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Exploring a biodiversity credit system (BCS) for Aotearoa New Zealand: Discussion document

Ministry for the Environment  
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## **RURAL WOMEN NEW ZEALAND (INC) SUBMISSION**

### **Exploring a biodiversity credit system (BCS) for Aotearoa New Zealand: Discussion document**

#### **Introduction**

Rural Women New Zealand (RWNZ) welcomes the opportunity to provide a submission to the Ministry for the Environment (the Ministry) on the Exploring a biodiversity credit system (BCS) for Aotearoa New Zealand: Discussion document. We note that the Ministry is seeking feedback on the need for and the design of a BCS.

RWNZ asks the Ministry to recognise that rural communities are the most likely areas of Aotearoa New Zealand to feel the effects/impacts of a BCS as well as any unintended consequences.

#### **Comments**

RWNZ agrees with the Minister of Conservation regarding the need to look at new and innovative ways to support landholders to protect and restore indigenous biodiversity and ensure range of ecosystems are protected and restored. We consider a BCS to be a positive initiative and offer our support for the approach 'in principle' subject to the following:

1. Designing a BCS will require in-depth knowledge of relevant ecosystems. We believe the designers / Ministry will need to work closely with landholders and rural communities.

2. The BCS should be outcome-based to achieve goals for all Aotearoa New Zealand communities (society in general). This would provide recognition of biodiversity benefits in a way that can readily be seen and understood. Biodiversity gains would need to be demonstrably delivered and maintained to gain credits.
3. The BCS should be wide enough to cover a range of different activities and projects. To ensure those activities and projects are adequately recognised, the measures must be capable of being verified and audited at different levels.
4. Biodiversity credits by project would be advantageous in particular for recognising the investment (time, energy, cost) of land owners/holders. Projects undertaken for biodiversity benefits must be well-documented with measurable (and measured) improvements to gain associated credits.
5. We recommend the BCS be implemented via a staged approach to ensure that from the outset:
  - Adequate operational processes and monitoring structures are in place; and
  - Suitable outcomes and reporting frameworks are enabled.
6. A BCS for Aotearoa New Zealand should apply to all biodiversity environments, ie all land, coastal and water types. RWNZ suggests that with more data likely available for terrestrial environments, land-based biodiversity credits should be the initial stage (starting point) before the BCS is progressively rolled out to other environments.
7. Several state governments in Australia (notably South Australia and New South Wales) have implemented biodiversity credit systems. We hope the Ministry seeks best practise examples/learnings from these and other international examples. International systems already tested in operation would provide useful benchmarking/guidance in the development and implementation of a BCS in Aotearoa New Zealand
8. RWNZ expects any BCS to be self-funding noting that a user-pays model must have clarity up-front to set expectations from the very beginning.
9. Trading should not be the driver of a BCS. RWNZ is particularly insistent that the BCS purpose should not be for companies to take advantage of the system by making land-use changes solely for credit trade-offs.

## **Closing**

In closing, RWNZ has prioritised what we consider should be the top four principles (from the Question 12 list provided in the discussion document) to underpin a Aotearoa

New Zealand biodiversity credit system:

Principle 3 – Robust, with measures to prevent abuse of the system

Principle 2 – Transparent and verifiable claims

Principle 1 – Permanent or long-term (eg, 25-year) impact

Principle 6 – No double-counting, and clear rules about the claims that investors can make.

Thank you for the opportunity to provide feedback.

### **About Rural Women New Zealand**

Rural Women New Zealand (RWNZ) is a not-for-profit, member-based organisation that reaches into all rural communities to provide a credible and respected voice on rural environment, health, education, technology, business and social issues.

RWNZ strives to ensure that all rural residents, workers and families have equitable access to services, inequalities are addressed by Government, and the wellbeing of rural communities is considered from the beginning of all policy and legislative development.

RWNZ is affiliated to the Associated Country Women of the World and as such upholds all United Nations, International Labor Organisation (ILO), Food and Agriculture Organisation (FAO) and World Health Organisation (WHO) conventions and outcome statements as they relate to women and rural women in particular.

Nāku iti noa, nā



Gill Naylor  
**National President**