

IGR & Wellbeing Frameworks Unit  
Treasury  
Parkes ACT, 2600  
By email: [MeasuringWhatMatters@Treasury.gov.au](mailto:MeasuringWhatMatters@Treasury.gov.au)

Level 3 329 Collins Street  
Melbourne Victoria 3000

[info@alca.org.au](mailto:info@alca.org.au)

ABN 80 637 680 310

26 May 2023

Dear Measuring What Matters team,

**RE: Submission to second Treasury consultation on Measuring What Matters**

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a submission to the second Measuring What Matters consultation regarding the development of environmental indicators for Australia's wellbeing budgets. Also enclosed is ALCA's earlier submission of 30 January 2023 on the first Measuring What Matters consultation.

Please note that ALCA is happy for this submission to be published in full.

## Recommendations

ALCA iterates its recommendations on environmental indicators as provided in its January 2023 submission to the first 'Measuring What Matters' consultation<sup>1</sup>.

In relation to the emerging policy themes and draft descriptions:

1. ALCA strongly recommends that the description of the theme entitled 'Sustainable' should be amended as follows:

“A natural environment that is valued, **protected** and sustainably managed ~~in the face of a changing climate~~ for current and future generations.”

As a related amendment, ALCA strongly recommends the following change to the first description against the 'Sustainable' theme:

“A healthy natural environment for current and future generations, ~~protected from the damage being caused by climate change~~.”

The 2021 State of the Environment Report identifies that climate change, whilst a significant threat, is but one of many significant causes of the escalating decline in our natural environment. Indeed, whilst “*climate change is increasing in importance as a direct and indirect driver of biodiversity loss*”, to date, “*the intensive use and extraction of resources from land, fresh water and oceans has dominated the loss of biodiversity and the deterioration of ecosystems globally*”<sup>2</sup>.

The current wording imperfectly implies that climate is the only significant threat, or that the nature crisis should be contemplated as a subset of the climate crisis. However, the 2021 State of Environment Report demonstrates that land use change (land clearance) and invasive species are, for example, more dominant impacts with much greater immediate threat to

<sup>1</sup> As enclosed; also available at: <https://alca.org.au/alca-submission-to-treasurys-measuring-what-matters-consultation/>

<sup>2</sup> State of the Environment Report 2021; see: <https://soe.dcceew.gov.au/biodiversity/outlook-and-impacts>

biodiversity than climate change<sup>3</sup>. ALCA believes that by incorrectly implying that climate change is the only significant pressure facing the environment, policy makers will be inclined to believe that acting on climate change will be sufficient to avert the nature crisis, when evidence demonstrates that this will not be enough. The nature crisis is a standalone – as well as interconnected – challenge facing Australia.

2. ALCA strongly recommends that the following indicators (as detailed in the January 2023 submission) would slot under the description “*A healthy natural environment for current and future generations*”:

As leading indicators:

- The proportion of Australia’s lands (including freshwater) that are Protected Areas
- The proportion of Australia’s seas that are Protected Areas<sup>4</sup>

As sub-indicators:

- i. The proportion of Protected Areas on land by IBRA bioregion<sup>5</sup>
- ii. The proportion of Protected Areas on sea by marine bioregion<sup>6</sup>
- iii. The IUCN Red List Index of Threatened Species for Australia, as per the OECD indicator, which “*shows trends in overall extinction risk for species, and is used by governments to track their progress towards targets for reducing biodiversity loss*”<sup>7</sup>
- iv. The extent of remnant native vegetation in Australia<sup>8</sup>

3. ALCA recommends that the following indicator (as detailed in the January 2023 submission) would slot under the description “*A society that values the social, cultural and economic significance of our natural environment*”:

- Access to green space, namely, the relevant OECD indicator: “*the share of the urban population with access to recreational green space within 10 minutes’ walking distance from their home*”.

4. ALCA recommends that the following indicator (as detailed in the January 2023 submission) would slot under the description “*A society that sustainably uses our natural resources, on track to reach to net zero emissions*”:

- The relevant OECD indicator, namely, “*the tonnes of CO<sub>2</sub>-equivalent per capita emitted by Australia*”<sup>9</sup>, as per Australia’s National Greenhouse Accounts<sup>10</sup>.

<sup>3</sup> Ibid; see: Figure 25 ‘Prevalence of threats to Australian threatened taxa’;

<https://soe.dcceew.gov.au/biodiversity/pressures/threats-and-key-threatening-processes>

<sup>4</sup> Modelled on SDG indicator 15.1.2; see: Goal 15, Sustainable Development Goals, Department of Economic and Social Affairs, United Nations; <https://sdgs.un.org/goals/goal15>

<sup>5</sup> Interim Biogeographic Regionalisation for Australia; see: DCCEEW, <https://www.dcceew.gov.au/environment/land/nrs/science/ibra>

<sup>6</sup> See: DCCEEW, <https://www.dcceew.gov.au/environment/marine/marine-bioregional-plans>

<sup>7</sup> See: International Union for Conservation of Nature; <https://www.iucnredlist.org/assessment/red-list-index>; aligns with SDG indicator, 15.5.1

<sup>8</sup> National Vegetation Information System (NVIS); see: DCCEEW, <https://www.dcceew.gov.au/environment/land/native-vegetation/national-vegetation-information-system>

<sup>9</sup> Aligned with SDG indicator 13.2.2; <https://sdgs.un.org/goals/goal13>; and the Australian Institute of Health and Welfare: <https://www.aihw.gov.au/reports-data/indicators/australias-welfare-indicators/environment/environment>

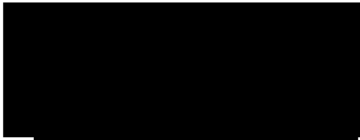
<sup>10</sup> See: DCCEEW, <https://www.dcceew.gov.au/climate-change/emissions-reporting/tracking-reporting-emissions>

Thank you again for the opportunity to contribute to the Treasury's second consultation on 'Measuring What Matters'.

ALCA and its members look forward to ongoing engagement with the Treasury to ensure that the condition of our environment and its impact on Australians is adequately measured and reported.

If you have questions regarding the 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**  
**Chief Executive Officer**  
**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 fifteen members are:

- Australian Wildlife Conservancy
- Biodiversity Conservation Trust NSW
- Bush Heritage Australia
- EcoGipps
- GreenCollar
- Greening Australia
- Landcare Australia
- Nature Foundation
- 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 3 million square kilometres with more than 4,000 landholders. We have over 70,000 supporters and our combined annual turnover exceeds \$280 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.