

From:
To: [Committee, EC \(SEN\)](#)
Subject: Submission on the Nature Repair Market Bill 2023
Date: Monday, 5 June 2023 3:48:34 PM

To the Committee,

The Labor Government claims that the new 'Nature Repair Market Bill' will provide financial opportunities for landholders to protect and restore nature on their land.

However, this new scheme risks becoming an avenue for government-endorsed greenwashing by allowing nature-wrecking companies like developers and mine operators to use the market to buy 'offsets' for the damage they do to nature. Land managers should be supported to protect and restore nature, not destroy it and simply buy offsets.

I, as an ardent environmentalist and someone with a passion for Australian native biodiversity believe that a much better approach would be the following:

First, the bill must be amended to rule out allowing the 'Nature Repair Market' to be used for offsets for nature destruction.

And finally, will the government must prioritise reforms of our national nature laws.

Yours sincerely,

From:
To: [Committee, EC \(SEN\)](#)
Subject: Submission on the Nature Repair Market Bill 2023
Date: Wednesday, 17 May 2023 10:54:59 AM

To the Committee,

First let me define 'Nature' here as land and all the things above and below it, in particular things that contribute to the life cycles of things on the land, neighbouring land and the global ecosystem. Such things might be animal vegetable or mineral.

The most unique things are those that have evolved over lots and lots of time in connection with a moving set of other things.

'Nature' is not something that can be commoditised - to which a unit value can be applied that allows a relative value to be placed on one piece of nature over another.

Due to it's uniqueness a piece of Nature cannot be replaced. Any piece of land bigger than a house block will have some element of uniqueness that makes it different to all other blocks of land - you could think of comparing them as similar to comparing two people. If you find this concept hard to grasp imagine comparing and placing some sort of value on two children you know.

It's seems pretty clear that the climate will change over the next century to a state where not experienced in written memory. It's likely though that our ecosystems have experienced similar states and that somewhere there are combinations of things with a unique ability to thrive under climates very different to put current one, and that Australia is likely to have that somewhere. Not just the warming we are experiencing now but the freeze we might experience in 100000 years. The more blocks of nature we have the more likely we are to have available solutions to help thrive in all conditions we might face.

As a nation we have degraded, often immensely, the vast majority of blocks of nature here 250 years ago. Please do your best to protect what we have going forwards.

Offsetting one block against another is something that just can't empirically be done with any sort of honesty. To sum the value of one block of Nature against another is akin to the summing of value of one human to another by measuring the shape of their skulls or the colour of their skin - it's something that we as a nation need to steer clear of.

Yours sincerely,

From:
To: [Committee, EC \(SEN\)](#)
Subject: Submission on the Nature Repair Market Bill 2023
Date: Thursday, 11 May 2023 8:33:09 PM

To the Committee,

We need to focus on the real priorities nature urgently needs the government to act on:

strong new laws with real environmental standards
an independent regulator to enforce the law, and
a commitment to ramping up public funding for nature.

Offset do not repair nature and can in fact destroy as much as they protect.

Please incentivise land holder to protect and restore the habitat they have.

Please do not give more money for fossil fuels - especially fracking which should be totally banned.

We should be getting more money from the mining companies who pay a pittance to dig it up and sell it off shore.

Yours sincerely,

From:
To: [Committee, EC \(SEN\)](#)
Subject: Submission on the Nature Repair Market Bill 2023
Date: Sunday, 28 May 2023 5:30:19 PM

To the Committee

The Nature Repair Market Bill 2023 should be amended to rule out allowing the Bill to be used for offsets for nature destruction.

OFFSETS DO NOT REPAIR NATURE.

Offsets destroy at least as much as they protect.

To solve the extinction crisis we have to stop habitat destruction at its source,

Offsets acting as compensation, is still continuing the extinction crisis.

The government should prioritise reforms of our national nature laws. The critical reforms of the Environment Protection and Biodiversity Conservation Act must be done right and should take priority over the Nature Repair Market.

Environment Minister Tanya Plibersek's Nature Positive Plan, which committed to introducing new, overhauled national nature laws to Parliament by the end of 2023 should be the focus of government resources and parliamentary time.

Land managers should be supported to protect and restore nature. Many of our most threatened species and ecosystems occur on private land, so incentivising land-holders to protect and restore habitat will help them recover.

There are many land holders successfully working in harmony with wildlife in Australia, who can be used as examples and resources, for other landholders, to do the same.

