

National Parks Australia Council

Working together for nature conservation areas



19 July 2024

Protected and Conserved Areas Policy Team
Department of Climate Change, Energy, the Environment and Water
By email: NRS.environment@dcceew.gov.au

Draft National Roadmap for protecting and conserving 30% of Australia's land by 2030

Dear Sir/Madam,

The National Parks Australia Council (NPAC), formed in 1975, is a national body that represents a range of state and territory non-government organisations focused on the creation and management of national parks and other Protected Areas. The Council's mission is to protect, promote and extend national park systems across Australia.

NPAC welcomes the exhibition of the *Draft National Roadmap for protecting and conserving 30% of Australia's land by 2030* (the draft roadmap). The draft roadmap is a long-awaited step towards implementing the Global Biodiversity Framework (GBF), one of the most important initiatives this nation has taken in response to the extinction and climate crises. Most importantly, the draft roadmap emphasises the central role of Protected Areas in practical and effective biodiversity conservation.

NPAC has funded detailed policy analysis about the expansion, connectivity and management of both the marine and terrestrial protected area estate in the past and the majority of this is still highly relevant to the present discussions. Please see our policy statements for further details, <https://npac.org.au/news-publications/>

Unfortunately, the draft roadmap offers a very incomplete pathway to 30by30, with a number of shortcomings that seriously compromise the likelihood that Australia will successfully implement our commitments under the GBF. The following highlight issues that NPAC believes must be addressed in the final roadmap.

Conflicting objectives

The draft roadmap states that Australia can meet the 30% component of 30by30 through the protection or conservation of an additional 60 million hectares of land. This equates to another 8% of the nation's land area on top of the 22% currently in the National Reserve System (NRS).

This claim is mistaken and misleading. The reason is that these figures ignore the requirement that Protected and Conserved lands must be 'optimally located for conservation'.

There are well-established methods and policies for assessing the adequacy of the NRS. This involves the application of Comprehensive, Adequate and Representative (CAR) principles to IBRA bioregions and subregions. Equivalent



National Parks Australia Council

Working together for nature conservation areas



assessment methods have been applied to marine and freshwater ecosystems, including the Interim Australian National Aquatic Ecosystem Framework and Marine Ecoregions of the World.

All of these long-accepted methods for determining whether new additions to the NRS are 'optimally located for conservation' are founded upon assessment at the bioregional level. The results of such analysis will not and cannot be equated to a gross calculation at the national scale. In our view, the national estimate provided in the draft roadmap is essentially meaningless as a measure of the adequacy of current protections for biodiversity.

The data in Figure 7 of the report indicate that 60 million hectares is a large underestimate of the extent of land and seas that will be required to meet or exceed 30by30 levels for all bioregions.

It is not sufficient to simply state that 'it is important to increase the level of protection and conservation in underrepresented IBRA bioregions' (draft roadmap, p25). Instead, the roadmap must provide clear guidance on priorities for addressing such shortfalls.

The gulf between the stated national target and the tailored biodiversity principles behind the NRS must be resolved in the final roadmap. Failure to do so will inevitably result in the states adopting the wholly inadequate framing of 30 by30 targets rather than lifting to protection and conservation aspirations outlined in the GBF.

Global Biodiversity Framework Target 2

The draft roadmap barely makes passing reference to the restoration objectives in Target 2 of the GBF. This is perplexing, given that the large ecological restoration of degraded landscapes will be required to meet protection targets in many degraded bioregions.

NPAC recommends that the final roadmap should identify bioregions where large-scale restoration is required to address current shortfalls in the total extent of, and connectivity between, Protected and Conserved Areas.

Marine Protected Areas

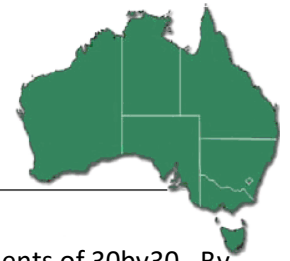
NPAC is shocked by the Commonwealth's decision to declare Marine Protected Areas (MPA) outside the scope of the draft roadmap. Marine conservation is a fundamental part of the GBF and Convention on Biological Diversity, and the casual reference to periodic reviews of management plans in no way replaces the need for the same level of strategy, policy and funding as applies to the terrestrial portion of Australia and the actual need for active management.

This neglect of marine biodiversity is justified by the extremely misleading assertion that 48% of Australian Waters are already protected. This assertion ignores the fact that the vast majority of existing MPA actually provide very limited protection for marine biodiversity. The science demonstrates emphatically that, apart from those areas managed as marine sanctuaries, the diversity and abundance of biodiversity in MPA is largely indistinguishable from areas outside the reserves.



