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supporting native grassy ecosystems
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Re. the *Discussion Paper: Implementing Australia's Strategy for Nature 2024-2030*

Friends of Grasslands (**FOG**) is a community group dedicated to the conservation of grassy ecosystems in south-eastern Australia - natural temperate grasslands and grassy woodlands. FOG advocates, educates and advises on matters to do with the conservation of these ecosystems, and carries out surveys and on-ground work. FOG is based in Canberra and its members include professional scientists, landowners, land managers and interested members of the public.

The Conservation Council ACT Region is the leading environmental advocacy organisation and hub for community groups in Canberra. Our mission is to protect nature and create a safe climate future in the ACT and region.

The National Parks Association of the ACT (**NPA**) is a community-based conservation organisation with more than 60-years of involvement in the protection of parks and reserves in the ACT and surrounding areas through an active program of walks, work parties, publications, advocacy, and support for scientific research.

FOG, NPA and the Council appreciate the opportunity to comment on the *Discussion Paper*. We have examined outcomes related to the 30 x 30 and restoration targets in detail (Attachment A). In making the following comments, we note FOG and the NPA have extensive expertise in these and two other targets, i.e., in countering invasive species and preventing extinctions.

For contemporary strategic direction based on the scale of the task before Australia now, we suggest you look no further than the Wentworth Group of Concerned Scientists' *Blueprint to Repair Australia's Landscapes*.[1] It describes a suite of 24 practical actions and investments, across five key environmental asset groups, to repair Australia's degraded landscapes. We note also that the Australian Committee for IUCN has recommended, in respect of all 23 Global Biodiversity Framework targets, *Priority actions to meet Australia's commitments to the Kunming-Montreal Global Biodiversity Framework by 2030*.[2]

When it comes to at-risk, highly biodiverse, difficult-to-restore ecosystems, like freshwater aquatic and native temperate grasslands, we believe Australia needs to protect and maintain, and to restore where necessary, the best of what's left. We recognise "it is far cheaper to maintain our natural systems than it is to allow them inadvertently to be damaged and, subsequently, to inherit a costly repair bill."[3] Australia must protect a comprehensive, representative and adequate sample of these ecosystems now. If action had been taken earlier, we would not now be facing such burgeoning ecological issues. Every minute of further delay pushes higher costs onto future generations.

When it comes to maintaining and restoring grassy ecosystems in Australia's southeast, as per the first paragraph in this submission, FOG is here to help. In our view, what is needed to achieve this is the

[1] Wentworth Group of Concerned Scientists (24 July 2024) *Blueprint to Repair Australia's Landscapes*. URL: https://wentworthgroup.org/2024/07/blueprint-repair-australias-landscapes/

[2] Australian Committee for IUCN (2023) *Priority actions to meet Australia's commitments to the Kunming-Montreal Global Biodiversity Framework by 2030.* URL: https://www.aciucn.org.au/_files/ugd/f443f7_c1ae8ddc208a424b9daa7ea316b415e1.pdf

[3] Prime Minister's Science, Engineering and Innovation Council (31 May 2002) Sustaining our natural systems and biodiversity, p. 2. URL: https://www.chiefscientist.gov.au/wp-content/uploads/20020531-Sustaining-our-natural-systems-and-biodiversity.pdf, accessed 21 June 2008 (no longer published).

broad-scale application of the best of a full suite of tools backed by money and political will. The tools available for application must include motivational, voluntary, price-based, property-right and regulatory incentives.[4]

Turning to what has been proposed in the Discussion Paper, we are concerned the outcomes attached to the targets we have reviewed: won't guide prioritisation; lack specificity and measurability; and lack ambition. Each outcome could be said to have been achieved already; as a result, these outcomes set little if any "strategic direction for collective action".[5]

We urge the Department and the Australian Government to recognise the cost of ongoing inaction and to lift your ambition. We welcome every opportunity and action that contributes to these ends.

Yours sincerely

SIGNED	SIGNED	SIGNED
Jamie Pittock President Friends of Grasslands	Dr Simon Copland Chief Executive Conservation Council ACT Region	Dr Rosemary Hollow President National Parks Association ACT
15 October 2025	15 October 2025	15 October 2025

[4] Young, MD., Gunningham, N., Elix, J., Lambert, J., Howard, B., Graboski, P., McCrone, E. (1996) *Reimbursing the future*. Biodiversity Series, Paper No. 9

[5] Discussion Paper, p. 4

Attachment A: Analysis of the outcomes for the 30 x 30 and the restoration targets

Re Target: Protect and conserve 30% of Australia's landmass ... by 2030, where the outcomes proposed to help prioritise areas for collective action are:

- Public and private protected and conserved areas are expanded on land
- Protected and conserved areas on land are well connected, ecologically representative and include areas of particular importance for biodiversity
- First Nations Peoples are supported to care for land and Sea Country
- Protected and conserved areas across land and sea are effectively managed

For this target, strategy is desperately needed. While an additional area of almost 1,033,000 square kilometres was added to the NRS between 2010 and 2024, increasing the percentage of Australia's land and inland water protected in the National Reserve System (NRS) from 13.43 per cent to 22.57 per cent, in the same period the number of IBRA bio-regions with protection above ten per cent (a measure of comprehensiveness) increased by just six from 54 to 60 (of 89), and the number of IBRA sub-regions with protection above ten per cent (a measure of representativeness) increased by just 34 from 182 to 216 (of 419). On 30 June 2024, a whopping 73 IBRA sub-regions still had less than 1 per cent of their area protected.[6]

However, neither the outcomes suggested for this target, nor the list of 'Criteria to identify priority areas for 30 by 30' found in Table 2 of the *National Roadmap for protecting and conserving 30% of Australia's land by 2030* (**National Roadmap**), give good strategic direction for collective action. The list in the National Roadmap includes, for example, the all-encompassing criterion 'provide habitat for nationally listed threatened species'. Given numerous threatened species are distributed across the nation, decision-makers can prioritise and invest in anything they like. If the task is to identify 'areas of particular importance for biodiversity', better more-specific outcomes must guide implementation.

