

## 2025 consultation

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### Disclaimer

This document is a submission to the Net Zero Commission's 2025 consultation. As part of the consultation process, the commission has committed to publishing the submissions it receives. Submissions do not represent the views of the commission.

NSW Net Zero Commission  
Via online submission  
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11 July 2025

Dear Net Zero Commission,

**RE: Submission to the NSW Net Zero Commission's 2025 consultation**

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a submission to the 2025 consultation by the New South Wales Net Zero Commission.

ALCA represents organisations that work to conserve, manage, and restore nature on privately managed land. Our member conservation efforts influence across over 3 million square kilometres with more than 4,000 landholders; we have over 70,000 supporters and our combined annual turnover exceeds \$370 million.

Whilst by no means the only threat, climate change presents great threats to New South Wales' biodiversity – to the survival of its unique species and ecosystems – as well as to the wellbeing of the New South Wales community who collectively depend upon nature to sustain their food security, their health, and their livelihoods.

Protection, management and restoration of biodiversity on private, public, and Indigenous lands is a key land management opportunity to sequester carbon at scale, whilst simultaneously delivering climate change adaptation, mitigation, and resilience.

The recent Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment report, *Climate Change 2022: Mitigation of Climate Change*, identifies the potential for scaling up land-based mitigation options in the Agriculture, Forestry and Other Land Uses (AFOLU) sector:

*“Where carefully and appropriately implemented, AFOLU mitigation measures are uniquely positioned to deliver substantial co-benefits and help address many of the wider challenges associated with land management.”<sup>1</sup>*

Furthermore:

*“The currently quantified efforts to reduce net emissions with forests and agricultural actions are helpful, but society will need to quickly ramp up investments to achieve carbon sequestration levels consistent with high levels of mitigation. Only 2.5% of climate mitigation funding goes to land-based mitigation options, an order of magnitude below the potential proportional contribution (Buchner et al. 2015).”<sup>2</sup>*

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<sup>1</sup> p107; [https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC\\_AR6\\_WGIII\\_FullReport.pdf](https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_FullReport.pdf)

<sup>2</sup> p821; [https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC\\_AR6\\_WGIII\\_Chapter07.pdf](https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_Chapter07.pdf)

Naturally, the NSW Government should continue its critical efforts to reduce emissions in the largest sectors of concern, namely, energy and then transport. However, there is a significant opportunity for the NSW Government to leverage the emissions mitigation opportunity within the land use, land use change, and forestry (LULUCF) category through the sequestering of carbon twinned with biodiversity conservation and restoration.

In 2017, research led by The Nature Conservancy and 15 other institutions<sup>3</sup> demonstrated that nature-based solutions can provide up to one-third of the emission reductions needed by 2030 to keep global temperature increases under 2°C – 30 percent more than previously estimated.

The value of investing in nature-based solutions for adaptation and mitigation to climate change is well-recognised by the Australian Federal Government:

*“Investing in nature-based solutions for adaptation and mitigation to climate change provide multiple benefits including:*

- *protecting biodiversity and threatened species,*
- *contributing to climate mitigation through carbon sequestration,*
- *making communities more resilient to climate change,*
- *contributing to food security, and*
- *supporting businesses reliant on healthy ecosystems such as fishing, tourism and agriculture.”<sup>4</sup>*

Furthermore, biodiversity conservation and restoration have great potential to help drive business investment and philanthropic funding that also delivers significant emissions reduction outcomes. The directions outlined above also align squarely with the priorities of the NSW Government’s *Plan for Nature*<sup>5</sup>.

ALCA’s challenge to the NSW Government is thus to mainstream nature-based solutions at scale, by designing and delivering initiatives that deliver on a package of emissions reduction, climate change adaptation and mitigation, and biodiversity conservation and restoration.

## Recommendations

ALCA makes the following recommendations to the Commission in the advice it makes to the NSW Government:

**Recommendation 1:** The advice explicitly recognise the importance of conservation (i.e. environmental protection, management and restoration) in the delivery of emissions reduction and climate change adaptation and mitigation. Further, it should recognise the alignment with actions in the Government’s *Plan for Nature*<sup>6</sup>.

<sup>3</sup> <https://www.pnas.org/doi/10.1073/pnas.1710465114>

<sup>4</sup> <https://www.dcceew.gov.au/climate-change/policy/nature-based-solutions-for-climate>

<sup>5</sup> <https://www.nsw.gov.au/departments-and-agencies/cabinet-office/resources/nsw-plan-for-nature>

<sup>6</sup> Ibid.

**Recommendation 2:** The advice should highlight the opportunity to design and deliver nature-based solutions to climate change<sup>7</sup>.

