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Ferntree Falls, Mt Buangor State Park, Djab Wurrung Country. DAVID TATNALL

SUBMISSION TO

Achieving 30 by 30 on land

Draft National Roadmap for protecting and
conserving 30 per cent of Australia's land by 2030

Victorian National Parks Association

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VNPA Submission

Achieving 30 by 30 on land: Draft National Roadmap for protecting and conserving 30 per cent of Australia's land by 2030

Who we are:

The Victorian National Parks Association (VNPA) is an effective and influential nature conservation organisation.

We work with local communities, scientists and government to advocate for evidence-based policy to safeguard wildlife, habitat and protected areas. We inspire connections with nature through citizen science, activities, action and education for all Victorians.

We've led the creation, oversight and defence of Victoria's natural estate for over 70 years.

Introduction

Thank you for the opportunity to provide feedback on the Draft National Roadmap for protecting 30 per cent of Australia's land by 2030. We support protecting at least 30 per cent of Australia's land by 2030 but are deeply concerned about the funding gap to make 30 by 30 happen.

The need to act to protect Australia's unique nature has never been more urgent:

- Australia leads the world in mammal extinctions.
- 1-in-5 Australian mammals are threatened and declining.
- 19 of our ecosystems are showing signs of collapse.

We would also like to see the prioritisation of creating more jointly managed national parks. Australians love national parks and the benefits they bring nature and people – they are affordable places for Australians to enjoy time off, and they create stronger economies in regional communities. In the following submission we explore a number of issues and highlight some of the application challenges, particularly in the context of Victoria.

Protected areas and park are popular

A national poll carried out in 2022 by the National Parks Australia Council (NPAC), of which VNPA is a member, showed that the vast majority of Australians (88 per cent) agree that protecting Australia's flora and fauna is a core responsibility of state and federal governments. Most of us (89 per cent) also agree that national parks are one of the best ways to protect Australia's nature, especially from resource extraction, including logging, mining and fishing (91 per cent), so it's no coincidence 80 per cent of us want more national parks and conservation areas.

Funding for park management is also of high national concern. More than four-in-five of us support an increase in government funding for national park management (85 per cent) and staff and rangers (83 per cent). <https://vnpa.org.au/majority-rules/>

Similarly, a national survey commissioned by the Biodiversity Council in 2024 found that 95 per cent of Australians want more spent on nature. <https://biodiversitycouncil.org.au/news/national-survey-finds-australians-want-government-to-lift-their-game-for-nature>

One per cent of budget for parks and nature

Without adequate federal funding, for both the public and private protected area estate, 30 by 30 will be unattainable and Australia's nature will continue to decline. In 2024, the Australian Government spend less than 0.1 per cent on biodiversity and nature protection. VNPA supports at least one per cent of the total budget going towards nature conservation and protected areas, and to help deliver 30 by 30 in order to protect the environmental, social and economic benefits provided by nature.

A recent analysis by Cyan Ventures, a specialist sustainability project development and advisory firm for the 30 by 30 alliance, found that Federal Government spending over last decade is only about 30 per cent of OECD levels, less than 8 per cent of the estimated annual need, and less than 3 per cent of the risks posed to the economy

Incentivising state governments

The Federal Government, through the final roadmap, should encourage states such as Victoria to match this one per cent commitment for management of national parks and the conservation estate. Currently, Victoria spends less than 0.5 per cent of its budget on managing national parks and conservation areas. <https://vnpa.org.au/funding-future-for-national-parks/>

The Commonwealth should consider incentivising states to deliver on new protected areas, both public and private. There not been any large new national parks formally establish in Victoria since 2012, and the current government has been very slow in either initiating processes for assessment of new protected areas or delivering on areas already committed. It has been, extraordinarily, more than 32 months since the State Government accepted the Victorian Environmental Assessment Council (VEAC) recommendations for new central west national parks. This is between two-to-three times longer than it took for the Box-Ironbark, Red Gum and Great Otway national parks to progress from government responses to final reports to creation. <https://vnpa.org.au/victorian-national-parks-creation-on-a-go-slow/>

While processes have been established and commercial native forest logging has ended on public land in Victoria, the move to legislate new protected areas has been caught up in slow-moving processes. <https://vnpa.org.au/end-of-native-forest-logging-a-year-on-milestones-duck-ponds-and-legislative-bunyip/>

Designing new protected areas

VNPA supports the roadmap being science-based by recognising the CAR Principles, acknowledging the rights and roles of Indigenous peoples and local communities.

