QUEENSLAND FARMERS' FEDERATION

Discussion Paper Implementing Australia's Strategy for Nature 2024-2030

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Our members

- Queensland Fruit & Vegetable Growers
- Cotton Australia
- Canegrowers
- Greenlife Industry QLD
- eastAUSmilk
- Australian Cane Farmers Association
- Queensland United Egg Producers
- Turf Queensland
- Pork Queensland
- Australian Chicken Meat Federation
- Bundaberg Regional Irrigators Group
- Burdekin River Irrigation Area
- Central Downs Irrigators Ltd
- Fairburn Irrigation Network
- Mallawa Irrigation
- Pioneer Valley Water Co-operative Ltd
- Theodore Water Pty Ltd
- Eton Irrigation
- Lockyer Valley Water Users

About the Queensland Farmers' Federation

The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland.

Our members are agricultural peak bodies who collectively represent more than 13,000 farmers who produce food, fibre and foliage across the state.

QFF's peak body members come together to develop policy and lead projects on the key issues that are important to their farmer members and the Queensland agriculture sector.

Together, we form a strong, unified voice leveraging our effectiveness by working together to drive policy and initiatives that support a strong future for Queensland agriculture.

Submission

The Queensland Farmers' Federation (QFF) welcomes the opportunity to provide feedback on the DCCEEW's discussion paper *Implementing Australia's Strategy for Nature 2024-2030*.

We provide this submission without prejudice to any additional submission from our members or individual farmers.

Introduction

Queensland's farmers collectively manage over 80 per cent of the state's landmass and play a pivotal role in sustaining the ecosystems that underpin Australia's biodiversity, climate resilience, and food security. The long-term success of *Australia's Strategy for Nature* therefore depends on recognising and integrating agricultural landscapes, and the people who manage them, into the nation's conservation and restoration frameworks.

Farmers are not only producers of food and fibre; they are custodians of soils, water, and biodiversity, and active managers of invasive species, carbon, and riparian systems. Recognising this stewardship is essential to delivering the Strategy's vision to "halt and reverse biodiversity loss by 2030 and live in harmony with nature by 2050."

QFF supports this ambition and the alignment with the Kunming-Montreal Global Biodiversity Framework (GBF), but implementation must be practical, equitable, and compatible with the realities of working agricultural systems.

In particular, the 30 per cent conservation target must be delivered in a way that avoids intrusion on productive agricultural land, recognising that much of Australia's biodiversity is already maintained within farming systems. Conservation outcomes should be achieved through collaboration, stewardship, and co-benefits within existing land uses, not through exclusion or restrictions that compromise farm viability or food and fibre production.

QFF recommends that the implementation of *Australia's Strategy for Nature 2024-2030* must:

- Minimise intrusion on productive agricultural land to achieve the 30 per cent conservation target.

- Recognise private landholders as critical partners in delivering effective biodiversity outcomes.
- Prioritise voluntary, incentive-based stewardship approaches over prescriptive regulation.
- Ensure alignment between biodiversity and climate policies to avoid duplication and perverse outcomes for landholders.
- Incorporate farmers' expertise and active participation in national monitoring, evaluation, and reporting systems.

Key points

1. Minimise intrusion on productive agricultural land

Achieving the 30 per cent conservation target must occur in ways that avoid compulsory acquisition, land-use restrictions, or conversion of productive farmland. Much of Australia's biodiversity is already maintained within working agricultural landscapes, and this existing stewardship should be recognised and leveraged. Implementation should prioritise collaborative approaches, voluntary conservation agreements, and multi-benefit outcomes rather than exclusionary measures. Conservation initiatives must complement food and fibre production, supporting regional jobs, export competitiveness, and the long-term viability of farming enterprises.

2. Recognition of agricultural stewardship within Strategy

The Discussion Paper's outcomes for Target 1 (30 by 30) and Target 2 (Restoration) highlight the need for collaborative, multi-sectoral action. However, the contribution of production landscapes remains under-recognised. Queensland farmers invest heavily in soil health, water efficiency, gully rehabilitation, pest and weed control, riparian restoration, and carbon farming, all of which deliver tangible biodiversity benefits. The Strategy should explicitly recognise these activities within the National Other Effective area-based Conservation Measures (OECMs) Framework and ensure that agricultural land under voluntary conservation, stewardship agreements, or biodiversity plans can be formally counted toward national 30 by 30 targets.

3. Voluntary and incentive-based approaches

Achieving the Strategy's outcomes depends on "whole-of-society" participation. For farmers, engagement is strongest when measures are voluntary, flexible, and supported by clear market or financial incentives. High input costs, climate variability, and global price volatility already place pressure on farm viability, so biodiversity outcomes must complement, not compete with, food and fibre production. Stewardship programs, biodiversity credits, local conservation covenants, and rate or levy rebates should reward landholders delivering measurable public environmental benefits. Regulatory expansion without accompanying incentives risks disengagement and erosion of trust.

