

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Meridian Energy Limited	228.115	Support in part	<p>Considers the Plan includes the defined term 'biodiversity offsetting' so the Appendix should use consistent language. Considers the reference to Policy ECO-P2 (Appropriate vegetation removal in significant natural areas) may be incorrect and the management hierarchy is actually set out in Policy ECO-P1 (Protection of significant natural areas).</p> <p>Considers that the policy framework and APP2 (Biodiversity offsetting) (should apply biodiversity offsetting to residual adverse effects that are more than minor. Some amendments are appropriate to align APP2 to the approach adopted in the Proposed Natural Resources Plan.</p>	Retain APP2 - Biodiversity Offsetting with amendment.
Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Meridian Energy Limited	228.116	Amend	<p>Considers the Plan includes the defined term 'biodiversity offsetting' so the Appendix should use consistent language. Considers the reference to Policy ECO-P2 (Appropriate vegetation removal in significant natural areas) may be incorrect and the management hierarchy is actually set out in Policy ECO-P1 (Protection of significant natural areas). The policy framework and APP2 (Biodiversity offsetting) (should apply biodiversity offsetting to residual adverse effects that are more than minor. Some amendments are appropriate to align APP2 to the approach adopted in the Proposed Natural Resources Plan.</p>	<p>Amend APP2 - Biodiversity Offsetting, in the following (or similar) way:</p> <p>The following sets out a framework of principles for the use of biodiversity <u>offsetting offsets</u>. Principles must be complied with for an action to qualify as a biodiversity offset. These principles will be used when assessing the adequacy of proposals for the design and implementation of offsetting as part of resource consent applications.</p> <ol style="list-style-type: none"> Adherence to the effects management hierarchy: The proposed biodiversity offset will be assessed in accordance with the management hierarchy set out in <u>ECO-P1, ECO-P2</u>. It should only be contemplated after the management hierarchy steps in <u>ECO-P1, ECO-P2</u> have been demonstrated to have been sequentially exhausted. Any proposal for a biodiversity offset will demonstrate how it addresses the <u>more than minor</u> residual adverse effects of the activity. Limits to offsetting: Many biodiversity values cannot be offset and if they are adversely affected then they will be permanently lost. These situations include where: <ol style="list-style-type: none"> Residual adverse effects cannot be offset because of the irreplaceability or vulnerability of the indigenous biodiversity affected or there is no appropriate offset site; There are no technically feasible or socially acceptable options or <u>no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offset options</u> by which to secure gains within acceptable timeframes; and Effects on indigenous biodiversity are uncertain, unknown or little understood, but potential effects are significantly adverse. ...
Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Meridian Energy Limited	228.117	Amend	Considers clarification of the expression 'trading up' is required.	Clarify the expression 'trading up' in APP2 - Biodiversity Offsetting.
Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Claire Nolan, James Fraser, Biddy Bunzl, Margaret Franken, Michelle Wolland, and Lee Muir	275.36	Support	[No specific reason given beyond decision requested - refer back to original submission]	Retain Appendix 2 Biodiversity Offsetting as notified.
Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Royal Forest and Bird Protection Society	345.397	Support in part	<p>Supports the provisions of APP2, except as set out below.</p> <p>Support the mandatory requirement that any offset proposal must comply with the principles in APP2</p>	Not specified.

