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Your submission for this review:

Please see attached for comments. Comments made represent both individual experiences as an accredited assessor / Ecologist, as well as a local government employee working within the space of the Biodiversity Offset Scheme.

IPART Issues Paper Review - Biodiversity Credit Market

Question for Comment	Comment
1. What contribution should the biodiversity credits market make to achieving the Biodiversity Offsets Scheme's purpose?	<ul style="list-style-type: none"> • It should ensure that there is a confirmed no net loss of biodiversity values through appropriate land conservation agreement to maintain the diversity and quality of biodiversity.
2. Do the outcomes in Table 3.1 accurately depict a well-functioning biodiversity credits market? What other factors should we consider?	<ul style="list-style-type: none"> • Remove the variation rules. • Require Species Credit Species to be offset with credits of that species within the same IBRA Region offset requirements as per the Ecosystem Credits. • The market should provide discounted rates where local offset lands have been secured. • Liquidity – where a landholder cannot sell credits through the market due to their scarcity, the Taskforce should purchase these credits to ensure active management can be triggered (only where credits have not sold within e.g. 3 years). • Prices – credit price should also reflect SAI entities and threatened status. • Transparency – there is clear understanding of the market and how to navigate it for credit sellers and credit buyers. Currently, it is not very clear what the processes are.
3. What are the main challenges facing the credits market? What evidence is there that might suggest the market is not working as effectively as it should be?	<p>The main challenge is ensuring the integrity of the market remains whilst also ensuring a no net loss of value occurs. There is evidence that the current market is not working as identified in the NSW Audit Office audit on the effectiveness of the Biodiversity Offset Scheme (BOS), which identified 9% of ecosystem credits and 4% of species credits demand could be match with existing supplies on a like-for-like basis.</p>
4. What published information would help you buy or sell credits in the market more efficiently?	<p>A live list of available credits and in-demand credits, along with credit values to determine project viability.</p>
5. Have you used a broker to buy or sell credits? Tell us about your experience.	<p>No.</p>
6. How clear are the biodiversity credits market rules and objectives? Is there appropriate oversight of brokers and other intermediaries?	<p>The complexity of the offset scheme and credit market make it difficult to freely navigate. There is currently a lack of clarity on the rules when attempting to understand the potential viability for establishing a Biodiversity Stewardship Agreement. There are also not enough skilled professionals working in the brokerage space to assist landholders in understanding the market and its viability.</p>
7. What other information should we consider to tell us how the market is performing?	<p>An indicator to identify if certain credits or species are likely to become scarce soon based on previous trade history and threatened status could be useful in understanding the shift in the market and regions.</p>
8. What affects your decision to enter a Biodiversity Stewardship Agreement? If you have inquired or applied, but not proceeded with an agreement, tell us why.	<p>Initial enquiries are currently being undertaken. Deciding factors on pursuing a BSA include:</p> <ul style="list-style-type: none"> • Clarity in the process. • Understanding if it is likely to be economically as well as environmentally viable. • Understanding future land use implications, including in perpetuity maintenance requirements. • Determining if the Total Fund Deposit could provide a reasonable management fund for long term management.
9. Have you wanted to terminate or vary an Agreement, or sell land under a Biodiversity Stewardship	<p>NA</p>

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Question for Comment	Comment
Agreement? What were the reasons?	
10. Have you found you could not sell credits at the price you need to manage your land under your Biodiversity Stewardship Agreement?	NA
11. Do you have unsold credits under your Biodiversity Stewardship Agreement? Are you confident you will have adequate funding to carry out management actions under your agreement?	NA
12. Have you found it difficult to find credits in the market? What were the reasons?	NA
13. Have you decided not to proceed with a development because credits were too expensive or not available?	NA