

17 December 2025



Environment Institute
of Australia and
New Zealand Inc.

The Hon. Penny Sharpe, MLC
Minister for the Environment
New South Wales
Via online contact form
cc: IPART – 2025 review of the NSW Biodiversity Offset Scheme

Re: Environmental Industry recommendations to strengthen the NSW Biodiversity Offsets Scheme and market integrity

Dear Minister,

On behalf of the Environment Institute of Australia and New Zealand (EIANZ) Biodiversity Offsets Community of Practice (Offsets CoP), I write to continue our constructive engagement with DCCEEW on improving the design and function of the NSW Biodiversity Offsets Scheme (BOS), particularly the Strategic Offset Delivery Agreement (SODA) framework.

The Offsets CoP currently represents approximately 85 NSW accredited assessors within their respective companies – approximately 30% of the ~300 registered consultant Accredited Assessors. Our practitioner network operates at the coalface of the NSW BOS, working with landholders, developers, the Biodiversity Conservation Trust and regulators. We are committed to a scheme that delivers credible biodiversity outcomes, investment confidence and market integrity.

PURPOSE AND OPPORTUNITY

The purpose of this submission is two-fold: to outline key operational aspects of the BOS that are directly impacting efficacy and market participation, and to provide recommended solutions to address these issues in partnership with Government.

Our submission is framed by IPART's ongoing review of the NSW Biodiversity Offset Scheme, which provides a timely opportunity to refine operational settings and strengthen market confidence. We believe the issues we have identified – relating to transparency, procurement processes, and governance – are solvable through targeted improvements that align with Government's objectives for an efficient, trusted offset system.

KEY CONCERNS

Our key concerns include:

- Conflicts of interest relating to the various NSW DCCEEW roles within the BOS, where Government operates simultaneously as regulator, price-setter, buyer, seller and credit creator



- Government involvement in the biodiversity credit market, including operation of SODAs and SODA-style reverse auctions, where pricing signals are often capped or unclear and published selection criteria are not always reflected in outcomes
- Lack of transparency around Government operations and processes, particularly regarding procurement evaluation, award outcomes, and end-to-end traceability of biodiversity obligations

These concerns are grounded in direct practitioner experience and have been validated through IPART's recent findings, which identified that unclear rules, high transaction costs, information asymmetry and pay-in options are impeding market participation and suppressing efficient pricing.

PROPOSED PARTNERSHIP APPROACH

In summary, our key recommendations include:

- Restoring market pricing and transparency through clear procurement protocols, published award outcomes, and improved governance processes (including SODAs)
- Improvements to credit registers, credit transaction processes and reduced fees, supported by streamlined processes that would significantly reduce Government processing time and cost
- Establishing independent oversight through a Market Integrity Unit to build confidence and ensure procurement probity

The attached technical submission provides comprehensive detail on these recommendations, along with a practical, staged implementation roadmap developed in three phases: immediate (0–6 months), near-term (6–12 months), and medium-term (12–24 months).

INVITATION TO CO-DESIGN

We believe these refinements represent constructive enhancements that align with Government's intent for a transparent, efficient and trusted offset system. They are not criticisms of the Scheme's objectives, but rather practical improvements informed by daily operational experience.

The Offsets CoP would welcome the opportunity to co-design a SODA Procurement Framework with DCCEEW and the BCT that embeds these principles in practice, and to consult more directly on any of our proposed recommendations. We stand ready to collaborate on solutions that deliver better biodiversity outcomes at lower public cost with higher market integrity.

Thank you for your continued willingness to engage with industry. We would be pleased to brief your office on these matters at your earliest convenience.

Yours sincerely,



Environment Institute
of Australia and
New Zealand Inc.

Dr Amanda Griffith
Chair
EIanz Biodiversity Offsets Community of Practice
The Environment Institute of Australia and New Zealand



Environmental Industry Recommendations to Strengthen the NSW Biodiversity Offsets Scheme and Market Integrity

1. PURPOSE

The EIANZ Biodiversity Offsets Community of Practice (CoP) has serious concerns around the operation and integrity of the Biodiversity Offsets Scheme (BOS).

