

Letter to the Editor

Ms Jemma Denny, a recent graduate of the New Zealand School of Forestry, writes in response to A Thomas, 'Biobanking: Conservation or Degradation?' 2011(2) NELR 54–62:

Dear editor

I have recently completed my Masters of Forestry Science at the New Zealand School of Forestry at the University of Canterbury, Christchurch, New Zealand. My research investigated the biobanking scheme in New South Wales and also mitigation and conservation banking in California and the United States. I therefore read Anne Thomas's article 'Biobanking: Conservation or Degradation?' with great interest. Having studied the available literature on biobanking and offset schemes worldwide, and having followed the development of the NSW biobanking scheme over the past four years I am always keen to see more academic analysis and discussion as schemes rapidly develop around the world. I do however wish to raise some points concerning Anne Thomas's conclusions that I feel are extremely important when debating the overall outcomes of the scheme.

I commend Anne's recognition of the importance of providing financial incentives to landowners, and this as a barrier to conserving biodiversity on private land to date. A pivotal improvement upon previous systems, the trust fund mechanism providing sustained income for biobank managers and owners is indeed a fundamental strength of the scheme. Her consideration of the numerous issues attributed to impeding the effective implementation of the scheme, concurs with my own research and others I have followed.

But I felt she misrepresented the scheme's objectives and this lead her to an erroneous conclusion. She correctly states that the scheme 'aims to protect biodiversity values by reducing the impact of urban development on the environment, while promoting more efficient, cost-based conservation'. I am concerned however that she uses 'three proposed guiding principles for biodiversity conservation as outlined by the NSW Government' as a basis for assessment, suggesting that the overall aim of the scheme is biodiversity conservation, which is misleading. Admittedly, this mistake is frequently made in commentary investigating this novel resource management mechanism. Nonetheless, it is one which requires urgent rectification so that such schemes are allowed to deliver the results they are actually designed to provide.

As a mechanism of sustainable development, offsetting and offset banking such as biobanking are intended to provide a balance of three 'results': economic, social and environmental. Success is realized with economic development via facilitating development projects; conservation by enabling perpetual conservation on privately-owned land; and outcomes both economically and environmentally in line with societies' needs and priorities.

Market-based mechanisms are employed so these outcomes are achieved in the most cost-effective way possible; meaning neither biodiversity conservation nor development should be more expensive under biobanking, compared to existing options. It should simply re-direct (private) finances to achieve more of these goals. Biobanking is therefore not a silver bullet for conservation. We still need national parks, reserves, conservation grants and the other existing conservation measures: biobanking simply offers an additional tool. I question whether it is therefore appropriate to assess biobanking against the three guidelines Anne suggests. Biobanking does not aim to achieve conservation all by itself, so should not be assessed as such. Anne rightly identifies some notable shortfalls within the current methodology. Her ambition for 'the management and improvement of all ecosystems' to be considered in the process of credit

assessment and allocation, 'which takes into account all facets of the ecosystem and assignable units that can satisfactorily represent all biodiversity values' is widely attractive and respectable.

Yet while such comprehensive assessment methodologies continue to be developed and debated around the world, scientific consensus has yet to mature. More importantly however, the time and money more comprehensive measurement involves potentially risks eroding any cost and time efficiency benefits the system is designed to deliver, deterring participation. Anne readily notes the already-rigorous and onerous requirements of biobanking as it currently stands.

Lastly, I believe that the scheme is indeed designed to aid prevention of biodiversity destruction because it encourages private land-owners with existing biodiversity values on their land to retain and perpetually manage them. Anne instead criticizes the scheme for failing to discourage degradation on development sites. Under the mandate of improve or maintain, biobanking cannot be expected to prevent all loss and degradation, and rather it maintains a balance of biodiversity 'stock' that incorporates sustaining existing values as part of this. Again, biodiversity conservation in New South Wales will be achieved through a variety of mechanisms, not biobanking in isolation.

For better or worse I offer no alternative opinion as to the success or otherwise of New South Wales' biobanking scheme and simply applaud Anne Thomas for her research. I only request that the correct frame of assessment be applied so that when judging the effectiveness of the scheme, it is done with a full appreciation for the true potential and intent of the scheme. Anything less risks arriving at incorrect conclusions; unfairly jeopardizing the positive outcomes that lie within reach.

Biobanking is not the isolated silver bullet conservation has been waiting for and should not be approached as such. I commend Anne Thomas for endeavouring to hold biobanking to a necessarily high standard and look forward to joining her in observing how the biobanking scheme can be continually refined and improved to achieve the best environmental, economic and social outcomes possible.

Jemma Denny
28 September 2011