



**Biodiversity  
Council**

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

17 July 2024

## ***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 National Roadmap for protecting and conserving 30% of Australia's land by 2030 (the Roadmap).

The Biodiversity Council notes that many points made in our [submission regarding the draft National Other Effective area-based Conservation Measures \(OECMs\) Framework](#) (particularly recommendations 2, 3, 4, 5 and 16) are still relevant.

## Our understanding

The Roadmap sets out a pathway for national efforts towards Target 3 of the Kunming-Montreal Global Biodiversity Framework (GBF) on land (GBF Target 3):

*Ensure and enable that by 2030 at least 30 per cent of terrestrial, inland water, and of coastal and marine areas, especially areas of particular importance for biodiversity and ecosystem functions and services, are effectively conserved and managed through ecologically representative, well-connected and equitably governed systems of protected areas and other effective area-based conservation measures, recognizing indigenous and traditional territories where applicable, and integrated into wider landscapes, seascapes and the ocean, while ensuring that any sustainable use, where appropriate in such areas, is fully consistent with conservation outcomes, recognizing and respecting the rights of indigenous peoples and local communities, including over their traditional territories.*

The Roadmap is an overarching framework that is intended to complement Australia's Strategy for the National Reserve System 2009–2030 (NRS Strategy), the National Other Effective area-based Conservation Measures Framework (OECMs Framework), and relevant policies in each state and territory.

The NRS Strategy provides national guidance to improve cross-jurisdictional coordination and collaborative action by Protected Area managers and key stakeholders to enhance the NRS.

The OECMs Framework provides guidance and minimum requirements for the recognition of land-based Conserved Areas in Australia.

The Roadmap, NRS Strategy and OECMs Framework are intended to guide how Australian, state and territory governments contribute towards achieving GBF Target 3, often referred to as the '30 by 30 target'. However, their contribution will also be impacted by their individual circumstances, priorities and resources.

## Key concerns

1. It is unclear how current efforts will be scaled up to achieve the 30 by 30 target on land

To achieve the 30 by 30 target on land would require protection of an additional 60 million hectares of land in six years. The Roadmap notes that:

*“Australia’s approach to achieving 30 by 30 requires Australian, state and territory governments, non-government organisations, First Nations groups, and the philanthropic and private sectors to work collaboratively to grow Protected and Conserved areas and support First Nations people to care for Country.” (p. 5)*

*“Responsibility for halting and reversing biodiversity loss sits across multiple sectors and groups, including government, environmental non-government organisations, the private sector, landholders, academia, First Nations people and each of us as members of the public.” (p. 5)*

The Australian Government has set a national target to protect and conserve 30% of Australia’s land by 2030. The Roadmap should make it clear that primary responsibility for achieving the target must sit with the Australian Government.

A key component of this is funding. It is critical for the Australian government to establish a new dedicated \$5 billion fund for the purchase of land of high biodiversity importance to create new public, privately owned or Indigenous Protected Areas, as recommended by The Nature Conservancy, WWF-Australia, Pew Charitable Trusts and the Australian Land Conservation Alliance in their [Pathways to 30x30 report](#).

The Pathways to 30x30 report suggests other effective pathways to meet Target 3, including long-term investment in Indigenous Protected Areas, expanding permanent private land conservation and transitioning suitable public land into conservation tenures.

The Roadmap should draw from the findings of the Pathways to 30x30 report and identify specific time-bound actions that the Australian Government will take to achieve the 30 by 30 target.

***Recommendation 1: The Biodiversity Council recommends that the Roadmap outline actions that the Australian Government will take to achieve the 30 by 30 target.***

2. The CAR criteria (Comprehensiveness, Adequacy and Representativeness) should be given greater emphasis and embedded throughout the document

The Roadmap discusses the CAR criteria of comprehensiveness, adequacy and representativeness. However, it does not provide as detailed an analysis and commitment as provided in the NRS Strategy. This is concerning given that Figure 2 suggests that the NRS Strategy is subsidiary to the Roadmap. It is essential that the CAR criteria as stated in the NRS Strategy to be reaffirmed in the Roadmap.

The definitions of Comprehensiveness, Adequacy and Representativeness should be consistent throughout the document and align with the definitions provided in the NRS Strategy. The Adequacy criteria does not. In Box 8 in the Roadmap and within the NRS Strategy,

*“Adequacy refers to how much of each ecosystem should be sampled to provide ecological viability and integrity of populations, species and ecological communities at a bioregional scale. The concept of adequacy incorporates ecological viability and resiliency for ecosystems for individual protected areas and for the protected area system as a whole.”*

However, the Roadmap goes on to say that:

*“The adequacy criterion is addressed through focusing on protecting and conserving vulnerable biodiversity components and ecological process and significant refuge areas of more diverse habitat, regardless of existing levels of protection and conservation, in each IBRA region”. (p. 25)*

These definitions are not the same. This Roadmap needs to reflect the definition in the NRS Strategy, which was built on decades of science-based policy, or justify why a new definition has been adopted and the science-based rationale.