The purpose of this submission is two-fold:

1. To outline and highlight key operational aspects of the BOS that are directly impacting the efficacy and eroding market participation/landholder confidence in the BOS
2. To provide recommended solutions/measures to address these issues.

Our key concerns include:

1. Conflicts of Interest relating to the various NSW DCCEEW roles within the BOS
2. Government involvement in the biodiversity credit market including operation of Strategic Offset Delivery Agreements (SODAs) and SODA-style reverse auctions.

Central to each of these concerns is a lack of transparency around Government operations and processes. This document outlines each key concern and provides recommendations to address them.

Key recommendations include:

1. Restoring market pricing and transparency and improvements to Government governance/operational processes (including SODAs)
2. Improvements to credit registers, credit transaction processes and reduced fees (which would be supported by improved processes significantly reducing Government processing time and cost).

2. CONFLICTS OF INTEREST

NSW DCCEEW currently operates across all areas of the BOS such that it is difficult to understand how there is no potential for actual or perceived conflict of interest. Concerns to date regarding the processes and various roles the Government has in the BOS have been discussed in detail in *Independent Pricing and Regulatory Approval [IPART] Summary of stakeholder workshops - Biodiversity*



Credits Market monitoring review 17 October 2024. Key issues raised include potential conflicts of interest with respect to various roles within the scheme (namely creating, approving, regulating and buying and selling biodiversity credits) as well as implementation of credit procurement processes that have reduced landholder participation and confidence in the scheme.

NSW DCCEEW is currently responsible for:

1. Creation of the Biodiversity Assessment Method (BAM), which continues to undergo multiple technical changes (which can impact the market), and BOS
2. Review role of Biodiversity Development Assessment Reports (BDARs) for State Significant Development (SSD) and State Significant Infrastructure (SSI) projects
3. Creation of credits through development of offset sites
4. Approval and regulation of offset (stewardship) sites and credits generated
5. Establishing and maintaining credit registers relating to credit supply, demand, and transactions (noting that these registers are spread across multiple locations, contain errors, and are generally not user-friendly)
6. Setting the ‘ceiling’ price of credits and issuance of Developer Charge Quotes/credit price estimates (via the Biodiversity Conservation Fund; BCF)
7. Buying and selling of credits (purchasing credits via the BCF, both purchase and sale of credits via the Credit Supply Fund; CSF)
8. Delivery of SODAs on behalf of CSSI project proponents (which may include all of the above).

Agencies may buy, sell and set prices while also establishing BSAs. The following practitioner observations highlight concerns around conflicts of interest that are directly impacting the operation and/or confidence in the BOS:

1. We have seen **differences in treatment** of ‘internal’ BSAs (prepared by the Planning, Offsets and Threatened Species and Ecosystems division; POTSE) compared to ‘external’ BSAs (consultant accredited assessors), e.g. a perception of much lower standards/expectations for ‘internal’ BSAs; and faster approval timeframes.
2. **Assessment cost asymmetry.** Government bearing the cost of development of offset sites the Government is facilitating through the CSF. The cost recovery, which was initially required, was removed. Landholders establishing BSAs through the CSF have assessments arranged without equivalent out-of-pocket costs, creating significant price advantages over private (external) proponents.
3. **Market price ceiling dynamics.** Publishing a single but inaccurate (and not-compliant with the Charge Order) price from the BCF risks creating a focal price that feeds back into the charge calculation and trends downward over time, dampening supply incentives—consistent with



IPART's concern that pay-in suppresses market pricing. Changes to section 6.31 of the *Biodiversity Conservation Act 2016* (BC Act) further weaken what the BCF is required to deliver when it takes on a biodiversity credit obligation. The BCF does not need to meet the full credit obligation, only to utilise the funds paid in, in an attempt to meet the credit obligation. Further, the BCF has expanded access to the variation rules. There also does not appear to be a formalised feedback loop to correct BCF pricing (which acts as a price ceiling in the market), should credit costs be identified as being higher than BCF pricing, or close to BCF pricing (say within 10%). This induces a downward price impact that is perverse to inflation affecting costs.

