



15 July 2024

Inquiry into the Nature Positive bills
c/o Committee Secretary
Senate Standing Committees on Environment and Communications
PO Box 6100
Parliament House
Canberra ACT 2600
seniorclerk.committees.sen@aph.gov.au

Dear Senate Standing Committee,

Nature Positive bills 2024 inquiry

GreenCollar welcomes the opportunity to provide a submission to the Senate's Environment and Communications Legislation Standing Committee on its consultation on the Nature Positive bills 2024 (Environment Protection Australia) Bill 2024 [Provisions] and related bills. GreenCollar is Australia's largest environmental markets investor and project developer. We believe that the best way to achieve lasting environmental outcomes is to place a value on the environment and enable markets to provide incentives and payment for sustainable land management practices and ecosystem services.

The reforms of the legislation aimed at protecting and conserving nature in Australia present a significant opportunity to improve current legislation.

GreenCollar is a member of The Australian Land Conservation Alliance and endorses ALCA's submission into this Inquiry.

GreenCollar agrees to this submission being made public.

Overall Comments

The Samuel Review found that 'Australians do not trust that the EPBC Act is delivering for the environment, for business or for the community'.

The review highlighted numerous areas of concern, including lack of transparency as to:

- how (and what) information is collected and incorporated into decision-making
- allegations of non-compliance with the Act.

GreenCollar supports the Samuel Review recommendations as to transparency. Similar recommendations were made in the Chubb Review and our experience in environmental markets is that transparency is vital in building credibility and trust with stakeholders and communities.

Release of the National Environmental Standards planned under stage 3 of this legislative reform should be expedited to provide clarity on how nature positive outcomes will be achieved and assessed. There are aspects of the National Environmental Standards planned under stage 3 that are critical to understand how the legislation will operate to protect the environment and improve environmental outcomes.

Climate Trigger

GreenCollar supports the introduction of a climate trigger to ensure the impacts of climate change on biodiversity are a triggering process and that emissions from new projects will be regulated under the EPBC Act.

Nature Positive (Environment Protection Authority) Bill 2024

In line with the general comments above about trust and transparency, GreenCollar supports an EPA that is transparent in its decision making and independent of government.

Nature Positive (Environment Information Australia) Bill 2024

As a science-based organisation, GreenCollar welcomes the establishment of Environment Information Australia to improve environmental data management, monitoring and evaluation. All organisations and businesses working to improve environmental outcomes need access to high quality, reliable, accurate data which is central to evidence-based decision making.

As has been pointed out by many others, the definition of nature positive would benefit from inclusion of baseline and target years. These targets would be supported by:

- a measured baseline,
- a timeframe,
- a target,
- a clear set of actions to be carried out costed and sequenced,
- an analysis of how these actions will achieve net gain, and
- regular monitoring and disclosure of progress towards our goal.

As identified in the Samuel Review, we require an effective framework to support a comprehensive, data-driven evaluation of Nature Positive Bills to assess their effectiveness.

Thank you again for the opportunity to provide a submission to the Committee regarding the Nature Positive bills 2024.

GreenCollar looks forward to continuing to engage with the Government, Parliament and the Committee to enhance Australia's environmental law reform agenda.



Yours sincerely

Nerida Bradley
Chief Impact Officer

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