



Te āwhina i te taiao me ngā tāngata kia puāwai

Helping nature and people thrive

Exploring a biodiversity credit system for Aotearoa New Zealand
Summary of submissions



Ministry for the
Environment
Manatū Mō Te Taiao



Department of Conservation
Te Papa Atawhai



Te Kāwanatanga o Aotearoa
New Zealand Government

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This document may be cited as: Ministry for the Environment. 2024. *Helping nature and people thrive: Exploring a biodiversity credit system for Aotearoa New Zealand – Summary of submissions*. Wellington: Ministry for the Environment.

Published in April 2024 by the
Ministry for the Environment
Manatū mō te Taiao
PO Box 10362, Wellington 6143, New Zealand
environment.govt.nz

ISBN: 978-1-991140-08-1 (online)

Publication number: ME 1826

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Introduction

The Ministry for the Environment (the Ministry) and the Department of Conservation (DOC) sought feedback on the need for and the design of a biodiversity credit system (BCS), and the different roles the government could play in implementing it.

This report summarises the views expressed in public consultation. It does not provide an analysis of those views or recommendations in response to them. Any such recommendations will be made through policy development and advice to the government.

Public consultation

How we consulted

From 7 July to 3 November 2023, the Ministry and DOC consulted on whether a BCS could help to incentivise the protection and restoration of native wildlife in Aotearoa New Zealand.

To inform the consultation, the discussion document *Te āwhina i te taiao me ngā tāngata kia puāwai – Helping nature and people thrive* was published on the Ministry website on 7 July 2023, alongside a short summary of the document in English and te reo Māori.

Between 17 July and 20 October 2023, the Ministry and DOC undertook a range of webinars, supported by advertisements and posts on social media. Officials also presented the work at nationwide hui organised for the New Zealand Emissions Trading Scheme (NZ ETS) review consultation. Over 500 people attended the government agency-led events and webinars. The Ministry and DOC also met with a number of representative groups from environmental non-government organisations, and from the primary industry, corporate and community sectors.

Consultation tools

Submitters were invited to submit their views using the Ministry's online public engagement and survey platform Citizen Space ([Whakawhiti kōrero – Have your say](#)) or by email to its consultation inbox (biocredits@mfe.govt.nz). If identical submissions were made through both methods, one was counted and the other archived.

Submitters choosing to submit via Citizen Space could respond to the questions in the discussion document, with the option of answering all or some of the questions. Submitters could also add written feedback or provide additional supporting information, or both.

Who responded?

We received 276 submissions, most of which were from organisations and submitted via Citizen Space. Table 1 shows the proportions of submitters from each group.

Table 1: Proportion of submissions by submitter group

Submitter type	% of total
Business/industry groups	26
Iwi/Māori groups	15
Environmental groups	18
Territorial authorities and central government agencies	10
Subject-matter experts	13
Other	18

Scope of this report

This report provides a summary of key themes arising from submissions and consultation, which comprise the following.

- [Overall support for a BCS](#)
- [BCS design](#)
- [Role of government](#)
- [Synergies](#) (alignment with other systems)

[Appendix 1](#) provides survey statistics for questions that we could analyse statistically.

Next steps

Alongside the release and publication of this document, we will also publish submissions from those who agreed to publication. These will be available on the Ministry's website.

The Ministry is providing advice to the government on a BCS. The advice is informed by this consultation and other Ministry work, including engaging with stakeholders, consulting across government agencies, researching best practice methods from overseas, and other work programmes.

Overall support for a BCS

Most submitters saw the need for a BCS, but for varying reasons

Submitters were asked if they supported the need for a BCS. Most submitters (76 per cent) confirmed their support, and the majority (70 per cent) believed a BCS would attract investment to support indigenous biodiversity in Aotearoa. Responses and reasons behind their support were extremely varied, but some key themes emerged.

- Biodiversity has been chronically undervalued in current systems. Alongside a BCS, framing/thinking needs to change, so that biodiversity conservation actions and outcomes are valued differently – that is, beyond short-term economic thinking.
- Funding from government, and for DOC, is currently not sufficient to turn around biodiversity decline, and it likely never will be. A BCS could supplement government funding and result in extra support from the private sector.
- A BCS could play an important role in recognising iwi and Māori rights and interests. Biodiversity credits could help support whānau, hapū and iwi to actively carry out their role as kaitiaki.
- Biodiversity credits could provide recognition to landowners/managers who already engage in active management to support biodiversity on their lands, often at a significant financial cost. This recognition could incentivise additional positive action, but the system needs to be voluntary and not unnecessarily burdensome for landowners/managers.
- Biodiversity credits should not be thought about in isolation, or as a ‘silver bullet’. Rather, a BCS should be considered only one of the possible mechanisms for reversing biodiversity decline. The government should also explore other incentives, such as ecosystem rebates, or protection supported through covenants.
- Any new BCS should be thought about in relation to other existing systems, such as carbon markets and the National Policy Statement for Indigenous Biodiversity.