4. **Lack of equity in access to BCF credit pricing** disadvantaging credit suppliers. Lag in publishing BCF Charge Quotes means current BCF credit pricing provided to a developer is often not available to credit suppliers. Credit suppliers also do not have the option of paying for a BCT price estimate should they wish.
5. **Credit purchases influenced by other Government program objectives** other than price e.g. fulfilment of Total Fund Deposit (TFD). The CSF Tender states fulfilment of TFD may influence procurement outcomes, and we are aware of situations where cheaper credits offered for purchase have not been acquired in CSF tenders. We believe that this is related to other Government program objectives regarding conversion of offset sites into 'active management', which occurs when a TFD reaches 100%. Fulfilment of TFD should not be relevant to market purchases. This penalises credit holders who have been in the market for longer and undermines confidence for all sellers about the ability to sell credits in the future and achieve anticipated returns from the site.
6. The recent CSF Auction (September 2025) was not a 'tender'/'reverse auction' but rather a 'regulated managed (capped) price offer'. Credits sought through the Credit Supply Fund tenders were subject to ceiling pricing imposed by the CSF (to allow for cost recovery) thus removing the ability for the market to dictate pricing (detailed further below).
7. **Lack of transparency** leading to uncertain credit procurement/transaction processes. During the current CSF reverse auction process (September 2025), the CSF came to market requesting prices for any and all credit types in NSW – no known quantities of credits were disclosed. Subsequently a Biodiversity Offset Scheme update issue 43 (published 12 November 2025) stated:

"Over 215 credit types available from the Supply fund auction.

Over 215 credit types have been approved for purchase... The department will seek buyers for the approved credits for the next six months."

With this the Department have set themselves up as being a broker in the biodiversity credit market, given that they have sought pricing and will then seek buyers. There is no transparency about what the CSF margin or markup on any credit transactions will be. It is also unclear what processes were used to determine which credits were "*approved credits*" to be offered for purchase. For credits to be created they must already go through a formal approval process, so what does the terminology of "*approved credits*" mean in practice? Furthermore, will this



market price sensitive data be passed to other government agencies and be used to inform the SODA cost delivery model, without this having been disclosed to parties providing prices?

8. The operation of the biodiversity credit market is severely hampered by **poor credit registers and transaction processes**. Credit registers are currently on different platforms, difficult to work, contain errors and omissions, do not contain details for past sales as to whether these were open market, arrangement commercial or TFD only. It also fails to comply with 6.21(5) of the Act by not including prices when credits have been retired without being first traded. High credit transaction fees and paperwork, with a lack of a standard credit transaction agreement, which significantly increases legal fees, do not facilitate sellers and proponents reaching direct sale agreements. Improvement to these fundamental tools would significantly improve the direct operation of the biodiversity credit market and significantly reduce the need for government intervention.
9. Transparency and governance processes with clear separation of market functions (we provide recommendations below) is essential. We unequivocally believe that the Government should step away from trading biodiversity credits. The impact of the Government involvement in the market is detailed below.

3. GOVERNMENT INVOLVEMENT IN THE BIODIVERSITY CREDIT MARKET

This section focuses specifically on the operation of SODAs and SODA-style reverse auctions, as these mechanisms are now central to delivering large-scale infrastructure offsets. With a few targeted improvements, SODAs can become a powerful delivery instrument that drives supply, reduce reliance on variation rules, and restore confidence across the market.

