

NBSAP Taskforce
DCCEEW
Parkes ACT 2600
Via email: nbssecretariat@dcceew.gov.au

8 April 2024

Dear NBSAP Taskforce,

RE: Updating Australia's Strategy for Nature 2019-2030

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a submission to the Australian Government's consultation on its update of Australia's Strategy for Nature 2019-2030.

The Australian Land Conservation Alliance (ALCA) is the peak national body representing organisations that work to conserve, manage, and restore nature on privately managed land. We represent our members and supporters to grow the impact, capacity, and influence of private land conservation to achieve a healthy and resilient Australia.

The land conservation efforts of ALCA's seventeen member organisations have influenced over 3 million square kilometres with more than 4,000 landholders. We have over 70,000 supporters and our combined annual turnover exceeds \$325 million. Together ALCA and its members address some of the most pressing conservation issues across the country, including restoring endangered ecosystems, building the protected area estate, tackling invasive species, expanding private conservation finance, and funding, and using nature-based solutions to tackle climate change.

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

Top-level recommendations

The scale and accelerating consequences of the nature crisis facing Australia and the world has been well-documented, having been set out by ALCA and Australia's private land conservation sector, the 2021 State of Environment Report, the UK Government's Dasgupta Report, various World Economic Forum reports, and by many others across the national and international community more broadly. **Together, we know that the nature crisis is an existential threat for humanity, and it is gathering pace.**

The need and the opportunity for Australia to deliver a strong, globally leading Strategy for Nature that articulates Australia's contribution to a set of global targets through the Kunming-Montreal Global Biodiversity Framework ('GBF') is imperative. **As a megadiverse country with an advanced economy, Australia must make strong and meaningful contributions to the Global Biodiversity Framework if it is to be taken seriously in its biodiversity protection and management.**

The current discussion paper indicates we have a lot of work still to do to meet the ambition required – and committed to by the Australian Government – for all Australians.

ALCA has six top-level recommendations:

1. **The six priority targets that have been chosen must be policy and evidence driven.** Specifically, this means **the targets need to be SMART: Specific, Measurable, Achievable, Realistic, and Timebound** and more explicitly linked to the GBF targets. “*Work towards zero new extinctions*” is a particularly egregious example, being a non-target that not only states the status quo ante, but that contains less specificity than that previously found in other relevant Government policy (especially the *Threatened Species Action Plan*¹). Further the targets more broadly must be at least as ambitious and detailed as those found in the GBF.
2. **GBF Target 19 – mobilising finance, including for developing countries, must be an additional priority area for the Australian Government, especially within the context of a forthcoming Global Nature Positive Summit and the regional (and global) leadership role Australia is expected to play for the Indo-Pacific.** The Department of Foreign Affairs and Trade should be urgently consulted regarding the public diplomatic and reputational risk to Australia, especially with our less-developed regional neighbours, if this is not selected as a priority area to target.
3. **GBF Target 20 – capacity building – should be incorporated as an additional enabler in the Strategy** (e.g. “*Strengthen capacity-building and development to meet the needs for effective implementation*”).
4. Through the GBF, **Australia has committed to develop targets and corresponding indicators that respond to all 23 Targets of the GBF by COP16 in October 2024.** 6 of those targets are accounted for under ‘priority areas’ and 3 are accounted for under ‘enablers’. However, it is unclear how the remaining 14 GBF Targets are to be accounted for in the current draft and this needs to be clarified, noting that most of these Targets remain highly relevant to Australia.
5. **The key, strategic actions against each priority is unclear.** This cannot be a document library of existing Government policies – the Government needs a clear “strategic action plan” that the international and Australian community expects a National Biodiversity Strategic Action Plan to deliver.
6. **The indicators for the targets should feature in the Strategy,** or, if the timeline and available resources do not permit their rapid immediate development, at the very least it should be explicitly stated within the Strategy that the indicators relating to the Australian version of the 23 GBF targets will be drafted and contained within a clearly identifiable standalone document for subsequent consultation.

