

Fraser Coast Branch of the Wildlife Preservation Society of Queensland
PO Box 7396
Hervey Bay 4655

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Research Director

Agriculture, Resource and Environmental Committee

Parliament House

BRISBANE

Submission on Queensland Environmental Offsets Policy 2014.

We hereby tender our submission on the draft Queensland Environmental Offsets Policy 2014. The Fraser Coast Branch of the Wildlife Preservation Society of Queensland has approximately 60 members who have been invited to comment on the submission. Our chief objective is the conservation of Australian flora and fauna via the conservation of habitat.

Introduction:

We feel that the draft policy does not adequately limit the use of offsets, is deficient in requiring suitable environmental criteria for offsets, is deficient in protecting offsets, and accepts unsuitable compensation for measurable damage to vulnerable ecosystems.

Comments on Particular Elements of the Policy:

1. Availability of offsets: Offsets refer to damage done to endangered ecosystems and species for a proposed development outcome. As these ecosystems are already in threatened state, all other options for avoiding or mitigating environmental damage should be investigated prior to the consideration of offsets. We feel that offsets can only be justified in cases where the proposed project is strictly geographically constrained eg communications towers on hilltops, ports on the coast. We feel that for residential development and even the siting of such utilities as hospitals, police stations and other community infrastructure, it is possible to construct the facility on a site which does not support an endangered ecosystem. We feel that even such activities as coal mining do not justify offsets since coal deposits are so widespread in Australia.
2. Irreplaceable unique ecosystems: Ecosystems which are critically endangered or unique (virtually impossible to replace) should not be considered for destruction and as being able to be offset.
3. Timing of offsets: The proposed damage to an existing ecosystem should not commence prior to the approval and acquisition of the offset. If the offset involves planting, then the

age that the planting becomes functional eg providing food or filtering water needs to be taken into account. Timing will be absolutely critical where another species depends on the ecosystem for its vital needs eg. trees for koalas will need to be 20 years old before useable habitat will be created.

4. Requirements to be met by offsets:
 - A. Offsets should consist only of land with the same ecosystem or habitat values as the land to be cleared.
 - B. Offsets should be geographically close to the area to be cleared preferably within the same catchment so that the function of the ecosystem in the catchment can be maintained. Eg. Filtering of runoff by wetlands, soil stability in riparian or montane areas.
 - C. If an area of vegetation is to be lost, the offsets should not consist of several fragments of land. This is to avoid edge effects, weed invasion and genetic isolation of flora and fauna populations.
 - D. An endangered ecosystem should not be reduced to a single parcel of land as this risks destruction by a catastrophic event such as a bushfire or flood.
5. Determination of Offsets. Consultants, who provide advice on offset selection, need to have the relevant academic qualifications and to be accredited by the Queensland Government. After selection, all offsets need to be independently verified by an officer of the Department of Environment and Heritage. The selection of the offsets should be publicly posted so that members of the public can make comment.
6. Nature of offsets: Financial contributions to research or other environmental rehabilitation, not related to the vegetation to be destroyed, must not qualify as valid offsets since these do not contribute to the actual physical conservation of the endangered ecosystem. Actions to increase the “social” or “economic” values of the offset are not related to conservation values and should not be considered as offset contributions. If the Government does decree that financial contributions may form part of the offset, the financial contribution should be quarantined in a trust account to ensure that it is utilised only for the conservation of endangered ecosystems. The financial trust should be open to public scrutiny.
7. Monitoring: The proponent should be required to meet a set of ecological outcomes within the offset. An annual report should be lodged with the DEH on the progress towards the targets. Depending on the nature of the offset, this may involve a few years to up to 20 years. This especially applies to offsets which involve replanting.
8. Degree of remediation required: Offsets are required for ecosystems that are registered as of concern/threatened on Federal basis or on a State basis. If the Federal Government requires a certain offset, and the administrator of the offset policy regards the Federal requirement to be inadequate to address the damage done, it should be possible for the administrator to condition the offset requirement. In other words, the precautionary principle should prevail. It should also be possible for local governments to protect ecosystems which are endangered within their local government area - although the ecosystems in mind may not be endangered at a State or Federal level.
9. Level of protection of offsets: Offsets need to receive an absolute level of protection. The protection needs to be in perpetuity. It should not be possible for the chief executive to revoke protection at his discretion.

10. Transparency: The Queensland Government needs to establish a register of offsets granted that is open to public scrutiny without charge. All relevant data with regards to the offset should be available from this register.
11. The Currumbin Wildlife Sanctuary: The sanctuary is an important part of the heritage of the Gold Coast. It has the largest walk through aviary in the southern hemisphere. It was acquired by the National Trust status in 1976. We believe that it should continue to occupy this site and to provide education and research facilities for the foreseeable future.

Thank you for the opportunity to comment on the proposed bill. We sincerely hope that consideration of submissions such as ours will lead to an improvement in conservation outcomes.

Carolyn Bussey

Treasurer

Contact:

Telephone: 07 4129 5979

Email: bussey.tony@westnet.com.au