



Achieving 30 by 30 on land: DRAFT National Roadmap for protecting and conserving 30% of Australia's land by 2030

About EIANZ

The Environment Institute of Australia and New Zealand (EIANZ) is Australasia's peak body for environmental professionals. We represent members from a diverse range of technical professions including scientists, policy makers, engineers, lawyers and economists. Our members are at the forefront of issues such as biodiversity and climate change, and many have direct experience of working with the current *Environment Protection and Biodiversity Conservation Act* (EPBC Act) as both administrators and proponents.

This submission has been developed by the Institute's Ecology Special Interest Section and endorsed by the Board.

Introduction

EIANZ welcomes the Australian Government's commitment to protect and conserve 30% of Australia's land and 30% of its marine areas by 2030 (the '30 by 30 target'). This aligns well with global biodiversity conservation targets, such as those outlined in the Kunming-Montreal Global Biodiversity Framework (GBF) and in particular, Target 3 of the Framework.

We commend the recognition of Conserved Areas (known internally as OECMs) and Indigenous Protected Areas (IPAs) in the Draft National Roadmap, and their integration into the target. This acknowledges the critical role of Indigenous land management practices in biodiversity conservation.

However, we find the draft roadmap lacks detail on precisely how the targets will be achieved. We seek further clarity on how various programs will work in concert to ensure protection of Australia's biodiversity and ecosystems. Collaboration will be essential to the success of the roadmap, as will careful integration of programs across the country.

In the following submission, we make recommendations for improvements to the clarity, consistency, and practicality of the roadmap.

Recommendations

1. Coordination and alignment with 'Comprehensive, Adequate and Representative (CAR) principles

As mentioned above, EIANZ supports the inclusion of Conserved Areas and Indigenous Protected Areas (IPAs) in measuring Australia's progress towards protection or conservation of 30% of Australia's land.

Currently, Protected Areas are selected to ensure a 'Comprehensive, Adequate and Representative (CAR) system of reserves'. These same principles should be applied to any inclusion of Conserved Areas and IPAs towards the 30 by 30 target.

However, we note that these areas have nature conservation as a secondary objective, i.e. they may be acquired and managed for broader criteria than the biodiversity that the GBF aims to achieve.

Private organisations acquiring Conserved Areas do not necessarily choose these areas based on the same criteria that government agencies use to acquire and manage national parks, while IPAs appropriately protect a range of cultural values in addition to ecosystem representation.

Further to this, much of the land protected in IPAs is in inland (dry) parts of the continent, where the widely distributed resources and variable conditions require extensive land holdings to conserve functioning ecosystems and require the expertise of Indigenous rangers/managers to effectively Care for Country. The current system for determining and maintaining IPAs should remain, while ensuring that any IPAs counted towards the 30 by 30 target meet or at least support CAR criteria.

Ultimately, meeting the 30 by 30 target will require national coordination of Protected Areas, Conserved Areas, IPAs and the National Reserve System (NRS), of which IPAs currently make up about fifty per cent.

2. Management of conserved areas

EIANZ notes that large areas of privately-owned land and inland waters are currently managed for nature conservation, by organisations such as Bush Heritage Australia and Australian Wildlife Conservancy. With appropriate legislation to ensure permanent nature conservation on private land, at least some of these areas are likely to meet the criteria for Protected Areas, thereby contributing to the 30 by 30 target. For example, the Queensland Government has recently gazetted Edgbaston Reserve (owned by Bush Heritage Australia) as a "Special Wildlife Reserve", a category of PA, notwithstanding it is not part of the NRS.

Conserved Areas (where conservation is not the primary management objective or land use) could and should include land and inland waters that are under Native Title and/or Indigenous Land Use Agreements and support high biodiversity values.

EIANZ also encourages owners of land under consideration as Conserved Areas (which may include government-owned land assets) to co-manage biodiversity with Traditional Owners.

Conserved Areas should also be identified and gazetted on lands and inland waters which buffer and link PAs, recognising not only existing wildlife movement corridors but also future movement of populations and ecosystems resulting from climate change.

3. Legislative Framework and Funding

Developing a robust legislative framework to support permanent conservation on private lands and incentivise biodiversity stewardship is essential to achieving the long-term protection of these areas. [The Gondwana Link](#) provides an excellent example.

Clear funding mechanisms and incentives are crucial to ensuring the financial viability of achieving the 30 by 30 target across diverse landscapes that also meet the international criteria

for OECMs. The draft roadmap provides examples of programs that serve this function within each state and territory.

The NatureAssist program in Qld is provided in the roadmap as an example of a program that allows private landowners to protect land and receive financial support in doing so. This program is valuable and should continue to be supported, however, EIANZ is aware of several challenges and issues with the program.

