

National Adaptation Policy Office – Climate Adaption Policy  
Department of Climate Change, Energy, Environment and Water  
Parkes ACT 2600  
Via email: [climate.adaptation@dcceew.gov.au](mailto:climate.adaptation@dcceew.gov.au)

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15 April 2024

Dear National Adaptation Policy Office,

**RE: Climate adaptation in Australia – National Adaptation Plan Issues Paper**

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a submission to the Australian Government’s consultation on its National Adaptation Plan.

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.

## Summary

Policymakers are increasingly recognising that nature and climate are an indivisible nexus. The climate crisis cannot be solved without also solving the nature crisis by protecting existing stocks of nature – and thus the carbon it contains – supplemented with large-scale nature restoration.

In 2017, The Nature Conservancy and fifteen other institutions concluded that nature-based solutions (for climate change) “*provide up to 37 percent of the emission reductions needed by 2030 to keep global temperature increases under 2 degrees Celsius – 30 percent more than previously estimated*”<sup>1</sup>, a finding only reinforced by subsequent studies.

In short, whilst phasing out fossil fuels will be necessary to avert the worst impacts of climate change, protecting and restoring nature (and the carbon it contains) will also be absolutely necessary. Beyond carbon, there are dramatic benefits to society, cultural, human wellbeing, food security, disaster risk reduction, and of course, biodiversity itself, in protecting and restoring nature. The easiest and lowest-cost way to reduce our emissions is to protect our existing natural stocks of carbon.

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<sup>1</sup> See: <https://www.pnas.org/doi/10.1073/pnas.1710465114>

Privately managed land accounts for approximately 60% of Australia’s land, with much of that land being used for agricultural production. This makes private land conservation a critical pathway for delivering the protection, management, and restoration of nature, and the national adaptation benefits those efforts provide.

## Recommendations

### **Box 2**

**Recommendation 1:** Australia’s nature should not be read as merely an adjunct to the built environment. The proposed vision for the Plan should therefore be amended as follows (**amendments in bold**):

*Australia’s economy, society, **nature, and natural** and built environments are being managed and invested in, to reduce climate impacts and harness any opportunities now and into the future – by all levels of government, business and community.*

**Recommendation 2:** The key objectives of the Plan cannot ignore the environment in which people live – Australia’s prosperity is indivisible from the landscapes we inhabit, and nature also has inherent social, cultural, and economic value. The objectives of the Plan should therefore be amended as follows:

*The key objectives of the National Adaptation Plan are to ‘mainstream’ adaptation action, drive a substantial uplift in private sector investment and establish support for **disproportionately vulnerable people, and communities, and nature. in disproportionately vulnerable situations.***

**Recommendation 3:** The natural environment (refer p2, Table 1, *First pass assessment report appendix – risk descriptions*<sup>2</sup>) should be a Commonwealth priority for this Plan because of the indivisibility of the nature and climate change nexus. The climate crisis cannot be solved without also solving the nature crisis, and many of the measures required to repair Australia’s nature have significant benefits for reducing the impacts of climate change and for climate adaptation.

First and foremost, we need to protect the nature we have to minimise impacts from climate change (including for their carbon stocks and important contributions to disaster risk reduction). This is captured in Australia’s complementary commitment to protect 30% of its lands and 30% of its seas by 2030<sup>3</sup> – further complemented by Australia’s international commitments to engage in large-scale restoration of degraded landscapes<sup>4</sup>.

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<sup>2</sup> <https://www.dcceew.gov.au/sites/default/files/documents/national-climate-risk-assessment-first-pass-assessment-report-appendix-2024.pdf>

<sup>3</sup> As per: <https://minister.dcceew.gov.au/plibersek/speeches/national-press-club-address>, and various Australian Government policy documents (2022-2032 *Threatened Species Action Plan*, etc.)

<sup>4</sup> UN Convention on Biological Diversity, *Kunming-Montreal Global Biodiversity Framework*, Target 2: “Ensure that by 2030 at least 30 per cent of areas of degraded terrestrial, inland water, and marine and coastal ecosystems are under effective restoration, in order to enhance biodiversity and ecosystem functions and services, ecological integrity and connectivity.”;

<https://www.cbd.int/doc/decisions/cop-15/cop-15-dec-04-en.pdf>

### **Box 3**

**Recommendation 4:** There is a significant opportunity for collaboration between DCCEEW's National Climate Adaptation efforts and DCCEEW's environment and water divisions, State and Territory environment departments, the on-ground conservation sector (as largely represented by the Australian Land Conservation Alliance), and Aboriginal and Torres Strait Islander-led land management organisations. In short, **we need to devise plans and policies that address the nexus of the nature and climate crises together.** Creating separate solutions only leads to greater and unnecessary opportunity costs being borne by Government and by society.

