



**Biodiversity  
Council**

# Submission to the A Fresh Start for Private Protected Areas Discussion Paper

12 September 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 'A Fresh Start for Private Protected Areas Discussion Paper' (the Discussion Paper). We recognise the important role that Queensland's private protected areas play in conserving the state's biodiversity, landscapes, and cultural heritage. We note that many of the opportunities and challenges outlined in the discussion paper reflect long-standing issues and priorities within the private land conservation sector.

## Our understanding

Just 8.59% of Queensland is formally protected, with an increase of only 1% over the past decade, leaving the state's ecosystems less secure than those in other parts of Australia.<sup>1</sup> Protected areas are widely recognised as a critical tool for conserving biodiversity.<sup>2</sup>

The Biodiversity Council supports the diversity of approaches taken by private landholders to improve environmental outcomes across Australia, whether that be Landcare, Land for Wildlife, Nature Refuges, property management plans or regenerative agricultural practices.

Queensland has the largest private protected area network in Australia, with Nature Refuges covering almost 5 million hectares and making up one-third of Queensland's total protected area.<sup>3</sup> The new Queensland Government wants to expand Queensland's protected area system, particularly through private land partnerships. The Discussion Paper seeks insights from landholders and stakeholders about how to improve the government's approach to private protected areas.

The Biodiversity Council supports the Government's efforts to expand Queensland's protected area systems and remove barriers to establishing private protected areas. Some key concerns and recommendations are outlined below.

## Key concerns

1. Expansion of the protected area estate must focus on biodiversity values that are currently underrepresented

In 2024, all Australia's Environment Minister agreed to national targets for biodiversity,<sup>4</sup> including to

Protect and conserve at least 30% of Australia's terrestrial and inland water areas, and marine and coastal areas by 2030, especially areas of particular importance for biodiversity

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<sup>1</sup> Department of the Environment, Tourism, Science and Innovation. (2025). *A Fresh Start for Private Protected Area: Discussion Paper*. Queensland Government.

[https://www.qld.gov.au/data/assets/pdf\\_file/0031/612859/fresh-start-for-private-protected-areas-discussion-paper.pdf](https://www.qld.gov.au/data/assets/pdf_file/0031/612859/fresh-start-for-private-protected-areas-discussion-paper.pdf)

<sup>2</sup> Gray, C. L., Hill, S. L. L., Newbold, T., Hudson, L. N., Börger, L., Contu, S., Hoskins, A. J., Ferrier, S., Purvis, A., & Scharlemann, J. P. W. (2016). Local biodiversity is higher inside than outside terrestrial protected areas worldwide. *Nature Communications*, 7(1), Article 12306. <https://doi.org/10.1038/ncomms12306>

<sup>3</sup> <https://www.qld.gov.au/environment/parks/protected-areas/private/program>

<sup>4</sup> <https://www.dcceew.gov.au/sites/default/files/documents/emm-communique-21-june-2024.pdf>

and ecosystem functions and services, ensuring protected and conserved areas are ecologically representative, well connected and effectively managed, recognising and respecting the rights of First Nations peoples.<sup>5</sup>

Of critical importance is the term ‘ecologically representative’. Australia’s National Reserve Systems is underpinned by the CAR principles: Comprehensive, Adequate and Representative. The Queensland Government should ensure that the CAR principles guide the expansion of the protected area system.

To meet the CAR principles, the reserve system must include examples of ecosystems in each bioregion and the variability of habitat within ecosystems.<sup>6</sup> It is the Biodiversity Council’s position that proper representation means having a minimum 10% of each IBRA subregion protected and a sample of every major structural vegetation type in each subregion.

The [Pathways to 30x30 report](#) provides maps of the current reservation levels for bioregions, subregions and major vegetation groups. The maps show that many Queensland subregions have <5% reservation, the Brigalow region is particularly poorly conserved and also suffers ongoing landclearing.

Major vegetation types in central and western Queensland, particularly in the Mount Isa Inner, Mitchell Grass Downs, Desert Uplands, Gulf Plains and to a lesser extent Einasleigh Uplands, show <10% reservation. It is important to note that many of these bioregions contain significant areas of pastoral leasehold land, rather than freehold land.<sup>7</sup> To address underrepresented vegetation types, there must be strategies for expanding public and private protected areas on leasehold land.

