



**Biodiversity
Council**

Submission regarding Implementing Australia's Strategy for Nature 2024-2030

15 October 2025

About The Biodiversity Council

The Biodiversity Council brings together leading experts including Indigenous knowledge holders to promote evidence-based solutions to Australia's biodiversity crisis. The Council was founded by 11 universities with the support of Australian philanthropists.



Introduction

The Biodiversity Council welcomes the opportunity to provide feedback on [Implementing Australia's Strategy for Nature 2024-2030 Discussion Paper](#) ('Discussion Paper').

The biodiversity crisis

The [Kunming-Montreal Global Biodiversity Framework](#) (GBF) seeks to respond to the ample evidence that “despite ongoing efforts, biodiversity is deteriorating worldwide at rates unprecedented in human history.”

Australia is a major contributor to the global biodiversity crisis. The 2021 SOE report found that Australia's biodiversity is declining, and the number of threatened species is increasing. On most measures since the prior report, our biodiversity is either in no better condition and is deteriorating or is in worse condition and is still deteriorating.

The Threatened Species Index,¹ Australia's primary indicator for tracking EPBC Act listed species, shows an annual decline in the abundance of threatened species by 2-3% per year, on average, since 2000.

We are a long way from realising the Vision of Australia's Strategy for Nature.

Australia is a megadiverse country supporting 7.8 per cent of the world's described species, with more than 90 per cent of our vascular plants, frogs, and reptiles, and more than 80 per cent of our mammals, being endemic.² Of the 17 megadiverse countries, Australia is one of only two on that list that are also wealthy developed countries (the other being the United States). Australia should therefore be world leading in its ambitions to deliver against the goals and targets of the GBF.

Australia's response to the GBF

The former Prime Minister, alongside 63 other global leaders, signed the Pledge for Nature in 2020. The pledge set out urgent actions as part of the UN Decade of Action to achieve Sustainable Development. It recognises the ‘benefits of restoring natural resources outweigh the costs ten-fold, and the cost of inaction is even higher.’

In 2022, Australia adopted the GBF and in 2024 it released an update to [Australia's Strategy for Nature 2024-2030](#). The Strategy is Australia's National Biodiversity Strategy and Action Plan (NBSAP) under the Convention on Biological Diversity that sets out how it will align with the international target set out in the GBF.

The update changed the vision of the Strategy to better align it with the 2050 vision and 2030 mission of the GBF. These vision in the updated Strategy for Nature is that

Australia will halt and reverse biodiversity loss by 2030, putting nature on a path to recovery, meaning that by 2050 we will be living in harmony with nature.

¹ www.tsx.org.au

² (Chapman 2009; UNEP 2020).

The update also established six national targets:

- Protect and conserve 30% of Australia's landmass and 30% of Australia's marine areas by 2030
- Priority degraded areas are under effective restoration by 2030 (target)
- No new extinctions
- Minimise the impact of climate change on biodiversity
- Eradicate or control invasive species in priority landscapes and further minimise their introduction by 2030
- Increase Australia's circularity rate, and reduce pollution and its impacts on biodiversity by 2030.

The update also established three enablers of change:

- Mainstream nature into government and business decisionmaking, including in financing, policies, regulations and planning processes
- Ensure equitable representation and participation in decisions relating to nature, particularly for First Nations peoples
- Ensure environmental data and information are widely accessible and supports decision-making.

Our position

We made a [submission regarding the update to Australia's Strategy for Nature](#) in 2023. We noted that the update did not materially change the problematic 2019 Strategy. Our submission stated that Australia cannot afford a minor updating of its NBSAP, it cannot afford only incremental, unambitious reforms, and it cannot afford to ignore the multi-billion shortfall in the financial resources needed for effective GBF implementation.

We note that all nine of our recommendations were not acted upon and remain relevant for the implementation plan.

The Biodiversity Council is deeply concerned by the lack of urgency, ambition, and credibility in the approach being taken to the Strategy for Nature. Without significant improvements, the vision of the Strategy for Nature will never be realised.

This is an important opportunity to set national ambition to meet the targets in the Kunming-Montreal Global Biodiversity Framework (GBF) and address ongoing biodiversity decline. It is critical to get this right.

The Biodiversity Council has provided high-level comments about the approach, rather than more detailed comments about each outcome, target and enabler of change because our concerns sit at a more fundamental level.

More detail about key issues are outlined below.

Key issues

1. The implementation approach lacks specificity and accountability

The Discussion Paper notes that

The implementation plan will not be prescriptive or exhaustive in defining the actions required to achieve Australia's targets. Rather it is intended to help guide governments and stakeholders to develop their own implementation plans and contributions from their jurisdiction or sector.