We generally support the directions outlined on p. 26 and Table 2 of the Draft National Roadmap for protecting and conserving 30 per cent of Australia's land by 2030. However, there needs to a greater level of detail and nuance to how that is applied.

The directions outlined include:

- Increase protection and conservation in bioregions and subregions where ecosystems are not fully represented.
- Improve connectivity of existing protected areas through establishment of new protected or conserved areas.

- Prioritise protection and conservation of areas of particular importance for biodiversity and ecosystem functions and services.

Table 2: Criteria to identify priority regions

Criteria	Description
Areas of particular importance for biodiversity and ecosystem functions and services	Priority given to areas that: <ul style="list-style-type: none"> • are high in species diversity • contain species that are highly endemic to an area • provide habitat for nationally-listed threatened species and ecological communities, and migratory species • contain, or provide habitat for, species and/or ecological communities under severe and imminent threat • are irreplaceable/at risk of extinction • are important for the continued provision of ecosystem functions and services, and • have ecological integrity, intactness and • contribute to ecological connectivity.
Areas which are ecologically comprehensive and representative	Alignment with the CAR scientific framework (refer to <i>Box 8: What are the CAR criteria?</i>). Priority given to including adequate samples of ecosystems within and across each IBRA bioregion and subregion.

The draft roadmap states that Australia can meet the 30 per cent component of 30 by 30 through the protection or conservation of an additional 60 million hectares of land. The 60 million hectares represents another 8 per cent of the nation’s land area on top of the existing 22 per cent in the National Reserve System (NRS).

This framing of the challenges of implementing 30 by 30 is very misleading. The target must be calibrated against the requirement that protected and conserved lands be ‘optimally located for conservation’.

The stated percentages and totals are inconsistent with the well-established methodology and policies that have previously been applied to the NRS. The successes and shortcomings of the NRS have traditionally been assessed by applying Comprehensive, Adequate and Representative (CAR) principles to IBRA bioregions and subregions.

The draft roadmap should have included a careful analysis of bioregions/subregions using CAR criteria. It is not sufficient to simply state that ‘it is important to increase the level of protection and conservation in underrepresented IBRA bioregions’ (Draft National Roadmap, p. 25), the roadmap must provide clear guidance on priorities for addressing such shortfalls. This should include the Commonwealth’s commitment to prioritised funding for strategic acquisitions, a notable omission from the draft roadmap.

The dissonance between the current framing of objectives of 30 by 30 and the more nuanced, tailored objectives of the NRS must be resolved in the final roadmap.

We also support the statement on p. 30 that ‘A site’s suitability for Protected Area designation should be considered first and Conserved Area recognition considered where formal Protected Area designation is not possible, appropriate or supported’. This principle needs to be clearly embedded in the final paper.

We are generally comfortable with the criteria outlined in Table 2 of the draft roadmap, but it will require a higher degree of detail to be able to be applied. It is also important to note the difference in tenure, landscape and ecological condition across different jurisdictions, which will also need to be considered. It should not be just a race for the most hectares.

For example, Victoria is the most cleared state in Australia, with a highly fragmented landscape. Much of the bush that is left is of high conservation significance and rich in threatened species, but often in small blocks than in other less intensively developed states. This is evidenced by the large number of individual reserves in Victoria, over 4000 covering only 4 million hectares, which is almost twice as many as other jurisdictions, even though many other places have much larger networks in terms of total hectares.

The draft roadmap's lack any clear targets or timelines or any detail on process or mechanisms that will be used to deliver the government commitment. Without this level of detail, it is less a roadmap and more a framework.

Ensuring on-going protection.

Roughly 70 per cent of national parks and other publicly owned protected areas (IUCN Category I-IV) in Australia are in the states. So, while called national parks, they are really creatures and creations of state governments. The Commonwealth Government need to ensure that the integrity of these areas is managed and protected for the purposes that they were established.