4. Alignment of policy instruments

Farmers experience the cumulative impact of intersecting climate, water, energy, and environmental policies. The Discussion Paper's recognition of "the interconnection between targets and enablers" is therefore critical. Implementation must align initiatives such as the Nature Repair Market, Reef 2050 Plan, Murray-Darling Basin Plan, Natural Heritage Trust, and

the forthcoming National Adaptation Plan. Without alignment, there is a risk of double-handling, reporting fatigue, and inefficient outcomes that undermine both biodiversity and agricultural objectives.

5. Data, measurement and recognition

QFF supports the emphasis on high-quality, consistent data (Enabler 3), but measuring biodiversity in productive landscapes is inherently complex. National indicators must capture the contributions of managed land, not only protected areas. Environmental accounts co-designed with farmers, linking soil carbon, water quality, and habitat metrics, can provide transparent, trusted reporting that recognises on-farm stewardship without imposing punitive consequences.

Target-specific feedback

Target 1: Protect and conserve 30% of Australia's land and sea by 2030

QFF acknowledges the ambition of the 30 by 30 target, but we stress that it must not be achieved through compulsory acquisition or conversion of productive agricultural land. Australian farmland has already declined by approximately 14 per cent over the past three decades. Further reduction would threaten food security, regional jobs, and export markets.

Rather than prioritising the *quantity* of protected areas, the focus should be on improving the *quality and management effectiveness* of existing areas, including control of invasive species, fire management, and infrastructure maintenance.

- Minimise intrusion on productive agricultural land to achieve conservation outcomes.
- Prioritise effectiveness and ecological integrity over expansion, focus on quality, not quantity.
- Recognise agricultural stewardship agreements, Land Restoration Fund projects, and voluntary conservation covenants as OECMs contributing to 30 by 30 outcomes.
- Ensure protected areas are adequately funded and actively managed to prevent pest and weed proliferation.
- Exclude compulsory acquisition or conversion of productive agricultural land to meet numerical targets.

Target 2: Priority degraded areas under effective restoration by 2030

QFF supports the intent of restoring degraded landscapes where practical, but restoration efforts must not come at the expense of agricultural production, food security, or regional livelihoods. Degraded areas often retain productive capacity that supports local economies and employment. Converting productive or semi-productive farmland into restoration zones risks diminishing Australia's export competitiveness and regional resilience.

Further, restoration requires long timeframes, significant capital investment, and substantial opportunity costs for landholders. Government programs must recognise these realities and provide appropriate resourcing and incentives.

- Avoid the conversion of viable agricultural land to restoration use unless mutually beneficial production-conservation outcomes are demonstrable.

- Recognise and integrate existing on-farm rehabilitation works (gully repair, riparian revegetation, soil carbon projects) within national reporting frameworks.
- Prioritise invasive species eradication and land degradation prevention as the most cost-effective means of restoring ecosystem function.
- Develop national restoration standards that include farm-based practices such as rotational grazing, regenerative cropping, and soil health improvement.

Target 3: Eradicate or control invasive species by 2030

Invasive species remain the single greatest threat to Australia's biodiversity, agricultural productivity, and ecosystem resilience. While the Discussion Paper identifies the importance of collaboration and biosecurity, the proposed framing around "priority landscapes" risks underrepresenting the national scale of the problem. QFF recommends that this target be reframed to commit to *national-scale control and eradication*, with prioritisation based on biodiversity value rather than geographic limitation. Queensland's producers face ongoing and escalating costs from prickly acacia, feral pigs, fire ants, and pest birds, all of which degrade native habitats and reduce farm productivity.

- Expand the target to: "Minimise the impact of invasive species on biodiversity in areas of high biodiversity value, with an ultimate objective of national eradication."
- Establish long-term, recurrent funding for coordinated pest management under the *National Biosecurity Strategy* and its Action Plan.
- Invest in R&D for emerging control methodologies such as biological controls, immunocontraception, drone-based surveillance, and genetic technologies.
- Fund the *Centre for Invasive Species Solutions* on an ongoing basis to drive innovation and application of proven technologies across species groups.
- Ensure that invasive species management in national parks and public land is undertaken in collaboration with private landholders to prevent cross-boundary re-infestation.

Target 4: No new extinctions

QFF supports the goal of preventing new species extinctions. Implementation should emphasise measurable outcomes through improved data collection, monitoring, and on-ground management partnerships with landholders. The work of Environment Information Australia (EIA) will be critical in achieving these aims.

- Prioritise accurate, transparent species data collection through EIA and regional partnerships.
- Focus initial investment on controlling invasive predators and weeds that drive the majority of species loss.
- Support the fast-tracked *Nature Repair Market* methodology for feral species control and ensure long-term funding for its uptake by landholders.