This approach embodies the notion that 'when everyone's responsible, no one's responsible'. The 2021 State of the Environment Report noted that the 2019 Strategy was criticised because it lacked detail and specific measurable targets and was unlikely to guide or drive action to improve biodiversity in Australia or enable progress to be assessed or reported on.³

In our 2023 submission we recommended that the strategy use SMART targets: targets that are Specific, Measurable, Assignable, Realistic, and Time-related.⁴ The proposed approach lacks specific objectives and accountability measures that are critical for success in high-level strategic policy.

For example, to operationalise the GBF target to effectively protect 30% of land and seas by 2030, governments should aim to provide a high level of protection to at-least 30% of each Australian marine (IMCRA) and terrestrial (IBRA) bioregions by 2030. Doing so would align with the GBF target 30 by 30 target, science-based conservation planning, and the Australian Government's policy approach to conservation planning under the National Reserve System (NRS) and National Representative System of Marine Protected Areas policies (NRSMPA). Analysis by the Biodiversity Council shows that despite 24% of Australia's seas being in highly protected no-take zones, 64% of Australia's bioregions have less than 10% of their area in no-take zones (see Appendix 1).

The [Victorian Marine and Coastal Strategy](#) provides a clear example of how this could be done with clear actions, responsibilities and timing. This level of clear accountability is missing from the Plan, and jeopardises meaningful progress.

2. The implementation plan needs a Program Logic

The Discussion Paper asks 'what additional outcomes will support us to achieve our target or enabler of change?'. This completely confuses what an outcome is. An outcome is that state that we want to occur as a result of the actions we take.

³ 2021 SOE

⁴ see Maron, Simmonds & Watson (2018).

The achievement of the targets will be complex. As noted by the Discussion Paper, many organisations and people have a role to play. This makes it even more crucial to map out how the actions taken by one group contribute to the overall target, the interdependencies and assumptions. A well-designed Program Logic forms a foundation for measuring progress (through the use of indicators) and understanding where things are going wrong. It complements the SMART targets.

The implementation plan should include a program logic for each target. A useful summary of the components of a [program logic has been prepared by the Queensland Treasury](#). DCCEEW has produced program logics for [Regional Delivery Partners](#) and [Indigenous Protected Areas](#); it is not too much to ask for one to be prepared for Australia's Strategy for Nature.

3. There must be more consultation with First Nations peoples in developing the implementation plan

The [GBF states](#) that its Vision, Mission, Goals and Targets are to be understood and implemented consistent with the contribution and rights of indigenous people and local communities. More specifically,

The Framework's implementation must ensure that the rights, knowledge, including traditional knowledge associated with biodiversity, innovations, worldviews, values and practices of indigenous peoples and local communities are respected, and documented and preserved with their free, prior and informed consent, including through their full and effective participation in decision-making, in accordance with relevant national legislation, international instruments, including the United Nations Declaration on the Rights of Indigenous Peoples, and human rights law.

It is not clear how this will be achieved.

The Discussion Paper includes an Outcome

First Nations peoples are supported to preserve and apply Traditional Knowledge, with governance arrangements that enable culturally grounded, self-determined decisionmaking.

The description under this outcome is

To the extent desired by First Nations peoples, Traditional Knowledge systems, cultural practices and stewardship principles can be recognised and integrated into biodiversity policy, programs and regulation. This will enhance outcomes and support ongoing connection to Country. First Nations engagement must grow through increased opportunities for partnership, co-design and joint management arrangements. Traditional Knowledge, cultural authority, and community leadership can be embedded in program design, decision-making, and delivery.

To ensure this is delivered, the plan must outline how it will undertake and resource the process required to achieve this.

4. The Strategy must include all GBF targets

As was done in the 2019 Strategy, it is no longer credible for Australia to cherry pick targets from the GBF. Despite this, the updated Strategy's six targets and three enablers do not reflect all four outcome goals and 23 action-oriented targets in the GBF.

The Strategy does not include actions that would deliver on [Goals B 'Prosper with Nature', Goal C 'Share Benefits Fairly' and Goal D 'Invest and Collaborate'](#).

The Strategy falls short on the following GBF targets:

