

# New Forests' Comments on Australia's Strategy for Nature Discussion Paper

## 15 October 2025

## Introduction

New Forests appreciates the opportunity to provide feedback on Australia's *Strategy for Nature* ("Strategy") discussion paper *Implementing Australia's Strategy for Nature 2024-2030*. New Forests, founded in 2005, is a global investment manager focused on nature-based real assets and natural capital strategies. We manage a diversified portfolio of sustainable timber plantations and conservation areas, carbon and conservation finance projects, agriculture, timber processing, and infrastructure. We aim to generate shared prosperity for our clients and the communities in which we operate and accelerate the transition to a sustainable future. In 2022, we launched New Agriculture to expand our portfolio in the global sustainable agriculture transition. We have almost AUD 12 billion in assets under management across 4.3 million hectares worldwide.

Please find New Forests' responses to the discussion paper consultation below. Thanks for your consideration, and we look forward to future opportunities to contribute to both the development and implementation of the *Strategy*.

## General comments

- Detailed implementation mechanisms, data, metrics, and timelines are critical to achieve targets.
  - We believe the outcome descriptions are too brief, vague, and unspecified to allow for substantive commentary on either their comprehensiveness or associated barriers to their achievement. Each outcome needs clear, science-based benchmarks and timelines to better assess its potential contribution to achieving its associated target.
  - Aggregating data at the national level should be central to the *Strategy*, and incorporating existing data into future consultations may help rectify stakeholder concerns over information availability. Acknowledging the hyperlinks to associated policies and programs, if key target estimates, data, or metrics are available, however, it will benefit stakeholders to see these in the discussion paper rather than referencing multiple resources to decipher the scope and scale of each target and outcome.
- Effective policy and regulatory environments are critical to achieve targets.
  - Establish clear roles and responsibilities for all Commonwealth, state, and territory governments while clearly articulating the intersections and interactions among the constellation of national strategies, policies, programs, and regulations under the 'umbrella' *Strategy*.
  - Increase opportunities for stakeholders to co-design plans and processes across all levels of government through varied engagement opportunities.
- Investments in climate mitigation and nature are critical to achieve targets.
  - Increase engagement with investors, industry, and associations, such as the Investor Group on Climate Change, Responsible Investment Association Australasia, the National Farmers Federation, and the Australian Forest Product Association, and align mechanisms to achieve *Strategy* targets and outcomes with economic incentives wherever possible.
  - Clearly articulate opportunities within the ACCU Scheme and Nature Repair market across all targets and relevant outcomes, as they provide critical economic incentives for scaling capital investment.
- Communication, learning, and information feedback loops are critical to achieve targets.
  - Leverage knowledge and experiences from existing compliance and voluntary carbon and emerging nature markets into development of the *Strategy* implementation plans.
  - As soon as possible, provide diverse stakeholders with opportunities to contribute to the development, refinement, and distribution of actional implementation plans.

## Monitoring, evaluation, and reporting

- The discussion paper provides limited information on how protection and restoration will be accurately measured and monitored. Tangible measurements, targets, and monitoring protocols are critical to achieve outcomes.

- Measurement and monitoring costs must be primary considerations throughout *Strategy* development and implementation. Stakeholder engagement provides opportunities to develop implementation plans that are accessible and affordable across diverse groups, biomes, and ecosystems.
- Set clear roadmaps for mandatory nature-related disclosure and align the *Strategy* with International Sustainability Standards Board (ISSB) and Task Force for Nature-Related Disclosures (TNFD) reporting frameworks and the Networks for Greening the Financial System (NGFS) guidelines for nature risk assessments.

## Targets and enablers

	Do the 'outcomes' in the discussion paper represent the main areas where action should be focused to achieve this target or enabler of change? If not, what additional outcomes will support us to achieve this target or enabler of change?	Are there any barriers to achieving this target or enabler of change? If yes, what solutions do you suggest for overcoming these barriers?	Are you or your organisation already taking action to contribute to achieving this target or enabler of change? If yes, please provide further information on the action you are taking.
Target: Protect and conserve 30% of Australia's landmass and 30% of Australia's marine areas by 2030	<p>Quality, not just quantity, is critical for nature protection and restoration. Protected and conserved areas must be well managed.</p> <p>Working lands play a critical role in nature protection, restoration, connectivity, and climate resilience and should not be impacted by or excluded from 30 by 30 activities.</p>	<p>Poorly managed reserves can exacerbate environmentally damaging conditions including wildfire and invasive species.</p> <p>Investment and economic incentives must be clearly defined, accessible, and aligned.</p> <p>The government should implement financial incentives for private landowners to conserve new areas (e.g., via covenants) and maintain the conservation of existing areas (e.g., via methodologies under the Nature Repair Market). For the latter, however, a key barrier is lack of demand.</p>	<p>Yes, our investment and management strategies include protection and restoration of nature within and surrounding the assets we manage. Where appropriate, we permanently set-aside areas to protect high conservation value ecosystems and biodiversity. We consider biodiversity indicators, ecological representativeness, and connectivity while also partnering with First Nations communities, organizations, and individuals.</p>
Target: Priority degraded areas are under effective restoration by 2030	<p>It is not clear what defines a "priority" degraded area. Are these ecosystems with low representation left?</p>	<p>Need financial incentives for private landowners to undertake restoration activities.</p>	<p>Yes, New Forests and New Agriculture operate through investment and management strategies in regenerative and sustainable agriculture that include areas prioritised for degradation. Our projects include swamp and wetland rehabilitation and replanting</p>

