



The Hon Michael Sukkar MP  
Assistant Treasurer  
c/o Pre-Budget Submissions  
The Treasury  
PARKES ACT 2600  
By email: [prebudgetsubs@treasury.gov.au](mailto:prebudgetsubs@treasury.gov.au)

28 January 2022

Dear Minister,

**RE: 2022-23 Pre-Budget submission**

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a 2022-23 Pre-Budget submission to The Treasury and its Ministers.

*Please note that ALCA is happy for this submission to be published in full.*

[About the Australian Land Conservation Alliance](#)

ALCA represents Australia's leading land restoration and conservation organisations working with landholders on privately owned and managed land across Australia. Together, ALCA's members represent a substantial and growing voice in Australia's land management sector. Our eleven members are:

- Australian Wildlife Conservancy
- Biodiversity Conservation Trust NSW
- Bush Heritage Australia
- Greening Australia
- Landcare Australia
- Nature Foundation
- Queensland Trust for Nature
- South Endeavour Trust
- Tasmanian Land Conservancy
- The Nature Conservancy Australia
- Trust for Nature (Victoria)

ALCA land conservation efforts stretch across over 3 million square kilometres with more than 3,000 landholders. We have over 50,000 supporters and our combined annual turnover exceeds \$200 million. Together we work to support some of the most pressing conservation issues across the country – including tackling invasive species and managing national environmental biosecurity threats, restoring endangered ecosystems, and building the protected area estate.

Some ALCA members are statutory entities; the views expressed in this submission do not represent the views of the Government administering those statutory entities.

## Background

ALCA recognises the hardship that climate change will create for our community, including the adverse social impacts upon some communities from the industrial transition necessary to reduce our carbon emissions.

As recognised in Article 38 of the COP-26 Glasgow Climate Pact<sup>1</sup>, the coming Budget provides an opportunity to highlight the role of nature-based solutions to climate change, as well as – in its own right – the importance of safeguarding our shared natural environment for the ongoing benefit of future generations of Australians.

ALCA is the key partner for Government through which environmental protection can be achieved at a scale necessary to meaningfully halt and reverse the decline of our rapidly degrading Australian ecosystems and species.

The importance of a scaled approach to environmental conservation and restoration was recognised by the Coalition Government when it established the National Reserve System Programme<sup>2</sup> (1996-2013); it is only with a programme of *at least* this size – that there can be an improved future for terrestrial environmental outcomes in Australia.

With the necessary support from a strengthened EPBC Act and some minor taxation reforms, ALCA member organisations and other private conservation landholders across the country stand ready to partner with Government to do the heavy lifting for Australian environmental conservation.

## Budget commitments being sought

ALCA notes the Government's commitments to the environment to date, and is seeking the following commitments in the 2022-23 Budget:

1. **The reinstatement of the National Reserve System Programme (or similar mechanism) with fund capitalisation of least \$1 billion**, with stated goals of:
  - a. Assisting Australia to meet a commitment to protect 30 per cent of Australia's land and 30 per cent of Australia's sea by 2030, in line with the post 2020 Global Biodiversity Framework;
  - b. Scaling the current protection provided by Private Protected Areas from its current rate of 2% of private land, to 5% of private land by 2030; and
  - c. Addressing the adequacy, and representativeness of our protection of Australia's unique and diverse ecosystems.
2. **An initial budget commitment of at least \$80 million to \$100 million over the forward estimates to expand the private protected areas network**, delivered via the capitalised fund described above and/or by a direct Payment Measure;
3. A commitment to a **review of Commonwealth taxes upon conservation landholders** by Treasury or the Productivity Commission, including, but not limited to:
  - a. Expanding the 'Landcare operations' deductions under Section 40.630 of the *Income Tax Assessment Act 1997* to include 'ecological management and restoration' or 'management and restoration of ecosystem goods and services'; and

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<sup>1</sup> Article 38 of the Glasgow Climate Pact recognises the role of biodiversity and environmental conservation by "*Emphasiz[ing] the importance of protecting, conserving and restoring nature and ecosystems to achieve the Paris Agreement temperature goal, including through forests and other terrestrial and marine ecosystems acting as sinks and reservoirs of greenhouse gases and by protecting biodiversity, while ensuring social and environmental safeguards*".

<sup>2</sup> See: <https://www.awe.gov.au/agriculture-land/land/nrs/management>

- b. Amending Section 31.5 of the *Income Tax Assessment Act 1997* to remove the qualification around material benefit to allow conservation covenantors to meaningfully access this exemption.
  4. A commitment to **implementing the recommendations of the Samuel Review** of the EPBC Act, but especially:
    - c. Strengthened National Environmental Standards<sup>3</sup>;
    - d. Well-resourced and genuinely independent oversight from an Environment Assurance Commissioner<sup>4</sup>; and
    - e. Strategic national and regional planning with a focus on Commonwealth priorities<sup>5</sup>.
  5. **ALCA also continues to strongly support the ‘Working with Nature’ conservation jobs proposal<sup>6</sup>** published in March 2021 and provided to Government.

Thank you again for the opportunity to submit to the 2022-23 Pre-Budget process.

ALCA looks forward to an ongoing engagement with Government to improve Australia’s protection of biodiversity and to progress our shared private land conservation outcomes.

**Australian Land Conservation Alliance**

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<sup>3</sup> Recommendations 1 to 4 (amongst others); <https://epbcactreview.environment.gov.au/resources/final-report>

<sup>4</sup> Recommendation 23; Ibid.

<sup>5</sup> Recommendation 26; Ibid.

<sup>6</sup> See: *Working with Nature: Restoring landscapes and supporting regional communities through economic stimulus*, March 2021; <https://workingwithnature.org.au/report/>