



AUSTRALIA

SUBMISSION

MAY 2025

RESTORING NATURE AND ENHANCING VALUE FOR LANDOLDERS



Sulfur-crested Cockatoo image WWF / Stuart Blanch

WWF-Australia submission to Review by NSW Natural Resources Commission

2 May 2025

Introduction

WWF-Australia is part of the WWF International Network, the world's largest independent conservation organisation. WWF's global mission is to 'stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature'. WWF-Australia has approximately 2.4 million financial and non-financial supporters.

WWF-Australia welcomes the opportunity to provide a submission to NSW Natural Resources Commission's review into *Restoring nature and enhancing value for landholders*.

The following responses are provided in relation to the questions posed by the NRC.

1. What do you consider is the most significant action(s) we can undertake to protect and restore biodiversity and ecosystem function on private lands?

The most significant action is for the NSW government to develop and implement a package of regulatory reforms, programs, financial supports and natural capital markets to end loss and degradation of forests and other native vegetation habitats, and to restore forests, on private land in NSW. This could be achieved:

- by transferring regulation of native vegetation management from Part 5A and Schedules 5A and 5B of the Local Land Services Act 2013 to a strengthened *Biodiversity Conservation Act 2016* (NSW) administered by the environment portfolio;
- establishing this goal in the BC Act, by including statutory Objects that explicitly commit to ending deforestation and forest degradation, protecting the habitat of threatened species, and expanding forests. The Objects of the repealed [Native Vegetation Act 2003](#) (NSW) contains a statutory framing that is even more relevant today, if in need of explicit mention of the need to prevent deforestation and forest degradation, consistent with Australia's commitment in the First Global Stocktake agreed at COP28, UAE;ⁱ
 - "to prevent broadscale clearing unless it improves or maintains environmental outcomes"; and,
 - "to protect native vegetation of high conservation value having regard to its contribution to such matters as water quality, biodiversity, or the prevention of salinity or land degradation" (ss 3b-c);
- legislating rigorous environmental assessment processes, rather than exempting millions of hectares of forest and woodland from application of native vegetation regulations, or relying upon self assessment under the weak and permissive Land Management (Native Vegetation) Code;
- ensuring decisions on management of native vegetation are based on the best available scientific data, validated by on-ground ecological surveys where appropriate, and the substantial number of geospatial databases available on SEED and BioNet;
- ensures compliance enforcement commensurate with the nature and climate crises;
- invests in improving the accuracy and public availability of mapping and monitoring of plant community types, and woody vegetation change, including making SLATS wood vegetation change databases freely available online and reviewing the adequacy of the State Vegetation Type Map to meet minimum standards of accuracy (e.g., >80% accuracy for PCT boundaries before on-ground validation); and,
- enhance civil and criminal penalties for breaches;

2. How can we further improve soil, water and vegetation management to protect and restore biodiversity while delivering sustainable economic outcomes?

- substantially expanding private protected areas, with environmental stewardship payments to landholders. This would align to the NSW Government's commitment to support protecting 30% of Australia's land to 30% by 2030, as agreed to by [Environment Ministers Meeting](#) on 21 October 2022: "To work collectively to achieve a national target to protect and conserve 30% of Australia's landmass and 30% of Australia's marine areas by 2030";
- expand environmental stewardship investment streams into private land conservation to enable effective management of lands under conservation agreements and other legal and voluntary private land

conservation mechanisms administered by the Biodiversity Conservation Trust, non-government organisations and private conservation businesses;

- legislate special conservation agreements, modelled on [Queensland's Special Wildlife Reserves](#) to afford private landholders who enter into such agreements protection equivalent to National Parks, such as from mining and gas extraction;
- amend and finalise the Native Vegetation Regulatory Map, in concert with changes to regulatory frameworks, to:
 - remove the Category 1 Exempt category of vegetation, as the NSW Government can not effectively play its part in ending deforestation if it fails to regulate the management of forests and other native vegetation across millions of hectares of land;
 - provide strong protection for habitat of all endangered species and threatened ecological communities in lands categorised and mapped as Category 2 Regulated Sensitive Land, not just critically endangered species and communities as currently occurs;
 - establish a statutory threshold for regrowth native vegetation to be automatically categorised as mature regrowth after an ecologically-based timeframe, such as 10-15 years, as occurs in other jurisdictions; and,
 - replace the ineffective Native Vegetation Panel;

3. What do you consider is the most effective way to further support and enable landholders to deliver sustainable land management and production outcomes?