Recent experience with the Central-West Orana REZ reverse auction indicates that the published weighting of selection criteria (price primacy with location as a consideration) was not consistently applied in practice, with location within the REZ area effectively overriding price. Proponents incurred significant costs to meet eligibility on the basis that cost-per-credit would rank bids, only to find that location was determinative. This approach introduces uncertainty, elevates costs, and risks undermining confidence in market processes. These practical concerns align with IPART's findings that unclear rules, high transaction costs and information asymmetry impede participation and reduce market confidence. Our key criticisms, observations and recommendations are detailed below.



Recommendations

1. Ensure clear and consistent assessment rules

Feedback from recent reverse auctions, including those associated with the Central West Orana Renewable Energy Zone (CWO REZ), indicates a disconnect between the published rules and procurement decisions. While the Participants Guide clearly ranked price as the primary competitive criterion (as it should), in practice location preference within the REZ appeared to override price competitiveness entirely.

We believe that the NSW Government should use the BOS geographic trading rules and only include geographic policy priorities in exceptional circumstances. The CWO REZ Reverse Auction was not one that should be considered exceptional as this meets what the market and BOS were established to address.

Undisclosed weighting and variations to the BOS trading rules undermines investor confidence and introduces sovereign risk signals that deter capital.

We recommend:

- Price should be weighted above all other factors. If the Department wish to impose other weightings (noting that we advise against this) they should apply them transparently, with such rules being clearly advised well before a tender is conducted, and such rules applied as stated in documentation.
- TFD status of suppliers should not be considered a selection criterion.
- Post-award disclosure of scoring outcomes should be mandatory (e.g. prices, location criteria applied) within 30 days
- Disclose all credits purchased and the prices paid on a biodiversity credit register to provide transparency to all within the market, both proponents and landholders. Clarity on prices paid and the price differential between use of a SODA and proponents negotiating with landholders directly should also be made clear by the Department.
- To increase Biodiversity Stewardship Sites in specific geographic areas, or to meet other conservation objectives, the credits generated on these sites should be increased relative to Sites outside these areas. With price being the determining factor, this would allow the market to reduce prices in these regions and therefore increase supply from these regions. However, sites that may achieve efficiencies of scale elsewhere could still seek to participate in credit tenders. This would require an amendment to the BC Act, which would take time, but would also be transparent as well as encourage conservation in the specific geographic areas of interest.



*We consider that adoption of this recommendation will reduce ambiguity, improve trust and align SODA procurement with **best-practice probity and value-for-money principles**.*

2. Fix timing barriers to supply to ensure better environmental outcomes

Currently, SODA timelines clash with the 18–24 month BSA establishment lead times, and do not guarantee that the Government can supply like-for-like solutions, often forcing them into otherwise avoidable variation pathways (such as procuring offsets under the variation rules).

We recommend:

- Introduce pre-SODA credit procurement or allow SODAs to be executed prior to project approval.
- SODAs should be a last resort option for developers particularly for credits available in the market. This will give the market time certainty and procurement visibility to invest in new BSAs, and by improving supply and market efficiency will ensure the best cost outcome for participants.
- Make it compulsory for project proponents to include offset obligations on the BOS Credit demand register and to negotiate with any parties that make contact in good faith, for a specified time period prior to having access to a SODA.
- Release an annual SODA Procurement Schedule by OTG/species and region
- Run regular quarterly micro-tenders to address ongoing supply gaps
- Introduce payment time standards—final settlement within 60 days to improve liquidity

We consider that the adoption of this recommendation will unlock supply, thereby reducing reliance on variation rules, and lowering the long-term cost of offsets. These steps align with IPART's diagnosis that high transaction costs, information gaps and timing lags impede participation and suppress efficient pricing. Note that the NSW Government has a mandatory 'Faster Payment Terms Policy' that is mandatory and with which the payment to Small Businesses (which includes almost every credit supplier) has to be made within 5 business days.