**Recommendation 3:** The advice should highlight the importance of expanding NSW's protected area estate (private, public, and Indigenous Protected Areas) if it is to meet its climate change targets.

This must include expanding protected areas in the eventual transition of NSW's state forest estate.

**Recommendation 4:** Further to Recommendation 3 above, the advice should encourage the NSW Government to adopt an explicit target for permanent protection of nature by 2030 that elevates the NSW contribution to the shared commitment of State, Territory and Federal Australian Governments to protect 30% of Australia's lands (and 30% of Australia's seas) by 2030<sup>8</sup>, in line with *Australia's National Roadmap for protecting and conserving 30% of Australia's land by 2030*<sup>9</sup>, *Australia's Strategy for Nature 2024-2030*<sup>10</sup>, and the Australian Government's commitment to the Global Biodiversity Framework under the Convention on Biological Diversity<sup>11</sup>.

**Recommendation 5:** The advice should elevate the knowledge, science and leadership of First Nations in addressing climate change adaptation and mitigation.

**Recommendation 6:** The advice should highlight the opportunity to scale up programs to deliver on NSW action for climate change, such as:

- the Federal Government's recently announced Australian Bushland Program<sup>12</sup>, which offers the NSW Government the opportunity – via State-based investment vehicles – to leverage Federal and philanthropic funding for acquisition of property for the protected area estate that protects and restores nature and its carbon sequestration; and
- investment in the NSW statutory entity, the NSW Biodiversity Conservation Trust, which protects and restores nature on private land in NSW<sup>13</sup>, which also delivers carbon sequestration through that protection and restoration.

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<sup>7</sup> An example of the potential contribution of nature-based solutions / natural climate solutions is outlined in research led by The Nature Conservancy and 15 other institutions; see:

<https://www.pnas.org/doi/10.1073/pnas.1710465114>

<sup>8</sup> <https://www.dcceew.gov.au/sites/default/files/documents/emm-communique-21-oct-2022.pdf>

<sup>9</sup> <https://www.dcceew.gov.au/environment/land/achieving-30-by-30/national-roadmap>

<sup>10</sup> <https://www.dcceew.gov.au/environment/biodiversity/conservation/publications/australias-strategy-for-nature>

<sup>11</sup> <https://www.cbd.int/article/cop15-final-text-kunming-montreal-gbf-221222>

<sup>12</sup> <https://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;query=Id%3A%22media%2Fpressrel%2F10225815%22;src1=sm1>

<sup>13</sup> <https://www.bct.nsw.gov.au/>

Thank you again for the opportunity to provide a submission on the NSW Net Zero Commission's 2025 consultation. ALCA and its members look forward to continuing to engage with the Commission and the NSW Government in the development of its carbon emissions reduction efforts.

If you have questions regarding this submission, please do not hesitate to contact ALCA via [michael@alca.org.au](mailto:michael@alca.org.au) (Mr Michael Cornish, Policy Lead).

Yours sincerely,



**Dr Jody Gunn**  
**CEO**  
**Australian Land Conservation Alliance**

## About the Australian Land Conservation Alliance

The Australian Land Conservation Alliance is the peak national body representing organisations that work to conserve, manage, and restore nature on privately managed land. We represent our members and supporters to grow the impact, capacity, and influence of private land conservation to achieve a healthy and resilient Australia.

Our nineteen members are:

- Arid Recovery
- Australian Wildlife Conservancy
- Biodiversity Conservation Trust NSW
- Bush Heritage Australia
- EcoGipps
- GreenCollar
- Greening Australia
- Landcare Australia
- Nari Nari Tribal Council
- Nature Foundation
- North Australian Indigenous Land and Sea Management Alliance
- NRM Regions Australia
- Odonata
- Queensland Trust for Nature
- South Endeavour Trust
- Tasmanian Land Conservancy
- The Nature Conservancy Australia
- Trust for Nature (Victoria)
- World Wildlife Fund - Australia

ALCA member land conservation efforts have influenced over 9.3% of Australia with more than 4,000 landholders. We have over 70,000 supporters and our combined annual turnover exceeds \$370 million. Together ALCA and its members address some of the most pressing conservation issues across the country, including restoring endangered ecosystems, building the protected area estate, tackling invasive species, expanding private conservation finance, and funding and using nature-based solutions to tackle climate change.

Through their active land management, ALCA member organisations are deeply embedded in rural communities and economies, providing jobs, securing significant regional investment, and safeguarding remaining native habitat, with its many positive spill-over effects for community, wellbeing, and food security. We seek to demonstrate the role and value of private land conservation as a cornerstone of the Australian economy.

Some ALCA members are statutory entities; the views expressed in this submission do not necessarily represent the views of the Government administering those statutory entities.