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Date of submission: Thursday, 6 July 2023

Your submission for this review:

I am a consultant ecologist. I am concerned that some Threatened Ecological Communities and associated Plant Community Types have not generated biodiversity credits to offset clearing. This is in situations where these TECs are variously very rare, localised, on very expensive land. In Wingecarribee Shire, cases include Robertson Rainforest, Robertson Basalt Tall Open-forest, and Southern Highlands Shale Woodland TECs. All three suffer from extensive clearing and fragmentation, small remnant patch size, and high land values. Permits for clearing of these TECs continue to be granted by consent authorities, primarily Council, despite there not being any (to my knowledge) like-for-like offsets available in the market. This tends to see developers having to buy notional credits from the BCT, or being allowed to buy credits from deemed-similar or higher value equivalents. This results in net decline in these TECs, contrary to the objectives of the BC Act and the BOS. The SAIL status of these TECs does little to stop the process from what I have seen of it. The situation is worsened when consent authorities and Planning Panels don't understand the BOS and its limitations. We have a situation where the TECs continue to be cleared under the BOS, but no truly equivalent credits are available, and prospects for generating them are very constrained. There are very few patches of some of these TECs that are large enough and sufficiently intact to warrant being set aside for credit generation. I think this situation generates a limitation of the BOS and perhaps a market failure that warrants regulatory change.