We can, and must, aim higher. The future of Australia’s unique biodiversity – and the Australian community that relies so heavily upon our shared environmental resources for their health, social wellbeing, and economic prosperity – are depending on action at least reasonably commensurate with the scope and challenge of the nature crisis that we face.

On this basis, and noting the limited time available for public comment, ALCA has drafted below the kinds of SMART targets and key strategic actions that would lift Australia’s ambition and Strategy for Nature to a more internationally and domestically creditable standard.

¹ <https://www.dcceew.gov.au/environment/biodiversity/threatened/publications/action-plan-2022-2032>

Detailed recommendations

Seven priority targets

ALCA supports the six priority areas that have been selected under the draft Strategy, and strongly urges the adoption of a seventh priority area to articulate Target 19 (mobilising finance, especially for developing countries), as outlined in Recommendation 2 above.

To be clear, ALCA recommends that **all** GBF Targets should be elevated and be assigned Australian targets.

ALCA recommends the targets under these priority areas – and the other targets that should be added – be revised to be SMART (Specific, Measurable, Achievable, Realistic, and Timebound) wherever possible. A full comparison of the GBF target, Australian priority area target (original and proposed), and suggested indicators can be found at Annexure 1 to this document.

Proposed amendments are in **bold**.

Australian Target 1:

30% of **priority** degraded **areas terrestrial, inland water, and marine and coastal ecosystems** under effective restoration **or permanent protection** by 2030.

Commentary: The current draft would create artificially binary categories, ‘priority degraded areas’ and ‘non-priority degraded areas’. ALCA is concerned that what would be contained within these artificial categories could be politically determined rather than based on scientific rigour. Degraded ecosystems and effective restoration should instead be defined according to Society for Ecological Restoration Standards 2.2².

There is no persuasive reason to water down the specificity regarding the different ecosystems (terrestrial, inland water, marine and coastal) as contained in the GBF and this should be re-inserted.

Lastly, the detail of how restoration and protection should overlap needs to be further teased out in implementation.

Australian Target 2:

~~Minimise the impact~~ **Reduce the number of invasive alien species on biodiversity across all ecosystems by 30%, reduce the introduction of new invasive alien species by 50%, and seek to eliminate invasive species in our most precious places, by 2030.**

Commentary: Sound policy on invasive species requires that we do more than simply ‘minimise’ the impacts once they have occurred, rather, we must also proactively be preventing impacts, as well as reducing impacts. Whilst particular places should indeed be protected, the national focus should also be on the invasive species themselves. Further, ‘our precious places’ is insufficiently defined.

² See: <https://www.seraustralasia.org/live-launch/national-standards>

Australian Target 3:

~~[Expand/grow/maximise/increase] the circularity of Transition to a circular Australia's~~ economy by 2030, ~~to reduce and minimise~~ the impact of pollution and habitat destruction.

Commentary: The term 'transition to a circular economy' is not only more descriptive and forward-leaning, but it is also language already collectively endorsed at the Environment Ministers Meeting of 10 November 2023³. Minimising impact should be the ambition, not merely 'reducing' the impact, which could in practice be exceptionally little real progress.

Whilst ALCA has proposed some general language changes, it is particularly pressing that this target is 'SMART', which will inevitably require the inclusion of a clear, pithy definition of 'circular economy' within the target itself.

ALCA further notes and endorses the more detailed position of ALCA member organisation WWF-Australia regarding this Target.

Australian Target 4:

Embed climate change **mitigation**, adaptation, and **disaster risk reduction for nature** into decision-making by **2030 2027**, ~~to support increased resilience of biodiversity~~.

Commentary: The proposed changes more fully and accurately reflect GBF Target 6 by referring to the other two required actions – mitigation and disaster risk reduction. Further, it is critical that this target directly act on climate change decision-making **for** nature – rather than indirectly merely 'to support... biodiversity' – as this would only be business as usual.

A 2030 target to embed these elements into Government decision-making is not ambitious enough for a country with advanced governance arrangements such as Australia – an earlier timebound target should thus instead be adopted, such as 2027 as proposed above.

In addition, there should be explicit references to nature-based solutions at the action / implementation level.

