the risk of modelling and QA costs being shifted to participants. The NFF recommends that EKS include default scenarios showing what would happen without the project (for example, “stable mid-storey,

improving canopy through natural recovery") editable only where justified. DCCEEW should publish an ENV NBAS settings pack with worked examples before the method is finalised, including scenarios relevant to grazed mosaics and mixed-use landscape.

PROJECT ACTIVITIES

The NFF is deeply concerned that the ENV method frames grazing primarily as a threat to be controlled, rather than as a management tool that can deliver biodiversity outcomes. "Enhanced grazing control" is defined as the elimination or reduction of grazing pressure, implying that less grazing is always better for biodiversity. This framing is fundamentally inconsistent with contemporary evidence from Australian grazing systems, including the Commonwealth's own pilot programs, and with sustainable land management on farms. Over half of Australia's remaining native vegetation occurs on land managed primarily for grazing. In these landscapes, well-timed, well-scaled grazing is routinely used to manage biomass, control weeds, maintain native species diversity, and prevent woody thickening. These are actions that actively support ecological function and habitat quality.

Grazing

Several programs and research efforts demonstrate biodiversity benefits from well-managed grazing across ecosystems within the ENV method's eligible project area. The ACT Government's *Lowland Native Grassland Ecosystem Condition Monitoring Plan* explicitly defines conservation grazing as a tool to enhance natural values in temperate grasslands[2]. The Commonwealth's guide to *Managing Box Gum Grassy Woodlands* recommends rotational grazing to support diverse native understorey structure[3]. CSIRO's evaluation of the *Midlands Conservation Partnership* in Tasmania highlights how stewardship-style agreements and grazing-adapted practices improved habitat quality for threatened orchids and native mammals[4]. The *National Recovery Plan for the Plains-wanderer* identifies moderate grazing as critical for maintaining the sparse, low-profile grassland structure required by this endangered species[5]. Findings from the PlainsTender program in Victoria demonstrate that large, species-rich native grasslands can be conserved on private farms through conservation-oriented grazing strategies[6]. Experimental work by Mavromihalis et al. further supports that intermediate grazing levels can increase native plant diversity in temperate grasslands[7]. Finally, the *Enhancing Remnant Vegetation Pilot*, funded under the Agriculture Stewardship Package, integrates managed grazing as a tool to deliver biodiversity outcomes in production landscapes[8]. Together, these examples demonstrate that excluding grazing by default is inconsistent with ecological evidence and risks marginalising Australia's most biodiverse working lands.

The NFF recommends amendments to the specific requirements for grazing management, which are intended to minimise the risks posed by grazing to biodiversity values. By permanently banning grazing on any project area not grazed in the three years prior to commencement, the ENV method locks in land-use decisions for the entire permanence period. This approach disregards the role of planned, moderate grazing in controlling weeds and biomass and effectively penalises those who responsibly rest land by removing any future grazing option. Likewise, the mandated minimum three-month livestock exclusion each year during the "optimal plant growth period" is a blunt, one-size-fits-all measure that

fails to accommodate different climates, seasonal conditions or emergency needs, and hampers management flexibility.

While the NFF agrees early protection of young plants is important, the prohibition of grazing until 90% of regenerating trees reach 1.5 metres in height or 80% of species have flowered is an impractical threshold that leaves no room for site-specific management. Finally, expecting proponents to "manage" all grazing pressure, including feral pests and overabundant native herbivores, is an unrealistic, open-ended obligation, because controlling those populations at that scale is beyond any individual landholder's capacity. Collectively, these constraints would lock in land-use decisions and overlook the practical realities of managing farmland, making the method poorly suited to adaptive, condition-based approaches.

Additionality

The NFF acknowleges the Department's clearer articulation of additionality in the ENV method, particularly the recognition that projects may demonstrate eligibility through either the addition of new activities or by increasing the intensity of existing management actions. This clarification responds directly to stakeholder feedback on the *Replanting Native Forest and Woodand Ecosystems method*, which lacked flexibility for landholders already undertaking good stewardship practices.

However, the NFF still maintains our position that an additionality requirement is not strictly required under legislation, and we continue to seek justification as to why the Committee has included this despite indicating otherwise in the Nature Repair Act 2023. As outlined in our submission on the *Replanting Native Forest and Woodand Ecosystems method*, there is no rationale within the scope of biodiversity for additionality in projects. Provisions outlined under the Environment Protection and Biodiversity Conservation Act 1999 ("maintain or improve") and Nature Repair Act ("enhance or protect") both recognise the inherent value in existing habitat and biodiversity presence. We therefore maintain our position that it is inconsistent to require methodologies that only address additional attributes.