National Parks Australia Council

Working together for nature conservation areas



Our view is that only genuine marine sanctuaries should be classified as satisfying the requirements of 30by30. By this measure, Australia is nowhere near satisfying the 30% target for marine biodiversity. The Commonwealth's decision to ignore marine biodiversity in the draft roadmap is truly reprehensible.

The final roadmap must include pathways to adequate conservation of marine biodiversity.

Resourcing 30by30

30by30 will be rendered meaningless unless Governments make commitments to the acquisition of new and expanded Protected Areas. The draft roadmap references strategies for incentivising individuals and organisations to contribute to Conserved Areas, but ignores how and by whom resources will be generated for Protected Areas.

NPAC regards Conserved Areas are an integral part of the conservation estate, with particularly important roles in maintaining connectivity at the landscape scale and providing opportunities for site focused conservation in severely modified bioregions. However, even the most stringent legal agreements for Conserved Areas offer little or no guarantee of long-term management for biodiversity outcomes. Future owners are free to change how they manage their land, meaning that public investment in this form of conservation carries a significant risk of poor outcomes over the long-term.

Protected Areas are the backbone of our nation's conservation estate. Only Protected Areas have the statutory protections, management expertise and primary focus on conservation that guarantees permanent contributions to biodiversity conservation.

The draft roadmap makes no commitment to funding for enhancements to the NRS. The lack of such commitment sends an unmistakable signal to the States that they should be focusing their efforts on the establishment of Conserved Areas rather than Protected Areas.

The final roadmap **must** include funding mechanisms to support the States in their delivery of the backbone of 30by30, the NRS. The scale of the challenge goes beyond the capacity of previous funding programs for the NRS, and may require innovative funding options such as changes to the taxes and excises arrangements that constrain changes in property status.

NPAC recommends that Commonwealth funding be prioritised towards the acquisition and restoration of significantly underrepresented bioregions. Habitat remnants in underrepresented bioregions should be prioritised over larger and more intact areas in better conserved bioregions.

Threatened Species

The roadmap proposes to prioritise areas that 'provide habitat for nationally-listed threatened species and ecological communities, and migratory species'. NPAC does not support the proposed focus on nationally listed species. There are several reasons for the inconsistencies between state and national listings, including the fact that species can be



National Parks Australia Council

Working together for nature conservation areas



threatened at the regional or state level but secure at the national level. We ask that the reference simply refer to 'listed threatened species'.

NPAC recommends that recovery plans be developed for all threatened species. Adequate on-going funding needs to be provided to implement all species recovery plans.

Protecting Protected Areas

The draft roadmap provides a framework for ongoing assessment of the condition of Conserved Areas. NPAC commends this as an essential part of ensuring that the roadmap generates real conservation outcomes.

A similar approach is required in relation to Protected Areas, whether managed by States, private organisations or Aboriginal communities. The last decade has provided many examples of inappropriate developments that have significantly reduced the values of Protected Areas, such as the Snowy 2.0 project in Kosciuszko National Park.

Protected Areas are vulnerable to infrastructure development, from recreational facilities to electrical connections to telecommunications towers. NPAC is unaware of any systematic accounting of the species and habitat losses associated with such development in Protected Areas.

The condition of Protected Areas is also affected by factors such as climate change induced mega-fires, sea level rise and the loss of connectivity at the landscape scale, all of which impact on the capacity of Protected Areas to conserve biodiversity.

NPAC recommends that the final roadmap include methods of gauging the extent to which Protected Areas are providing lasting biodiversity outcomes.

Meeting the 2030 deadline

On 21 October 2022 Australia's Environment Ministers agreed *'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'*.

The draft roadmap lacks any focus on the deadline for the fulfilling of these targets, a mere 6 years away.

The failure to grapple with this timeframe is bewildering. The current NRS has taken 150 years to create, a rate of establishment far slower than that required under 30by30. Yet rather than address the new challenge, the roadmap offers little more than a 'tweaking' of past reserve establishment practices.

The timeframes imposed 30by30 demands fundamental changes to past reserve establishment practices. Instead, the draft roadmap downplays the current shortfalls in existing coverage. This 'head in the sand' approach falls far short of the leadership that the community expects from the Commonwealth.



National Parks Australia Council

Working together for nature conservation areas



Implementing 30by30 will trigger a profound change in how land and seas are managed across Australia. The final roadmap must provide guidance on how the Commonwealth and States can generate the social licence needed to sustain these transitions.

If you have any questions on these matters, please contact NPAC at garyd@npansw.org.au

Yours sincerely,

Dr Bruce McGregor
President
National Parks Australia Council