Australian Target 5:

Protect and **conserve manage** 30% of Australia's land and 30% of Australia's oceans by 2030 **in alignment with the Strategy for Australia's National Reserve System**.

Commentary: Australia's National Reserve System is underpinned by a scientific framework – the *Strategy for Australia's National Reserve System*⁴ – to ensure that we progressively extend protection to examples of all our ecosystems.

This scientific framework has a clear objective: to develop a 'comprehensive, adequate and representative' ('CAR') system of protected areas⁵. **Protected area targets need to have**

³ <https://www.dcceew.gov.au/sites/default/files/documents/emm-communique-10-nov-2023.pdf>

⁴ <https://www.dcceew.gov.au/environment/land/nrs/publications/strategy-national-reserve-system>

⁵ Which can be further supplemented by relevant work regarding climate change and protected areas, for example: Dunlop M. et al., *The implications of climate change for biodiversity conservation and the National Reserve System: Final synthesis*, CSIRO, 2012; <https://publications.csiro.au/publications/publication/Plcsiro:EP105380>

explicit reference to this science-based Strategy that rightfully highlights the importance of quality – and not just quantity, as currently contemplated – in alignment with more than 30 years of Australian public policy.

Furthermore, the *Strategy for Australia's National Reserve System* has already secured collective agreement from all Federal, State and Territory governments, and thus should not present political barriers to State and Territory concurrence.

Australian Target 6:

~~Work towards zero~~ New extinctions of plants and animals are prevented and the risk of extinction is reduced for all priority species.

Commentary: Australia already has already committed to the objective that “*new extinctions of plants and animals are prevented*” and “*the risk of extinction is reduced for all priority species*” in its *2022-2032 Threatened Species Action Plan* – the Target as originally written is a disappointing backsliding on those earlier commitments and should at least be re-written to reflect these commitments that have already been made.

As noted earlier, **as a megadiverse country with an advanced economy, Australia must make strong and meaningful contributions to the Global Biodiversity Framework if it is to be taken seriously in its biodiversity protection and management. This target must be strengthened to at least reflect current policy**, and to mitigate the risk of the Government being perceived as abandoning its existing commitments as set out in its Threatened Species Action Plan.

Australian Target 7:

Substantially and progressively increase the level of public and private financial resources to implement the national action plans of Australia and developing country partners by 2030.

Commentary: As noted in ALCA's top-level recommendations above, the GBF Target 19 of mobilising finance, including for developing countries, must be an additional priority area for the Australian Government, especially within the context of a forthcoming Global Nature Positive Summit and the regional (and global) leadership role Australia is expected to play for the Indo-Pacific. **The Department of Foreign Affairs and Trade should be urgently consulted regarding the public diplomatic and reputational risk to Australia, especially with our less-developed regional neighbours, if this is not selected as a priority area with a clear target.**

Preferably, the Target should be further strengthened by detailing specific and measurable descriptors to ‘substantially and progressively’; for example, “*increase by x% year on year until 2030*”.

Potential indicators

The Discussion Paper states that further work, including on indicators, will be required to support and track implementation under the Monitoring Framework agreed as part of the GBF⁶. The GBF Monitoring Framework includes a series of indicators for monitoring the implementation of the GBF, namely, ‘Headline indicators’, ‘Global level indicators’, ‘Component Indicators’, and ‘Complementary indicators’. The GBF Monitoring Framework

⁶ <https://www.cbd.int/doc/decisions/cop-15/cop-15-dec-05-en.pdf>

also states that the framework may be supplemented by additional national and subnational indicators.

As the Australian government considers indicators for its new Targets, ALCA recommends that it:

1. Use, to the extent practicable, the indicators contained within the GBF Monitoring Framework so as to ensure consistency with globally-adopted indicators;
2. Consider using existing national and subnational indicators listed in Annexure 1 below; and
3. Ensure that the data required to inform the indicators tracking Australia's progress against the GBF and its own Targets is incorporated into the forthcoming National Environmental Standards for Data and Information and the Biodiversity Data Repository.

ALCA looks forward to providing further input into the development of the indicators as the Australian government moves into the implementation phase of this work.