Some submitters did not support a market, preferring other funding sources

A small number of submitters (7 per cent) stated they did not see the need for a BCS, and a few key themes were identified from these submissions.

- Both the idea of saving species and the intended purpose of a BCS are worthwhile, but credits are not the right mechanism. It would be better to explore other incentive measures, or at least incentives that are not government led. Credits are likely to be burdensome and administration heavy, and it is very difficult to capture the ‘value’ of biodiversity.
- The funding gap for biodiversity could be better reduced through increased public financing derived from progressive tax reforms and fiscal reprioritisation. This would avoid private interests driving priorities, as well as reducing the possibility of commodification of nature. A market must not send a message that the public purse is not needed to fund biodiversity.

Prospective investors require transparency and assurance

A key theme raised in submissions was that prospective investors require transparency and assurance that the credits they purchase are legitimate and verified, and that biodiversity gains will be maintained over time.

- Submitters looking to invest raised the need for clear guidelines around what qualifies for a credit. These submitters noted that projects offering the greatest potential increase in biodiversity would be the most attractive.
- Submitters highlighted that prospective investors may be concerned about purchasing biodiversity credits that may lead to accusations of false or inaccurate claims. Concerns over greenwashing are heightened by the shortcomings of voluntary carbon markets.
- Submitters considered that, to trust the system, prospective investors want to be sure of high methodologic integrity in measurement, monitoring, reporting and verification.
- Some submitters also raised that they would be discouraged from investing if a large proportion of the credit price went to market administration, rather than to the project itself.

BCS design

Most submitters showed a strong preference for a BCS to cover all ecological domains

Submitters were asked what scope they preferred for a BCS. A majority of submitters (62 per cent) showed a strong preference for a BCS to cover all ecological domains. A few submitters (8 per cent) preferred that a BCS only cover terrestrial ecosystems, and others (11 per cent) considered that a BCS should cover terrestrial and freshwater domains. Their comments on the different scopes are summarised as follows.

- **Terrestrial, freshwater and coastal marine environments.** Many submitters raised that ecosystems are interdependent, and investment in the protection of all our natural resources should be incentivised. However, submitters noted that marine ecosystems present a greater challenge and may take more time to be integrated into a BCS.
- **Terrestrial environments.** Submitters considered that focusing on terrestrial environments would be the easiest option to implement at the outset and may demonstrate effective positive change quickly. They also noted that positive action on the land would have positive flow-on effects for freshwater and marine environments.
- **Terrestrial and freshwater environments.** Submitters raised that wetland habitats are often under-represented and undervalued for the services they provide (eg, carbon sequestration, stormwater management, increased water quality for local fauna and recreational activities, and the continued use of waterways for traditional activities like the harvest of mahinga kai). These submitters considered that a focus on protecting and restoring freshwater ecosystems would also allow better connectivity between habitat fragments.

Most submitters preferred a BCS to extend to all land types

Submitters were asked to state their preferred scope for land-based biodiversity credits. Overall, 55 per cent of submitters preferred a BCS to extend to all land types, 21 per cent preferred limiting the types of land that are eligible for a BCS, and 24 per cent did not directly express a preference.

Among iwi, hapū and Māori submitters, 39 per cent supported including all types of land in a BCS, 24 per cent preferred having limitations on land types, and the remaining 37 per cent did not respond. Comments and feedback related to land types are summarised as follows.

- **All land types, including public and private land, and whenua Māori.** Submitters considered all land types and the biodiversity on them (now or in the future) to be important. At-risk environments, or potentially significant environments, are not restricted to one land type. Iwi, hapū and Māori submitters expressed a preference for projects on whenua Māori to be prioritised, given a large amount of whenua Māori contains indigenous biodiversity.
- **Certain categories of land (eg, private land, including whenua Māori).** Some submitters raised issues over the inclusion of public conservation land and how this could outnumber the number of credit offerings on private or other types of land. Submitters also noted that

public land can gain funding (often taxpayer funding) that private land cannot, and they considered that biodiversity action on public land should not be monetised.

