



**Biodiversity
Council**

Submission to the Nature Repair Committee Enhancing Native Vegetation method consultation

5 August 2026

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 the [draft Enhancing Native Vegetation \(ENV\) method](#). There are three elements:

1. Nature Repair (Enhancing Native Vegetation) Methodology Determination 2026 ('the method')
2. Detailed explainer Exposure Draft Enhancing Native Vegetation Method ('the Explainer')
3. Nature Repair Market – Enhancing Native Vegetation Method Explanatory Materials for Nature Repair Committee consultation ('the Consultation Paper').

Our understanding

The Nature Repair Market is a national, legislated biodiversity market designed to support voluntary action on nature repair and may also provide a source of environmental offsets.

Methods are legislative instruments made under the *Nature Repair Act 2023*. Methods must be consistent with the biodiversity integrity standards (BIS) defined in the Act and the biodiversity assessment instrument (BAI).

Projects seeking to trade on the Nature Repair Market must be registered under an approved method. Methods in the market:

- define the conditions that must be met for a project to be registered and for proponents to be issued with a biodiversity certificate
- specify the activities that project proponents can carry out and any restricted or prohibited activities
- specify required reporting, notification, record keeping and project monitoring
- require projects to have a project plan detailing how the project will be implemented to achieve its biodiversity outcome.

The ENV method is the first method to allow offsets.

As noted in our [submission regarding the new rules under the Nature Repair Market](#) we are concerned that the NRM is not fit-for-purpose for offset delivery. We have serious concerns that the offset requirements are simply 'bolted-on' to the existing frameworks for carbon credits without considering how the scheme will work holistically considering the role of new institutions and the feedback loops required to ensure that the system has integrity. This is further elaborated in our submission.

In regard to the ENV method, our focus is offset delivery. Specific concerns are outlined below.

Key concerns

1. A project can be used to offset an impact on a threatened species even if there is no real world improvement in an outcome for a threatened species

Where a project is seeking to be offsets-capable¹ for a threatened species or threatened ecological community, the ‘threatened species characteristic’ must be used. The characteristic is designed to ensure that “offset capable projects targeting threatened species or threatened ecological communities can clearly and consistently demonstrate threatened species outcomes within the characteristic framework”. The Biodiversity Council is concerned that the method as it is described now does *not* measure outcomes. Measuring actual outcomes is an essential component of biodiversity offsetting.

There are three parts of the threatened species characteristic:

1. ecosystem condition
2. threat management
3. habitat features.

Ecosystem condition

Ecosystem condition is assessed against a reference ecosystem in regard to 11 factors that include structural components (canopy height, tree density, cover of different lifeforms), recruitment (of canopy species) and species richness. The assessor must determine the initial ecosystem condition and assign a management objective based on the ‘transition type’.²

To get a biodiversity certificate so that the project may be used as an offset, the indicators for ecosystem condition must reach a threshold value. The method specifies the threshold values for each factor. Importantly, none of these condition indicators directly relate to a threatened species outcome. Therefore, the land manager may improve vegetation conditions without materially improving the viability of a threatened species.

Threat management

The ‘Explainer’ for the method notes that the threat management indicator “only reflects the scope of threat management activities being undertaken at the project area, rather than directly measuring the threat or the threat’s impact on the species.” The focus of the threat management indicator is on *relevant threats*, which are defined as those that are present, impact the persistence of a threatened species at the project site and are capable of being

¹ Meaning it can be purchased or used to offset development impacts

² See table in s. 58. There are 4 transition types M1: maintain an ecosystem of moderate to high condition, M2: maintain a modified ecosystem with targeted enhancement, E1: Enhance modified native vegetation, and E2: More ambitious enhancement of modified vegetation.

addressed by a threat management activity. Threats which will have the most serious impact on the threatened species within a project area are *priority threats*. The Explainer notes that the land manager may commit to managing some of the identified relevant threats, but is not required to manage all of them.

The threat management indicator is scored by dividing the number of managed threats by the number of relevant threats, which is defined as PropRSN (see Table 1, below). Scoring in this way is an odd approach because it seems to give all threats equal weight, when in actuality, some are likely to have disproportionately large impacts on a threatened species, and many may interact. For example, predation by foxes, changed fire regime, weed invasion, and disease may all be impacting the viability of a species at a site, but unless foxes are effectively managed, managing weeds and fire alone will not allow the species to persist at the site.

Table 1: Scores for threats-managed proportion of the project for a threatened species

Score:	None	Low	Moderate	High/Benchmark
State of managed threats	PropRSN = 0% (no managed threats)	PropRSN = 0 to 33% At least one threat effectively managed	PropRSN = 34 to 66% At least one <i>priority</i> threat effectively managed	PropRSN = 67 to 100% All <i>priority</i> or high risk threats are effectively managed.

Confusingly, the scoring table also refers to priority threats. It is unclear if this is a drafting error, or a requirement additional to PropRSN. This is highly relevant. A focus on relevant threats, rather than priority threats, is problematic if there is not considerable overlap between the two. For some species the threats are not practicable for any individual land manager managing an offset-capable project. However, a focus on ‘relevant threats’ means that the project may only measure what is practicable rather than what is effective or necessary to improve the viability of a threatened species.

