



POLICY SUBMISSION

Submission on the Proposed Nature Repair Method: outline of the Biodiversity Assessment Instrument

Prepared by the Environment Institute of Australia and New Zealand (EIANZ)

Introduction

The Environment Institute of Australia and New Zealand (EIANZ) is the peak body for environmental professionals in Australia and Aotearoa New Zealand, representing 3,500 members and certified professionals as part of a global network of over 100,000 environmental practitioners.

Through its Code of Ethics and Professional Conduct, EIANZ sets and enforces high ethical and professional standards for environmental practitioners. The specific interests and skills base of EIANZ lies in evidence-based and ethical environmental practice.

This submission contains recommendations from expert members and Certified Environmental Practitioners with extensive experience in the relevant fields.

General Comments

EIANZ is generally supportive of the proposed Instrument. However, the current draft is insufficient to ensure the intended environmental outcomes. We are supportive of this consultation and expect that the process may be able to provide some of the improvement required.

While responses have been provided to specific sections of the Instrument, the following two topics are important to note as overarching feedback.



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Scientific Basis

We suggest that the department carefully inspects the Instrument to ensure requirements are not arbitrary but instead have a scientific basis. One example is Section 1.4 addressed below.

While EIANZ supports specificity in requirements, it is important to ensure that all aspects of the Instrument are based on scientifically robust evidence.

Adequate Quality Assurance

There are many parts of the document that imply rigour is required with respect to data collection and reporting, but falls short of a mechanism for quality assurance, for example:

- Section 1.5.3.3 “systems, data and **expertise** in place to support the implementation of these systems”
- Section 1.5.3.3 “However, in most cases for project planning purposes, available mapping may need to be verified in-field by someone with **appropriate expertise**”
- Section 1.8.3 “**reliable and trusted** environmental information”
- Section 2.6.2 “undertake an **appropriately comprehensive** site assessment, which may include an in-field assessment, to provide evidence for the application for certificate issuance”
- Section 2.8 “**meet minimum requirements** for the quality and management of data, information and expertise that informs project planning and project implementation”
- Section 3.8 “**Evidence on data quality** could be required for example, as part of the project plan”

Since 2014, the Certified Environmental Practitioner Scheme (CEnvP) has been providing proponents with a way to evidence their competency and ethical standing, and government with assurance that work is being undertaken by reliable professionals.



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Specialist certification is required to sign off environmental impact assessments for State- and Nationally-significant projects in New South Wales, and similar requirements exist for site contamination reports in New South Wales, New Zealand and Tasmania.

These requirements have improved the quality of submissions, decreased approval times, reduced administration in determining whether someone is suitably qualified, and provided government with third-party assurance at no cost.

We strongly recommend that CEnvP's Ecology Specialist certification be included in the Instrument as a primary method to evidence that a practitioner is a suitably qualified person using appropriately robust data.

EIANZ would also support a requirement for officers from the Clean Energy Regulator to be suitably qualified - it will be vital to ensure a base level of knowledge among those assessing the projects, so they can identify reasonable from unreasonable approaches. For instance, a carbon expert should not be making determinations about ecological projects without appropriate expertise. Ecological specialisation is crucial to maintain the integrity and accuracy of environmental assessments and to ensure that decisions are informed by relevant, robust data.

Moreover, implementing a standardised qualification requirement for officers would enhance the quality and reliability of project assessments, fostering greater confidence from both proponents and the government. This would streamline the approval process, reduce administrative burdens, and help achieve the intended environmental outcomes more effectively.

To ensure the intended environmental outcomes are achieved, a more stringent quality assurance method is required that removes subjective, arbitrary, and/or uninformed decision making.

Detailed Comments on Specific Sections

Section 1.1

EIANZ supports the outlined approach to defining key terms and concepts.



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Section 1.2

The approach to First Nations knowledge, values and data reflects the standards set by EIANZ. Further information is available in this [Position Statement](#), which guides environment practitioners.

Section 1.3 (and Section 3.3)

The Instrument requires ‘measures adopted by the project to respond to climate change’.

Please be aware that some advocate using genetic material from different climate zones to address predicted climate change (e.g. seed stock of *Eucalyptus tereticornis* from Rockhampton may be used in a project in Brisbane on the basis that Brisbane’s climate will become warmer).

While the concept has some merit, there is no scientific basis for this approach. Relocating genetic material without proper scientific consideration of long-term consequences of gene pools/genetic diversity may have unforeseen consequences many years from now that cannot be undone. The document does not preclude using genetic materials from other places and, if this method becomes common practice, it could easily become entrenched as acceptable practice.

To give a second example, papers presented at the recent Australasian Plant Conservation Conference have demonstrated that some community-based regeneration projects have reduced the genetic diversity of the species planted. This increases risks from climate change by reducing the breadth of genetic traits available to survive conditions climate change may introduce.

The Instrument includes terms like ‘must consider climate change’, without providing context on the nature of the consideration. While EIANZ supports the high-level principle, we caution against broad terms that are too open to interpretation.

Section 1.4 (and Section 3.4)

EIANZ supports addressing certainty and confidence in the Instrument. However, scoring must be based on a scientifically robust approaches rather than arbitrary numbers.



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Presently, certainty and confidence are incorporated in the EPBC Act offsets calculation method, however numbers are arbitrary, and proponent's decisions are frequently overridden by DCCEEW officers during the assessment phase (i.e. during discussions, DCCEEW officers will often request numbers are adjusted based on their opinion rather than a rigorous/defendable approach).

The department is advised to remain aware that the outlined approach to certainty and confidence will be subject to arbitrary decision-making.

Section 1.5.3.4

We agree that existing mapping utilities are useful and should inform assessments. To ensure consistency and transparency across the country, all projects should also address a single standardised approach to ecosystem mapping, specifically the National Vegetation Information System (NVIS) for terrestrial environments. This is acknowledged in Section 3.5.4 and the draft Proposed Nature Repair Method for Replanting Native Forest and Woodland Ecosystems.

Adopting the NVIS will aid future reporting related to the market, assist in identifying potential gaps for market participants (e.g., if a system is underrepresented, it might have greater 'value'), and align with the 'Ecological Field Monitoring Protocols Manual'. The EIANZ supports the reference to the NVIS as it promotes a cohesive approach across varied projects and regions.

Section 1.5.5.2

EIANZ supports the reference to SERA's standard. This is a commendable standard that ensures high-quality restoration and ecological integrity in rehabilitation projects. Adopting SERA's standard will further enhance the reliability and success of environmental initiatives.

Conclusion

EIANZ appreciates the opportunity to provide input on the proposed Instrument. We believe that incorporating these recommendations will aid in the success and reliability of the Nature Repair Market.

For further information or discussion, please contact us at communication@eianz.org.



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Thank you for your consideration.