Most submitters did not support the inclusion of offsets

Most submitters (46 per cent) did not support the inclusion of offsets for development being included in a BCS, compared to 33 per cent who did support such inclusion. Although most demographic groupings were opposed to the inclusion of offsets, 43 per cent of business groups were supportive of offsets (compared to 31 per cent of business groups who were in opposition).

The feedback from the submissions for and against the inclusion of offsets is outlined below.

Support for including offsets

Submitters in support of offsets provided submissions noting that:

- offsets would provide more funding for a BCS, particularly by incentivising developers and businesses to engage in biodiversity-enhancing activities
- an offsetting framework is needed, to ensure appropriate management of biodiversity where adverse effects cannot be avoided
- by allowing offsetting, organisations will likely undertake activities that are better able to meet biodiversity outcomes, which could have positive results for biodiversity overall.

However, many submitters raised the importance of assessing projects on a case-by-case basis, to minimise negative impacts.

Opposition to including offsets

Submitters opposed to the inclusion of offsets highlighted that:

- offsetting often fails to achieve adequate biodiversity outcomes, since the complexity of ecosystems makes it challenging to accurately predict the environmental impacts of a specific project
- many biodiversity values cannot be offset due to irreplaceability or vulnerability, and if they are adversely affected, they may be permanently lost
- offsetting could encourage greenwashing and presents a reputational risk through undermining the perceived value of biodiversity credits among key stakeholders and the public
- regulated biodiversity offsets are a resource management tool and should operate separately from a biodiversity credit system
- offsetting in a credit-based system would add unnecessary complication.

Most iwi, hapū and Māori submitters noted that an offsetting approach does not align with their values and tikanga. Nor does it align with mātauranga, which is centred on restoring, enhancing, and protecting indigenous biodiversity and ecosystems, rather than allowing any form of degradation.

Role of government

Many submitters considered the government should have a role

Submitters were asked what components of a BCS the government should be involved in. Many submitters (44 per cent) considered the government should have a role in the operation of the market and registry, and in the verification of claims. Some submitters (36 per cent) saw monitoring, measurement and reporting as important roles for the government in a BCS. Other submitters (19 per cent) considered project provision to be the least important role for government. Submitter comments and feedback on types of government involvement are summarised as follows.

Project provision

On the subject of project provision roles (ie, where a project or activity is undertaken by a party other than the landowner), suggestions from submitters included that:

- DOC should have a project provision role
- the government should be a market enabler rather than a market administrator, and should have a role in identifying, initiating or facilitating projects
- the government should have a very minor or indirect role.

A few submitters thought that the government should not be involved in project provision, citing reasons such as:

- not wanting politics to be involved
- considering it to be unrealistic
- other groups being more appropriate for project provision.

Quantification of activities and outcomes; monitoring, measurement and reporting; and verification of claims

Many submitters considered that the government should have a role in these components. Their submissions included statements that:

- the government could develop metrics, methodologies, standards and protocols
- government involvement would assist with the credibility, transparency, legitimacy, authenticity and integrity of the system
- government regulation is needed to prevent greenwashing, to maximise efficiency, and to ensure that the system meets its objectives.

Iwi, hapū and Māori submitters raised that a verification system should be developed in partnership with tangata whenua and should work in accordance with local mātauranga, tikanga and kawa. Those against government involvement thought that verification should be undertaken by private entities or other parties, or should be done at a local level.

Operation of the market and registry

Nearly half of submitters (44 per cent) considered government operation of the market and maintaining a registry to be essential for building trust and credibility within the system. These submitters highlighted that:

- a government-operated or supervised registry can ensure that credits are accurately recorded, traded, and monitored
- government regulation of the market is important, to prevent monopolistic practices, ensure fair trade and avoid regulatory issues like double-counting of biodiversity claims
- the government has the best tools, experience and regulatory mechanisms available to operate the market.

Investing in credits

Some submitters considered that investment in credits should be left to private sector actors, with no government involvement. Many of these submitters considered that the government should adequately fund indigenous biodiversity on public conservation land and should not rely on a market for this investment. However, some submitters raised that government purchasing of biodiversity credits could accelerate market development and stimulate innovation, especially in the early phases of market development.