We have outlined these issues below to illustrate potential problems that can arise with such programs, which should be considered in the Draft roadmap to support the 30 by 30 targets:

- **Funding Uncertainty:** One of the primary issues for Nature Assist is uncertainty around the program's ability to secure long-term funding commitments, which impacts its sustainability and the continuity of conservation efforts. Without stable funding, it becomes challenging to plan and implement conservation projects effectively.
- **Administrative Complexity:** The administrative process involved in accessing Nature Assist funding can be complex and time-consuming. This complexity may deter potential applicants from participating in the program, especially smaller organisations or landholders without dedicated administrative resources.
- **Limited scope and eligibility criteria:** A program's eligibility criteria and scope may limit the participation of certain landholders or organisations. For instance, specific criteria related to land size, conservation objectives, or geographic location may exclude potential applicants who could otherwise contribute significantly to conservation outcomes.
- **Monitoring and evaluation:** There may be challenges in effectively monitoring and evaluating the outcomes and impacts of projects funded programs such as Nature Assist. This can make it difficult to demonstrate the program's effectiveness in achieving its conservation goals and justify continued investment in the program.
- **Integration with other programs:** Coordination and integration with other conservation programs and initiatives, both within Queensland and at the national level, may pose challenges. Ensuring complementarity and avoiding duplication of efforts requires effective collaboration and communication among stakeholders.
- **Adaptation to climate change:** As climate change impacts become more pronounced, the Nature Assist program needs to adapt its conservation strategies to enhance resilience and support biodiversity in a changing environment. This may require additional resources and expertise.
- **Governance and accountability:** Ensuring transparent governance and accountability mechanisms within the Nature Assist program is essential for maintaining stakeholder trust and confidence. Issues related to governance, reporting, and accountability could affect the program's credibility and effectiveness.

4. Monitoring and Reporting for Australia's Conservation Goals

Australia's commitment to achieving the 30% conservation target involves establishing robust monitoring and reporting mechanisms. These mechanisms aim to track progress using clear indicators, baseline assessments, and regular updates. However, the current documentation lacks specific details on how the target will be achieved and how newly protected areas will be managed and restored.

The headline indicator for Target 3 of the GBF focuses on the coverage of protected areas and other effective area-based conservation measures. Australia plans to use the Collaborative

Australian Protected Areas Database (CAPAD) to capture these data. CAPAD aggregates information from federal, state, and territorial governments, as well as conservation organisations. However, several challenges undermine its effectiveness:

1. Data inconsistencies and gaps variations in data collection methodologies and reporting standards across jurisdictions lead to inconsistencies in data quality and accuracy.
2. Delays in reporting from different jurisdictions result in outdated information within CAPAD, hindering stakeholders' access to current data.
3. Concerns persist regarding the dataset's completeness, particularly in capturing Protected Areas managed by Indigenous groups or private landholders.
4. Data accessibility and transparency complex data ownership and management structures across jurisdictions limit public access to detailed datasets, affecting transparency and accountability.
5. Standardisation of classification systems; CAPAD integrates data using diverse classification systems, posing challenges in data interpretation and comparability.
6. Integration with international standards aligning CAPAD with international standards, such as those set by the International Union for Conservation of Nature (IUCN), is crucial for benchmarking Australia's conservation efforts globally.

To address these issues, collaborative efforts among federal, state, and territorial governments, along with conservation partners are essential. Improvements in data collection, reporting standards, timeliness of updates, and transparency are also critical to enhancing CAPAD's effectiveness.

For example, adopting a system akin to Europe's Natura 2000 Viewer could improve accessibility, transparency, and the usability of Australia's Protected Areas data. This user-friendly platform offers interactive mapping, detailed site information, and supports multiple languages, thereby facilitating informed decision-making and public engagement in biodiversity conservation efforts.

5. Integration with Urban and Regional Planning

Opportunities to align the roadmap with urban planning frameworks to promote Nature Positive Cities and enhance connectivity between protected areas should be investigated and not ignored. Urban areas play a pivotal role in biodiversity conservation and should be integrated into broader conservation strategies. The Institute's recent communique on Nature Positive Cities is attached to this submission.

6. Climate Resilience and Ecological Connectivity

We commend the Department for prioritising areas that enhance ecological connectivity, buffer against climate change impacts, and support the resilience of ecosystems. This approach ensures that protected areas contribute effectively to mitigating and adapting to climate change.