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2 ACT Government, Environment, Planning and Sustainable Development Directorate (2017). *Lowland Native Grassland Ecosystem Condition Monitoring Plan.*

3 Department of Environment, Water, Heritage and the Arts (2010). *A Guide to Managing Box Gum Grassy Woodlands.*

4 CSIRO (2022). *Midlands Conservation Partnership: Outcomes and Insights*

5 Department of Environment, Water and Natural Resources (2016). *National Recovery Plan for the Plains-wanderer (Pedionomus torquatus).*

6 Zimmer, H. C., et al. (2010). *Native grasslands in the PlainsTender incentive scheme: conservation value, management and monitoring.*

7 Mavromihalis, J. A., et al. (2013). *Manipulating livestock grazing to enhance native plant diversity and cover in native grasslands.*

8 Department of Agriculture, Water and the Environment (2021). *Agriculture Stewardship Package – Enhancing Remnant Vegetation Pilot.*

In the case where additionality will be a requirement of eligible projects, the NFF recommends that further refinement is undertaken to ensure that it does not unintentionally exclude genuine, long-term managers of native vegetation. In light of this, the ENV method should:

1. Provide explicit guidance that existing biodiversity activities can be onboarded where proponents commit to measurable improvement beyond prior practice, consistent with section 6.2 of the consultation paper,
2. Clarify how the "beyond prior practice" test will interact with the Act's integrity standard, which already ensures projects deliver outcomes unlikely to occur without intervention, and
3. reaffirm that additionality is a market design choice, not a legislative necessity, and that proportional, risk-based evidence should suffice to demonstrate newness or improvement.

Assessment

The NFF supports the Department's proposal to broaden the definition of "suitably qualified person" to include individuals beyond those with formal ecological qualifications. This is a positive step toward ensuring that diverse, practical expertise can be recognised within the method. To ensure this flexibility is effectively implemented, the NFF recommends the final method include a clear, tiered framework that aligns the level of required expertise with project complexity and risk. For lower-risk or smaller-scale projects, proponents should be able to rely on local knowledge or regionally supported input, escalating to formal ecological sign-off only where necessary. This approach would reduce consultant reliance, lower costs for small producers, and maintain ecological integrity and market confidence.

The NFF acknowledges the need to plan for long-term ecological resilience in the face of climate change, however, we are concerned that the ENV method places disproportionate responsibility on individual landholders to identify and manage climate risk at project scale without adequate support or regionally relevant guidance. Expecting proponents to draw on climate projections, select "climate-ready" species, and document adaptive strategies, especially in data-poor or high-variability zones, risks shifting the burden of policy-scale planning onto farms already dealing with operational complexity. This challenge is particularly acute for small-to-medium producers. Furthermore, requiring ecosystem condition to be held above issuance thresholds for five years before any certificate can be issued, combined with potential penalties for post-issuance declines beyond the proponent's control, adds uncertainty and risk. The NFF recommends that climate resilience be addressed at the method level through investment in region-specific decision tools, rather than imposed as a project-by-project obligation.

PERMANENCE

The NFF reiterates its position as outlined in the *Replanting Native Forest and Woodand Ecosystems method* that rigid permanence periods are one of the most significant barriers to participation in the Nature Repair Market. While we welcome the Department's consideration of a flexible Type C permanence period under the ENV method, a mandatory minimum of 25 years still poses substantial disincentives for working farms. Long-term land-use and enterprise planning must

remain adaptive to changes in markets, ownership, technology and climate. Many family-run and mixed-enterprise operations cannot commit to fixed 25+ year obligations without eroding flexibility or exposing future landholders to ongoing liabilities. If permanence is to remain a feature of the scheme, it must be balanced by appropriate compensation and robust opt-out pathways. The NFF recommends that the ENV method allows proponents to nominate a permanence period between 10 and 100 years, with scaled benefits, and explore short-term contract models in future methods to broaden participation.

VARIABILITY

The ENV method introduces new and revised project characteristics aligned with the Biodiversity Assessment Instrument (BAI). The NFF supports a flexible framework for project characteristics, allowing proponents to demonstrate outcomes across diverse management types and ecological contexts. However, we remain concerned that some characteristics, particularly ecosystem condition, are overly complex and impose disproportionate monitoring burdens on smaller farms.

Ecosystem condition remains a mandatory characteristic and is measured using multi-stratum field surveys, benchmarked against pre-clearing reference vegetation types. As was raised by the NFF in concern to the *Replanting Native Forest and Woodand Ecosystems method*, the use of pre-1750 NVIS vegetation benchmarks as the sole reference ecosystem remains conceptually and practically flawed. Landscapes have been profoundly modified since European settlement, and the continued use of historical mapping, often inaccurate or unverifiable at paddock scale, fails to reflect the lived reality of working farms. If ecosystem condition is to serve as a fair and achievable benchmark, these references must be contextualised and fit-for-purpose for modified landscapes. This includes allowing on-ground verification and simplified sampling for mosaics and transitional areas. The NFF reiterates its recommendation that NBAS tools within PLANR should publish baseline settings and minimum sampling guidance prior to method finalisation to allow projects to plan efficiently.

