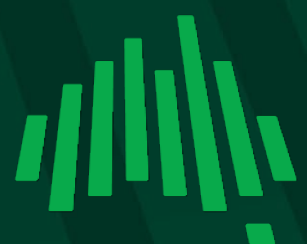


Nature Repair (Protect and Conserve) Methodology Determination

June 2026



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.



TABLE OF CONTENTS.

EXECUTIVE SUMMARY..... 5

100 YEAR PERMANENCE PERIOD 6

MAINTAIN ECOSYSTEM CONDITION WITH AN OPTION TO ENHANCE OUTCOMES
FOR THREATENED SPECIES 6

OTHER VARIABLE BIODIVERSITY PROJECT CHARACTERISTICS IN THE METHOD 7

ENVIRONMENTAL OFFSETS 7

LAYERING WITH OTHER NATURE REPAIR MARKET METHODS..... 8

CONCLUSION 8

EXECUTIVE SUMMARY

The National Farmers' Federation (NFF) welcomes the opportunity to comment on the revised Protect and Conserve (P&C) methodology developed by the Nature Repair Committee. The method has been streamlined to focus on long-term protection and conservation of biodiversity on land with the option to improve outcomes for threatened species. All projects under the method will either be, or become, a protected or conserved area.

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 Roadmap¹, 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 protecting and conserving, so long as shortfalls to the procedures are addressed.**

Currently, the proposed methodology for protecting and conserving biodiversity 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](#)

100 YEAR PERMANENCE PERIOD

The NFF does not support mandatory 100-year permanence as the default requirement for all P&C projects. While offset-capable projects may require more stringent permanence, security, evidentiary and monitoring requirements, those settings should not automatically apply to projects intended to support voluntary biodiversity outcomes. A 100-year obligation extends well beyond ordinary farm business planning and may affect succession, refinancing, leasing, sale value, infrastructure decisions, enterprise change, drought response, fire management, grazing flexibility and future productive use. These impacts are particularly significant for family farms, pastoral businesses and mixed-enterprise operations, where land-use flexibility is central to commercial resilience.

Permanence settings must recognise the realities of agricultural production systems, including climatic variability, mixed land use and the long-term stewardship activities already undertaken by farmers. Landholders require certainty about permanence obligations, reporting requirements, additionality tests, security arrangements and future land-use implications before committing land to a P&C project, particularly where that project may later be used as an environmental offset. The final method should retain a 25-year or flexible permanence option for non-offset projects, with certificate descriptions and scoring transparently reflecting the duration and security of the commitment. Longer permanence should be available as an elected pathway for offset-capable projects or proponents seeking the highest level of protection recognition, not imposed as the only pathway.

If the Department proceeds with mandatory 100-year permanence, the method must include practical options for project variation, land transfer, and discontinuation. Long-term project obligations must also be matched with financial and risk-management support, so individual landholders are not left carrying the full cost or liability for events outside their control. The method must clearly distinguish deliberate non-compliance from drought, fire, flood, pest outbreaks, biosecurity incursions and other events outside the reasonable control of landholders. Relinquishment or cancellation should remain a last resort after reasonable remediation, adaptive management and extensions to permanence periods have been considered, and any replacement certificate requirements should remain practical, proportionate and flexible enough to account for natural variability across agricultural landscapes.

MAINTAIN ECOSYSTEM CONDITION WITH AN OPTION TO ENHANCE OUTCOMES FOR THREATENED SPECIES

The NFF supports the decision to remove enhancement of the ecosystem condition characteristic from the P&C method where this avoids duplication with ENV and future enhancement methods. A protection and conservation method should be able to recognise the value of maintaining existing biodiversity, particularly on farms where landholders have already protected remnant vegetation, habitat corridors, riparian areas, native pasture, shelterbelts or other conserved areas. Maintenance should not be treated as a lesser outcome where the alternative is decline, fragmentation or loss of long-term management.