The stock routes represent an enormous opportunity to improve the representation of poorly conserved habitats and ecoregions in Queensland. The government should continue to explore this opportunity and devise a mechanism for funding the management of this huge and important network.

The Biodiversity Council also sees an opportunity to address threatened species that are currently underrepresented in the reserve system. A recent paper led by [Dr Michelle Ward](#) identifies urgent needs for protected area expansion to cover critically endangered species across Australia. The paper identified 305 Critically Endangered species that have narrow ranges (<20,000 km<sup>2</sup>), and are distributed in fewer than six discrete patches and determined how much was outside protected areas. The paper determined that approximately half of the combined habitat area for narrow-range Critically Endangered species was outside protected areas, with 39 species having their entire habitat outside protected areas.

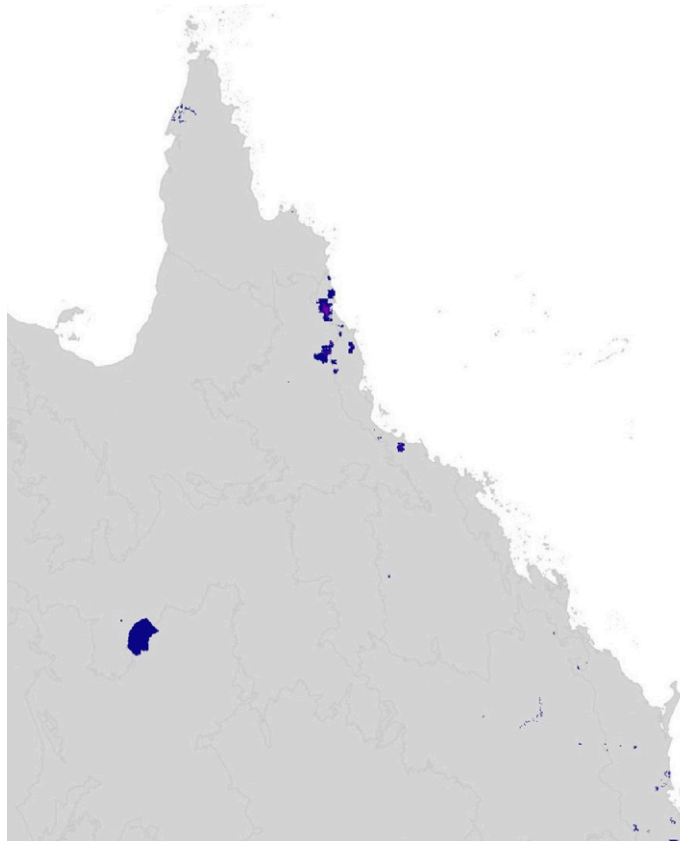
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<sup>5</sup> <https://www.dcceew.gov.au/sites/default/files/documents/australias-strategy-for-nature-2024-2030.pdf>

<sup>6</sup> Fitzsimons J, Picone A, Partridge T, Cornish M, (2023). *Protecting Australia’s Nature: Pathways to protecting 30 per cent of land by 2030*. The Nature Conservancy, WWF-Australia, the Australian Land Conservation Alliance and the Pew Charitable Trusts. [https://report.30by30.org.au/wp-content/uploads/sites/2/2023/11/Report3030\\_FINAL\\_web-1.pdf](https://report.30by30.org.au/wp-content/uploads/sites/2/2023/11/Report3030_FINAL_web-1.pdf)

<sup>7</sup> For instance see intersect of land tenure here: [https://www.agriculture.gov.au/sites/default/files/images/AUSTEN\\_v2\\_250m\\_L3\\_2020\\_21.png](https://www.agriculture.gov.au/sites/default/files/images/AUSTEN_v2_250m_L3_2020_21.png) with major vegetation types here: [https://report.30by30.org.au/wp-content/uploads/sites/2/2023/11/Report3030\\_FINAL\\_web-1.pdf](https://report.30by30.org.au/wp-content/uploads/sites/2/2023/11/Report3030_FINAL_web-1.pdf)

There are key areas in Queensland that require protection to prevent these Critically Endangered Species from becoming extinct (see map below extracted from the paper). These should be the highest priority for protection.