Nothing in the outcomes suggests relatively intact examples of grossly under-represented temperate grassy ecological communities will be prioritised in any way in future efforts to add to the protected and conserved area estate. This is despite the fact nine of eleven of the temperate grassy ecological communities are now listed as threatened under the *Environment Protection and Biodiversity Conservation Act 1999* (**EPBC Act**) at the threat level 'critically endangered'. The other two are 'endangered'.

None of the outcomes associated with the protected and conserved area target relates to adequacy as defined in the *Australia's Strategy for the National Reserve System 2009–2030* (**NRS Strategy**). Nothing could be more important than 'finalising and implementing measures for assessing adequacy of [the protected and conserved area] system in the context of surrounding land use, complementary off-reserve measures, connectivity and adaptation to climate change.'[7]

Absent an outcome and any measures related to assessing adequacy, how will we know if, e.g., the sample of each grassy landscape that is protected and conserved will "provide ecological viability and integrity ... at a bioregional scale"?[8]

It is not clear how nor what conserved area statistics will be collated and published; what we do know is that the *National Other Effective area-based Conservation Measures Framework* (**Conserved Area Framework**) did not commit to collect let alone publish the reasons why a protected area designation was not appropriate or supported for any land recognised as a conserved area. Nor will anyone outside of a former conserved area land manager know the reason why any site will lose its conserved area

[6] CAPAD, national summaries 2010-2024. URL: www.dcceew.gov.au/environment/land/nrs/science/capad

[7] Natural Resource Management Ministerial Council (May 2009) *Australia's Strategy for the National Reserve System 2009–2030* (**NRS Strategy**), URL: https://www.dcceew.gov.au/sites/default/files/documents/nrsstrat.pdf, p. 32, Priority action 2.7 under the heading 'Protected Area Design and Selection'

[8] NRS Strategy n 7, p. 64

recognition. As a result of these failures, we worry conserved area monitoring will be very superficial in Australia, limited to addressing no more than the minimum, i.e., "Coverage of protected areas and other effective area-based conservation measures"[9], which we understand will be a single number expressed in hectares. It's not ambitious.

Re Target: Priority degraded areas are under effective restoration by 2030, where the outcomes proposed to help prioritise areas for collective action are:

- Priority degraded areas are identified to guide restoration where it will best support native species and ecosystem recovery
- Effective restoration is clearly defined to promote best practice
- On-ground restoration is supported

Like the above, and for precisely the same reasons, FOG does not see how these outcomes will set direction. FOG welcome every measure that will advance the conservation of grassy ecosystems.
As some of Australia's most endangered and difficult-to-restore ecological communities, grasslands and grassy woodlands are the acid test of whether ecosystem restoration measures can be effective. They are fragmented, hard to identify to the unknowing, can be destroyed through otherwise innocuous activities such as over grazing and require active management.

Working toward a standard unit of biodiversity would be a good start.
The distillation of a broadly applicable minimum standard for the management of biodiverse land, rivers or inland waters is important. Think of this standard as a 'general duty' to manage biodiversity well. It manifests when, for example, a land manager is required by a responsible authority to remove a weed or feral animal from land they lease or otherwise control. In the absence of such a standard, no-one will know – including the Clean Energy Regulator administering the *Nature Repair Act 2023* (**NR Act**) – whether projects in different biomes and ecosystems, and in different jurisdictions, go beyond, and if so how far they go beyond, minimum standards and existing legal obligations. These are additionality and proportionality problems, respectively. A standard is needed to ensure payments from collective actors get bang for buck.

A legal mechanism for securing the gains made in restoration projects is desperately needed and obviously missing. The NR Act is very clear every registered biodiversity project's "permanence period is intended to cover the life of the project and there would be no obligations for project proponents (or any other person) in respect of the project after the end of the permanence period."[10] This is despite Standard 1.7.2 of the *National Standards for the Practice of Ecological Restoration in Australia* (**National Restoration Standards**) which, if applied, begs consideration of the "potential for ongoing prevention of impacts and maintenance on [any project area] after completion of [any registered biodiversity project] to ensure that the [project area] does not regress into a degraded state"[11].

There is an existing legal mechanism that could support the retention of gains. The Minister has the power now to protect biodiversity in the Australian jurisdiction by executing simple, secure and (when they need to be) permanent Conservation Agreements under Part 14 of the EPBC Act[12].

Finally, a strategy is desperately needed to guide the pricing of gains in the nature repair market. Grassy ecosystems lack the sex appeal of koalas hanging about in tall forests; yet, they are highly biodiverse ecosystems. The offer a tremendous potential to support the sustainable future of some forms of agriculture. That future will depend, in part, on sustaining and boosting the abundance of the genetic material species within natural grasslands have to confer resilience and drought hardiness.

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[9] GBF Indicator Framework, Target 3, Indicator 3.1

[10] Revised Explanatory Memorandum for the Nature Repair Bill 2023 (Cth), para 208 on p. 44 here: https://www.aph.gov.au/Parliamentary_Business/Bills_LEGislation/Bills_Search_Results/Result?bId=r7014

[11] Standards Reference Group (Sep 2021) *National standards for the practice of ecological restoration in Australia*. URL: https://www.seraustralasia.com/standards/NationalStandards2_2.pdf, p. 24

[12] EPBC Act, s.304(1)(a)(i) and s.305(1)(a)