Four enablers

ALCA generally supports the approach taken through the explicit adoption of 'enablers' which clearly reference GBF Targets 14, 21 and 22. ALCA also recommends the following amendments and addition of a new enabler.

Proposed amendments are in **bold**.

Enabler 1: Mainstreaming biodiversity considerations into government and business decision-making, including in financing, policies, regulations, **and** planning **and implementation** processes

Commentary: As noted below, implementation is a key and unavoidable complement to any planning process and thus must be included.

Enabler 2: Ensuring **the best available** environmental data and information is widely accessible and supports planning **and implementation**

Commentary: The addition of 'best available' would align this enabler with the relevant GBF target, Target 21, improving the ambition of the enabler without creating significant additional burden in practice. It is important that environmental data and information should also be used to guide implementation as well as planning.

Enabler 3: Ensuring **inclusive and** equitable representation and participation in decisions relating to nature, particularly for First Nations peoples

Commentary: If representation and participation is just 'equitable', it may allow equitable non-inclusion. Adding the word 'inclusive' ensures that Governments should be expected to proactively seek to involve communities in decision-making that affects them, and not merely balance limited numbers of participants in decision-making.

Proposed Enabler 4: Strengthen capacity-building and development to meet the needs for effective implementation.

Commentary: This enabler reflects Target 20 and directly adopts its language.

The on-ground conservation and land management sector, including the unique role of Aboriginal and Torres Strait Islander communities, is under-resourced in funding and capability to address the significant challenges of our time.

Because nature has not been formally valued in the way that other resources or sectors are valued, the conservation sector has been chronically under-resourced through successive governments.

The sector that ALCA represents cannot and should not be taken for granted – **investment in building the capacity of the on-ground conservation sector is much-needed and urgent if we are truly to deliver robust outcomes for Australian nature, and at scale.**

The remaining twelve GBF Targets

ALCA proposes that the Australian government adopt targets for the remaining twelve GBF Targets. ALCA recommends the Australian Government review in detail the ACIUCN's forthcoming report⁷ that provides more detail regarding proposed targets, actions and measures relevant to the 23 targets. Given the limited time available to consider these in detail, the proposed Australian targets below are to be considered as drafts only, rather than final ALCA positions. Time constraints also explain the limited number of proposed actions and indicators in Annexure 1 – ALCA reserves the right to expand upon these.

GBF Target 1: Land and sea use change

Ensure that all areas are under participatory, integrated and 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.

Proposed Australian target:

Bring the loss of areas of high biodiversity importance close to zero by 2030.

GBF Target 5: Exploitation of wild species

Ensure that the use, harvesting and trade of wild species is sustainable, safe and legal, preventing overexploitation, minimizing impacts on non-target species and ecosystems, and reducing the risk of pathogen spillover, applying the ecosystem approach, while respecting and protecting customary sustainable use by indigenous peoples and local communities.

Proposed Australian target:

Prevent the overexploitation of wild species by 2030.

GBF Target 7: Pollution

Reduce pollution risks and the negative impact of pollution from all sources by 2030, to levels that are not harmful to biodiversity and ecosystem functions and services, considering cumulative effects, including: (a) by reducing excess nutrients lost to the environment by at

⁷ [Forthcoming] *Priority Actions to meet Australia's commitments to the Kunming-Montreal Global Biodiversity Framework by 2030*, IUCN National Committee Australia

least half, including through more efficient nutrient cycling and use; (b) by reducing the overall risk from pesticides and highly hazardous chemicals by at least half, including through integrated pest management, based on science, taking into account food security and livelihoods; and (c) by preventing, reducing, and working towards eliminating plastic pollution.

Proposed Australian target:

Reduce pollution from all sources to levels that are not harmful to biodiversity by 2030.

GBF Target 9: Management of wild species

Ensure that the management and use of wild species are sustainable, thereby providing social, economic and environmental benefits for people, especially those in vulnerable situations and those most dependent on biodiversity, including through sustainable biodiversity-based activities, products and services that enhance biodiversity, and protecting and encouraging customary sustainable use by indigenous peoples and local communities.