The Roadmap notes that “Australia’s efforts to expand and enhance Protected and Conserved Areas will increase protection and conservation in bioregions and subregions where ecosystems are not fully represented” (p.26). However, it does not outline how this outcome will be measured and reported on. 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 Australian Government should report how much of the probable distribution of each Federally listed threatened species is protected.

Figure 7 in the Roadmap provides a map of underrepresented IBRA bioregions. The figure appears to rely on concepts of what is under-represented from the NRS Strategy, which was developed when the global protection target was 10%, not 30%. The [Pathways to 30x30 report](#) provides a more nuanced and up-to-date view of representativeness that could be reflected in the Roadmap.

It is concerning that under ‘Balancing biodiversity outcomes with other land-use’ the Roadmap states:

*“In some instances, designation of places as Protected Areas or recognition of Conserved Areas may not be appropriate due to other priorities within a region” (p. 10)*

This suggests that whole regions may no longer be considered for protection, and therefore Representativeness in the CAR criteria may not be met. This must be reconsidered.

***Recommendation 2: The Biodiversity Council recommends that the definition of ‘Adequacy’ in the Roadmap be clarified and aligned with the NRS Strategy.***

***Recommendation 3: The Biodiversity Council recommends that the Roadmap state a commitment for State and Federal governments to protect a minimum 10% of each IBRA subregion and a sample of every major structural vegetation type in each subregion.***

**Recommendation 4: The Biodiversity Council recommends that the ‘Balancing biodiversity outcomes with other land-use’ be revised to remove the reference to protection being inappropriate.**

3. The criteria should be refined and target areas identified

The Roadmap provides criteria for identifying areas where efforts should be focussed for achieving 30 by 30. The criteria provide a list of attributes that an area may have to be considered a priority. A more strategic approach which identifies target bioregions is likely to be more effective at directing effort. The Australian Government needs to provide sufficient funds or other proven incentives for a range of protection approaches at a bioregional level, especially for regions that are priorities for increasing the comprehensiveness, adequacy and representativeness of the protected and conserved area system.

The criteria to guide expansion of the protected and conserved estate is inconsistent through the roadmap. For example, late in the Roadmap it states *“Future expansion and enhancement of Protected Areas and recognition of Conserved Areas should focus on sites with high biodiversity value”* this is the first and only time “high biodiversity value” is mentioned and it is not defined. There are multiple different drivers for how expansion is prioritised. This section should be extended to focus on sites that are *“of particular importance for biodiversity and ecosystem functions and services, increase the comprehensiveness, adequacy and representativeness of the protected and conserved area system or improve the connectivity of this system.”*

**Recommendation 5: The Biodiversity Council recommends that the Roadmap identify target areas for protection and the most appropriate mechanisms to apply in these areas.**

4. There should be more detail about ‘effective conservation and management’, ‘well-connected’ and ‘equitably governed’

GBF Target 3 requires that protected areas are effectively conserved and managed, but this is barely mentioned in the Roadmap and is not defined. Given the variety of mechanisms by which the 30 by 30 target may be achieved, not simply large public reserves, it would be beneficial if the Roadmap defined what ‘effectively conserved and managed’ means. The Roadmap should outline how this will be measured and monitored over time.

**Recommendation 6: The Biodiversity Council recommends that the Roadmap define the terms ‘effective conservation and management’, ‘well-connected’ and ‘equitably governed’.**

5. The Roadmap should include more quantitative targets and reporting on progress

Section 8 ‘Monitoring progress towards 30 by 30’ is very brief. The headline indicator - percentage of landmass protected or conserved - is only one time-bound quantitative target. The three ‘sub-indicators’ - percentage of the extent of Protected and Conserved Areas managed or jointly managed by First Nations people, increase in ecological representativeness, and increase protection or conservation of private land - do not include targets. As a minimum, the roadmap should reaffirm

Priority Action 5.5 of the NRS Strategy which states: “Publicly report every two years on progress against the priority actions and national targets for comprehensiveness, adequacy and representativeness in the National Reserve System”. This is not currently being done and should as a matter of priority.

As per Recommendation 4 of our submission regarding the draft National Other Effective area-based Conservation Measures (OECMs) Framework, the Roadmap should also clearly outline the contribution that OECMs are expected to make to the 30 by 30 target in 2024, 2027 and 2030 underneath the headline indicator.

***Recommendation 7: The Biodiversity Council recommends that the Roadmap should provide a more comprehensive framework for reporting on progress towards the 30 by 30 target.***