



The Hon. Murray Watt
Minister for the Environment and Water
PARLIAMENT HOUSE
CANBERRA ACT 2601

13 February 2026

Re: Submission on the National Environmental Standards (Matters of National Environmental Significance) 2025

Dear Minister,

I am writing out of concern about the limited scope of the exposure draft of the National Environmental Standard (Matters of National Environmental Significance) 2025, to offer reflections based on extensive on ground experience endeavouring to protect core endangered species habitat in public native forests, and to strongly support the recommendations made in the submission by the Environmental Defenders Office. This letter has been included in a submission to the public consultation process.

Aligning with International Commitments

Recommendation: The Objectives of the Standard should include ‘satisfying Australia’s obligations to meet international commitments’.

As currently drafted, the National Environmental Standard (the Standard) will fail commitments made by Australia under the Convention on Biological Diversity when it adopted the Kunming-Montreal Global Biodiversity Framework (K-M GBF) and the Paris Agreement.

For example, Goal A of the K-M GBF is to protect and restore the integrity, connectivity and resilience of all ecosystems and halt and reverse human induced extinctions and safeguard the adaptive potential of ecosystems and species. The Goals of the K-M GBF are underpinned by 2030 targets, including:

- *“Ensure that all areas are under participatory integrated spatial planning and/or effective management processes addressing land and sea use change to bring the loss of areas of*

high biodiversity importance, including ecosystems of high ecological integrity, close to zero by 2030..." (Target 1).

- *"Ensure urgent management actions to halt human induced extinction of known threatened species and for the recovery and conservation of species...to significantly reduce extinction risk, as well as maintain and restore the genetic diversity within and between populations ...to maintain their adaptive capacity..." (Target 4).*

UNFCCC [COP 28 CMA para 33 on the Global Stocktake](#) recognised the importance of aligning climate action in land, forests and other ecosystems with the K-M GBF and ending deforestation and forest degradation by 2030.

Landscape planning as per K-M GBF Target 1 is needed in order to implement targets 1-8 of the K-M GBF, including restoration (Target 2) and protection (Target 3) and to meet Australia's COP 28 commitments. Revised protection and restoration targets are needed for all ecosystems in order to improve their resilience and ability to resist threats that are increasing with climate change, which can also best be met through landscape planning envisaged in Target 1 of the K-M GBF.

The impacts of climate change and urgency of fostering adaptive capacity for all ecosystems and species was elaborated in [CBD 16/22](#). National Environmental Standard must help deliver this imperative on the ground.

Australia's obligation to meet international commitments should be included in the Objectives of the Standard. Further, the Standard should pay heed to the importance of protecting and restoring ecological integrity, connectivity and genetic diversity for the survival, recovery and resilience of all species and the provision of high-quality ecosystem services, including carbon retention.

The Samuel Review

Recommendation: The Standard must ensure that the protection and recovery of all listed threatened species and ecological community are supported by actions, decisions, plans and policies that use the best available information and data to identify habitat, important populations and condition thresholds.

The Standard has far more discretion than intended by the Samuel Review, which called on the government to develop and implement management arrangements that address cumulative impacts and other threats to support the recovery of listed species and ecological communities. Actions should be consistent with recovery and threat abatement plans and ensure decisions reflect conservation advice. The best available information to assess habitat, species populations and condition thresholds should be required by the Standard as recommended by the Review.

Critical habitat

Recommendation: Remove the words '*including critical habitat of [protected matter 1, 2 and 3] where the habitat is irreplaceable and necessary for a threatened species to remain viable in the wild*' from the Threatened species, Ecological communities and Migratory species (Item 1, 2 and 3) Objectives for protected matters table.

Recommendation: There should be no significance threshold for the habitat of listed threatened species.

All habitat used by threatened species is essential to the survival and recovery of individuals, populations and entire species. This includes current habitat, but also future habitat that will be recolonised once populations recover and expand. The Standard cannot seek to recover threatened species without protecting, conserving and recovering all occupied and future habitat.

The Standard stipulates that '*Habitat, including critical habitat of the listed threatened species where the habitat is irreplaceable and necessary for a threatened species to remain viable in the wild, is protected, conserved and restored to support the survival and recovery of the threatened species. Protection and recovery actions support the viability of threatened species in the wild.*' This same wording is used for Ecological communities and Migratory species.

It is unclear why the objective quickly narrows its focus by introducing "critical habitat" as an additional qualifier, after already referring broadly to habitat. This is made more confusing by using the qualifying phrase: '*where the habitat is irreplaceable and necessary for a threatened species to remain viable in the wild*'. Arguably, all habitat used by threatened species is irreplaceable and necessary for their viability in the wild. The inclusion of this condition is redundant at best, and at worst, invites a narrow interpretation of this objective.