- [Target 1 'Plan and Manage all Areas To Reduce Biodiversity Loss'](#) - The Strategy and Discussion Paper do not reflect the intent of this target to ensure that all areas are under participatory, integrated, and biodiversity inclusive spatial planning and/or effective management processes.
- [Target 5 'Ensure Sustainable, Safe and Legal Harvesting and Trade of Wild Species'](#) and [Target 9 'Manage Wild Species Sustainably To Benefit People'](#) - The Strategy and Discussion Paper are silent on this.
- [Target 10 'Enhance Biodiversity and Sustainability in Agriculture, Aquaculture, Fisheries, and Forestry'](#) - The Strategy and Discussion Paper are silent on this.
- [Target 12 'Enhance Green Spaces and Urban Planning for Human Well-Being and Biodiversity'](#) - This overlaps with the Strategy's Objective 9 'Enrich cities and towns with nature'; but there is no Australian target for this objective and so it is not included in the Discussion Paper.
- [Target 13 'Increase the Sharing of Benefits From Genetic Resources, Digital Sequence Information and Traditional Knowledge'](#) - The Discussion Paper states that Traditional Knowledge in the management and restoration of biodiversity should be embedded in decision making through the application of the FAIR (Findable, Accessible, Interoperable and Reusable) and CARE (Collective benefit, Authority to control, Responsibility, Ethics) principles. However, there is no commitment to ratifying the Nagoya Protocol and developing a nationally consistent legal framework to ensure that Traditional Knowledge is accessed with free, prior and informed consent and that any benefits arising from this knowledge are shared.⁵
- [Target 18' Reduce Harmful Incentives by at Least \\$500 Billion per Year, and Scale Up Positive Incentives for Biodiversity'](#) and [Target 19 'Mobilize \\$200 Billion per Year for Biodiversity From all Sources, Including \\$30 Billion Through International Finance'](#) - see key issues below.

⁵ For more discussion of this see Key policy 5 on Page 6 in our [Safeguarding nature: Priorities for the next Australian Government](#) report.

The Strategy for Nature must adopt all GBF targets and enabling strategies, and only adapt those where there is a clearly stated evidence base and rationale for doing so having regard to Australia's circumstances. A small number may require less implementation emphasis in Australia where our current institutional and policy arrangements are more mature.

5. There must be a material uplift in funding – GBF Target 19

Unless Australia (i.e. the Australian Government first and foremost; state and territory governments; and the private sector) makes material commitments to increasing funding to meet the multi-billion dollar shortfall in biodiversity conservation funding, all else this strategy is trying to achieve will fail, continuing the status quo of failure to date.

For a more fulsome exposition of the funding required to deliver against the GBF in Australia, see the Biodiversity Council's 2024/25 Pre-budget Submission.

The Biodiversity Council submits that the revised NBSAP must include a material uplift in funding consistent with Target 19 of the GBF, consistent with the evidence on the level of funding required, and consistent with the purpose and objectives of the GBF and the Sustainable Development Goals.

The Australian Government should take a leadership role and commit to investing at least 1% of current government expenditure in nature protection and restoration ongoing (approximately \$7 billion per annum) and use this commitment to leverage the remaining necessary resources from state and territory governments and the private sector. Investment priorities are outlined in our report [Safeguarding nature: Priorities for the next Australian Government](#).

6. The Strategy must commit to reforming biodiversity harmful subsidies – GBF Target 18

The revised Strategy for Nature must respond to GBF Target 18 that calls on parties to the CBD to reduce harmful subsidies by at least \$500 billion globally. The Biodiversity Council's 2024/25 Prebudget Submission makes a recommendation on this issue.

In the absence of action from the Australian Government, the Biodiversity Council undertook [a project to identify and assess subsidies](#) from Australian government programs that are likely to be harmful to biodiversity. The project estimated that the total monetary value of Australia's direct and indirect subsidies in 2023-23 that are potentially likely to have a medium to high adverse impact on biodiversity was \$26.3 billion. This is over 50 times larger than the average of \$475 million per annum that the Australian Federal Government has invested in biodiversity over the last decade.

Reforming and repurposing biodiversity harmful subsidies in Australia would achieve positive biodiversity outcomes and there is scope to free significant financial resources to

fund GBF goals and targets. In addition, new revenues could be raised from the private sector and/or leveraged from the states and territories to support GBF implementation.

As a first step the Australian Government should commission a detailed independent assessment of biodiversity harmful subsidies to enable an official estimate of the monetary value and biodiversity impact of these subsidies.

7. The Strategy must genuinely mainstream biodiversity conservation as an overriding policy imperative

The strategy cannot pay lip service to the concept of mainstreaming biodiversity conservation at a whole-of-government level.

To deliver on the GBF's conception of transformative action, the strategy will only be credible globally and nationally if it includes steps to reform policy settings in portfolios beyond that of the environment that are the key direct and indirect drivers of ongoing biodiversity loss. It must be evident from the strategy that it has been endorsed and is supported at a whole-of-government level, not just within environment portfolios. This will necessitate transformative change in traditional governance to support the necessary transformative governance of biodiversity and sustainability needed to achieve mainstreaming.⁶

⁶ IPBES 2019

Appendix 1: Map of the level of protection in each marine bio-region around Australia. This shows about half have 0-5% in no-take zones and almost all fall short of the 30x30 initiative.

**% cover of fully protective MPAs in
each Provincial Bioregion**

