

21 October 2025

Australian Academy of Science submission on *Implementing Australia's Strategy for Nature 2024-2030*

Australia's Biodiversity Strategy and Action Plan for Nature 2024-2030 (the Strategy) should be a critical step in aligning our national biodiversity outcomes with the Global Biodiversity Framework (GBF). Unfortunately, in its current form the Strategy lacks operational clarity, legislative foundations and scientific rigour necessary to achieve its stated objectives.

The Academy recommends that the Strategy implementation plan:

- Establish a national biodiversity monitoring program to measure progress toward the 2030 and 2050 GBF commitments.
- Set targeted research priorities and an associated investment framework sufficient to enable Australia to meet its GBF targets.
- Action the recommendations from the Samuel Review of the Environmental Protection and Biodiversity Conservation Act 1999 (the EPBC Act), especially the commitment to legally-enforceable National Environmental Standards.
- Elevate freshwater ecosystems in equal standing with other ecosystems within the Strategy.
- Set interim quantified milestones towards Australia's GBF targets.

[Establish a national biodiversity monitoring program as a key enabler of the strategy](#)

Monitoring is not a secondary function of environmental data management, but crucial to evidence-based biodiversity policy and accountability. Australia's monitoring of biodiversity, collection of data, and data curation and standards are inadequate for environmental decision-making and in pressing need of reform. A national biodiversity monitoring program is needed to track progress toward the 2030 and 2050 GBF goals and quantified interim milestones, providing support and accountability at local, regional and national levels.

Directly aligned to GBF targets 1-23, this program would enable measurable indicators and provide transparency and comparability across multiple jurisdictions. Establishing a national biodiversity monitoring program underpins the Strategy's monitoring, evaluation and reporting framework.

[How will Australia prioritise, fund and coordinate biodiversity research?](#)

Achieving our national targets, including restoration, invasive species control and climate adaptation will require new research and innovation. Long-term ecological baselines for management, freshwater ecosystem recovery and impact modelling remain underfunded and poorly coordinated. Without explicit research directions aligned to the quantitative national targets, the Strategy runs the risk of being aspirational rather than actionable. The GBF aims to coordinate parties to strengthen research, build capacity and technology transfer to support the targets. The proposed Strategy's failure to link the implementation plan to its actions, targets or outcomes undermines its credibility and feasibility.

[Include legislative reform in the Strategy implementation](#)

The Samuel Review of the EPBC Act provided a clear roadmap for reform to strengthen environmental governance, improve transparency, and introduce legally enforceable national environmental standards. Whilst the government has supported the recommendations of the Samuel Review in principle, legislative reforms have not yet passed, leaving Australia's legislative framework misaligned with the Strategy's objectives and the GBF's requirements for accountability and compliance.

Legislative reform must be recognised as a key enabler in the Strategy, meriting equal consideration with data access. Without statutory authority for monitoring, reporting, and performance evaluation, the Strategy lacks enforceability and will not drive measurable change.

Freshwater biodiversity must be explicitly recognised and monitored

Rivers, wetlands, and groundwater (freshwater) systems are among the most threatened ecosystems globally. These systems are vulnerable to key threatening processes and human induced stressors such as water extraction, pollution, invasive species and climate extremes. The biodiversity loss in these systems is occurring at twice the rate observed in terrestrial and marine ecosystems. Freshwater biodiversity must be explicitly recognised and monitored with distinct targets, indicators and specific actions to safeguard them, in line with the GBF holistic approach to ecosystem integrity.

Clear direction and interim quantitative milestones are needed

Australia holds the scientific expertise and capacity to provide a strategy with clear direction, measurable outcomes, legislative authority and sustained investment in monitoring. The current proposed Strategy implementation plan fails to establish interim milestones aligned with the GBF's 2030 timeline. This lack of clarity leaves the Strategy to become merely descriptive, without defined timelines and quantifiable outcomes. Without defined interim targets or timelines, monitoring meaningful progress toward 2030 and 2050 goals will be impossible.

To discuss or clarify any aspect of this submission, please contact Lauren Sullivan, Manager Policy at science.policy@science.org.au.