**Recommendation 5:** The initial Plan should cover at least until 2050, with short (by 2030), intermediate (2040) and long-term (2050) goals and actions. Short-term goals and actions that relate to nature should align with DCCEEW's forthcoming policy publication, *Delivering the 30 by 30 land target: Australia's National Roadmap*.

### **Box 4**

**Recommendation 6:** Nature is a clear gap in the draft principles. As per Recommendation 2 above, the draft principles of the Plan cannot ignore the environment in which people live – Australia's prosperity is indivisible from the landscapes we inhabit, and nature also has inherent social, cultural, and economic value. The principles should therefore be amended as follows (**additions in bold**):

***“assist Australian biodiversity disproportionately affected by climate impacts and ensure that adaptation supports nature.”***

### **Box 5**

**Recommendation 7:** Under the Natural Environment System (which ALCA recommends be renamed 'Nature' or 'Natural System' to distinguish it more clearly from the 'built environment'), the following policies should be added:

- *Delivering the 30 by 30 land target: Australia's National Roadmap* (forthcoming, and expected to secure collective Federal, State and Territory commitment)
- *Strategy for Australia's National Reserve System 2009-2030* (which, notably, has collective Federal, State and Territory commitment)

### **Addressing barriers**

**Recommendation 8:** A major barrier to strengthening climate adaptation is the lack of resources provided to deliver protection, management, and restoration of Australia's nature. The Federal Government currently spends less than 0.1% of the Federal budget on Australia's biodiversity<sup>5</sup> – an amount that is desperately inadequate to address the urgency and scale of Australia's nature crisis and the serious contribution that investment in nature and nature-based solutions can have in reducing climate impacts and contributing to climate adaptation.

**The National Adaptation Plan could help by co-investing in nature-based solutions for climate.**

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<sup>5</sup> Best estimate based on the methodology used in the 2021 State of Environment report, see Fig. 53, <https://soe.dcceew.gov.au/sites/default/files/2022-07/soe2021-biodiversity.pdf>

**Recommendation 9:** A barrier related to the chronic and inadequate investment in nature by successive Australian Governments (see Recommendation 8 above) is that the sector being relied upon to *deliver* for nature – the on-ground conservation and land management sector, including the unique role of Aboriginal and Torres Strait Islander communities – is under-resourced in both funding and capability.

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.

Our sector is well-placed to undertake action to strengthen adaptation in the natural environment (nature) system – but 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 climate, and at scale.**

**Recommendation 10:** Advance Environmental Economic Accounting initiatives. As foreshadowed in Recommendation 9, nature has not been formally valued in the way that other resources or sectors are valued, and this is a partial cause of both private and Government underinvestment in the nature-climate nexus. **The Plan should support research and other efforts to fully and appropriately value the contributions of nature to the reduction of climate impacts, climate adaptation, and disaster risk reduction.**

**Recommendation 11:** Ensure, at-minimum, **agnostic tax treatment of the conservation sector and conservation activities:**

- a. Noting the Government’s commitment to protect 30% of Australia’s lands by 2030, preventing further species extinction<sup>6</sup>, and reducing our carbon emissions, **instigate a Treasury or Productivity Commission review into federal and state taxes upon conservation** (as aligned to Recommendation 28(d) of the *Independent Review of the EPBC Act*<sup>7</sup>).
- b. Extend **fringe benefit tax (FBT) concessions to conservation charities** that are currently only afforded to Public Benevolent Institutions (PBIs; i.e., charities that relieve poverty, sickness, or destitution).

In practice, this means that environmental charities struggle to attract talent when compared with other organisations in the charity sector, let alone the wider workforce, with average salaries being significantly less than in PBIs for equivalent roles, which undercuts our sector’s ability to deliver carbon sequestration at scale.

**Recommendation 12:** **The Government’s carbon market procurement efforts should be delivered to maximise public value** (i.e. maximise social<sup>8</sup> profit), rather than lowest cost abatement.

Significant public resources are currently being invested by Government to deliver lowest cost abatement of greenhouse gas emissions in the public interest. However, there are large opportunity costs in supporting carbon projects only according to the lowest cost and without

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<sup>6</sup> See: <https://www.dcceew.gov.au/environment/biodiversity/threatened/publications/action-plan-2022-2032>

<sup>7</sup> See: <https://epbcactreview.environment.gov.au/resources/final-report/chapter-8-planning-and-restoration/84-government-effort-alone-not-enough>

<sup>8</sup> Ibid.

considering other public benefits that could also be available, particularly the contributions to climate adaption that nature provides.

Thank you again for the opportunity to provide feedback on the National Adaptation Plan. ALCA looks forward to continuing to engage with the Government on the development of the Plan and the opportunity it presents to deliver for people and nature.

**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.