Adding a new 'trigger' in national environmental laws for national parks and reserves would give the Australian Government power to intervene to protect national parks and protected areas when risks to their integrity arise.

The national parks trigger, a policy recommendation by all members of the National Parks Australia Council, was a Labor election commitment in the 2019 election. It's logical. It's practical. But since Labor lost that election, the commitment has fallen off the agenda and did not appear as a recommendation in the Albanese Government's report on the Samuel Review. Ensuring that the Commonwealth has some legal oversight would ensure that both formal protected areas and conservation areas are appropriately managed as part of 30 by 30 pathway. For background see <https://vnpa.org.au/is-it-time-to-make-national-parks-truly-national/> or for detail briefing paper see <https://vnpa.org.au/npac>

Conservation Areas (OECMS)

There is also no question that the Protected Areas of the NRS form, and should continue to form, the backbone of our nation's conservation estate. Only Protected Areas have the statutory protections, management expertise and primary focus on conservation that guarantees their continued contributions to biodiversity conservation into the decades ahead.

Accordingly, it is very disappointing that the draft roadmap omits any clear commitment to funding for enhancements to the NRS. The danger is that the lack of such commitment sends a signal to the States that they should be focusing their efforts on the establishment of Conserved Areas

In general terms we support the idea of conservation areas as a complimentary part of the 30 by 30. However, we remain concerned that these tools will be used to water down or avoid areas requiring permanent protection. There is a real risk that jurisdiction will use this a green light to create paper protections while claiming biodiversity outcomes.

We support the use of the national standards for the practice of ecological restoration in Australia to cover planning, implementing, monitoring and evaluating activities for conservation areas. This need be more clearly defined or enforced for Other Effective area-based Conservation Measures (OECMs) as a way of demonstrating management. See

<https://www.seraustralasia.com/standards/National%20Restoration%20Standards%202nd%20Edition.pdf>

We also support the principle that arrangements for Conserved Areas should be in-perpetuity consistent with Australia's Strategy for the National Reserve System, but if this is not possible, then the minimum should be at least 99 years. Australia has a long-established definition of 'long-term' – specifically a minimum timeframe of 99 years is required if permanent protection is not possible – embedded in both national policy and legal agreements.

VNPA does not support the idea of a short-term legal commitment of 25 years as ... 'coupled with a long-term conservation management commitment of at least 99 years', as sufficient demonstration of effort to protect in perpetuity (p. 25, OECM Framework

<https://www.dcceew.gov.au/environment/land/achieving-30-by-30/conserved-areas/national-oecms-framework>). This definition should be tightened.

A clear verification system for assessing proposed conservation areas also need to be put in place. Current informal reserve system in Victoria, for example, are no longer fit for purpose.

Informal zoning systems, RFAs and delivering 30 by 30

The Regional Forest Agreements (RFAs) tend to make big claims that logging is okay because it also protects the environment through the establishment of parks and reserves. But this is largely a myth. For example, the 2019 Independent Consultation Paper - Modernisation of the Victorian Regional Forest Agreements paints a rosy picture of the success of RFAs in Victoria, but key elements of it are unfounded and misleading.

<https://www.agriculture.gov.au/sites/default/files/documents/independent-report-on-joint-vic-aus-govt.pdf>

The report notes that all the changes to land tenure identified through this process were implemented in Victoria's RFA regions between 1999 and 2004. The report also notes that Victoria has 3.68 million hectares of parks and conservation reserves.

However, of the 3.68 million hectares of parks and conservation reserves cited, 84 per cent or roughly 3,077,000 hectares of land was protected under the *National Parks Act 1975* in Victoria prior to 1999 – before the RFAs started. This does not include the significant areas protected in other public land tenures such the *Crown Land (Reserves) Act 1978*.

The RFA process has had little to do with the establishment of new national parks and reserves in Victoria, and has been a block rather than a driver to the creation of protected areas.]While this may be now obsolete as Victoria has agreed to end the RFAs with the end of native forest logging, it does have a legacy which is relevant to 30 by 30.

