

SYDNEY COASTAL COUNCILS GROUP Inc.
PO Box 999, Manly NSW 1655
Email: info@sydneycoastalcouncils.com.au
Web: www.sydneycoastalcouncils.com.au
ABN: 39 638 876 538



Reference: 056-22 JM

Friday, 25 November 2022

Independent Pricing and Regulatory Tribunal
PO Box K35
Haymarket Post Shop
NSW 1240

Re: Draft terms of reference for IPART to monitor the NSW Biodiversity Credits Market

Dear Sir/Madam,

Thank you for the opportunity to make a submission on the [draft terms of reference](#) for IPART to monitor the biodiversity credits market.

Strategic Alignment

The Sydney Coastal Councils Group (SCCG) is a regional organisation of councils, established in 1989 to promote collaboration among member councils on environmental issues relating to the sustainable management of the urban coastal and estuarine environment. The group comprises nine councils adjacent to Sydney marine and estuarine environments and associated waterways and represents nearly 1.3 million Sydneysiders. We are guided by the SCCG's 2019-2029 Strategic Plan which includes six goals which are highly relevant to the draft terms of reference:

- People and places adapt to a changing climate and future shocks and stressors
- Waterways and the foreshore are protected and healthier
- Marine biodiversity is protected in the bioregion
- The SCCG Region is comprised of sustainable, livable and 'smart' cities
- There is a collaborative, effective and consistent approach to coastal and estuarine management
- SCCG is trusted and respected to make representations that reflect the values of its members

The SCCG understands that the Minister for Customer Service has directed IPART to monitor the NSW biodiversity credits market for the next three years. The biodiversity credits market is used by landholders, developers and the Biodiversity Conservation Trust to offset the unavoidable impacts of development or clearing on biodiversity through the trading of like for like credits.

Terms of Reference setting out the scope for IPART's new marketing role. Comments are invited from stakeholders about whether IPART's role has the right focus.



Sutherland Shire
COUNCIL



INNER WEST



WAVERLEY
COUNCIL



Bayside Council

northern
beaches
council



WILLOUGHBY
CITY COUNCIL
City of Diversity



Randwick City Council
a sense of community



Our Comments

The SCCG has reviewed the Terms of Reference and makes the following comments.

The continuation of the biodiversity credits market is an important component of the Biodiversity Offset Scheme and the continuing protection and conservation of biodiversity.

The SCCG wishes to highlight the importance of finding offsets to biodiversity impacts in the local setting within which the impacts on biodiversity are occurring. This emphasis would result in better conservation outcomes for individual ecological communities, as well as improved biodiversity outcomes as a whole.

I trust that the feedback provided above will be helpful in finalising the Terms of Reference. I also wish to note that the SCCG did not receive direct notification about the invitation for comment on IPART's Terms of Reference although the SCCG has responded on a range of IPART matters for consultation over recent times. The SCCG is a key industry body for Local Government, representing its member councils who have an expectation that the SCCG will coordinate advocacy on their behalf. It would be greatly appreciated if the SCCG could be added to your distribution list via info@sydneycoastalcouncils.com.au for all future communications to your stakeholders.

In addition, the lack of direct contact as well as the short time frame for response has only provided a limited opportunity to consider the Terms of Reference.

If you have any queries, please contact me on 0407 733 075 or by email at executiveofficer@sydneycoastalcouncils.com.au

Yours sincerely,



Sarah Penny Joyce
Executive Officer



Sutherland Shire
COUNCIL



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