

**National
Farmers
Federation**

Nature Repair (Enhanced Native Vegetation) Methodology Determination

July 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



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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 Commonwealth 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 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 continues our in-principle support for the development of a methodology for enhancing native vegetation, so long as shortfalls to the procedures are addressed. Despite amendments, the proposed methodology for enhancing native vegetation falls short of Government's intended vision and aspiration of a Nature Repair Market. The June 2026 exposure draft is more developed than the proposal considered in 2025, and several improvements are acknowledged, nevertheless some of the NFF's most significant concerns remain unresolved. 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](#)

BIODIVERSITY INTEGRITY STANDARDS

The NFF acknowledges that the Nature Repair Committee's consultation process primarily reflects its statutory responsibility to assess the proposed ENV method against the Biodiversity Integrity Standards. While the consultation questions appropriately focus on these Standards, they do not adequately test whether the method will be practical, commercially viable and workable within Australian agricultural landscapes. The ENV method will operate largely on privately managed land, and its success will depend on farmers being willing and able to participate voluntarily over long periods.

The ENV method will operate predominantly on privately managed land and within productive landscapes. Its success will depend on the willingness and capacity of farmers and other landholders to participate voluntarily over long periods. A method may be technically robust while still failing to generate participation if its eligibility settings, land-use restrictions, monitoring requirements, permanence obligations and commercial pathway do not reflect the realities of running an agricultural business.

Eligible project regions

The NFF's original submission in November 2025 raised significant concerns about the restriction of projects to selected IBRA subregions in eastern and south-western Australia. The NFF argued that this substantially constrained participation, particularly across northern Australia and grazing and native-pasture landscapes, and recommended consideration of percentage-based eligibility or case-by-case assessment for otherwise suitable projects.

The exposure draft does not materially address this concern.

While more vegetation types and condition states may now be eligible within that footprint, opportunities remain unavailable across large areas of Australia where farmers actively manage native vegetation.

The NFF acknowledges the inclusion of a broader range of vegetation types and condition states under the exposure draft, including forests and woodlands, shrublands, and grasslands. The method now provides pathways to revegetate cleared or highly degraded land, enhance the condition of remnant native vegetation, and maintain moderate-to-high condition vegetation. This is a positive improvement that should allow a wider range of biodiversity projects to be undertaken within the eligible region however the geographic region itself has not been significantly expanded.

The Nature Repair Market is intended to be national. If this method remains geographically restricted, complementary methods must be prioritised for northern, rangeland and other agricultural landscapes. There remain significant opportunities to enhance biodiversity in native pasture, grazed woodland, rangeland and other production landscapes outside the eligible regions. These areas support remnant vegetation, ecological connectivity and habitat values and are actively managed by farmers. Their exclusion limits opportunities for landholders who may already be undertaking weed control, pest management, grazing management, fire management and restoration work.

As was raised in our previous submission, The final ENV method should also allow land located partly outside an eligible IBRA boundary to be considered where on-ground assessment confirms that the project is environmentally appropriate. This could include a percentage-based eligibility test or a case-by-case assessment by a

suitably qualified person. Requiring the entire project area to sit within listed boundaries risks excluding coherent landscape-scale projects because of mapping lines that do not necessarily reflect conditions on the ground.

Grazing must be recognised as a land management tool

The NFF's original ENV submission expressed strong concern that grazing was framed primarily as a threat to be reduced or eliminated, rather than a management activity that can support biodiversity outcomes when appropriately planned and implemented.

Managed grazing is used across Australian grasslands and grassy woodlands to control biomass, reduce weed competition, maintain habitat structure and support ecological communities and species. The NFF's ENV submission provided detailed examples demonstrating biodiversity benefits from well-managed grazing across ecosystems within the ENV method's eligible project area. These examples included conservation grazing in native grasslands, Box-Gum Grassy Woodlands and other production landscapes. The recommendation was for grazing regimes to be designed according to ecosystem type, seasonal conditions and the intended biodiversity outcome.

The NFF welcomes the changes that have been made in response to this feedback. The method now provides greater recognition that targeted grazing may be used as a complementary activity, and the historical grazing period used to determine previous land management has been extended from three years to five years. These are positive outcomes, however the underlying approach to managed grazing remains unnecessarily prescriptive. Fixed grazing reductions, annual exclusion periods and restrictions based on historical grazing remain poorly suited to Australia's highly variable climates and production systems. A single grazing rule cannot appropriately apply across grasslands, woodlands, shrublands and different rainfall zones.

The final method should expressly recognise conservation grazing and allow the development of a project-specific grazing plan. Default safeguards may be appropriate, but landholders should be able to adopt alternative grazing intensity, timing and exclusion periods where these are supported by sound evidence. Practical provisions are also required for drought, bushfire risk, emergency animal welfare and unusually high biomass seasons.

Project design and mixed farming landscapes

The clearer ability to include different activities and disconnected activity areas within one project is a positive improvement. It may reduce the need for landholders to register several small projects covering restoration, enhancement and maintenance activities however the stratification and reference ecosystem requirements remain complex for mixed agricultural landscapes. Native pasture, scattered trees, woodland patches, drainage lines and modified paddocks frequently occur as interconnected mosaics. Requiring these areas to be divided into numerous separate activity areas may increase sampling, monitoring and consultant costs without improving the overall biodiversity outcome.

The method should allow practical project management units containing different vegetation associations and condition classes, provided outcomes can still be transparently measured and reported.

Permanence and future land use

The continued minimum 25-year permanence period remains a significant barrier for family farms and mixed-enterprise businesses. Farm ownership, succession, finance arrangements, markets, technology and climatic conditions may change substantially over that period. Long-term commitments must be supported by sufficient commercial return and clear arrangements for property sales, succession, project variations, area excision, natural disasters and corrective action. The NFF continues to support a broader range of permanence options, including a minimum period below 25 years and future short-term stewardship arrangements.

Environmental offsets

The potential use of ENV certificates for environmental offsets is a major change since the NFF's original submission. The NFF accepts in principle that a future nature repair market may provide one pathway for offsets, but voluntary projects and offset-capable projects must remain clearly separated.

Offset-capable projects may reasonably require higher evidentiary, monitoring and security standards. These additional obligations should not automatically apply to farmers participating only in the voluntary biodiversity market. Clear guidance is required on the respective responsibilities of the Clean Energy Regulator, environmental approval bodies and state regulators to prevent duplicated assessments and reporting.

As outlined in the NFF's submission for ongoing developing of the nature repair market and inclusion of environmental offsets, participation must not create new restrictions on productive land outside the registered project area. Natural disasters must also be treated differently from deliberate non-compliance. Drought, bushfire, flood, storm damage and pest outbreaks should not expose an otherwise compliant landholder to the same consequences as intentional destruction or negligent project management. Remediation and adaptive management must be considered before certificate relinquishment or project cancellation.

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.