To get a biodiversity certificate so that the project may be used as an offset, the threat management indicator is meant to reach a threshold value. However, unlike ecosystem condition, there does not appear to be an objective target that must be reached. Instead, the method defines the threshold value for threat management as “the state of managed threats that represents the commencement and ongoing implementation of the required threat management processes.” In other words, it appears that you can begin weed control and show a commitment to continuing it, but don’t actually have to reach a weed control target; for another example, if cat predation is a relevant threat, simply undertaking cat management activities such as baiting would be sufficient to deliver an offset even if they do not work and the number of cats at the site does not significantly change. Furthermore, as

stated above, there is no direct measurement of the biodiversity outcome, killing cats is *not* a biodiversity outcome and outcomes can only be used for offsets.

Habitat features

The habitat features indicator is for threatened fauna species only. It includes factors relating to feeding and shelter scored over four levels:

1. None: no feed species and no shelter available
2. Low: Project area supports few nesting and shelter opportunities and/or sparse vegetation or low prey availability for foraging,
3. Moderate: Project area supports multiple nesting and shelter opportunities, and/or moderate population and diversity of vegetation or prey available for foraging, and
4. High/Benchmark: Feed species and shelter available as per reference, or large variety and density of nesting and shelter opportunities, and high population and diversity of vegetation or prey available for foraging.

The threshold value for the habitat features indicator is 80% of the difference between the starting value and the forecast value³ (unless the suitably qualified person sets a different level as being reasonable). However, like for ecosystem condition, the land manager may increase the presence of habitat features without materially improving the viability of a threatened species. For instance, the land manager could put up nest boxes and increase shrub density through fencing out herbivores, but the population of a threatened bird species may not improve due to other factors. Again, actions are not outcomes.

The indicators collectively

The method does appear to try to relate the indicators to species outcomes in the section on ‘the indicators collectively’, however, a close reading shows that it falls short.

There are different requirements for Type A threatened species (those recorded on the project site that are likely to benefit from management activities) and Type B threatened species (those likely to occur on the project site that are likely to benefit from management activities).

For each Type A species, the forecast value (the expected value at the end of the project) of at least one of the indicators must be “consistent with a demonstrable improvement in the viability of the threatened species”. In other words, the predicted end-state for ecosystem condition, threat management or habitat features is considered to improve species viability *in theory*, then it is sufficient to meet the criteria even if there is no actual improvement of species viability. (It is important to note that the term ‘viability’ is not defined in the method or the *Nature Repair Act 2023*).

³ The forecast value is the expected value that will be achieved over the life of the project from the activities.

For each Type B species, “the forecast value for the ecosystem indicator and where applicable, the threat management and habitat features indicator must result in the species inhabiting or utilising the site during the permanence period”. In other words, the predicted end-state for ecosystem condition, threat management or habitat features is such that the species may live in or visit the site, and the criteria is met even if that is only an infrequent occurrence. For highly mobile species, occasionally visiting a site would not equate to an increase in viability.

Recommendation 1: *The Biodiversity Council recommends that requirements for priority threats be clarified.*

Recommendation 2: *The Biodiversity Council recommends that, for offset-capable projects, that the project show a measurable improvement in the outcome for a threatened species before a certificate is issued, rather than rely on changes in proxy indicators.*

Recommendation 3: *The Biodiversity Council recommends that offset-capable projects in the Nature Repair Market be evaluated in 3 years from the beginning of implementation to determine what improvements to species outcomes are actually achieved. Until those outcomes are achieved no offset should be assigned a credit.*

2. No metric for calculating a specific ‘quantum’ of offset to compensate for a specific ‘quantum’ of impact

The Consultation Paper notes that:

The project and information requirements in a method are intended to provide offset decision makers with detailed, consistent and transparent information over the life of a project. The ENV method design provides detailed information about the protection or enhancement of biodiversity for offset decision-makers; this includes information about activity areas, including their location and their ecological stratification.

As noted in our submission regarding the Nature Repair Market rules, this suggests that the new EPA must check the documentation that supports project registrations. For instance, it would need to check if the projects overlap with other regulatory requirements or investment programs to determine if the additionality principle of the new National Standard for Offsets is met, and the details of offset activities, indicators and threshold values to determine if the feasibility principle in the National Offsets Standard is met. Importantly in regard to this method, the EPA would need to closely examine the indicators and site area to determine if it thinks that the proposed offset would adequately compensate for the impact because there are no metrics relating to species benefits. While a development assessment may calculate the area of habitat lost or the proportion of a population likely to be impacted, there are no equivalent measures for the amount of habitat improved or the increase in population expected from offsets-capable projects. This makes it very difficult to determine if an offsets-capable project will adequately compensate for specific impacts on threatened species from a development project.

Recommendation 4: *The Biodiversity Council recommends that metrics be developed to measure threatened species outcomes from offset-capable projects.*