The Independent Consultation Paper statement that 'By 2003, 900,000 hectares of forest had been added to the existing reserve system in Victoria through the RFA process' is quite misleading. The bulk of this 900,000 hectares is in the informal reserve system, and not formally or permanently

protected. According to the 2018 Victorian State of the Forests report, 828,000 hectares of special protection zones (actually informal and impermanent reserves) were established in Victoria in 2004 (see below).

Around 92 per cent of so-called reserves created under all the Victorian RFAs are informal (special protection zones etc.). Only 8 per cent of reserves related to RFAs are protected in formal reserves. This zoning system no longer has any legal effect, as it only relates to potential impacts for commercial logging which has now been phased out in Victoria. Other damaging impacts are not covered in the zoning systems for forests.

Victorian under no circumstances should be allowed to claim this zoning system as either part of the protected area estate or as conservation areas, unless there is a substantial strengthening of the legal force of the zoning system to cover other damaging activities, or similar amount of land are added to the protected area estate. Without new protected areas, there is a risk in Victoria that our reporting against CAR reserves system (as articulated under national forest policy and RFAs) will in fact go backwards by almost million hectares. It is unlikely that the informal reserve system, in its current state, would meet even the basic benchmarks for the OECMs.

Review of the Victorian CAR Reserve System: Synthesis Report, Final Report, undertaken by DWELP in 2022 in context of RFA, highlighted some areas for improvement in current JANIS-based CAR Reserve System performance. <https://www.forestsandreserves.vic.gov.au/forest-management/comprehensive,-adequate-and-representative-car-reserve-system-review>

This includes:

- Significant shortfalls in the protection of some ecological vegetation class (EVCs) against some of the JANIS criteria. This finding is in line with other assessments e.g. by the VEAC and as part of the development of the Victorian Government's 'Protecting Victoria's Environment – Biodiversity 2037' strategy.
- Low levels of protection for several EVCs that are vulnerable to climate change. Increasing the extent of protection for these EVCs will be important for increasing climate resilience of the reserve network.
- Options for improving protections for some EVCs are limited. For many 'shortfall EVCs', much of the remaining 'unprotected' extent is on private land. Mechanisms for increasing protections for these EVCs are limited (conservation covenants) and rely on reaching agreements with individual private landholders. Targeting of private land conservation investment to priority EVCs will be necessary to address this challenge.
- There are significant areas for improvement in terms of data and evaluation, including a lack of:
 - A robust protocol to evaluate performance against the full set of JANIS criteria.
 - Integrated data on habitat condition, structure and function.
 - A protocol for quantifying and incorporating data on the impacts of major events (e.g. bushfires).
 - Clear criteria for evaluating performance against the broader objectives of the CAR Reserve.
 - Systems including, for example, cultural heritage and landscape objectives, ecosystem service provision etc.

It recommended on public and private land the following:

On public land

For some EVCs, there are options to improve performance against the JANIS criteria by incorporating public land into the CAR Reserve. This includes:

a) Formally incorporating areas that are currently protected through policy (Immediate Protection Areas (IPAs), areas protected via VEAC recommendations) into the CAR Reserve System to enable more permanent protection.

b) Incorporating currently unprotected State Forest land (General Management Zone (GMZ), Special Management Zone (SMZ)) into the CAR Reserve.

However, only a relatively small proportion of EVCs would be able to meet the JANIS criteria threshold through such additions...

On private land

For a significant majority of EVCs that fall short of the JANIS criteria thresholds, much of their currently unprotected extent falls on private land. Options for pursuing improved CAR Reserve coverage on private land could include specific targeting of private land conservation investment to EVCs that are currently under-represented in the CAR Reserve System. Any such efforts should particularly prioritise shortfall EVCs that are rare or endangered.

The current DECCA website 08/05/23 notes that 'The Victorian Government is considering how the report's findings can improve the CAR reserve system, including how this work can provide an input to the Australian Government's commitment to protect 30 percent of land by 2030.'

To summarise, for any 30x 30 pathway to be credible, Victoria cannot use the existing forest zoning systems because:

- The zoning system no longer has any legal effect, as it in its current form only relates to potential impacts for commercial logging which has now been phased out in Victoria.
- Other damaging impacts are not covered in the zoning systems for forests, it is also not permanent and can be changed relatively easily.