- supporting development by farmers, food manufacturers, retailers and banks of deforestation-free supply chains and traceability tools, such as through the provision of property-scale native vegetation change monitoring and accurate data to underpin claims of d-free status;
- adopt and support regenerative agriculture principles and practices to further transform management of native vegetation on private land;
- developing fair and just transition pathways and economic diversification programs for landholders and rural and regional communities to prepare for a post-deforestation future that decarbonises the land sector and protects and restores biodiversity;
- boosting support for Aboriginal land rights by enabling Indigenous communities to secure ownership and management of private land to care for Country; and,
- growing the type of financial incentives for private landholders to protect and restore nature, including tax incentives, rate relief, enhanced funding for conservation covenants, high-integrity natural capital markets;

4. Is there any other information about this topic you would like to share with us?

- Enacting a suite of legislative, policy, investment and industry support reforms to end deforestation and forest degradation by 2030, and reverse forest loss, is consistent with Australia's international commitments under the First Global Stocktake, agreed at COP28, Dubai, in relation to managing forests to abate and sequester carbon emissions:
 - "Further emphasizes the importance of conserving, protecting and restoring nature and ecosystems towards achieving the Paris Agreement temperature goal, including through enhanced efforts towards halting and reversing deforestation and forest degradation by 2030, and other terrestrial and marine ecosystems acting as sinks and reservoirs of greenhouse gases and by conserving biodiversity, while ensuring social and environmental safeguards, in line with the Kunming-Montreal Global Biodiversity Framework;" (para 33, emphasis added).
- This goal is also consistent with Australia's commitments under the Kunming-Montreal Global Biodiversity Framework, notably Targets 1-4:
 - *TARGET 1: Ensure that all areas are under participatory integrated biodiversity inclusive spatial planning and/or effective management processes addressing land and sea use change, to bring the loss of areas of high biodiversity importance, including ecosystems of high ecological integrity, close to zero by 2030, while respecting the rights of indigenous peoples and local communities,*
 - *TARGET 2: Ensure that by 2030 at least 30 per cent of areas of degraded terrestrial, inland water, and coastal and marine ecosystems are under effective restoration, in order to enhance biodiversity and ecosystem functions and services, ecological integrity and connectivity.*
 - *TARGET 3: Ensure and enable that by 2030 at least 30 per cent of terrestrial, inland water, and of coastal and marine areas, especially areas of particular importance for biodiversity and ecosystem functions and services, are effectively conserved and managed through ecologically representative, well-connected and equitably governed systems of protected areas and other effective area-based conservation*

measures, recognizing indigenous and traditional territories, where applicable, and integrated into wider landscapes, seascapes and the ocean, while ensuring that any sustainable use, where appropriate in such areas, is fully consistent with conservation outcomes, recognizing and respecting the rights of indigenous peoples and local communities, including over their traditional territories.

- *TARGET 4: Ensure urgent management actions to halt human induced extinction of known threatened species and for the recovery and conservation of species, in particular threatened species, to significantly reduce extinction risk, as well as to maintain and restore the genetic diversity within and between populations of native, wild and domesticated species to maintain their adaptive potential, including through in situ and ex situ conservation and sustainable management practices, and effectively manage human-wildlife interactions to minimize human-wildlife conflict for coexistence.*

These and other GBF targets are the focus of Australia's Strategy for Nature 2024-30, which is Australia's plan for acting on the GBF obligations and was developed with and endorsed by each state environment minister. It is imperative that state and federal governments work together to deliver on these targets by reflecting them in state processes and plans (including NSW) and by collaborating to maximise synergies and promote best practice across jurisdictions. NSW can offer a lot to other jurisdictions in this regard and has the potential to be a leader.

Achieving this outcome would assist implementation of Labor's commitment at the March 2023 NSW election to:

"help save koalas from extinction by protecting key habitats and restoring environmental protections";

"[e]nsure the statutory review of the Biodiversity Conservation Act strengthens environmental protections, stops run away land clearing...";

"Work cooperatively with landowners (public agencies, First Nations, Councils, farmers and other private land holders) to develop ways to protect key habitat through partnerships & investment on all types of land"; and,

"Work cooperatively with the Commonwealth Government to meet the objectives of the Threatened Species Action Plan 2022-2032 and the 30 per cent protected areas by 2030 commitment to meet the goal of no new extinctions."

ⁱ *First global stocktake*, Proposal by the President Draft decision -/CMA.5, COP28, United Arab Emirates, 30 November to 12 December 2023, UNFCCC, FCCC/PA/CMA/2023/L.17, available at <https://unfccc.int/event/cma-5?item=4>, see para 33: “*Further emphasizes* the importance of conserving, protecting and restoring nature and ecosystems towards achieving the Paris Agreement temperature goal, **including through enhanced efforts towards halting and reversing deforestation and forest degradation by 2030**, and other terrestrial and marine ecosystems acting as sinks and reservoirs of greenhouse gases and by conserving biodiversity, while ensuring social and environmental safeguards, in line with the Kunming-Montreal Global Biodiversity Framework;”