The use of the word 'irreplaceable' when talking about the habitat of threatened species, ecological communities and migratory species, is unnecessary for the purposes of the Standard and will likely prove difficult to define or apply consistently. The use of this word is also conflicting with the new definition of 'critical habitat' which states:

(4) Habitat is critical habitat for a listed threatened species or listed threatened ecological community if the habitat is necessary for one or more of the following:

(a) activities such as foraging, breeding, roosting or dispersal;

(b) the long-term maintenance of the species or ecological community (including maintenance essential to its survival);

(c) the maintenance of genetic diversity and long-term evolutionary development;

(d) the reintroduction of populations or the recovery of the species or ecological community.

Notably, this definition does not require habitat to be irreplaceable, so why would the Standard?

Although the revised definition of critical habitat is no longer so rigid, there are still legitimate concerns about using it in the Standard. Before the EPBC reforms, critical habitat was defined by a formal register of habitat, containing just five locations – the most recent entry was included in 2005. There is no certainty that the new definition of critical habitat will be used correctly or effectively. The Standard should focus on the need to protect, conserve and restore habitat without muddying this requirement.

The importance of Climate Change

Recommendation: The Standard must adequately protect source populations and connectivity pathways for listed threatened species.

The 2015 Samuel Review pre-dates increasing understanding of the two-way interactions between biodiversity loss and climate change. It is important that the new Standard responds to this new knowledge ([Young et al \(CBD\) 2025](#); [Young et al \(UNFCCC\) 2025](#)). It would be negligent in the extreme if the Standard does not result in the identification, protection and recovery of climate refugia and connectivity pathways that enable all listed species to repopulate across their natural range and maximise their capacity to adapt to climate change ([Bradby et al. 2023](#); [Mackey et al. 2023](#)).

For example, after the 2019/20 fires, environmental consultants commissioned by the NSW EPA made the following recommendations: that logging cease for 20-100 years in all areas of unburned and lightly burned forest; for connectivity/dispersal pathways be identified and protected from logging; and that logging intensity elsewhere be reduced by 50% to give wildlife populations a chance to recover from the devastating impact of the fires ([Austeco 2020](#)). Since then, source populations for recovery have been identified, largely by citizen scientists, but remain unprotected from logging ([Wilderness Australia 2023](#); [Forest Alliance NSW 2024](#); [Wilderness Australia 2026](#)).

This is now critically important in forests where past logging disturbance and climate change now interact to increase the severity of threats like drought and fire that are already increasing with climate change ([Wilson, Bradstock & Bedward 2022](#); [Bushfire Report 3, 2021](#)).

The Standard must ensure that source populations for listed species are protected from all forms of human disturbance and that recovery plans identify and protect connectivity pathways. Development must support recovery plans and avoid core habitat.

Native forests

Recommendation: The Standard must ensure that threatened species habitat in RFA regions is protected, conserved and restored in the same way it is in non-RFA regions. The Timber Fibre Strategy must not influence the Standard and how it applies to logging in native forests.

New tools, scientific knowledge and increased scientific capacity in local communities have repeatedly demonstrated that current logging prescriptions and regulatory frameworks governing logging in native forests have failed to protect, let alone foster recovery, of listed species. ([Samuel 2020](#); [Wilderness Australia 2023](#); [Yahoo!News 2025](#); [Wilderness Australia 2026](#); [NEFA 2026](#); [The Guardian 2026](#)).

We welcomed the announcement that the Government would remove the previous exemption of logging in Regional Forest Agreement (RFA) regions from environmental laws and standards. We were alarmed and dismayed however, when the Government also announced that it would guarantee the future of native forest logging by adopting the Australian Timber Fibre Strategy (TFS) ([Press conference 27 November 2025](#), [Doorstop 1 December 2025](#), [Media Release 27 November 2025](#)).

The TFS ignores the robust body of scientific evidence demonstrating the adverse impact of logging on the health of forest ecosystems and their ability to both resist and adapt to threats that are increasing with climate change. New knowledge emphasises the importance of concurrent climate and biodiversity action to protect and restore the stability and resilience of forest ecosystems ([Young et al \(CBD\) 2025](#); [Young et al \(UNFCCC\) 2025](#)).

It is important to ensure that the TFS does not pre-empt the promised revision on National Forest Policy nor influence National Environment Standards and how they apply to logging in native forests.

Comments made by the Prime Minister and yourself, about the expected impact of removing logging exemptions from the EPBC on the native forest sector of the timber industry are alarming and suggest a profound lack of awareness of the depth of the problems logging has had and continues to have for the integrity and resilience of forest ecosystems and wildlife.

It has been decades since any federal minister spent time with conservation experts in the forests to understand the depth and breadth of the problems now being faced. I'm sure you would be welcome to spend time with conservation scientists in the forests at any time and extend an open invitation to you to visit people on the ground doing the governments' job of finding and endeavouring to protect, core habitat for threatened species.

Sincerely,



Virginia Young
Director, Wilderness Australia



Aila Keto
President, ARCS

Signed on behalf of:

**ACF Community
Forest Alliance Victoria** 
Independently organised ACF group

**ACF Community
Melbourne NxNW** 
Independently organised ACF group