The government should lead the way with public funding to support landholders to protect and restore biodiversity rather than relying on private investment through the Nature Repair Market.

Yours sincerely

From:
To: [Committee, EC \(SEN\)](#)
Subject: Submission on the Nature Repair Market Bill 2023
Date: Saturday, 13 May 2023 11:24:33 AM

To the Committee, I am very concerned to read that the Nature Repair Market can be used by companies as a means of 'offsetting' habitat destruction that they commit in other places.

It is essential that our National Nature laws actually protect what we have left and not provide loopholes for businesses to commit environmental crimes in other areas. The climate and extinction crises that we, as an entire planet, face now are unprecedented and must be addressed with the utmost seriousness and urgency.

The Australian Government has a duty of care and custodianship for this country and must put its long term security ahead of corporate profits. For far too long Australia has utterly failed to protect its Natural Heritage. Now that we have a government that actually claims to care about the environment then they must back up these claims with more than empty words.

As well as ruling out offsets and strengthening nature laws the government should be empowering landowners to do the right thing to protect and restore biodiversity on their land.

Yours sincerely,

From:
To: [Committee, EC \(SEN\)](#)
Subject: Submission on the Nature Repair Market Bill 2023
Date: Tuesday, 30 May 2023 1:37:19 PM

Dear Senate Environment and Communications Legislation Committee

I love nature and when I am stressed or need upbuilding physically and emotionally, the peace, beauty of untouched natural beautiful surroundings and the wildlife around relax and revive my soul.

It distresses me that we are destroying nature at such a fast rate. Governments and businesses know it is wrong, but they are so invested in development and expansion, that nature comes second always to economic gain. When will we realise that what we are doing is wrong? It will be too late to reverse this trajectory of decline. We only have a small window to change how we think and what we value as a nation regarding Australian nature.

The government has committed to reform our national nature protection law the EPBC Act and has accepted the need for “fundamental reform” of these laws. The priority for this government MUST be establishing strong new national nature laws rather than creating a market for biodiversity certificates. Logically getting the standards and laws embedded into law must come FIRST with an independent office established to enforce these laws and standards.

In essence, the principle embedded in the plan to create a new market for biodiversity protection on privately-owned land is good. It is the way that it will function is a concern to me.

The government must focus on improving the foundation of our nature laws. The EPBC Act has failed, otherwise we would not have destruction of our environment daily bulldozed at the rate of 52 hectares every hour- that is the size of 28 Sydney Opera Houses. That is a huge area of wildlife habitat destroyed EVERY HOUR. Currently our nature laws are broken and powerless to stop it. That is the problem and that is what has to be fixed FIRST and SOON. We must have strong nature laws and a strong system that protects our environment from this ongoing destruction through an independent regulator who will have the power and be properly funded to enforce the law.

Despite overwhelming evidence that a substantial boost in funding is needed, the budget in May 2023 allocated less than 1% of new spending to nature. Treasurer Chalmers did not even mention the environment once in his delivery of the Budget. That was a concern and showed me how low a priority this ongoing massive destruction of nature is to the Albanese government.

Nature needs \$2 billion according to scientists every year to protect and restore and address the biodiversity crisis. The government prioritised more fossil fuel subsidies and more money to submarines in this budget. The Australian Government will continue subsidising fossil fuels, earmarking about \$50 billion over forward estimates. The government could not even spare \$2 billion for nature so hence we will lose our special places and unique wildlife.

We cannot protect and restore nature on a shoestring budget and introduce a Nature Repair Market expecting businesses to foot the bill and the funding because the government wasn't committed enough to do it themselves.

This will lead to dodgy projects being assessed and approved because of these dodgy offsets that were written into plans, and nature will never be fairly compensated for what it has lost in environmental values due to development, which will lead to further environmental decline.

Past environmental assessments that were inaccurate were proven to have misleading data and were in fact made to fit the developer's proposal, so projects could be approved at a cost to nature. Correct data on wildlife that lived within the boundaries of the development proposal were undercounted, habitat that was destroyed and was poorly compensated with less trees on less land in a poorer quality area.

The Biodiversity Offset Scheme failed nature and accelerated more destruction. Projects were submitted with an offset where the business (like a developer or mine operator) was given a permit to destroy nature in one place provided they buy the protection of nature elsewhere as compensation, which was drawn out over time, some never being compensated properly and never being followed up diligently enough by authorities to ensure there

was an equal compensation in a timely manner.