- Introduce stewardship payments or incentive schemes for farmers managing critical habitats or conducting on-ground pest control that benefits threatened species.
- Integrate farm-based monitoring programs into national biodiversity reporting to track progress transparently.

Target 5: Minimise the impact of climate change on biodiversity

QFF supports the use of *nature-based solutions* where these provide co-benefits to biodiversity, carbon sequestration, and agricultural resilience. Climate mitigation actions must not reduce the availability of productive farmland through poorly designed offset projects or vegetation conversion. Federal initiatives such as the *National Soil Strategy* and *Australian Agricultural Sustainability Framework* demonstrate constructive pathways for embedding adaptation while maintaining productivity. Policy coherence across these initiatives will be required.

- Prioritise adaptation investment in farm-scale infrastructure (shade, shelter, efficient irrigation, drought-resilient pastures).
- Limit the use of carbon or biodiversity offsets to lower-productivity lands or marginal zones, avoiding displacement of agricultural production.
- Ensure the *National Adaptation Plan* and *Net Zero 2050 Plan* explicitly integrate agricultural resilience and food security as key outcomes.
- Promote programs that support farmers to implement multi-benefit nature-based solutions (e.g., riparian revegetation for water quality and shade).

This is an emerging policy space for agriculture and presents opportunities for innovation and regional diversification. Many Queensland producers are already contributing to circularity through renewable energy generation, nutrient recycling, organic waste reuse, and low-emission technology adoption. However, the transition remains constrained by infrastructure, investment, and scale.

- Invest in regional recycling, reprocessing, and bioenergy facilities to support farm waste recovery.
- Expand and strengthen product stewardship schemes for agricultural plastics, chemical containers, tyres, and machinery.
- Recognise on-farm circular economy practices (e.g., composting, biochar production, renewable pumping systems) within national reporting.
- Ensure circularity initiatives are designed to enhance agricultural productivity and environmental resilience simultaneously.

Enablers of change

Enabler 1: Equitable representation and participation

QFF recognises the essential role of First Nations peoples in managing Country and biodiversity and supports genuine inclusion of Traditional Knowledge. Equally, agricultural producers, who manage the majority of land, must be recognised as key delivery partners in biodiversity stewardship.

- Establish regional advisory councils bringing together First Nations, agricultural, and community representatives to guide implementation.
- Support co-management models that combine Indigenous land management and agricultural production knowledge.
- Ensure decision-making bodies reflect the diversity of regional Australia, including youth, gender, and ability representation.

Enabler 2: Mainstreaming nature into government and business

Mainstreaming biodiversity into government and business decisions must simplify rather than complicate regulatory systems.

- Develop farmer-friendly assessment tools and templates to streamline biodiversity planning without requiring costly consultants.
- Encourage agri-business supply chains, processors, and retailers to co-invest in on-farm biodiversity outcomes through certification and procurement programs.
- Align environmental and planning approvals to recognise accredited industry BMP (Best Management Practice) programs as evidence of compliance.
- Ensure the Nature Repair Market is accessible to small and medium producers, with clear rules, low transaction costs, and technical support.

Enabler 3: Environmental data and Information

Data collection must build trust and provide clear benefits to participants. Many landholders are cautious that environmental data may later underpin new restrictions or land use controls.

- Co-design biodiversity data systems with farmers and ensure confidentiality protections.
- Develop *environmental accounts* that integrate productivity, soil carbon, water quality, and biodiversity metrics.
- Invest in remote sensing and citizen science platforms to reduce monitoring costs and increase transparency.
- Recognise industry-led data contributions (e.g. BMP programs, LRF projects) within national reporting frameworks.

Monitoring, evaluation and reporting

QFF supports the Discussion Paper's intent to align national monitoring with the GBF Monitoring Framework adopted at COP16.2. Indicators must capture outcomes across both protected and production landscapes. Reporting must seek to leverage existing farm data and avoid imposing new compliance layers.

- Integrate agricultural data collection systems into national biodiversity reporting where appropriate.
- Recognise the positive contributions of production landscapes, not only protected areas, in national indicators.

- Establish feedback loops so farmers can access and use biodiversity data for management decisions.
- Use the State of the Environment and GBF reporting processes to communicate the agricultural sector's contributions to biodiversity recovery.

Conclusion

QFF supports the vision of *Australia's Strategy for Nature 2024-2030* and the ambition to halt and reverse biodiversity loss by 2030. Implementation must be practical, equitable, and recognise the central role of farmers as custodians of land, water, and biodiversity. Achieving conservation and restoration outcomes should minimise intrusion on productive agricultural land, leverage voluntary stewardship, and deliver multi-benefit outcomes that complement food and fibre production.

Yours sincerely

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