Conclusion

Australia's commitment to the 30 by 30 target is crucial for safeguarding its unique biodiversity and ecological resilience. However, achieving this goal requires a holistic and coordinated approach that also integrates Indigenous knowledge, engages diverse stakeholders, strengthens legislative frameworks, and ensures robust monitoring and reporting. EIANZ stands ready to collaborate closely with the government and stakeholders to address the recommendations made in our submission and help to ensure the roadmap's success.



Communiqué: Nature Positive Cities Symposium

Summary

The concept of delivering improved ecological outcomes in urban settings has been with us for some time, yet in practice, this idea appears to be in its infancy.

In March 2024, EIANZ held its inaugural Nature Positive Cities Symposium. This communiqué outlines key takeaways from the event and makes recommendations to policy makers and regulators.

The Symposium heard that:

- Connection to nature in cities has been shown to have a range of health and economic benefits such as increased physical and mental wellbeing¹, improved property values² and reduced crime rates³
- The development of Nature Positive Cities is essential to addressing the challenges of climate change and biodiversity loss in Australia and Aotearoa New Zealand
- Developing nature positive cities requires striving for Biodiversity Net Gain – which must be supported through both legislation and philosophy of design
- Successful nature-based solutions necessitate a truly multidisciplinary approach with the urban resident at the centre
- More concerted and genuine efforts must be made to incorporate the vast knowledge of First Nations peoples into the planning and design of cities.

¹ White, M. P., Alcock, I., Wheeler, B. W., & Depledge, M. H. (2013). Would You Be Happier Living in a Greener Urban Area? A Fixed-Effects Analysis of Panel Data. *Psychological Science*, 24(6), 920-928. <https://doi.org/10.1177/0956797612464659>; Morrison N, Barns S, Dunshea A, Paine G, Pry J, Sajan J, Thompson S, Van Den Nouwelant R (2021). Making healthy places: NSW built environment practitioners' perspectives on place-making opportunities that help deliver health and wellbeing outcomes. *Marudulu Budyari Gumal* <https://doi.org/10.52708/LCWA1416>; Marina G, Cavuoto, Liam Davies, Ella Rowsthorn, Lachlan G. Cribb, Stephanie R. Yiallourou, Nawaf Yassi, Paul Maruff, Yen Ying Lim, Matthew P. Pase (2024). Cross-sectional associations between neighborhood characteristics, cognition and dementia risk factor burden in middle-aged and older Australians. *Preventive Medicine Reports*, Volume 41, <https://doi.org/10.1016/j.pmedr.2024.102696>; State of New South Wales (Department of Planning, Housing and Infrastructure) (2024). Biodiversity in Place: A framework to improve urban biodiversity in NSW. <https://www.planning.nsw.gov.au/sites/default/files/2024-05/biodiversity-in-place.pdf>

² CRC for Water Sensitive Cities. How much do we value green spaces? (2017). https://watersensitivecities.org.au/wp-content/uploads/2017/05/IN_A1-1_How_much_do_we_value_green_spaces_V1.pdf

³ S. Scott Ogletree, Lincoln R. Larson, Robert B. Powell, David L. White, Matthew T.J. Brownlee (2022). Urban greenspace linked to lower crime risk across 301 major U.S. cities. *Cities*, Volume 131, <https://doi.org/10.1016/j.cities.2022.103949>

EIANZ calls on policy makers and regulators to:

- Recognise that developing nature positive cities and meeting the targets set by the [Kunming-Montreal Biodiversity Framework](#) (GBF) requires striving for Biodiversity Net Gain – which must be supported through both legislation and philosophy of design
- Implement governance arrangements that make climate change and biodiversity loss a central consideration in policy and decision-making on urban planning
- Agree upon priorities for cities and nature through well thought-out regional and strategic planning and assessments
- Address the skills shortage in the environment industry by supporting the training of more practitioners (including First Nations peoples)
- Genuinely and authentically engage with First Nations peoples in the development of nature positive cities.

Background

Most of Australia and Aotearoa New Zealand's major cities exist within ecosystems that have numerous threatened flora and fauna. Many cities in our region also face significant water supply challenges, pollution, and a loss of connection to nature. Meanwhile, Australia is one of the most biodiverse countries on the planet yet has seen an alarming rate of species loss in the last 240 years. Notably, Australia and Aotearoa New Zealand have both committed to the GBF's '[30x30](#)' target to protect 30% of land and ocean globally by 2030.

As governments look to increase housing supply to meet growing population demand, this can come at the expense of good planning and decision making, where outcomes for nature are not integrated into planning or design. The consequences of this are deferred costs to the community in the form of extra heating/cooling costs, health consequences, and poorer pollution and water management.