Under the Nature Repair Market, this would mean businesses that want to destroy nature could buy 'biodiversity certificates' as their offsets. The Albanese Government hasn't ruled offsets out of the Nature Repair Market – a critical call that will determine the integrity of the scheme and the true benefit for nature. Owing to the problems created by the last offsets scheme, one is skeptical whether nature will be fairly represented and considered in approvals and whether offsets will be of the same quality and value and immediate. What is set aside as an offset never really replaces what is destroyed. There are loads of examples of dodgy and failed biodiversity offsets schemes, we can't afford to make these mistakes again while the extinction crisis continues to escalate.

I support in principle land managers being paid for stewardship efforts that go beyond their legal obligations. 48% of Australia's threatened species habitat occurs on private land, so having better systems to support landholders to protect nature has a role to play in helping threatened species recover. However, overall, the Nature Repair Market is an unnecessary distraction from the urgent needs of new nature laws and much more public funding to protect and restore nature is needed NOW.

The Albanese Government has committed to reform our national nature protection law, the Environment Protection and Biodiversity Conservation Act (EPBC Act). That is the path they must stay on now.

Environment Minister Tanya Plibersek has responded to the recommendations of the independent, 10-year review of the EPBC Act, and accepted the need for "fundamental reform" of these laws. That is the priority, and this must be dealt with first otherwise our wildlife will continue to struggle as they face more of their habitat being eroded away and they will quietly slip into extinction. It will be too late for many species. Minister Plibersek promised to protect and restore nature -so it starts now with stronger laws, standards and a stronger EPBC Act. The time is now to focus on this area as the foundation to protect and restore nature moving forward. This is the higher priority than creating a market for biodiversity certificates.

The answer to reducing emissions and reducing biodiversity loss is the same – stop the problem at its source by doing drastically reducing habitat destruction and native forest logging. Pretending that offsets are the solution will make the problem worse! Offsets are NOT the solution -it is an easy way to say that the government is encouraging landholders to develop their properties through businesses that will offset the damage and loss of environmental values in exchange for another poorer quality area later into the future that could be worthless to wildlife. The Biodiversity Offsets program accelerated more damage to nature. Offsets will NEVER be a 'like for like' exchange for what has been destroyed of the same quality. Wildlife cannot wait around for an offset and a replaced environment when their habitat has been destroyed. Companies, businesses and developers are not obliged to offset immediately. Our wildlife will die as they need healthy habitat kept in place to survive.

In summary I -

- Welcome in principle the intention of providing support to landholders to protect and restore nature on their land.
- Express concern about the lack of evidence for demand and lack of detail about the biodiversity outcomes the market is intended to deliver.
- Oppose the use of biodiversity offsets as a source of demand for Biodiversity Certificates.

Protecting nature matters to me. I strongly urge consideration on these points-

- The Committee should recommend that the Bill is amended to rule out allowing the Nature Repair Market to be used for offsets for nature destruction. Offsets do not repair nature, and they destroy at least as much as they protect. To solve the extinction crisis, we have to stop habitat destruction at its source, not continue to allow it by allowing offsets to act as 'compensation'. This has failed and will fail again to protect nature.
- The government should prioritise reforms of our national nature laws. The critical reforms of the Environment Protection and Biodiversity Conservation Act must be done right and should take priority over the Nature Repair Market. Environment Minister Tanya Plibersek's Nature Positive Plan, which has committed to introducing new, overhauled national nature laws to Parliament by the end of 2023 should be the focus of the government resources and parliamentary time.
- Land managers should be supported to protect and restore nature. Many of our most threatened species and ecosystems occur on private land, so incentivising landholders to protect and restore habitat will help them recover. The government should lead the way with public funding to support landholders to protect and restore biodiversity rather than relying on private investment through the Nature Repair Market.

The Nature Repair Market is not the answer.

Adding the Nature Repair Market into the system will only make it harder to protect the environment, and provide a financial incentive attached, to destroy it instead by developers and businesses.

Yours sincerely,

From:
To: [Committee, EC \(SEN\)](#)
Subject: Submission on the Nature Repair Market Bill 2023
Date: Monday, 15 May 2023 9:19:19 AM

To the Committee,

It is vital that the Bill is amended to rule out allowing the Nature Repair Market to be used for offsets for nature destruction, that would be nothing more than a neoliberal greenwashing con job, like the far greater proportion of "offsets" have proven themselves to be.

Reforming our national nature laws is far more critical, so should be the priority over a Bill that appears to benefit corporations far more than nature.

