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OBJECT

Submission ID: 216580

Organisation: N/A	Key issues: <i>Other issues</i>
Location: <i>New South Wales 2578</i>	
Attachment: N/A	

Submission date: 11/21/2024 10:45:30 AM

I wish to add to my earlier submission but noting that the proponent relies on the Biodiversity Offsets Scheme to purchase credits for biodiversity values that would be destroyed by the proposal. One of the credit types is for Eucalyptus macarthurii. I am a NSW DCCEEW registered expert on this species. My concern is that to the best of my knowledge, there are no credits available for this species, and it is unlikely that credits will become available because most occurrences of this species are on freehold land that is already cleared for pastoralism or other conservation-incompatible uses, or is within State Forest or Council bushland reserve. These areas and tenures can't be used to generate credits through a Biodiversity Stewardship Agreement because they are variously too degraded, too small, or are otherwise not available for that purpose. This means that any credit purchases for this species, and also any for Southern Highlands Shale Woodland TEC - which is one of two main local habitats for it - are unlikely to result in like-for-like offsets. Instead, the fee for those credits will likely go to the Biodiversity Conservation Trust and remain with it and never be used as intended. I don't believe this (or any other) proponent that relies on buying notional credits for this species can achieve a like-for-like outcome. However, if the trees on the subject land are definitely plantings, not remnants, then the better outcome would be to ensure that the species is a) planted on the site at a 3:1 ratio to those cleared as long as this does not conflict with considerations such as bushfire safety; b) equivalent plantings secured on one or more other properties subject to legal protection so that the plantings are to be maintained in perpetuity. Some Councils have a tree removal offset scheme of this nature that is unrelated to the BOS. Some, such as Campbelltown Council, require payments at a published price per tree removed, and at a particular offset ratio that see the developer fund permanent plantings on Council-owned or managed land where such plantings would otherwise not happen due to lack of funding. This may be a suitable option in this case if amenable to Council.

In relation to other BOS credits that are required for this project, I suggest that the Commission satisfy itself that those credits are available in the market before accepting the claim that habitat removal will simply be offset by credit purchases.