National Farmers Federation

Restoration Contributions Calculator Methodology

October 2026

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

15 October 2026

Restoration Contribution Holder
Department of Climate Change, Energy, the Environment, and Water
King Edward Terrace
Canberra ACT 2600

Via Email: Restorationcontributions@dcceew.gov.au

Dear Sir / Madam,

RE: Restoration Contributions Calculator Methodology

The *National Farmers' Federation* (NFF) welcomes the opportunity to provide a submission to the *Department of Climate Change, Energy, the Environment, and Water* (Department) *Restoration Contributions Calculator Methodology* Discussion Paper.

NFF supports Restoration Contributions as a practical alternative to proponent-delivered environmental offsets and as a means of funding strategic conservation at a landscape scale. The Restoration Contributions system must be workable for both business and the environment and have sufficient flexibility to deliver strategic environmental outcomes while also ensuring charges remain proportionate and encourage participation.

We bring to your attention a Discussion Paper developed by the *Minerals Council of Australia* (MCA) and co-signed by NFF and others: D*esigning a Workable Restoration Contributions System* which we understand the Department has received. The Paper reflects our shared position.

Our overarching concern is that the proposed calculator adopts overly conservative cost and risk assumptions which could result in prohibitively high charges that would discourage participation and undermine the intended benefits of the system. This can be an issue especially for agricultural proponents who may lack the resources to independently secure and manage complex environmental offsets and would otherwise benefit from a more accessible contributions pathway. Of particular concern are the proposed cost-confidence setting and reversal-risk contingency, which, when combined with other cost allowances, risk unnecessarily inflating charges without adequately recognising the efficiencies available through a nationally pooled fund.

Separate to the above, NFF strongly supports greater flexibility in the Restoration Actions available to the *Restoration Contributions Holder* (Holder) including habitat restoration, invasive species and predation management, fire and disease management, and connectivity improvements. Pest management is especially relevant as invasive species are consistently identified as a major pressure on the natural environment. Addressing invasive species and predation will deliver substantial and cost-effective improvements at a landscape scale rather than relying solely on the creation of additional habitat.

There is also mistrust and misguided ambition in the 'like-for-like' ambition. The process needs to be outcomes-based and focus more on predation and invasive weed infestation than on creating more habitat. Making the existing landscape a better place is a worthy and more achievable goal. It is well known that experience under existing State-based

offset schemes have consistently shown the practical difficulties of securing suitable habitat and meeting narrowly prescribed obligations.

We note that the *National Environmental Standard for Environmental Offsets* already provides some flexibility to depart from 'like-for-like' where an alternative would deliver a greater benefit for the affected Protected Matter consistent with relevant conservation planning priorities. We also note that the Standard is not intended to apply to Restoration Actions delivered by the Holder as it is subject to separate statutory requirements under the Act. It is therefore important that the calculator methodology and underlying arrangements support and enable the exercise of this flexibility. This is essential to ensuring the delivery of effective and strategic environmental outcomes while reducing reliance on land-based measures and the pressures this puts on agricultural land.

Thank you for the opportunity to contribute to this important matter. Please do not hesitate to contact Warwick Ragg, General Manager, Natural Resource Management, via e-mail: WRagg@nff.org.au in the first instance to progress this discussion.

National Farmers Federation

Leading Australian Agriculture

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