



21 February 2023

Attention: Biodiversity Market Team
naturerepairmarket@dcceew.gov.au
GPO Box 3090
Canberra ACT 2601

To Whom it May Concern,

**WILDLIFE HEALTH AUSTRALIA (WHA) SUBMISSION: NATURE REPAIR MARKET
DRAFT BILL**

Thank you for the invitation to provide feedback on the Draft Bill for the proposed Nature Repair Market.

Based on our national expertise, we provide comment and recommendations to improve the Draft Bill's protection of native wildlife.

We consider this as a vital opportunity to provide input and wish you all the best with this important work.

Best wishes,

Tiggy Grillo
National Coordinator & Chief Operating Officer, Wildlife Health Australia
Australian World Organisation for Animal Health Focal Point for Wildlife
International Union for Conservation of Nature (IUCN) Species Survival Commissions Wildlife Health
Specialist Group Co-Chair

Dear Biodiversity Market Team,

The proposed Nature Repair Market clearly represents a vital opportunity to garner private investment and commitment to native species conservation by creating a scheme to approve environmental stewardship that is recognised through biodiversity certificates.

There is a need to ensure that the Nature Market Repair Bill is complemented by a continued and enhanced commitment by government to protect Australia's biodiversity underpinned by a robust sustainable framework, strengthened legislation, action and processes.

Wildlife Health Australia (WHA) is tendering this formal submission to the drafters of the Nature Repair Market Draft Bill currently on public exhibit for comment until 24 February 2023.

WHA has a strong view that if biodiversity certificates are issued under the Act, they need to be in direct relation to rewarding private entities for their environmental stewardship to deliver benefits to biodiversity, and not as an offsets scheme that compensates the loss of biodiversity elsewhere.

Where the Draft Bill describes "a condition or requirement that relates to the measurement or assessment of the enhancement of biodiversity of native species", this needs to have clear measures that quantify specific biodiversity **outcomes**, e.g. increased population size of a threatened species or decrease in the abundance and diversity (or health) of species impacted by chemicals and the species that feed on them (e.g. birds)¹, **as opposed to** simply certifying **activities**, such as tree planting or fencing.

The methodologies and biodiversity assessment instrument should also consider targets and goals outlined in the [Kunming-Montreal Global Biodiversity Framework](#), which recognises that decreasing pressures on biodiversity can reduce risks to the health of wildlife, humans and ecosystems.

Therefore, Wildlife Health Australia regards as important the role of the Nature Repair Market Committee in endorsing the methodology required for nominated projects to meet the pertinent biodiversity integrity standards (Part 4, Division 3, section 57 applies).

This includes the Committee's responsibility to ensure that approved projects have outcomes that are **measurable** for native species and ecosystems:

Part 4, Division 2, Subdivision A – Making of methodology determinations and other sections refer, in particular, to the "measurement or assessment of the protection of biodiversity".

WHA also believes that the Draft Bill needs to ensure that outcomes of projects meriting biodiversity certificates are also monitored, assessed, and **verified** in terms of the relevant biodiversity integrity standards.

Specifically, the Committee needs to ensure that it enforces conditions requiring "a clear indication of the level of certainty of achievement of the enhancement/protection."
(Part 4, Division 3, section 57 and elsewhere applies).

¹ Stephenson, P.J. and Carbone, G. (2021). *Guidelines for planning and monitoring corporate biodiversity performance*. Gland, Switzerland: IUCN.

Where the Draft Bill describes responsibilities of the Nature Repair Market Committee to advise the Minister that they are satisfied that an assessment of a biodiversity instrument would ensure “that methodology determinations comply with the biodiversity integrity standards”, the Department and Minister need to ensure that membership of the Committee requires the highest calibre of knowledge, experience and judgement in regard to practical conservation needs of native species in Australia. (Part 4, Section 64, Subdivision D and elsewhere apply).

WHA recommends that the descriptions in the Draft Bill of the qualifications required to become a member **be varied**.

The **current** section titled Membership of the Nature Repair Committee states:

“(2) A person is not eligible for appointment as a Nature Repair Market Committee member unless the Minister is satisfied that the person has:

- (a) substantial experience or knowledge; and
- (b) significant standing;

in at least one of the following fields of expertise:

- (c) agriculture;
- (d) biological or ecological science;
- (e) environmental markets;
- (f) Indigenous knowledge relevant to the functions of the Committee;
- (g) land management;
- (h) economics.”

Having a high level of experience in agriculture and/or economics does not guarantee that the member is knowledgeable and experienced in effective management of native wildlife.

Given that Australia has the worst mammal extinction rate of any country in the world, WHA strongly recommends that the criteria for membership of the Committee be **amended to**:

(2) A person is not eligible for appointment as a Nature Repair Market Committee member unless the Minister is satisfied that the person has:

- (a) substantial experience or knowledge; and
- (b) significant standing;
- (c) demonstrated high level of knowledge and experience of relevant international standards, guidelines, assessments and peer-reviewed evidence-based science;
- (d) demonstrated high level of knowledge and experience relating to management of Australian wildlife.

in at least one of the following fields of expertise:

- (d) agriculture;
- (f) biological or ecological science;
- (g) environmental markets;
- (h) Indigenous knowledge relevant to the functions of the Committee;
- (i) land management;
- (j) economics. (refer Part 19, Division 3, Section 198(2))”

Thank you for the opportunity to provide feedback and advice on the Draft Bill. Please consider these matters very seriously in terms of:

- Tasking the Nature Repair Market Committee to ensure that approved projects are measurable and monitored, assessed and verified in terms of their outcomes for natural species and populations, and
- The requirements for membership of the Committee are updated to include international knowledge and wildlife management expertise, as listed.

Please feel free to be in touch if you would like to clarify any of these matters. Please also confirm that the matters raised herein will be utilised to update the Nature Repair Market Draft Bill.

ABOUT WILDLIFE HEALTH AUSTRALIA

[Wildlife Health Australia](#) (WHA) is the peak coordinating body for wildlife health in Australia. We host Australia's World Organisation for Animal Health (WOAH) focal point for wildlife health, nominated by the Australian Chief Veterinary Officer as Australia's WOAH Delegate, and the co-chair of the International Union for the Conservation of Nature (IUCN) Wildlife Health Specialist Group. Our Chief Executive Officer advises the WOAH on their Wildlife Health Framework and contributes a wildlife health perspective to issues involving the quadripartite of WOAH, World Health Organization (WHO), Food and Agriculture Organization (FAO) and United Nations Environment Programme (UNEP).

Its mission is to lead national action on wildlife health including welfare to protect and enhance the natural environment, biodiversity, economy and animal and human health through strong partnerships. WHA assists Australian governments as the central part of our national wildlife health system and is trusted by government and NGO stakeholders.

WHA reports to the Agriculture Senior Officials Committee (AGSOC) via the Animal Health Committee and the National Biosecurity Committee and has observer status on the Environment and Invasives Committee and the Consultative Committee for Emergency Animal Diseases. WHA is custodian of the [National Emergency Wildlife Disease Response Guidelines](#).

WHA has 40 member organisations and over 750 individual members. WHA membership operates as a network that includes government agencies including the environment, and agriculture and /or primary industries and partners from the non-government partners including universities, zoos and aquariums, private veterinarians and licenced / registered wildlife carers who are usually volunteers. WHA works with up to 120 different government and non-government agencies and organisations on a regular basis and WHA members are invariably requested to assist with any wildlife health issues occurring within Australia and Australian Antarctic Territory.

More information on WHA is available at: <http://www.wildlifehealthaustralia.com.au>.