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			with indigenous / native vegetation.
Target: Eradicate or control invasive species in priority landscapes and further minimise their introduction by 2030			Yes, New Forests and New Agriculture work with local and national organisations to fund, support, and implement projects that protect ecosystems and biodiversity from invasive species.
Target: No new extinctions	Clearly articulate the intersections of this target and its associated outcomes to other targets within the <i>Strategy</i> (e.g. invasive species).	Requires improved data, monitoring, and threat management.  Investments in data collection and infrastructure, Indigenous knowledge, species and habitat monitoring, and new technologies will be critical to achieve this target.	Yes, New Forests' investment and management strategies include protection of sensitive and threatened species. We have launched long-term biodiversity improvement programs focusing on threatened species that integrate new detection technologies and management techniques to maintain habitat connectivity.
Target: Minimise the impact of climate change on biodiversity	Support, incentivise, and scale-up nature-based solutions that provide multiple co-benefits, including carbon sequestration, nature protection, and climate resilience.  Clearly articulate the intersections of this target and its associated outcomes with the opportunities presented by the ACCU Scheme and Nature Repair Market.	Investment and economic incentives to scale-up nature-based solutions will be critical to achieve this target.	Yes, we strive to reduce the impact on biodiversity and climate change in the assets we manage globally. We have carbon removal and impact targets which include the enhancement and protection of biodiversity. We have several case studies of our positive impact on climate and nature.
Target: Increase Australia's circularity rate and reduce pollution and its impacts on biodiversity by 2030	Recognising that the enablers of change cut across targets and outcomes, there is likely a	Economic incentives for consumers, products, organizations, and supply	Yes, New Forests sees forests and agriculture as central to a sustainable circular bioeconomy

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	larger public awareness and educational component necessary to achieve this target than is currently represented within the proposed outcomes.	chains will be critical to achieve this target.	transition. We work along our value chains to invest in circular manufacturing infrastructure, reusing waste, and optimising resource use.
Enabler of change: Ensure equitable representation and participation in decisions relating to nature, particularly for First Nations peoples	Incentivise climate and nature investments in First Nations peoples, organizations, and communities and those organizations in partnership with them.		New Forests is committed to First Nations leadership and knowledge-sharing, and we partner with First Nations and indigenous groups globally. In Australia, we have partnered with First Nations organizations and communities in land management and through governance processes, most recently associated with developing a Reconciliation Action Plan.
Enabler of change: Mainstream nature into government and business decision making, including in financing, policies, regulations and planning processes		Interoperability and alignment of data standards and systems will be critical to achieve this target.  Transparency in governance and decision-making processes will be critical to achieve this target.  Efficient and accessible communication processes are critical to achieve this target.	Yes, New Forests is engaged in frontier-building work in natural capital accounting alongside partners that include TNFD, the Nature Positive Initiative, and the International Sustainable Forestry Coalition, among others. More broadly, sustainability and impact are foundational to New Forests' governance, investments, and operations.
Enabler of change: Ensure environmental data and information are widely accessible and support decision-making	Within or in addition to the proposed outcomes, clearly articulate the opportunities for and importance of diverse stakeholder engagement in both ensuring data are accessible and contributing to high-quality information	Interoperability and alignment of data standards and systems will be critical to achieve this target.  Transparency in governance and decision-making processes will be critical to achieve this target.	New Forests has developed partnerships with scientific and community groups to enhance biodiversity monitoring and data availability. Through group associations and memberships, we contribute to data infrastructure and

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	systems to support decision-making.	Efficient and accessible communication processes are critical to achieve this target.	accessibility initiatives, and we integrate new technologies into our management systems and practices.