3. Restore market signals and pricing confidence

The BOS is intended to be market-based, yet SODA outcomes are often opaque, and price discovery is weak. Credits sought through the Credit Supply Fund tenders (on behalf of SODAs) are subject to ceiling pricing imposed by the CSF (to allow for cost recovery), thus removing the ability for the market to dictate pricing. The recent CSF Auction was not a 'tender'/'reverse auction' but rather a 'regulated managed (capped) price offer'. The result is uncertainty and inefficient capital deployment—an outcome



also highlighted by the IPART Biodiversity Credits Market Monitoring Report 2023–24, which warns that unclear rules and government market intervention continue to suppress market function.

We recommend:

- Disclose and publish clear rules on SODA pricing and processes
- Publish SODA Award Summaries: OTG, region and actual individual credit purchase prices
- Clarify how SODA results interact with BCF charge settings to avoid reinforcing artificial price ceilings and allow for self-regulating market pricing.

This recommendation will avoid location-based outcomes that distort price competition and undermine the BOS's intended design. This shifts SODAs from being "black box" procurements to trusted market signals.

4. Preserve price discovery and value-for-money

SODAs should signal scarcity and value rather than embed reference ceilings. Practitioners remain concerned that public charge prices can create focal points which flow back into future charge calculations, dampening supply incentives.

We recommend:

- Anchor SODA selection to competitive price ranking within the eligible area, with transparent and detailed award disclosures (credit purchase price, volumes, locations) within 30 days.
- Where the State acts as buyer, publish method notes on how SODA outcomes inform (or don't inform) BCF charge calibration, to avoid inadvertent price ceilings.
- Where location is determinative (although we do not support this outside the BOS trading rules), communicate that beforehand and then maximise competition on price within that subset.

IPART's monitoring underscores that pay-in options and opaque procurement can suppress market development and pricing signals; SODAs are a lever to reverse that dynamic.

5. Operate SODAs as catalysts for supply, not substitutes

To reduce reliance on variation and support net-positive objectives, SODAs should pull forward supply.

We recommend:



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- Pilot credit futures for high-scarcity OTGs/species within REZ footprints, allowing staged delivery with verified milestones.
- Enable offset banking with modest uplifts for early supply to reward, pre-emptive restoration or protection aligned to REZ requirements. This could be achieved by creating a policy and financial framework that encourages early biodiversity credit creation before demand peaks (such as before a Renewable Energy Zone project receives DA approval). Currently, the BOS tends to be reactive — credits are only created once a development triggers demand. That leads to supply shortages, inflated prices, and overreliance on BCT variation. We note that this would also be consistent with proposed changes currently being discussed to the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) for advanced offsets. Offset banking could work as follows:
 - DCCEEW establishes a “Biodiversity Credit Bank” under BOS, allowing landholders to bank approved credits linked to priority REZ OTGs/species.
 - Participants who create verified supply before the REZ offset window opens receive:
 - A modest financial uplift (e.g., 10-15% credit premium), or
 - Priority tender access in Credit Tenders and Reverse Auctions.
 - When REZ-related demand arises, these “banked” credits are drawn down first — ensuring like-for-like outcomes without delay.
- Use price competition, rather than location preferences that can be perceived as changing the rules.
- There is no clarity as to whether a landholding on which ‘other conservation actions’ are implemented will be recognised on land title (as for BSAs) and therefore provide those landholdings with a benefit for assessment should they enter a BSA process at a later date.

This approach is consistent with the BOS and Commonwealth reform intent and supports a transition to clearer, more predictable procurement.

6. Improve transparency and governance

Confidence follows transparency. Currently, market participants cannot trace how SODA and BCF acquisitions satisfy biodiversity obligations. That gap needs to close.

We recommend:

- Involving Accredited Assessors. The current roll-out of SODAs has not included Accredited Assessors; no operational practice notes have been issued to Accredited Assessors to enable understanding and communication with relevant stakeholders. Accredited Assessors should be fully briefed on SODAs, and their role in these processes should be made transparent.