Many submitters thought the government should focus market investment towards particular activities and outcomes

Although many submitters (46 per cent) agreed the government should play a role in focusing investment, many iwi, hapū and Māori submitters expressed a preference for no such government role. Submitters' comments and feedback on focusing market investment are summarised as follows.

Support for a focus towards particular activities and outcomes

Those submitters in support of the government focusing market investment stated that, by clearly signalling the most threatened areas, ecosystems, and species, the government could ensure that resources target national conservation priorities. This would help the market contribute to national conservation objectives and achieve more effective and sustainable outcomes.

Further, some submitters expressed concern that leaving the market to decide what is valuable could lead to uneven investment and fail to drive the range of actions needed to address the biodiversity crisis.

Opposition to a focus towards particular activities and outcomes

Those submitters who did not support market investment focus considered that the government should maintain independence, to ensure all regions and ecosystems have an equal opportunity to participate in and benefit from biodiversity preservation initiatives. These submitters highlighted that specific activities and priorities will differ for each region, project,

and project proponent, so local information and communities should determine the priorities for their area.

Submissions from iwi, hapū and Māori, in particular, expressed a preference to exercise rangatiratanga, empowering Māori to undertake projects on their whenua with freedom of choice rather than by government direction. Some iwi, hapū and Māori submitters viewed the prioritisation of certain ecosystems as inconsistent with te ao Māori values, as all aspects of the natural environment are integral to the health and wellbeing of people. Further, some submissions expressed concern that focusing on certain categories of land (such as erosion-prone land) could also disproportionately impact Māori, as the majority of Māori-owned land has a Land Use Capability classification of 6,7 or 8.

Synergies

Many submitters supported alignment with international systems and frameworks

On a scale of 1 to 5, most submitters thought that alignment with international systems and frameworks had high/intermediate relevance (51 per cent rated the relevance as 3, 4 or 5), and some submitters thought that it had less/no relevance (17 per cent rated the relevance as 1 or 2). Submitters' comments and feedback on international alignment are summarised as follows.

High support for alignment

Those submitters supporting alignment with international systems and frameworks reasoned that this would give the BCS international credibility and attract important overseas investment in the market. Many of these submitters noted that the unique circumstances of Aotearoa will still need to be considered, including:

- the Crown's te Tiriti o Waitangi (te Tiriti) obligations with respect to land, resources, flora and fauna
- the wider Aotearoa policy landscape
- the unique ecological and biodiversity values in Aotearoa.

Some submitters considered that alignment could assist in delivering international biodiversity obligations and responsibilities.

Lower support for alignment

The submitters who did not consider international alignment to be highly relevant instead expressed the need for a system that best suits the unique biodiversity and challenges of Aotearoa. They considered that a BCS should be tailored to best suit our conservation efforts, reflecting te Tiriti and tangata whenua rights and interests.

Many of these submitters did acknowledge that lessons from international markets should be considered. However, they believed that the priority should not be to align with international markets, but to build a market that thrives within the unique and diverse context of Aotearoa.

Most submitters supported government and private sector collaboration for pilot systems in different regions

Over 60 per cent of submitters supported the idea of government working with private sector providers to pilot biodiversity credits. In particular, many iwi, hapū and Māori submitters expressed interest in pilots being undertaken on whenua Māori. Submitters comments and feedback on pilots are summarised as follows.

Support for pilot systems

Submitters in support of pilot systems considered them valuable for testing how a BCS could work and providing the opportunity to identify issues, refine approaches, instil early confidence to encourage broader uptake, and ensure real benefits to biodiversity.

Iwi, hapū and Māori submitters expressed a desire for any pilots to be carried out in partnership with whānau, hapū and iwi, and to take into account the varying circumstances of different tribal and ecological territories.

Submitters had practical suggestions regarding the approach to pilots, including:

- the need for expertise to support landowners
- running pilots through groups that already have well-established relationships in a region or catchment
- running pilots in a range of settings, environments and scales
- the importance of acting quickly to roll out and gain insights from pilots (action research as opposed to outcomes-oriented research).

On the practicalities of measurement, several submitters noted the importance of ensuring appropriate capability in the region undertaking a pilot. Submitters mentioned monitoring teams and ecologists, and some suggested drawing this capability from the regional council.

Opposition to pilots

Some submitters who did not support pilot systems considered that government should roll out a fully developed system. Other submitters were concerned that pilots would be distracting and could delay implementation.

Suggested alternatives to pilots included provision for review following implementation, or a modular approach to establishing system components.

In particular, iwi, hapū and Māori submitters noted that pilots should not run without whānau, hapū and iwi involvement.