Proposed Australian target:

Ensure the management and use of wild species is sustainable by 2030.

GBF Target 10: Sustainable production systems

Ensure that areas under agriculture, aquaculture, fisheries and forestry are managed sustainably, in particular through the sustainable use of biodiversity, including through a substantial increase of the application of biodiversity friendly practices, such as sustainable intensification, agroecological and other innovative approaches, contributing to the resilience and long-term efficiency and productivity of these production systems, and to food security, conserving and restoring biodiversity and maintaining nature's contributions to people, including ecosystem functions and services.

Proposed Australian target:

Ensure that agriculture, fisheries, and forestry are sustainably managed by 2030.

GBF Target 11: Ecosystem services

Restore, maintain and enhance nature's contributions to people, including ecosystem functions and services, such as the regulation of air, water and climate, soil health, pollination and reduction of disease risk, as well as protection from natural hazards and disasters, through nature-based solutions and/or ecosystem-based approaches for the benefit of all people and nature.

Proposed Australian target:

Develop nature-based solutions and ecosystem-based approaches to enhance nature's contributions to people, publishing a national policy on Nature Based Solutions by 2026.

Commentary: Australia has a significant policy gap in that it does not currently actively integrate nature-based solutions into its planning processes, especially – but only – climate change adaptation and mitigation. This target has been framed to instigate a much-needed

policy conversation in Australia on how to develop – and ideally deploy – nature-based solutions and ecosystem-based approaches to relevant policy issues.

GBF Target 12: Urban green and blue spaces

Significantly increase the area and quality, and connectivity of, access to, and benefits from green and blue spaces in urban and densely populated areas sustainably, by mainstreaming the conservation and sustainable use of biodiversity, and ensure biodiversity-inclusive urban planning, enhancing native biodiversity, ecological connectivity and integrity, and improving human health and well-being and connection to nature, and contributing to inclusive and sustainable urbanization and to the provision of ecosystem functions and services.

Proposed Australian target:

Increase the total share of green and blue areas in functional urban areas to 50% by 2030.

Commentary: This target relies and build upon OECD work and approaches to access to green urban areas.⁸

Alternatively – albeit less preferably – Australia could adopt and build upon the approach of the European Commission, which measures the share of the urban population with access to recreational green space within 10 minutes' walking distance from their home⁹, as follows:

Halve the share of the urban population without access to recreational green and blue space within 10 minutes' walking distance from their home.

GBF Target 13: Access and benefit sharing of genetic resources

Take effective legal, policy, administrative and capacity-building measures at all levels, as appropriate, to ensure the fair and equitable sharing of benefits that arise from the utilization of genetic resources and from digital sequence information on genetic resources, as well as traditional knowledge associated with genetic resources, and facilitating appropriate access to genetic resources, and by 2030, facilitating a significant increase of the benefits shared, in accordance with applicable international access and benefit-sharing instruments.

Proposed Australian target:

Review and update the *Nationally consistent approach for access to and the utilisation of Australia's native genetic and biochemical resources*¹⁰ by 2027.

Commentary: This national policy was endorsed in October 2002 by the Natural Resource Management Ministerial Council and has not been reviewed or revised since.

GBF Target 15: Business disclosures

Take legal, administrative or policy measures to encourage and enable business, and in particular to ensure that large and transnational companies and financial institutions:

(a) Regularly monitor, assess, and transparently disclose their risks, dependencies and impacts on biodiversity, including with requirements for all large as well as transnational

⁸ See: <https://stats.oecd.org/Index.aspx?QueryId=119735>

⁹ See: https://ec.europa.eu/regional_policy/sources/docgener/work/2018_01_green_urban_area.pdf

¹⁰ <https://www.dcceew.gov.au/environment/biodiversity/publications/nationally-consistent-approach-access-and-utilisation-australias-native-genetic>

companies and financial institutions along their operations, supply and value chains, and portfolios;

(b) Provide information needed to consumers to promote sustainable consumption patterns;

(c) Report on compliance with access and benefit-sharing regulations and measures, as applicable;

in order to progressively reduce negative impacts on biodiversity, increase positive impacts, reduce biodiversity-related risks to business and financial institutions, and promote actions to ensure sustainable patterns of production.