- Establish a SODA Ledger that links procurement outcomes to environmental obligations.
- Publish delivery status (contracted, in-progress, retired) to support accountability.
- Separate the delivery of SODA outcomes from the agency which reviews and approves BSAs. Furthermore, any BSA prepared by the government should be separated out into a separate agency or external body of accredited assessors to that which undertakes the review and approval process (addressing Conflict of Interest issues).
- Create a Market Integrity Panel to independently review procurement design, probity and fairness. IPART's market monitoring points to these transparency and confidence gaps. We suggest that a Market Integrity Panel is formed by IPART, given that this agency has already been reviewing the biodiversity credit market. We strongly believe that a panel which is completely independent to the Government agency tasked with delivery is crucial. All reports by the Market Integrity Panel should also be made publicly available.

We feel these recommendations do not introduce administrative burden; they simply embed credibility.

4. OPERATIONAL PAIN POINTS IMPACTING EFFICACY OF THE BOS

Key operational aspects of the market operation of the BOS that represent common pain points for practitioners and market participants, and recommendations to address these are detailed below.

Market transparency and transaction reform

While there have been improvements in large-scale delivery, the broader credit transaction environment remains too opaque, too slow and too expensive. The current credit transfer process is very complex, time consuming and costly (legal engagement for sale and purchase agreements, onerous administration associated with Credit Transfer documentation) leading to smaller obligations being paid into the BCF. Improving this process would facilitate market purchases, better support BSA holders, ensure like-for-like biodiversity outcomes are being met, and reduce the BCT's offset obligation.

The system would benefit from reforms that make transactions simpler, faster and more transparent for all participants — particularly smaller buyers and regional landholders. The following recommendations would result in lower transaction friction and improved market participation; faster settlements and better cashflow certainty for landholders; and increased liquidity and data-driven price transparency. A professional, scalable trading environment aligned with the Government's integrity objectives.

We recommend:

1. Build a modern Credit Supply and Demand Register

Expand the existing public register into a live, searchable market platform showing:

- Available credits (including 'equivalence' BBAM credits), active demand, recent trades and indicative price bands.



- Filters by PCT, species, OTG, IBRA subregion and seller type.
- Ensure regular updates and validation to maintain data accuracy and investor confidence.

This reform would increase price transparency, reduce information asymmetry, and allow both developers and landholders to plan with confidence.

2. Introduce proportional transaction pathways

Develop a tiered transaction model based on deal value and risk:

- Under \$50,000: simplified, low-cost pathway with minimal documentation.
- \$50,000–\$250,000: intermediate due diligence and abbreviated contract suite.
- Over \$250,000: maintain full probity and current governance standards.

This proportionality would reduce transaction costs, shorten settlement times, and improve liquidity in the lower end of the market.

3. Create a standardised Credit Sale Form

Government should produce a standard credit sale form, similar to a residential property contract, with pre-agreed terms for:

- Warranties, transfer and settlement provisions.
- Retirement confirmation and payment conditions.
- The contract should be available in digital format for e-signature and electronic lodgement through the Credit Register.
- Application to transfer biodiversity credits forms should be available in digital format for e-signature and electronic lodgement through the Credit Register.

This would eliminate repetitive legal drafting and make small-to-mid-size trades practical and cost-effective.

4. Enable digital settlement and payment tracking

- Integrate the transaction process with the Biodiversity Credit Register so that transfer, retirement and payment confirmation occur automatically.
- Provide sellers with real-time visibility of payment status and credit transfer — similar to modern conveyancing platforms.



5. BIODIVERSITY CONSERVATION FUND OPERATIONAL REFORM

We acknowledge the Government's reform summary and commencement of amendments regarding the Biodiversity Conservation Fund and commencement of s 6.31 of the BC Act on 7 March 2025. While we recognise the intentions, several operational settings risk entrenching the very issues IPART has identified:

- IPART finds that the pay-in option continues to stifle market development and suppresses price discovery.
- IPART also observes high buyer concentration (notably large infrastructure buyers and the Trust), which tends to depress prices below competitive levels.
- The amended s 6.31 framework enables acquittal via like-for-like or variation and allows application of funds across obligations, coupled with a 3-year acquittal clock and limited third-party recourse, which could dilute traceability and accountability and lead to poor biodiversity outcomes if not carefully governed.

