

Protected and Conserved Areas Policy  
Section  
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Dear Sir/Madam

### **DRAFT NATIONAL ROADMAP FOR PROTECTING AND CONSERVING 30% OF AUSTRALIA'S LAND BY 2030**

Thank you for the opportunity to make a submission regarding the *Draft National Roadmap for protecting and conserving 30% of Australia's land by 2030 (30x30 Roadmap)* (Department of Climate Change, Energy, the Environment and Water Safety (DCCEEW), July 2024).

The Environmental Protection Authority of WA (EPA) is an independent statutory Authority established under the *Environmental Protection Act 1986* (EP Act) with a statutory objective to protect the environment and conduct environmental impact assessment of proposals which are likely to have a significant impact on the environment.

The EPA supports the Australian Government's commitment to protecting or conserving 30 percent of Australia's landmass by 2030 in line with the Kunming-Montreal Global Biodiversity Framework 2030 (GBF) Target 3. The EPA agrees that the expansion and enhancement of protected and conserved areas needs to be part of a suite of broader actions to prevent further biodiversity loss. Collaboration at all levels of government, and in particular with the private sector and individuals, will be required to achieve this 30 by 30 target.

Recognising the increasing development pressures on areas of biodiversity, the EPA considers that the Roadmap should look to ensure integration and synergies with environmental impact assessment and the provision of offsets to counter-balance biodiversity impacts as much as possible. Given the highlighted low proportion of protected privately owned or managed land, the Roadmap should elaborate on the benefits of Private Protected Areas and consider incentives for landholders to voluntarily protect or conserve the biodiversity on their land, to ensure that a significant contribution of private land to the 30 by 30 target is achieved. The EPA considers that it would be helpful to include a discussion on the responsibilities and management of the Conserved Area Network (section 4.2)

The EPA also recognises the importance of nature positive initiatives, and the Nature Positive Plan could be mentioned in the broader approaches to addressing biodiversity loss in relation to the Nature Repair Market. The relationship with these

reforms could be shown in Figure 2. Please note that figures could be enlarged to improve readability.

The EPA also supports the draft Roadmap's reference to landscape-scale conservation planning but considers the intent of regional plans to guide development to less environmentally sensitive areas should be discussed, and the stated requirement to account for competing land uses (section 1.4, p.10) be reframed to be more consistent with the International Union for the Conservation of Nature (IUCN) management categories and DCCEE's draft regional planning framework. The current text also seems inconsistent with GBF Target 3 (p.11).

The importance of considering a range of options to achieve the 30 by 30 target is critical. The EPA is also encouraging of landscape scale planning approaches which incorporates environmental protection, as this can contribute to both achievement of 30 by 30 and sustainable development through application of the mitigation hierarchy. This provides confidence that high value areas are available to provide the environmental buffers, corridors, ecological functioning and advanced offsets which are necessary to achieve sustainable development. Other options include consideration of regional offsets that allow consideration of broader environmental protection and enhancement needs. Through consideration of the regional scale, the EPA recognises there is opportunity to allow offsets and other enhancement measures to contribute to delivering nature positive outcomes by enhancing the resilience, connectedness, and quality of environmental values. Ensuring the Roadmap considers landscape scales and provides a flexible approach is likely to be important to achieving the target.

The Roadmap doesn't discuss the role that rehabilitation and revegetation should play in achieving the target. Focusing on only protecting areas of existing biodiversity is likely to hinder the achievement of the target and doesn't recognise the pressure of increasing development. The EPA considers that without such an approach there is a risk of falling short of achieving an overall nature positive outcome. For example, in 2023 the EPA assessed the State's [Forest Management Plan 2024-2033](#) and recommended that there are opportunities to enhance and improve the extent of forest ecosystems through the rehabilitation and regeneration of disturbed areas at appropriate scales. This would serve to improve biodiversity and could assist to link habitat for species movement and resilience.

The EPA considers that the criteria to identify priority regions could be broadened to incorporate holistic considerations and additional specific criteria or considerations to guide the selection of protection and/or conservation areas. For example, specific criteria on inland water areas could be included, as well as those criteria/considerations listed separately (i.e. cultural benefits, connectivity and climate change). The intent to consider both terrestrial and inland water areas for priority areas should also be explicit. The EPA is concerned that by limiting the criteria to identify priority regions (Table 2, pg. 27, *30x30 Roadmap*) to areas of particular importance or ecologically comprehensive and representative, will not

allow consideration of other valuable areas or those under threat from current or emerging pressures.

In addition, further consideration of the criteria is needed for enabling protection of degraded areas. For example, the IBRA Avon Wheatbelt region, which is identified as having very low protection <5%, would not be considered for protection under the criteria in Table 2, and is underrepresented with respect to CAR criteria (Figure 7). To “increase the level of protection and conservation in underrepresented IBRA bioregions to ensure the NRS and Conserved Area Network are representative of Australia’s vegetation communities and ecosystems” as stated on p.25 of the *30x30 Roadmap*, incentive to restore and rehabilitate such areas is needed.

There is already allowance for Protected or Conserved Areas to be included in land use for Environmental, Social and Governance requirements, Green Bonds or restoration/rehabilitation projects under WA’s offsets framework ([WA Environmental Offsets Framework | EPA Western Australia](#)). In accordance with the EPA’s recently published public advice ‘Considering environmental offsets at a regional scale’ (March 2024), the EPA considers conservation areas provide secure tenure for environmental offsets, including but not limited to conservation reserves and conservation covenants.

The EPA welcomes further discussions on the 30x30 Roadmap and how the EPA and DCCEEW can continue to advocate for better environmental outcomes.

Yours sincerely,



**Lee McIntosh**  
DEPUTY CHAIR, ENVIRONMENTAL PROTECTION AUTHORITY

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