Nature in cities, and the ecology of our urban spaces, are important not only due to the demonstrated economic and social benefits, but because nature provides both the ecosystem upon which a city depends and habitats for threatened species.

Although environmental and planning laws have for many decades attempted to minimise and/or protect impacts on nature, we are continuing to see its decline.



In Australia, all levels of government have the powers and resources needed to create nature positive cities. Governments also have legislative and policy commitments to implement [ecologically sustainable development](#) (ESD), defined as 'using, conserving and enhancing the community's resources so that ecological processes, on which life depends, are maintained, and the total quality of life, now and in the future, can be increased'. Yet the three levels of Government do not always align powers and resources in regional planning and implementation. Western culture's focus on property rights limits the effectiveness of Planning Codes and health of urban ecosystems.

Following COP15 and the development of the GBF, there has been an increase in the use of terms and concepts such as Nature Positive, Nature-based Solutions, and urban ecology; however, there are generally no globally accepted definitions. One key principle behind many of the terms is that of Biodiversity Net Gain, in which a project results in a quantifiable *gain* in biodiversity. It is of vital importance that proponents and practitioners exercise caution in the use of such terms to guard against potential greenwashing and ensure that the principle of Biodiversity Net Gain is not lost.

Where to from here?

Successful nature-based solutions require a truly multidisciplinary approach with the urban resident at the centre. The different disciplines bring different skills, experiences, vocabularies, and approaches. To be successful, dedicated effort will be needed to achieve positive collaboration.

Governments, urban planners and environmental practitioners have much more to learn from First Nations peoples. More concerted and genuine efforts must be made to incorporate the vast knowledge of First Nations peoples into the planning and design of cities.

Urban planners, policymakers and environmental practitioners need to holistically design for: nature positive (and Biodiversity Net Gain), vibrant human communities, genuine collaboration with First Nations peoples, and climate resilience. Addressing each of these singly does not lead to rapid progress. Consensus and compromise will be required to achieve sustainable outcomes.

EIANZ's vision for Nature Positive Cities is as follows:

- Urban design integrates nature as an essential part of our experience
- Residents can walk, cycle or take public transport to services, dramatically reducing reliance on fossil fuel-powered cars
- Residents have access to free meeting areas, parks and play areas that include natural areas and native plantings
- Native plants that use less water, provide shade in summer and reduce our energy and water use are the default for public and private spaces
- Water and energy can be stored and used, and water infiltrates the ground rather than leading to flash floods
- Heat islands are a thing of the past, and heating and cooling are affordable to all residents
- Creeks and rivers are clear of invasive weeds and litter
- Cities provide their residents with the proven positives of nature.

As stated above, EIANZ calls on policy makers and regulators to:

- Recognise that developing nature positive cities and meeting the aims of the Global Biodiversity Framework requires striving for Biodiversity Net Gain – which must be supported through both legislation and philosophy of design
- Genuinely and authentically engage with First Nations peoples on the development of nature positive cities
- Agree upon priorities for cities and nature through well thought-out regional and strategic planning and assessments
- Address the skills shortage in the environment industry by supporting the training of more practitioners (including First Nations peoples)
- Implement governance arrangements that make climate change and biodiversity loss a central consideration in policy and decision-making

EIANZ calls on its members and all environmental professionals to:

- Work with a diverse group of people, including First Nations Peoples, urban residents, planners, social scientists, engineers, and developers, to establish sustainable needs and solutions
- Put Nature at the heart of urban design, making it a key stakeholder
- Refer to international frameworks such as the IUCN's [Global Standard for Nature-based Solutions](#) to develop robust and equitable solutions



- Make use of rapidly developing tools and solutions that are becoming available to support the development and understanding of the importance of nature in urban areas, while remaining critical and avoiding greenwashing.

Over the next three years, EIANZ will:

- Seek to form a Nature Positive Cities Community of Practice (within the [Ecology Special Interest Section](#)) to promote good urban ecology practice amongst its members and environmental practitioners more generally
- Hold a follow-up symposium to review progress and set new objectives before the end of 2026
- Strengthen our link with allied urban planning, land management and impact assessment professions
- Encourage all members to engage with First Nations perspectives in their work and promote these perspectives wherever possible.

The Environment Institute of Australia and New Zealand (EIANZ) is Australasia's peak body for environmental professionals and part of a global network of more than 25,000 environmental practitioners. We are a not-for-profit organisation representing members from a diverse range of technical disciplines including environmental scientists, policy makers, engineers, lawyers, and economists. Our members are at the forefront of challenging and complex issues such as climate change, sustainability and preserving biodiversity. Through our Code of Ethics and Professional Conduct, EIANZ sets high ethical standards for environmental practitioners.