



FOKE • P.O. BOX 584 • GORDON 2072 • TEL (02) 9416 9007
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2024 - Celebrating 30 years of Caring for Ku-ring-gai

26 November 2025

Friends of Ku-ring-gai Environment (FOKE) welcomes the opportunity to provide feedback on the Independent Pricing and Regulatory Tribunal NSW (IPART) [Monitoring the Biodiversity Credits Markets, Discussion Paper – 2024-25 Biodiversity Market Monitoring Review – 30 October 2025.](#)

FOKE is a community-based environmental advocacy group, established in 1994 to protect Ku-ring-gai local government area (LGA) – one of Greater Sydney's last remaining strongholds of endangered ecological communities with its rare, urban remnant forests.

Ku-ring-gai is a biodiversity hotspot, surrounded by three national parks (Ku-ring-gai Chase, Garigal, and Lane Cove) and retains significant remnants of carbon-rich urban forests, wildlife corridors, and habitats for unique species including the powerful owl, grey-headed flying fox, and multiple threatened birds, frogs, reptiles and insects.

The biodiversity Ku-ring-gai is now under serious risk with the NSW Planning System Reform Bill 2025 and other policies including the State Significant Developments, Transport Oriented Development (TOD) and Low to Mid-Rise Housing SEPPs..

These, when implemented, will dangerously threaten Ku-ring-gai's critically endangered Blue Gum High Forest and Sydney Turpentine-Ironbark Forest ecosystems.

We urge IPART to reject the NSW *Biodiversity Credits Market* because they have failed to halt NSW's extinction crisis.

As such, FOKE strongly opposes the NSW biodiversity offsets scheme because they are:

1. “fundamentally flawed”. They fail to deliver genuine conservation outcomes. One environmentally sensitive area cannot be replaced by an equivalent “offset”. How can Ku-ring-gai’s Blue Gum High Forest and Sydney Turpentine-Ironbark Forest be replaced by offsets, when it is unique to Ku-ring-gai? As well there are serious issues relating to the transparency of managing stewardship sites such as Sheldon Forest.
2. Duplicitous. They provide ways for developers and the NSW government to avoid proper on-site protection. They allow environmentally damaging projects to be pushed through when they should never have been approved in the first place.

It is time that the failed NSW biodiversity credits market be abandoned. They utterly fail NSW's biodiversity.

Yours faithfully,

Kathy Cowley

Kathy Cowley
PRESIDENT

cc Mayor and councillors, Ku-ring-gai Council
cc General Manager, Ku-ring-gai Council
cc Matt Cross MP, Member for Davidson
cc Penny Sharpe, NSW Minister for the Environment
cc NSW Shadow Environment Minister c/o – Shadow Leader Kellie Sloane MP
cc Nicolette Boele MP, Member for Bradfield

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