The Department's consideration of a new "commitment to protection" characteristic is noted. While the NFF recognises that permanent stewardship of high-quality vegetation should be recognised in the market, this characteristic must remain optional and transparent in its application. Many landholders may not be in a position to formalise protection obligations beyond the project term and should not be penalised or priced out of the market for maintaining operational flexibility. The NFF recommends that the final method clearly defines what constitutes a valid protection commitment and ensures that market access and certificate issuance are not contingent on voluntary characteristics.

Overall, the ENV method's proposed framework for variable characteristics introduces helpful flexibility, but several of the definitions and implementation mechanisms remain unclear. The NFF urges the Department to publish full indicator settings, data requirements and eligibility rules during consultation to allow stakeholders to assess workability. Optional characteristics must remain genuinely optional, and all characteristics, mandatory or otherwise, must be designed to ensure that smaller farms and mixed-use landscapes can participate without excessive cost or administrative complexity.

CERTIFICATE ISSUANCE

The NFF acknowledges the Department's intent to ensure ecosystem condition improvements are robust and durable before biodiversity certificates are issued. However, the ENV method's proposed approach requiring indicators to be held above threshold values for a full five years prior to issuance sets an excessively high bar for project proponents, particularly smaller landholders and graziers managing mosaics or marginal land.

While we recognise the Department's intent to prevent premature crediting and ensure that observed improvements are robust and durable, the requirement that indicators must reach threshold values in *two or more consecutive monitoring reports over at least five years* introduces an extended delay before landholders can receive certificates and access financial return. This delay, combined with the cost and effort of intensive monitoring, disincentivises participation from the very farming systems the Nature Repair Market seeks to engage. While the NFF recognises the goal of providing confidence in ecological outcomes, we caution that excessive delay between investment and recognition undermines the market's commercial viability for agriculture.

Furthermore, the proposal that smaller projects (<10ha) must meet thresholds in 100% of monitoring plots imposes an unreasonably rigid standard. These properties often include heterogeneous vegetation, transitional edges, or legacy disturbance, making uniform attainment across all plots ecologically unrealistic. While the >75% requirement for larger sites is a modest improvement, it still introduces risk for projects in variable landscapes or those recovering from historical impacts. This thresholding framework may create perverse incentives to under-declare marginal areas or artificially inflate homogeneity, rather than support whole-of-paddock ecological improvement. The NFF recommends the Department consider a scaled issuance approach that better aligns with landscape variability and project risk. This could include certificate tranches for incremental gains, or use of project-level averaging instead of requiring every plot to individually meet strict thresholds, to recognise improvement across a broader mosaic. Additionally, the five-year holding period could be reduced for projects demonstrating clear early gains, particularly where multiple ecosystem condition indicators rapidly exceed thresholds and show minimal fluctuation.

As previously outlined in our submission on the *Replanting Native Forest and Woodand Ecosystems method*, the costs and burdens of meeting certificate issuance thresholds, especially those tied to fieldwork, consultant verification, and ongoing reporting, must be recognised and addressed if the market is to scale. Certificate eligibility must balance rigour with realism and provide a clear, achievable pathway for landholders seeking to steward native vegetation without disproportionate regulatory or financial exposure.

CONCLUSION

The NFF thanks the Nature Repair Committee for its constructive engagement during development of the Enhancing Native Vegetation method. As the Nature Repair Market continues to take shape, it is essential that landholders remain central to its design and implementation. We look forward to continued collaboration as future

methodologies are refined, ensuring that the market remains practical, inclusive, and grounded in the realities of working landscapes. For further discussion, please contact Warwick Ragg, General Manager – Natural Resource Management (e) wragg@nff.org.au.

APPENDIX

Summary of programs and research efforts demonstrating biodiversity outcomes through grazing across ecosystems within the ENV method's eligible project area.

[2] ACT Government, Environment, Planning and Sustainable Development Directorate (2017). Lowland Native Grassland Ecosystem Condition Monitoring Plan

In the Australian Capital Territory, carefully managed livestock grazing is used as a conservation tool in native grassland reserves. The ACT Government explicitly refers to "conservation grazing" as the use of domestic stock to enhance the natural ecological values of grassland ecosystems. By allowing periodic grazing in these lowland native grasslands, land managers prevent excessive rank growth and thatch build-up. This helps maintain a mosaic of plant heights and opens up space for a rich variety of native grasses and wildflowers to thrive, supporting overall biodiversity.