Many submitters expressed a preference for some interaction between a BCS and carbon credits

Many submitters (42 per cent) expressed a preference for some degree of interaction between a BCS and carbon credits, with this preference being more pronounced in certain demographic groupings, such as government and iwi, hapū and Māori. Many submitters acknowledged that the outcome of NZ ETS reviews (underway at the time of consultation) would impact their desired level of integration.

Submitters' comments and feedback on alignment with carbon markets are summarised as follows.

Preference for little to no interaction

Some submitters were open to increasing interaction over time. However, they considered the ideal first step to be a BCS focused purely on biodiversity (where any carbon storage benefits are a bonus), because of its simplicity and flexibility.

These submitters expressed concern that integration would risk blurring the distinctly different policy objectives of carbon markets and BCSs. They also highlighted the risk of collateral damage to one system if the other market/system were to suffer credibility issues (a few submitters referenced the recent scrutiny of voluntary carbon markets).

Preference for some interaction

Many submitters said that recognising biodiversity credits alongside carbon benefits on the same land, via both systems (where appropriate) would attract investment and encourage innovation. Some said biodiversity credits should stand alone, but be able to interact with carbon markets.

Several submitters highlighted the need for robust methodologies and provisions against double counting. Some considered that alignment would support the resilience of sellers, because if one market failed, they would have a second market available to them. Many submitters saw potential for stacked or stapled credits to increase investment in indigenous forests and other ecosystems not recognised in carbon markets (such as wetlands).

Preference for high interaction

Submitters in favour of high interaction with carbon markets noted that:

- rigid biodiversity 'standards' for nature-generated carbon credits would support investor confidence and demand
- risks of double counting and conflicts between system outcomes would be reduced
- stacking and stapling credits would be easier with shared infrastructure.

These submitters did acknowledge this option would be necessarily more complex, because ecosystems themselves are complex.

Māori and te Tiriti o Waitangi

Māori submitters had a range of views on a biodiversity credit system and market

Key themes arising from iwi, hapū and Māori submissions are summarised as follows.

Support for a BCS

Iwi, hapū and Māori submitters who indicated support for a BCS highlighted an urgent need for greater investment towards protecting and restoring the health and resilience of the environment.

One submitter noted that securing funding to improve biodiversity outcomes can be difficult, and a BCS would support a mechanism to better channel private funding to projects. However, they stressed that such a system must be robust and transparent (like the NZ ETS).

Another submitter noted that a biodiversity system could support the efforts of those who are motivated to protect and restore nature but lack the financial resources to do so.

Opposition to a BCS

Some iwi, hapū and Māori submitters did not support a BCS. Some of the reasons provided included that:

- insufficient information had been provided to support the proposal
- a BCS could unintentionally disadvantage Māori landowners
- they could not see the proposal being a success for indigenous people and the environment.

Protection required for te Tiriti rights

Many iwi, hapū and Māori submitters highlighted the relationship of the proposed BCS to rights under te Tiriti and to treaty settlements. These submitters sought acknowledgement of the potential role that a BCS could have in:

- recognising iwi, hapū and Māori rights and interests
- supporting whānau, hapū, and iwi to actively carry out their role as kaitiaki.

These submitters expressed their perspective that the establishment of a BCS would need to be considered in relation to te Tiriti.

Partnership in design of the BCS

Many iwi, hapū and Māori submitters expressed an interest in informing the design of a BCS. These submitters noted that different iwi, hapū and Māori would have differing perspectives on approaches, based on their locality. For example, one iwi submission highlighted the

importance of Māori involvement to enable the proper application of mātauranga Māori “by whānau, hapū and iwi at place”. Another iwi submission stated that a BCS “must be designed to thrive within diverse contexts of whenua Māori”.

Appendix 1: Survey statistics

Note: Some questions were open-ended questions to which submitters were asked to provide their own answer (ie, questions 10, 11, 12, 13, 14, 15, 17). Statistics for the answers to those questions could not be included in this appendix. Statistics have been rounded to the nearest whole number.

1. Support for a biodiversity credit system (BCS) for Aotearoa New Zealand

Most submitters (76%) strongly supported a BCS, and this support was reflected across all main demographics. Some submitters (6%) partially supported a BCS, some submitters (7%) did not support it, and some submitters (8%) did not provide an answer.