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Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Royal Forest and Bird Protection Society	345.398	Support in part	Limits to offsetting: we generally support this principle. This is a crucial principle, given the risks and uncertainties associated with offsetting. As such, it is very important that this principle is as clear as possible. The wording must avoid any argument that offsetting is available, even where there is irreplaceable or vulnerable biodiversity affected.	Amend APP2 (Biodiversity offsetting): 2. Limits to offsetting: biodiversity offsetting is not available, and the activity causing the residual adverse effects must be avoided where: Many biodiversity values cannot be offset and if they are adversely affected then they will be permanently lost. These situations include where- a. The biodiversity affected by the residual adverse effects is irreplaceable or vulnerable; b. Residual adverse effects cannot be offset because of the irreplaceability or vulnerability of the indigenous biodiversity affected or there is no appropriate offset site; c. There are no technically feasible or socially acceptable options by which to secure gains within acceptable timeframes; and d. Effects on indigenous biodiversity are uncertain, unknown or little understood, but potential effects are significantly adverse.
Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Royal Forest and Bird Protection Society	345.399	Support in part	Long-term outcomes: we query the last clause of this principle: 'including through the use of adaptive management where necessary'. This is an unusual addition to this principle, and in our view it may increase the uncertainty inherent in offsetting, that an overall ecologically positive outcome will be achieved. As such, we oppose the inclusion of these words.	Amend APP2 (Biodiversity offsetting): 7. Long-term outcomes: The biodiversity offset must be managed to secure outcomes of the activity that last at least as long as the impacts, and preferably in perpetuity, including through the use of adaptive management where necessary.
Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Royal Forest and Bird Protection Society	345.400	Support in part	Supports in principle, but a requirement to "minimise" delay between loss and gains is unclear and inadequate to ensure good indigenous biodiversity outcomes. There will be a plethora of views about when time lags have been "minimised" or minimised enough. Ecologically, the longer the time lag between the loss and gains the less likely the outcome will be positive of achieve a net gain. In addition, delay increases risk that the offset will not be provided at all. Ideally an offset would be initiated before the loss occurs so that it gets a 'head start'. Sometimes, however, this may not be feasible, for example if the offset site would be impacted by the activity it is offsetting. The Otago Regional Policy Statement provides one way of overcoming these issues but avoiding the uncertainty of a principle requiring minimisation. It requires that the offset be time delay is the least necessary to deliver the best possible biodiversity outcome, or at most the term of the resource consent. This approach has merit but misses that some resource consents will not have a specific term. As such, a final backstop is required.	Amend APP2 (Biodiversity offsetting): 8. Time lags: The delay between loss of indigenous biodiversity at the impact site and gain or maturity of indigenous biodiversity at the offset site must be minimised <u>the shortest necessary to achieve the best possible biodiversity outcome and must not exceed the consent period or 35 years whichever is shorter so that gains are achieved within the consent period and</u> Any time lag must be identified within the biodiversity offset management plan.
Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Royal Forest and Bird Protection Society	345.401	Support in part	Considers trading up is not appropriate to include in offsetting principles. It is contrary to the requirement that the offset is like for like. It is not an accepted offsetting principle, although may be appropriate for compensation. We seek that this principle is deleted from APP2.	Amend APP2 (Biodiversity offsetting): 9. Trading up: When trading up forms part of an offset, the proposal must demonstrate that the indigenous biodiversity values gained are demonstrably of higher value than those lost, and the values lost are not indigenous taxa that are listed as Threatened, At risk or Data deficient in the New Zealand Threat Classification System lists, or considered vulnerable or irreplaceable.

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Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Royal Forest and Bird Protection Society	345.402	Support in part	Considers this principle needs minor amendments to be clear and effective.	Amend APP2 (Biodiversity offsetting): 11. Proposing a biodiversity offset: A proposed biodiversity offset must include a specific biodiversity offset management plan, that: a. Sets out baseline information on the indigenous biodiversity that is potentially impacted by the proposed activity at both the donor and recipient sites, and b. Demonstrates how the requirements set out in this schedule <u>are met, and how they will be carried out, and</u> c. Identifies the monitoring approach that will be used to demonstrate how the principles set out in this schedule will be fulfilled over an appropriate timeframe <u>in accordance with the principles set out above.</u>
Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Greater Wellington Regional Council	351.326	Support in part	Supports the inclusion of APP2 – Biodiversity Offsetting	Retain provision, subject to amendments, as outlined other submission points.
Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Greater Wellington Regional Council	351.327	Amend	Consider it should state the long-term outcome must be at least a 10 percent biodiversity gain or benefit to have regard to Policy 24 in Proposed RPS Change 1.	Seeks to amend to require that that biodiversity offsets shall provide at least a 10 percent net biodiversity gain.
Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Greater Wellington Regional Council	351.328	Amend	Consider it should state the long-term outcome must be at least a 10 percent biodiversity gain or benefit to have regard to Policy 24 in Proposed RPS Change 1.	Seeks the appendix should set out the limitations where biodiversity offsetting is not appropriate.
Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	WCC Environmental Reference Group	377.515	Support	Considers biodiversity offsetting to be a less-than-ideal solution, the reality is that it will be necessary at times, and these principles ensure that environmental damage will be minimised.	Retain APP2 (Biodiversity Offsetting) as notified.
Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Director-General of Conservation	385.84	Support	Supports the proposed framework of principles for the use of biodiversity offsets, which is in line with the guidance document “Biodiversity Offsetting under the Resource Management Act”.	Retain APP2 Biodiversity Offsetting as notified.
Appendices Subpart / Appendices / APP2 Biodiversity Offsetting	Taranaki Whānui ki te Upoko o te Ika	389.134	Not specified	[No specific reason given beyond decision requested - refer to original submission].	Seeks that there is awareness of the impending National Policy Statement for Indigenous Biodiversity. [Inferred decision requested]