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NBSAP Secretariat
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To whom it concerns,

SUBMISSION - UPDATING AUSTRALIA'S STRATEGY FOR NATURE 2019–2030

The Chamber of Minerals and Energy of Western Australia (CME) is the peak representative body for the resources sector in Western Australia. CME is funded by member companies responsible for 20 per cent of Australia's corporate income tax receipts in 2022-23.¹ In 2022-23, the WA resources sector accounted for 65 per cent of Australia's resources exports,² half of Australia's resources capital expenditure³ and 53 per cent of Australian resources employment.⁴

CME welcomes the opportunity to provide feedback to the Department of Climate Change, Energy, Environment and Water's (DCCEEW) consultation on Updating Australia's Strategy for Nature (**the Strategy**). CME understands that as a signatory to the Kunming-Montreal Global Biodiversity Framework (GBF), Australia is required to submit a revised or updated National Biodiversity Strategy, with national targets, before the 16th meeting of the Conference of the Parties (COP) in late October 2024 (COP16).

CME and its members also recognise the importance of conserving and protecting Australia's natural environment.

This submission makes a series of recommendations to support the development of biodiversity targets for Australia that minimise the risk of duplication across layers of government, align with broader State and Federal Government objectives (specifically reforms of the Environment Protection and Biodiversity Conservation Act (EPBC Act) and the Federal and State Government's energy transition objectives) and promote collaboration between the Federal government, State government, industry and other stakeholders on the development and implementation of the Implementation Plan.

1. Ensure targets can be aligned with future Nature Positive reforms

The development of Nature Positive reforms of the EPBC Act, including draft policy settings and draft legislation is ongoing and active at the time of this consultation. While CME understands that the timeline of this consultation is driven by international obligations to update Australia's Strategy for Nature ahead of COP16 in October 2024, we are concerned that targets set in advance of the Nature Positive reforms may result in inconsistencies.

CME understands that establishing biodiversity targets is a key element of the Strategy and Australia's international commitments. However, it is critical that Australia's biodiversity commitments do not undermine, contradict, or duplicate the objectives of ongoing Nature Positive reforms or other Federal Government objectives. **CME recommends that targets within the Strategy remain high-level and representative of the broad ambitions of the GBF. Further, CME recommends that the targets proposed to satisfy Australia's international commitment to the GBF are not contingent or reliant on any elements of Nature Positive reforms that are under development.**

CME supports the high-level biodiversity targets proposed in the consultation paper, recognising that qualitative targets will be more flexible to respond to developments associated with Nature Positive reforms. CME contends that it is more appropriate for specific targets and ambitions to be reflected in domestic policy frameworks.

¹ Includes company tax, fringe benefits tax, petroleum resource rent tax and excise duty. Commonwealth of Australia, [Final Budget Outcome 2022-23](#), The Treasury, 22 September 2023, Note 3: Taxation revenue by type, p 39.

² Government of Western Australia, [2022-23 Economic Indicators Resource Data File](#), Department of Energy, Mines, Industry Regulation and Safety (DEMIRS), 9 January 2024. Australian Bureau of Statistics (ABS), [5368 International Trade in Goods](#), Table 32a.

³ Investment refers to capital expenditure as measured by gross fixed capital formation, current prices. ABS, [5220 Australian National Accounts: State Accounts](#), Table 25. ABS, [5206 Australian National Accounts: National Income, Expenditure and Product](#), Table 34.

⁴ ABS, [6291 Labour Force, Australia, Detailed](#), Table 5.

Specifically, CME and its members support target 2, since invasive species, namely feral animals and weeds, are one of the largest threats to biodiversity in Australia.

2. Early consideration of implementation principles is essential for successful outcomes

CME notes that two of the six proposed targets (target 1 and target 5) feature specific quantitative metrics, being '30% of priority degraded areas under effective restoration by 2030' and to 'protect and conserve 30% of Australia's land and 30% of Australia's oceans by 2030', respectively. While CME recognises these quantitative targets represent Australia's commitment to the GBF, determination of the specific regions captured by the targets will require close collaboration between state and federal bodies and other stakeholders. **CME recommends that Strategy development and implementation should take a landscape-scale approach to improve biodiversity outcomes. The areas to be set aside for protection and conservation must be determined through a collaborative process between relevant federal and state departments. This collaboration should be extended to state-based stakeholders with deep expertise and operations in regional environments, such as indigenous groups, industry and other land management organisations.**

In addition, the opportunity for coordination between state and federal governments should be expanded to all the proposed biodiversity targets, not just targets 1 and 5 that have key quantitative metrics. **CME recommends that a key enabler is effective collaboration with state bodies to identify and utilise existing state-based biodiversity strategies and implementation plans to enhance efficiencies and reduce duplication. A collaborative approach, commenced early, is the best method to ensure these efficiencies are realised and there is alignment on objectives.**

Finally, considering the national scope of the proposed biodiversity targets, close collaboration with industry and other land management stakeholders is essential to ensure targets and implementation plan are practical and do not unduly affect domestic industries or other government objectives. We understand that a second round of consultation will be conducted later in 2024 with a focus on the development of the implementation plan. CME looks forward to participating in this future consultation. **CME recommends that future consultation opportunities on the Strategy's development and implementation are commenced early, with longer timeframes for public comment to ensure meaningful contributions.**

Should you require further information regarding this submission, please contact Ms Anita Logiudice, Acting Director of Policy and Advocacy, on 0448 468 632 or at a.logiudice@cmewa.com.

Yours sincerely.



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