It is capitalism that is causing the climate and biodiversity polycrisis, and neoliberal capitalist solutions such as this one have no hope of solving the multitude of problems it has created.

This appalling Bill is attempting to integrate the environment into the economy, whereas it is the economy that needs to be integrated into the ecosphere for there to be any hope at all for the future of life on Earth.

Yours sincerely,

From:
To: [Committee, EC \(SEN\)](#)
Subject: Submission on the Nature Repair Market Bill 2023
Date: Thursday, 1 June 2023 9:30:27 PM

To the Committee,

Australia has had the world's worst record on extinction and biodiversity loss. Our environment needs serious protection, not just from global heating, but also from the entrenched practises of our economic and (many) leisure pursuits. Many scientists say we are now in the sixth mass extinction. Yet we continue to glibly carry on pretending or hoping that 'she'll be right'. But it's not alright and the mechanisms for making it better are slow in coming.

Many of us have long held hopes that a renewed EPBC Act, as recommended by the Samuel's Review, would go some way to solving some of the problems the environment and our iconic species face. However while we wait for the improved EPBC Act, we now have a suggestion that our precious natural world might be used to offset the damage done by sectors of the business community.

The recent history of offsets being used for credits by organisations creating too much carbon dioxide or methane has been fraught. Many of these offset projects have been shown to amount to a rort. The Chevron project which is the largest of it's kind in Australia has been shown to be an abject failure.

The idea that habitat protection in one area can be used to buy credit for destroying another area is insane. Once natural or native habitat has been destroyed it can never be restored. We like to think that planting native plants in damaged areas is restoring habitat, but it's a myth. It might be repairing habitat but it's never restoring it. To solve the extinction crisis we must end habitat destruction and not allow dodgy offsets to create pretence of compensation.

We must strengthen the EPBC Act to ensure real protections for our iconic species, their habitat and the whole environment. This must include tiny insects, soil microbes and fungi.

Land managers such as farmers, landholders and miners must be encouraged and supported to protect, repair and help in the recovery of habitat. The government and the community must provide incentives and supports to landholders to care for country and not to see it a means to making money.

I ask that the committee recommend an amendment to the Bill to rule out the use of the Nature Repair Market to be used for offsets for the destruction of our wonderful nature

Yours sincerely,

From:
To: [Committee, EC \(SEN\)](#)
Subject: Submission on the Nature Repair Market Bill 2023
Date: Tuesday, 23 May 2023 11:08:15 AM

To the Committee,

Please recommend that the Bill is amended to disallow the so-called Nature Repair Market. This is an excuse to allow nature destruction. Offsets do not adequately replace complex ecosystems of nature, which have evolved over thousands or millions of years. Usually the offset areas are not equivalent, were not really threatened anyway and even if they were, they are not protected in perpetuity. Trying to adequately regenerate a replacement degraded area won't stack up either.

To address our biodiversity extinction crisis we have to stop habitat destruction, especially natural undisturbed bushland and stop pretending so-called offsets provide compensation for destruction.

Yours sincerely,

From:
To: [Committee, EC \(SEN\)](#)
Subject: Submission on the Nature Repair Market Bill 2023
Date: Sunday, 14 May 2023 5:52:39 AM

To the Committee,

Labor's priority should be urgently creating new national nature laws.

Instead of a new market with a dubious level of demand, nature needs strong new laws with real environmental standards, an independent regulator to enforce the law and a commitment to ramping up public funding for nature.

The Committee should recommend that the Bill is amended to rule out allowing the Nature Repair Market to be used for offsets for nature destruction. Offsets do not repair nature, and they destroy at least as much as they protect. To solve the extinction crisis we have to stop habitat destruction at its source, not continue to allow it by allowing offsets to act as 'compensation'.

The government should prioritise reforms of our national nature laws. The critical reforms of the Environment Protection and Biodiversity Conservation Act must be done right and should take priority over the Nature Repair Market. Environment Minister Tanya Plibersek's Nature Positive Plan, which committed to introducing new, overhauled national nature laws to Parliament by the end of 2023 should be the focus of government resources and parliamentary time.

Land managers should be supported to protect and restore nature. Many of our most threatened species and ecosystems occur on private land, so incentivising land-holders to protect and restore habitat will help them recover. The government should lead the way with public funding to support landholders to protect and restore biodiversity rather than relying on private investment through the Nature Repair Market.

Yours sincerely,