Proposed Australian target:

Develop and implement frameworks for businesses to disclose nature-related risks by 2027.

Commentary: This target aligns with Australia's plans under its (draft) Sustainable Finance Strategy¹¹, but also its exposure draft legislation on Climate-related financial disclosure¹² which outlines the scope for the Treasurer to regulate nature-related financial risks.

GBF Target 17: Biosafety

Establish, strengthen capacity for, and implement in all countries, biosafety measures as set out in Article 8(g) of the Convention on Biological Diversity and measures for the handling of biotechnology and distribution of its benefits as set out in Article 19 of the Convention.

Proposed Australian target:

Strengthen biosafety measures, including through a review by the Office of the Gene Technology Regulator by 2027.

GBF Target 18: Incentives

Identify by 2025, and eliminate, phase out or reform incentives, including subsidies, harmful for biodiversity, in a proportionate, just, fair, effective and equitable way, while substantially and progressively reducing them by at least \$500 billion per year by 2030, starting with the most harmful incentives, and scale up positive incentives for the conservation and sustainable use of biodiversity.

Proposed Australian target:

Identify by 2025, and eliminate, phase out or reform incentives and subsidies harmful for biodiversity, by 2030.

GBF Target 23: Gender equality

Ensure gender equality in the implementation of the Framework through a gender-responsive approach, where all women and girls have equal opportunity and capacity to contribute to the three objectives of the Convention, including by recognizing their equal rights and access to land and natural resources and their full, equitable, meaningful and informed participation and

¹¹ <https://treasury.gov.au/consultation/c2023-456756>

¹² <https://treasury.gov.au/consultation/c2024-466491>; see also ALCA's submission to this consultation: https://alca.org.au/wp-content/uploads/2023/02/20230217-ALCA-submission-Climate-related-financial-disclosure_web.pdf

leadership at all levels of action, engagement, policy and decision-making related to biodiversity.

Proposed Australian target:

Ensure gender equality throughout the implementation of the Kunming-Montreal Global Biodiversity Framework.

Thank you again for the opportunity to provide feedback on updates to Australia's Strategy for Nature. ALCA looks forward to assisting the Government to deliver on an ambition for nature commensurate with our global leadership role as one of only two leading advanced economies with a megadiverse environment. We know that the Australian Government – and the private land conservation sector that supports it – can rise to the challenge and deliver a vision and Strategy for nature that all Australians can be proud of.

Australian Land Conservation Alliance

About the Australian Land Conservation Alliance

The Australian Land Conservation Alliance is the peak national body representing organisations that work to conserve, manage, and restore nature on privately managed land. We represent our members and supporters to grow the impact, capacity, and influence of private land conservation to achieve a healthy and resilient Australia.

Our seventeen members are:

- Arid Recovery
- Australian Wildlife Conservancy
- Biodiversity Conservation Trust NSW
- Bush Heritage Australia
- EcoGipps
- GreenCollar
- Greening Australia
- Landcare Australia
- Nature Foundation
- NRM Regions Australia
- Odonata
- Queensland Trust for Nature
- South Endeavour Trust
- Tasmanian Land Conservancy
- The Nature Conservancy Australia
- Trust for Nature (Victoria)
- World Wildlife Fund - Australia

ALCA member land conservation efforts have influenced over 3 million square kilometres with more than 4,000 landholders. We have over 70,000 supporters and our combined annual turnover exceeds \$325 million. Together ALCA and its members address some of the most pressing conservation issues across the country, including restoring endangered ecosystems, building the protected area estate, tackling invasive species, expanding private conservation finance, and funding and using nature-based solutions to tackle climate change.

Through their active land management, ALCA member organisations are deeply embedded in rural communities and economies, providing jobs, securing significant regional investment, and safeguarding remaining native habitat, with its many positive spill-over effects for community, wellbeing, and food security. We seek to demonstrate the role and value of private land conservation as a cornerstone of the Australian economy.