***Recommendation 1: The Biodiversity Council recommends that the Queensland government identify target areas for protection and the most appropriate mechanisms to apply in these areas, depending on land tenure.***

***Recommendation 2: The Biodiversity Council recommends that the government continue to explore the opportunity for stock routes to improve the representation of poorly conserved habitats and ecoregions in Queensland and devise a mechanism for funding the management of this huge and important network.***

2. It is essential to ensure that OECMs are implemented properly to preserve their integrity.

The Convention on Biological Diversity defines an ‘other effective area-based conservation measure’ (OECM) as:

*“A geographically defined area other than a Protected Area, which is governed and managed in ways that achieve positive and sustained long-term outcomes for the in-situ conservation of biodiversity, with associated ecosystem functions and services and where applicable, cultural, spiritual, socio-economic, and other locally relevant values”.*

Australia has taken an expansive approach by actively incorporating private and Indigenous lands in addition to public land into the protected area network for the past 30 years.<sup>8</sup> In other countries, these areas may be classified as OECMs, but in Australia they are already counted as Protected Areas. In Australia, Other Effective area-based Conservation Measures (OECMs), as defined internationally, are expected to contribute far less towards the goal of protecting 30% of land by 2030 compared to other regions.<sup>9</sup>

OECMs are not currently part of the state's protected area target but are considered to contribute towards the national target to protect and conserve 30% of Australia's landmass and 30% of Australia's marine areas by 2030 (the '30 by 30' target). Queensland is currently piloting an OECM recognition program and officially recognised Australia's first OECM.

Land must meet the criteria set out in the [National OECM Framework](#) to be eligible for recognition. The Biodiversity Council made [a submission to the draft OECM Framework](#) but remains concerned that it the Framework vague and discretionary, and lacks suitable mechanisms for monitoring and reporting on OECMs.

***Recommendation 3: The Biodiversity Council recommends that if there is any doubt that the biodiversity values of a site can be maintained long-term, then it should not be recognised as an OECM.***

***Recommendation 4: The Biodiversity Council recommends that the Queensland Government outline clear triggers for landholders to report back about changes to management regimes or decline in biodiversity values, at the point in time when the changes are occurring.***

***Recommendation 5: The Biodiversity Council recommends that the Queensland Government keep a public register of OECMs and summary data about the contribution they are making to the protected areas system.***

***Recommendation 6: The Biodiversity Council recommends that the Queensland Government regularly monitor the condition of OECMs, and if biodiversity values have declined, through neglect or wilful damage, then they should be immediately removed from the public database and summary statistics of the protected area system.***

### 3. Land tax exemption for conservation covenants should be progressed

Queensland is the only remaining Australian state that levies land tax on landholders with conservation covenants (Nature Refuges, Special Wildlife Reserves, and *Land Title Act 1994* covenants).<sup>10</sup> An exemption from land tax is likely to significantly increase the willingness of private landholders to establish conservation covenants. In Victoria, the most recent state government that

<sup>8</sup> Fitzsimons, J.A.; Partridge, T.; Keen, R. (2024) Other Effective Area-based Conservation Measures (OECMs) in Australia: Key Considerations for Assessment and Implementation. *Conservation* 4: 176-200.

<https://doi.org/10.3390/conservation4020013>

<sup>9</sup> Fitzsimons, J. A. (2015). Private protected areas in Australia: current status and future directions. *BioRisk : Biodiversity & Ecosystem Risk Assessment*, 10(10), 1–23. <https://doi.org/10.3897/natureconservation.10.8739>

<sup>10</sup> Australian Land Conservation Alliance. (2025). *Queensland's opportunity to exempt conservation covenants from land tax*. ALCA. [https://alca.org.au/wp-content/uploads/2025/07/ALCA-Policy-Note\\_Land-Tax\\_Final-070725.pdf](https://alca.org.au/wp-content/uploads/2025/07/ALCA-Policy-Note_Land-Tax_Final-070725.pdf)

introduced a land tax exemption for covenants, landholder interest in covenants increased by 135% (i.e. over double) in the year following the commencement of the exemption.<sup>11</sup>

***Recommendation 7: The Biodiversity Council recommends that the Queensland Government introduce a land tax exemption for land protected under Nature Refuges, Land Title Act 1994 voluntary conservation covenants, and Special Wildlife Reserves.***

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<sup>11</sup> Australian Land Conservation Alliance. (2025) Submission on Queensland's private protected areas. [https://alca.org.au/wp-content/uploads/2025/09/20250910-ALCA-submission-Queenslands-private-protected-areas\\_web.pdf](https://alca.org.au/wp-content/uploads/2025/09/20250910-ALCA-submission-Queenslands-private-protected-areas_web.pdf)