# NRM Regions Australia submission on the Restoration Contributions Calculator methodology

October 2026

NRM Regions Australia welcomes the opportunity to make a submission on the proposed methodology for calculating restoration contributions charges under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) reforms.

Regional Natural Resource Management (NRM) organisations operate as vital bridges between national environmental policy and local, on-ground action. The regional NRM network supports landholders, Indigenous communities, and local industries to manage landscapes sustainably.

While we support the intent of the Restoration Contributions Scheme (RCS) to streamline environmental offsets and deliver strategic environmental outcomes, the calculator methodology must accurately reflect the practical realities of implementing a new scheme, and delivering long-term restoration at a landscape scale. This submission outlines five core points that warrant attention, along with specific recommendations.

NRM Regions Australia welcomes the opportunity to further discuss these issues.

1. **Factoring in the 'infrastructure' costs of supporting landholder participation in the Restoration Contributions Scheme**

   The success of the Restoration Contributions Scheme will likely require widespread, active participation from private landholders. Securing landholder engagement in and uptake of environmental markets such as the RCS is not passive nor cost-free, particularly in the current environment when we already know that landholders report confusion around the multiple offers made by various market players, including for carbon and biodiversity offsets. Successful landholder engagement requires robust extension from trusted, impartial sources (such as regional NRM organisations) with standing capability and capacity on environmental markets, advisory services from (often multiple) trusted, independent experts with detailed technical understanding of environmental markets, and extension systems and operational

support infrastructure that is coordinated with clearly defined roles and responsibilities for the actors involved.[1, 2, 3, 4]

Without this enabling infrastructure, landholder participation in the Restoration Contributions Scheme is likely to be significantly limited.

NRM RA recommendations:

We recommend that the RCS calculator methodology explicitly account for the operational costs of the 'infrastructure' required to support the scheme's extension and outreach services, in particular enabling trusted outreach organisations (such as regional NRMs) to provide support to landholders in their decision-making to participate in the RCS, and throughout their participation. For example, this might be done through:

- Incorporating an explicit 'Delivery Infrastructure & Extension Component' into the calculator's cost model, separate from administrative overheads.
- Setting aside dedicated funding to support the capability and capacity of local extension staff, technical advice networks, and landholder support systems necessary for running the RCS.
- Linking where possible through to other existing extension and environmental markets infrastructure, to avoid costly and confusing duplication.

## 2. Enabling and valuing co-benefits

Restoration interventions commissioned through the RCS provide opportunity to deliver multi-attribute outcomes though co-benefits. The potential for the RCS to enable strategic restoration at scale only amplifies this opportunity. In turn, focusing strictly on protected matters misses key opportunities for the RCS to contribute to restoration projects that also enable landscape resilience, agricultural productivity, carbon sequestration, and socio-economic benefits for First Nations and other communities.

NRM RA recommendations:

We recommend that the calculator methodology:

- Embed a Co-benefits Scoring Framework (or similar) into the Restoration Contributions framework to help assess projects and enable decision-making that

[1] Remarkable NRM (forthcoming). A review and analysis of landholder extension and outreach programs for environmental markets. A report for the Environmental Markets Participation Initiative. NRM Regions Australia, East Melbourne. Report funded by DCCEEW.

[2] Pearse, R., Rogers, T., and Whittle, E. (forthcoming). Bridging policy, practice and place: A systems view of extension and outreach in environmental markets. A report for the Environmental Markets Participation Initiative. NRM Regions Australia , East Melbourne. Report funded by DCCEEW.

[3] Schirmer, J. (forthcoming). Landholder segmentation for environmental markets extension and outreach. A report for the Environmental Markets Participation Initiative. NRM Regions Australia, East Melbourne. Report funded by DCCEEW.

[4] Evaluation and Sustainability Services (forthcoming). Outreach and extension theory of change for environmental markets. A report for the Environmental Markets Participation Initiative. NRM Regions Australia, East Melbourne. Report funded by DCCEEW.

delivers multiple environmental and social outcomes. The Queensland government's Land Restoration Fund's approach to co-benefits could provide a useful starting point.

- Where appropriate and possible, support and enable the participation of First Nations cultural knowledge, land management, and employment opportunities when commissioning restoration actions.
- With appropriate additionality safeguards, consider ways that RCS funding can be invested to leverage and extend existing restoration efforts and compound landscape benefits.

### 3. Embedding feedback loops and market signals

NRM RA acknowledges that as a new scheme, the RCS will begin with price assumptions based on limited pricing information and that will inevitably diverge over time from real-world delivery costs, land values, and supply-chain pressures. Without dynamic adjustments, the calculator risks misaligning charges with actual delivery costs, and potentially under-pricing.

As such, feedback loops that ensure market signals are regularly incorporated into the calculator will be critical.

