

Online submission

30 September 2024



Australian Academy of Science submission on the Nature Repair Market Legislation

Australia is failing to halt or slow, let alone reverse, biodiversity loss and species decline.

The Australian Academy of Science therefore only supports a voluntary market that will effectively protect Australia's environment, conserve its biodiversity and safeguard its species and its ecosystems.

The Nature Repair Market must be underpinned by scientific expertise, advice, and evidence to ensure robust project assessments and establish the market as a credible and trustworthy scheme.

In March 2023, the Academy made a submission [on the exposure draft of the Nature Repair Market Bill](#). This submission notes issues that are still relevant.

The Academy makes the following recommendations:

- Biodiversity outcomes of projects under the Nature Repair Market must be measurable
- To measure outcomes, the legislated Nature Repair Rules must provide clarification on whether projects address biodiversity at an ecosystem level, or the conservation of individual threatened species
- Information on what species the project addresses should be included as a specific project attribute
- The Nature Repair Committee must have a mechanism for ongoing access to biodiversity expertise, which could be through the Biodiversity Assessment Expert Reference Group
- Auditors need specialised expertise in biodiversity to conduct effective evaluations that ensure the genuine delivery of biodiversity benefits.

Biodiversity outcomes must be measurable

Currently, the proposed content of the Biodiversity Certificate does not specify the quantitative and qualitative measures of biodiversity improvement. The proposed content does not contain sufficient detail for use. It is not specified how much biodiversity gain must be demonstrated before a certificate is issued.

The Academy notes that biodiversity assessment instruments are in development and emphasises the importance of data-informed decision making. Australia's monitoring of biodiversity, collection of data, and data curation and standards are currently inadequate. The Academy has previously suggested the [establishment of a new national biodiversity information system](#), led by an independent agency to integrate data and tools, support decision-makers and ensure public confidence.

Biodiversity projects must also be considered at the ecosystem level

To measure biodiversity improvement, there is a need to distinguish between two situations for target taxa:

- (1) one or a few species are targeted because of their direct interest (such as being listed as threatened or of cultural interest)
- (2) a diverse and functionally important taxon or complementary taxa are targeted because of their proven indicator qualities in terms of broad biodiversity outcomes.

In Appendix A of the discussion paper, biodiversity is defined as including the diversity of ecosystems, as well as diversity within species and between species. However, the definition of 'biodiversity project' in Appendix A of the discussion paper does not include ecosystems, only *biodiversity in native species*. Biodiversity projects considering ecosystems must be included, given that any improvement at the ecosystem level will commonly produce positive biodiversity outcomes.

Information on species should be included as a specific project attribute

To register for a project, information on what species the project addresses should be required within the intended biodiversity outcome. This is important for clarification of the measurement of biodiversity improvement.

The Academy recommends that the following specific project attributes be included on a Biodiversity Certificate:

- whether the project addresses single species, multiple species, or whole ecological attributes.
- whether the project addresses species of different threat status.

The following points from the Academy's 2023 submission still need to be addressed to clarify how the system will account for the complexities of biodiversity management:

- Will all species be treated equally, or will projects be weighted according to specified criteria?
- How will these criteria be developed, and how will they be communicated?
- How can the system account for projects offering different types of projected benefits? For example, projects focussed on 'protection' (preventing biodiversity decline), compared to those aimed at 'enhancement' (improving local biodiversity).

The Nature Repair Committee must have a mechanism for ongoing access to biodiversity expertise

The establishment of the Biodiversity Assessment Expert Reference Group (BAERG) allows for scientific evidence, on-ground management expertise, and relevant Traditional Ecological Knowledge to be meaningfully considered and incorporated into decision-making. The discussion paper states that the BAERG will develop the structure and scope of the biodiversity assessment instruments. An ongoing link between the NRC and the BAERG would be desirable, so that the BAERG can continue to provide advice as required.

The Academy welcomes the inclusion of experts in biological and ecological science and Indigenous knowledge on the Nature Repair Committee (NRC). The composition of the committee should be carefully considered to ensure appropriate representation of required expertise. For example, biodiversity expertise is currently under-represented on the committee compared with committee members with a background in agriculture.

Auditors must have biodiversity expertise

Biodiversity expertise to conduct effective evaluation is an essential aspect of an effective biodiversity market. Therefore, auditors should have the necessary expertise to not only ensure that the project has met requirements, but also the genuine delivery of biodiversity benefits. The discussion paper states that audits will be undertaken by a registered greenhouse gas emissions and energy auditor, as defined in the *National Greenhouse and Energy Reporting Act 2007*. A similar requirement should be included for auditors to possess specialist biodiversity expertise.

To discuss or clarify any aspect of this submission, please contact Mr Chris Anderson, Director Science Policy at Chris.Anderson@science.org.au.