Victoria under no circumstances should be allowed to claim this zoning system as either part of the protected area estate or as conservation areas, substantial strengthening of the legal force of the zoning system would be required to make it qualify under 30 by 30 to cover other damaging activities and improving its legal force and permanency and oand or similar amount of land are added to the protected area estate.

Without new protected areas or substantial reform, there is a risk in Victoria that our reporting against the CAR reserves system, as articulated under national forest policy and RFAs, will in fact go backwards by almost a million hectares before 30 by 30 even gets started.

Table Fo15: Area available for harvest within native forests of Victoria between 2006 and 2022.¹⁴³³

Tenure	Forest management one	Year and area ('000 ha)							
		2006	2008	2012	2014	2016	2018	2020	2022
Available									
State forest	General Management Zone	2,403	2,318	2,110	2026	2,112	2,180	2,006 ^a	2,029 ^a
	Special Management Zone	182	172	275	263	159	153	152 ^a	200 ^a
Parks and conservation reserves	Limited timber production	12	12	18	14	19	19	0 ^b	0 ^b
Total available		2,597	2,502	2,403	2,302	2,290	2,352	2,258	2,229
Not Available									
State forest	Special Protection Zone	828	783	753	747	756	768	773	777
	Immediate Protection Area	-	-	-	-	-	0	96 ^a	96 ^a
Parks and conservation reserves	Limited timber production	-	-	-	-	-	0	19 ^b	19 ^b
	No timber production	3,820	3,825	3,982	4,117	4,106	4,139	4,130	4,139
Total not available		4,645	4,608	4,735	4,864	4,862	4,907	5,028	5,031
Grand total		7,242	7,110	7,138	7,166	7,153	7,259	7,286	7,260

^a In 2019, the Victorian Government developed the VFP. The plan identified IPAs across eastern Victoria which included areas where commercial timber harvesting was previously permitted. The area of GMZ in the IPAs (~89,000 ha), and the area of SMZ in the IPAs (~7,000 ha), has not been included in the area available for harvest.

^b The areas of limited timber production are forest areas where previous land-use determinations (e.g. by the Land Conservation Council) outlined that limited timber production is permitted in these areas, usually with conditions and with the permission of the land manager. While the land-use determinations are still in place these areas were not included in the Allocation Order 2013 (amended in 2014 and 2019). These areas have not been included in the tally of area available for timber production. These areas include: Ada River sawmills historic reserve, Colquhoun regional park, Comet Sawmill historic reserve, Grant historic area, Kirchubels tramway and mill historic reserve, Kurth Kiln regional park, Mississippi no. 1 mill historic reserve, Mount Murphy historic area, Mount Murphy historic area, Mount Wills historic area, Rubicon Valley historic reserve, and Walhalla historic area.

1431. Major Event Review Independent Panel 2022, 'Victorian regional forest agreements: Major event review of the 2019-20 bushfires', <https://www.agriculture.gov.au/sites/default/files/documents/vic-rfa-mer-bushfires-report-2022.pdf>. Accessed 21 November 2022.

1432. D+ sawlog is inclusive of B grade, C grade and D grade sawlog.

1433. Department of Jobs, Precincts and Regions (DJPR), 'Unpublished data', Melbourne, Victoria, Accessed 2022.

<https://www.ces.vic.gov.au/soe2023>

Missing Marine Protected Areas

We are disappointed that Marine Protected Areas (MPAs) are ignored in the scope of the draft roadmap. Not only is marine conservation a fundamental part of the GBF and Convention on Biological Diversity, but there is no doubt that marine species, habitats and ecosystems are the most inadequately protected of all Australia biota.

This neglect of marine biodiversity begins with the extremely misleading assertion that 48 per cent of Australian waters are already protected. This assertion ignores the fact that the vast majority of existing MPAs, both state waters and Commonwealth, offer little protection for marine biodiversity.

Victoria has less than 5.3 per cent of its coastal waters in MPAs, such marine national parks. While the Victorian model is more aligned with strict protected areas, the area covered largely falls well behind the coverage of most other jurisdictions in Australia. <https://vnpa.org.au/marine-national-parks-and-sanctuaries/>