The requirement to maintain ecosystem condition over 100 years must be adaptive and realistic. Australian agricultural landscapes are dynamic and subject to drought, fire, flood, cyclone, heat, invasive species, disease, seasonal variability

and climate change. The method should assess whether the proponent has implemented reasonable and evidence-based management actions, rather than assuming that all future changes in condition are within the landholder's control. Permissible values, thresholds and reporting obligations should be regionally appropriate, risk-based and supported by simple PLANR templates, remote sensing, photo-points and proportionate field verification.

The NFF supports the threatened species characteristic being available where targeted habitat management or threat reduction can improve the capability of the project area to support threatened species. The method should focus on habitat condition, threat abatement and management effort rather than implying that landholders can guarantee species presence, breeding success or species numbers over time. It should also clarify how projects involving threatened ecological communities will be treated where ENV is unavailable, not regionally suitable or not the right method for the project, so that important agricultural landscapes are not left without a practical pathway.

OTHER VARIABLE BIODIVERSITY PROJECT CHARACTERISTICS IN THE METHOD

The NFF supports a limited and practical set of variable biodiversity project characteristics for the P&C method. The method must state expressly which characteristics are mandatory, optional, unavailable and required only for offset-capable projects. The commitment to protection characteristic should be mandatory, but it must recognise both new protection and existing stewardship. Landholders who have maintained biodiversity values over time should not be disadvantaged against proponents who only establish new protection after the method commences.

The final method should enable the removal or reduction of threats characteristic as an optional feature. Threat management is central to protecting and conserving biodiversity on farms, including weed control, pest animal management, feral herbivore control, fire management, access management, erosion control, fencing and grazing management where appropriate. This would align the P&C method with the practical stewardship activities already undertaken by farmers and with future Nature Repair method work on pastoral rangelands, introduced hooved animal management, and native forest management.

ENVIRONMENTAL OFFSETS

The NFF supports, in principle, the Nature Repair Market becoming one pathway for supplying high-integrity environmental offsets. The P&C method may be useful for offsets where long-term protection, conservation and targeted threatened species management can deliver direct, measurable and like-for-like benefits. The method must make clear that offset capability is not automatic. A certificate should only be used as an offset where the method allows it and where any additional requirements under the method, rules and relevant environment protection laws are met.

The final method should establish a clearly labelled offset-capable stream that is separate from the voluntary P&C pathway. Offset-capable projects may require mandatory threatened species enhancement, stronger security, more detailed evidence, additional monitoring and clearer liability settings. Those settings should

not be imposed on voluntary projects by default. The respective roles of the Clean Energy Regulator, EPBC decision-maker, approval holder, certificate buyer, Restoration Contributions Holder and project proponent must be clearly explained so landholders understand who assesses offset suitability, who administers the certificate and who carries long-term risk.

The NFF maintains that deliberate non-compliance should not be treated the same as drought, fire, flood or other natural events outside the reasonable control of the landholder. Relinquishment or cancellation should remain a last resort after reasonable remediation, adaptive management, extensions, variation or pooled risk options have been considered. Publication settings must also protect commercially sensitive farm information, and location-sensitive threatened species data.

LAYERING WITH OTHER NATURE REPAIR MARKET METHODS

The NFF strongly supports layering P&C projects with other nature repair methods. As biodiversity outcomes are interconnected, a single property may protect remnant vegetation, maintain habitat, improve condition, manage pests, support threatened species, and deliver landscape connectivity at the same time. The method would clearly distinguish between double counting the same outcome and recognising different outcomes produced through coordinated management on the same land.

The revised scope correctly identifies that a P&C project focused on long-term protection could be layered with a method focused on enhancing ecosystem condition. This approach should be developed into clear rules that explain how protection, condition improvement, threatened species benefit, pest management and future pastoral rangeland or native forest management can interact.

The NFF's previous submissions have consistently supported a 'tell us once' approach, risk-based auditing. The P&C method should be designed from the outset to support one project area with multiple management units and layered outcomes, rather than forcing landholders into separate micro-projects that increase cost without improving biodiversity outcomes.

CONCLUSION

The NFF thanks the Nature Repair Committee for its constructive engagement during development of the Enhancing Native Vegetation method. As a 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 a 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.