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

Annexure 1: Australian targets comparison table

Note: Proposed amendments to targets in bold.

From Discussion Paper	Proposed by ALCA	Relevant GBF Target	Key additional actions	Potential National and Subnational Indicators
<i>Australian priorities</i>				
30% of priority degraded areas under effective restoration by 2030	30% of priority degraded terrestrial, inland water, and marine and coastal ecosystems are under effective restoration or permanent protection by 2030	Target 2 [ecosystem restoration]	~ Publish and resource a National Restoration Strategy	~ Relevant indicators within the National Restoration Standards (Appendix 4) ¹³ ~ For protected areas, Collaborative Australian Protected Areas Database (CAPAD) ¹⁴
Minimise the impact of invasive species on biodiversity in our most precious places by 2030	Minimise the impact Reduce the number of invasive alien species on biodiversity across all ecosystems by 30% , reduce the introduction of new invasive alien species by 50% , and seek to eliminate invasive species in our most precious places, by 2030	Target 6 [invasive alien species]	~ Publish and resource a National Environmental Biosecurity Strategy that sits under the National Biosecurity Strategy	~ Relevant indicators within the National Restoration Standards (Appendix 4) ¹⁵

¹³ https://www.seraustralasia.com/standards/NationalStandards2_2.pdf

¹⁴ <https://www.dcceew.gov.au/environment/land/nrs/science/capad>

¹⁵ https://www.seraustralasia.com/standards/NationalStandards2_2.pdf

From Discussion Paper	Proposed by ALCA	Relevant GBF Target	Key additional actions	Potential National and Subnational Indicators
[Expand/grow/maximise/increase] the circularity of Australia's economy by 2030, to reduce the impact of pollution and habitat destruction	[Expand/grow/maximise/increase] the circularity of Transition to a circular Australia's economy by 2030, to reduce and minimise the impact of pollution and habitat destruction	Target 16 [circular economy and reducing impacts of pollution]		
Minimising the impact of climate change on nature	Embed climate change mitigation, adaptation, and disaster risk reduction for nature into decision-making by 2030 2027, to support increased resilience of biodiversity	Target 8 [climate change]	~ Include an explicit section on nature within the forthcoming National Adaptation Plan ~ Publish a national policy on Nature Based Solutions [see also: GBF Target 11, below]	~ Targets within the forthcoming National Adaptation Plan
Protect and conserve 30% of Australia's land and 30% of Australia's oceans by 2030	Protect and conserve manage 30% of Australia's land and 30% of Australia's oceans by 2030 in alignment with the Strategy for Australia's National Reserve System	Target 3 [30 by 30]	~ Publish and resource a National 30 by 30 Roadmap	~ Collaborative Australian Protected Areas Database (CAPAD) ¹⁶ ~ Targets contained within Australia's Threatened Species Action Plan ¹⁷
Work towards zero new extinctions	Work towards zero New extinctions of plants and animals are prevented and the risk of extinction is reduced for all priority species.	Target 4 [Threatened species]	~ Publish and resource Recovery Plans for all threatened species and threatened ecological communities	~ Targets contained within Australia's Threatened Species Action Plan ¹⁸

¹⁶ <https://www.dcceew.gov.au/environment/land/nrs/science/capad>

¹⁷ <https://www.dcceew.gov.au/sites/default/files/documents/threatened-species-action-plan-2022-2032.pdf>

¹⁸ <https://www.dcceew.gov.au/sites/default/files/documents/threatened-species-action-plan-2022-2032.pdf>