2. Options for using biodiversity credits

Most submitters (52%) preferred that biodiversity credits be used to recognise positive actions to support biodiversity, and actions that avoid decreases in biodiversity. Some submitters (27%) preferred that biodiversity credits be used to recognise positive actions to support biodiversity only, and some submitters (21%) did not provide an answer.

3. Scope for a BCS

Most submitters (62%) preferred that a BCS cover all ecological domains. A few submitters (8%) considered that a BCS should only cover terrestrial ecosystems. Some submitters (11%) supported a BCS covering terrestrial and freshwater domains, and some submitters (18%) did not provide an answer.

4. Scope for land-based biodiversity credits

Most submitters (55%) preferred a BCS to extend to all land types, some submitters (21%) preferred limiting the types of land that are eligible for a BCS, and some (24%) did not directly express a preference.

Among iwi, hapū and Māori submitters, many (39%) supported including all types of land in a BCS, some (24%) preferred having limitations on land types, and many (37%) did not respond.

5. Approach for a BCS

Many submitters (35%) preferred an outcome-based approach (35%). Some iwi, hapū and Māori submitters (24%) preferred an activities-based approach. Some submitters (13%) supported project-based approaches and some (19%) preferred activity-based approaches.

Some submitters (5%) also indicated a preference for hybrid approaches,¹ which may involve outcomes, activities or projects being recognised in a BCS. Some submitters (28%) did not provide an answer.

6. Specified period

Most submitters (55%) thought the project or activity should be required to apply for a specified period. Some submitters (17%) did not agree with such a requirement (17%) and some submitters (28%) did not provide an answer.

7. Legal protection for areas of indigenous biodiversity

Many submitters (50%) supported awarding biodiversity credits for increasing legal protection for areas of indigenous biodiversity. Some submitters (24%) did not support this, and some (25%) did not provide an answer.

8. Offsetting development impacts

Many submitters (46%) did not support offsets for development being included in a BCS, and many submitters (33%) expressed support for including offsets. Although most demographic groupings were opposed to the inclusion of offsets, 43% of business groups supported offsetting, compared to 31% that opposed it. A few submitters (2%) expressed partial support and some (17%) did not provide an answer.

9. Attracting investment to support indigenous biodiversity

The majority of submitters (70%) believed that a BCS would attract investment to support indigenous biodiversity in Aotearoa, with only a few submitters (4%) believing it would not attract investment. Some submitters (24%) did not answer.

16. Role of government

Most submitters (44%) see a role for the government in the operation of the market and registry, as well as in the verification of claims. Many submitters (36%) also considered measurement and reporting to be part of their preferred role for government in a BCS. Across all demographics (19%), project provision was seen as the least important role for government in the BCS. Many submitters (32%) see the government as having a role in the quantification of activities or outcomes, and many (30%) consider the government should have a role in investing in credits. Many submitters (35%) did not answer.

18. Investment towards activities and outcomes

Many submitters (46%) agreed the government should play a role in focusing investment, but other submitters (26%) did not think government should play such a role. Most iwi, hapū and

¹ Hybrid approaches were classified for email submissions only, as those who filled the Citizen Space survey could only opt for one preferred approach.

Māori submitters (49%) preferred the government not to play a role in focusing investment, and 25% of submitters did not answer.

19. Alignment with international systems and frameworks

Most submitters thought that alignment with international systems and frameworks had high/intermediate relevance (51% rated the relevance as 3, 4 or 5 out of 5). Some submitters thought that it had less/no relevance (17% rated the relevance as 1 or 2 out of 5). Many submitters (33%) did not answer this question.

20. Pilots

Most submitters (62%) supported the idea of the government working with private sector providers to pilot biodiversity credits in different regions, with only some submitters (10%) opposing the idea. Many submitters (27%) did not answer this question.

21. NZ ETS and voluntary carbon markets

Many submitters (42%) expressed a preference for some degree of interaction between a BCS and carbon credits. This preference was more pronounced in certain demographic groupings, such as iwi, hapū and Māori (68%) and government (64%). An equal percentage of submitters (17% each) expressed a preference for either little/no interaction or high interaction with carbon credits, and some submitters (25%) did not answer the question.

22. Complementing the resource management system

Most submitters (58%) thought that a BCS should complement the resource management system. Some submitters (14%) thought that it should not, and many (25%) did not answer the question.

23. Supporting land-use reform

Most submitters (62%) thought that a BCS should support land-use reform. A few submitters (10%) did not think it should and a few submitters (2%) partially supported it. Many submitters (26%) did not answer the question.