[3] Department of Environment, Water, Heritage and the Arts (2010). A Guide to Managing Box Gum Grassy Woodlands.

In the critically endangered Box Gum Grassy Woodlands of south-eastern Australia, strategic grazing helps preserve the characteristic open woodland structure and diverse understorey. A Commonwealth management guide for this ecosystem recommends conservation-oriented grazing practices, for example, high-intensity, short-duration rotational grazing, as a way to maintain ecological health. Landholders briefly graze large mobs of livestock in smaller paddocks and then allow long recovery periods. This approach reduces excessive grass biomass, limits woody weed encroachment, and promotes a balance of native perennial grasses, herbs, and regenerating saplings in the woodland understorey.

[4] CSIRO (2022). Midlands Conservation Partnership: Outcomes and Insights

In Tasmania's Midlands, one of Australia's most heavily cleared biodiversity hotspots, the Midlands Conservation Partnership demonstrated that conservation outcomes can be achieved within working pastoral systems. The report highlights how stewardship-style agreements with local farmers enabled the protection and improvement of native pasture habitats without removing land from production. Grazing-adapted management – including rotational grazing, deferred rest, and low-intensity stocking – supported habitat quality for threatened orchids and native mammals. Monitoring showed improvements in vegetation structure and species richness over time, confirming that integrating biodiversity goals into commercial farming operations is both ecologically beneficial and economically viable.

[5] Department of Environment, Water and Natural Resources (2016). National Recovery Plan for the Plains-wanderer (*Pedionomus torquatus*)

The Plains-wanderer is a critically endangered bird of the Riverina grasslands that requires very sparse, low-profile native grassland habitat. Moderate livestock grazing is crucial for creating and maintaining these conditions. Conservation researchers have found that both overgrazing and total grazing exclusion can degrade Plains-wanderer habitat. During droughts, paddocks are rested to avoid denuding the ground, whereas after wet periods, increased grazing may be needed to prevent grass from growing too tall or dense. Land managers therefore use strategic, adaptive grazing regimes to keep approximately half the ground bare with short native grasses, the ideal habitat structure for Plains-wanderers to forage and hide, thereby directly benefiting this species' survival.

[6] Zimmer, H. C., et al. (2010). Native grasslands in the PlainsTender incentive scheme: conservation value, management and monitoring.

On Victoria's Volcanic Plains, many remnant native grasslands persist on private farms, and controlled grazing has proven compatible with their conservation. Through stewardship programs like "PlainsTender," landholders receive support to manage native grassland paddocks with conservation grazing strategies (such as resting pastures in spring or rotating stock at low densities). These grasslands, often large in size and rich in native plant species, have been successfully maintained under grazing. Farmers have kept over 70% ground cover and avoided heavy fertilisers or cultivation, allowing dozens of native wildflower and grass species to flourish alongside responsible livestock production. The continued presence of these intact, species-rich grasslands under grazing management shows that pastoral use and biodiversity protection can go hand-in-hand.

[7] Mavromihalis, J. A., et al. (2013). Manipulating livestock grazing to enhance native plant diversity and cover in native grasslands.

Ecological studies in temperate grasslands reinforce that intermediate grazing levels can maximize biodiversity. For instance, a multi-year experiment in south-eastern Australia compared different sheep grazing regimes. It found that excluding livestock entirely year-round led to a decline in plant species richness as ungrazed plots became dominated by dense grass growth and litter. In contrast, short grazing-and-rest cycles helped to preserve a mix of species: brief periods without grazing boosted sensitive native forbs, while periodic grazing kept invasive weeds and dominant grasses in check. The researchers concluded that employing a patchwork of grazing and resting across the landscape is most beneficial for native plant diversity. In summary, well-managed grazing can mimic natural disturbance, preventing any one species from monopolizing a site and thus directly improving biodiversity outcomes in these ecosystems.

[8] Department of Agriculture, Water and the Environment (2021). Agriculture Stewardship Package – Enhancing Remnant Vegetation Pilot Guidelines

The Enhancing Remnant Vegetation (ERV) Pilot, launched under the Agriculture Stewardship Package, supported farmers to protect and improve remnant native vegetation on agricultural land. The pilot explicitly included "enhanced grazing control" as a funded activity — not as outright exclusion, but as a form of managed grazing to promote biodiversity outcomes. Management actions under the pilot included seasonal rest periods, controlled stocking rates, and fencing to manage grazing intensity. While no formal outcome report has yet been released, funding agreements and project plans confirmed that many participants incorporated strategic, adaptive grazing to support vegetation structure, natural regeneration, and habitat quality. The pilot illustrates how grazing, when managed with ecological intent, can contribute positively to biodiversity in productive landscapes, reinforcing the need for flexible definitions in future biodiversity methodologies.