**NRM RA recommendations:**

- Establish regular, formal cost update cycles driven by actual contracting and participation data.
- Implement a transparent review mechanism that adjusts calculator inputs based on localised market signals and regional price variations.
- Provide opportunity for expert review of cost-data performance and input into periodic calculator recalibrations.

### 4. The need for a cautious and conservative approach to pricing, and implementation, that reflects the full costs and risks of delivery

Under-pricing restoration contributions creates a significant risk of funding shortfalls relative to the real-world, escalating costs of on-ground restoration and long-term land management. For example, current inflationary pressures, including through the cost of fuel, are likely to be having significant impacts on the current cost of restoration work. Importantly this can happen *during* the delivery and implementation of the restoration project, putting the project at risk. It could also be driven by the presence of the RCS itself, particularly if it is focused on a particular type of offset with a relatively small range. Landholders with the targeted matter(s) of national significance (MNES) on their land may raise their price expectations in anticipation of an offer through the scheme.

As such, NRM RA supports a cautious and conservative approach to the pricing and implementation of the RCS that accounts for the likely full costs and risks of delivery, and for the potential for the cost of land with targeted MNES to increase faster than land without it.

**NRM RA recommendations:**

- Apply a conservative baseline cost structure during the initial rollout phase, aimed at providing high certainty of achieving restoration outcomes, and accounting for potential market volatility and inflation.
- Ensure that the costs of delivering both restoration and protection, and associated risk of delivery, are built into the calculator, including where permanent protection is to be required as part of the approval.
- Include realistic contingency margins within the calculator that reflect site complexity, remote access challenges, and climate risks.
- Consult with state-based offset schemes wherever possible - but particularly during this initial implementation period - to feed in relevant offset pricing signals.
- Consider establishing a scheme-wide contingency fund or insurance scheme, to buffer against unexpected barriers to delivering the required restoration outcomes and/or reversals.

## 5. Ensure clear and transparent strategic allocation of the RCS

The consultation paper identifies that in some instances restoration contributions will be pooled to deliver strategic restoration. NRM RA supports the framework enabling the RCH to pool contributions and deliver strategically targeted restoration work.

However, it is NRM RA's view that strategic use of the RCS needs to be supported with clear objectives and transparent decision-making. The decision-making framework guiding the strategic use of restoration contributions should identify how the RCH will determine, for example:

- the circumstances in which pooling contributions produces a better ecological outcome;
- restoration priorities (including the alignment with the restoration priorities identified in regional NRM plans);
- geographic priorities (where and at what scale in the landscape these strategic restoration actions should occur);
- how sites and projects are selected;
- how to balance competing demands between protected matters;
- how to consider co-benefits; and
- how to retain the relationship between individual contributions and the strategic restoration they fund.

**NRM RA recommendations:**

To assist in the clear and transparent strategic allocation of restoration contributions, NRM RA recommends:

- the RCH develop with stakeholder input an overarching restoration framework that sets out the priorities for restoration, principles for allocating the contributions, criteria for selecting sites, strategies for restoration, principles for selecting delivery partners, and the required outcomes to be measured;
- strategic investment decisions be informed by priorities identified in existing evidence-based and community-informed planning documents, including the relevant regional NRM plans, and conservation planning instruments and evidence, including species recovery needs, threatened ecological communities, landscape connectivity, climate resilience and national biodiversity priorities;
- the framework clarifies how the proposed national restoration framework, the Strategy for Nature and other nationally agreed restoration and conservation priorities will guide RCH investment decisions;
- the framework clarifies when and how RCH investment can be used in conjunction with other public and private funding to achieve strategic restoration, and
- the Restoration Contributions Advisory Committee has a clear role in advising on and periodically reviewing strategic priorities.

**About NRM Regions Australia**

NRM Regions Australia is the national peak body of the 54 regional natural resource management (NRM) organisations which cover the whole of Australia. Our members plan, partner, and deliver projects and programs that support healthy landscapes, vibrant communities and productive primary industries.

Regional NRM organisations were established across the country 25 years ago to ensure national coverage for environmental restoration and sustainable land management issues. The regional NRM approach has enabled governments to move beyond ad hoc environmental investment by providing the foundations for integrated land management planning and project delivery. The regional NRM model ensures there are skilled, independent professionals in place across the country working with local stakeholders to develop strategic NRM plans that reflect the local environment, and social, cultural and economic contexts to ensure the right projects are delivered in the right places to achieve landscape restoration and resilience. Regional NRM organisations efficiently deliver practical, integrated, on-ground environmental and land management projects to restore nature, promote sustainable agricultural industries, and support economies and communities to thrive.

Thank you for the opportunity to provide this submission. We would be happy to discuss these points further. Please direct enquiries to NRM Regions Australia CEO Marnie Lassen at marnie@nrmregionsaustralia.com.au or Dr Mat Hardy mat@nrmregionsaustralia.com.au.