We recommend:

- In active markets with demonstrated supply, cap or phase down pay-in access to restore direct trading and price signalling, consistent with IPART's direction.
- Mandate like-for-like as default for BCT acquittals; permit variation only as a last-resort with published justification and Ministerial sign-off.
- Establish a public "Obligation Ledger" linking each BCF payment to the specific credit retirement (class, region, retirement ID) to ensure end-to-end traceability.
- Tighten delivery discipline: 12-month procurement trigger, 24-month acquittal, and a penalty pathway to a Biodiversity Investment Reserve for unmet timelines.
- Publish weekly market telemetry: BCF balances by OTG/region, outstanding obligations by age, scarcity index, and BCT acquisition prices in $\pm 10\%$ bands to sharpen market signals.
- Create an independent Market Integrity Unit (separate from BCT) to run tenders for scarce credits, validate equivalence decisions, and publish quarterly integrity reports.
- Move BCT toward facilitator status rather than buyer-of-first-resort; use transparent reverse auctions and credit futures contracts to align timing of supply and demand.
- Introducing standard service levels for payment timelines (e.g., ≤ 60 days, in line with the NSW Faster Payments Policy) would materially improve liquidity reverse auction/credit tender payments can take up to 12 months to settle.



6. SUMMARY

We believe these refinements are not criticisms, but constructive enhancements that align with Government's intent for a transparent, efficient and trusted offset system. The Offsets CoP would welcome the opportunity to co-design a SODA Procurement Framework with DCCEEW and the BCT that embeds these principles in practice; and/or to consult more directly on any of our proposed recommendations.

We suggest the below positive, practical roadmap (a staged program) that DCCEEW can implement in partnership with the profession to address key issues:

- Immediate (0–6 months)
 - Issue SODA/reverse auction addendum with explicit weighting and disclosure protocols.
 - Launch Obligation Ledger (beta) and 30-day award disclosure rule.
 - Set payment Service Level Agreements compliant to government policy and publish monthly performance.
- Near-term (6–12 months)
 - Pilot credit futures for priority OTGs/species; run transparent reverse auctions with public price bands.
 - Establish the Market Integrity Unit and commence quarterly reporting.
- Medium-term (12–24 months)
 - Phase down pay-in access for OTGs with active supply; require documented like-for-like exhaustion, irrespective of price, prior to any variation acquittal by BCT.
 - Implement 12-/24-month procurement/acquittal milestones with a clear penalty pathway.
 - Sophisticated credit supply and demand register, a digital payment and tracking system, and an online credit transfer process.

Thank you for your continued willingness to engage with industry. We stand ready to collaborate on solutions that deliver better biodiversity outcomes at lower public cost with higher market integrity.

7. ABOUT THE AUTHORS

This submission has been prepared by the Environment Institute of Australia and New Zealand Biodiversity Offsets Community of Practice, comprised of approximately 85 NSW Accredited Assessors (AAs) within their respective companies – approximately 30% of the ~300 registered consultant AAs. Our practitioner network operates at the coalface of the NSW BOS, working with landholders, developers,



the BCT and regulators. We are committed to a scheme that delivers credible biodiversity outcomes, investment confidence and market integrity (for the biodiversity credit market).

The Environment Institute of Australia and New Zealand (EIANZ) is Australasia's peak body for environmental professionals. As part of a global network of more than 100,000 environmental practitioners, we advocate for sound environmental policy and promote ethical and competent practice.

EIANZ represents members and certified practitioners from a diverse range of technical disciplines including environmental scientists, policy makers, engineers, lawyers, and economists. Our members are at the forefront of challenging and complex issues such as climate change, sustainability and preserving biodiversity.