From Discussion Paper	Proposed by ALCA	Relevant GBF Target	Key additional actions	Potential National and Subnational Indicators
N/A	Substantially and progressively increase the level of public and private financial resources to implement the national action plans of Australia and developing country partners by 2030	Target 19 [Financial resources]	~ Within the Portfolio Budget Statement for the climate change, energy, the environment and water portfolio, publish the funding allocated against each Australian NBSAP priority area	~ Adopt relevant indicators tracking progress against the Australian Sustainable Finance Roadmap ¹⁹
<i>Enablers</i>				
Mainstreaming biodiversity considerations into government and business decision-making, including in financing, policies, regulations and planning processes	Mainstreaming biodiversity considerations into government and business decision-making, including in financing, policies, regulations, and planning and implementation processes	Target 14 [Mainstreaming biodiversity into government]	~ Revise the Commonwealth Procurement Rules ²⁰ to account for biodiversity in procurement decisions ~ Update, publish and resource the national Environmental Economic Accounting Strategy and Action Plan ²¹	~ Adopt relevant indicators tracking progress against the Australian Sustainable Finance Roadmap ²²
Ensuring environmental data and information is widely accessible and supports planning	Ensuring the best available environmental data and information is widely accessible and supports planning	Target 21 [Data, information, traditional knowledge]	~ Legislate for the creation of Environment Information Australia	

¹⁹ <https://www.asfi.org.au/roadmap>

²⁰ <https://www.finance.gov.au/government/procurement/commonwealth-procurement-rules>

²¹ The current Strategy and Action Plan is from 2018; <https://eea.environment.gov.au/about/national-strategy-and-action-plan>

²² <https://www.asfi.org.au/roadmap>

From Discussion Paper	Proposed by ALCA	Relevant GBF Target	Key additional actions	Potential National and Subnational Indicators
Ensuring equitable representation and participation in decisions relating to nature, particularly for First Nations peoples	Ensuring inclusive and equitable representation and participation in decisions relating to nature, particularly for First Nations peoples	Target 22 [Equitable representation and participation]	~ Legislate a National Environment Standard on First Nations Engagement and Participation in Decision-making	
N/A	Strengthen capacity-building and development to meet the needs for effective implementation	Target 20 [Capacity building]	~ Publish and resource a Conservation Sector Development Strategy	
<u>Other GBF Targets</u>				
N/A	Bring the loss of areas of high biodiversity importance close to zero by 2030	Target 1 [Land and sea use change]		
N/A	Prevent the overexploitation of wild species by 2030	Target 5 [exploitation of wild species]		
N/A	Reduce pollution from all sources to levels that are not harmful to biodiversity by 2030	Target 7 [pollution]		
N/A	Ensure the management and use of wild species is sustainable by 2030	Target 9 [management of wild species]		
N/A	Ensure that agriculture, fisheries, and forestry are sustainably managed by 2030	Target 10 [sustainable production systems]		

From Discussion Paper	Proposed by ALCA	Relevant GBF Target	Key additional actions	Potential National and Subnational Indicators
N/A	Develop nature-based solutions and ecosystem-based approaches to enhance nature's contributions to people, publishing a national policy on Nature Based Solutions by 2026	Target 11 [nature-based solutions and ecosystem services]	~ Publish a national policy on Nature Based Solutions	
N/A	Increase the total share of green and blue areas in functional urban areas to 50% by 2030	Target 12 [urban green and blue spaces]		~ OECD indicator: total share of green areas in functional urban area's (FUA's) urban centres ²³
N/A	Review and update the <i>Nationally consistent approach for access to and the utilisation of Australia's native genetic and biochemical resources</i> by 2027	Target 13 [access and benefit sharing of genetic resources]		
N/A	Develop and implement frameworks for businesses to disclose nature-related risks by 2027	Target 15 [business disclosures]	~ Publish disclosure frameworks for nature-related financial risks (e.g. via the proposed <i>Treasury Laws Amendment Bill 2024: Climate-related financial disclosure</i> ²⁴)	
N/A	Strengthen biosafety measures, including through a review by the Office of the Gene Technology Regulator by 2027	Target 17 [Biosafety]		

²³ <https://stats.oecd.org/Index.aspx?QueryId=119735>

²⁴ <https://treasury.gov.au/consultation/c2024-466491>

From Discussion Paper	Proposed by ALCA	Relevant GBF Target	Key additional actions	Potential National and Subnational Indicators
N/A	Identify by 2025, and eliminate, phase out or reform incentives and subsidies harmful for biodiversity, by 2030	Target 18 [Incentives]		
N/A	Ensure gender equality throughout the implementation of the Kunming-Montreal Global Biodiversity Framework	Target 23 [Gender equality]		