

24 March 2014

The Research Director
Agriculture, Resources and Environment Committee
Parliament House
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Environment
Institute of
Australia and
New Zealand
SOUTH EAST QLD DIVISION

Re: EIANZ's Comments on the Proposed Offsets Bill and Related Policy

The Environment Institute of Australia and New Zealand (EIANZ) is pleased to submit its comments on the recently released Offsets Bill and related Policy. The Institute acknowledges the efforts being made by the Queensland Department of Environment and Heritage Protection to improve the way in which offsets are being applied to address development project impacts.

The EIANZ is the leading professional body in Australia and New Zealand for environmental practitioners, and promotes independent and interdisciplinary discourse on environmental issues. On all issues and all projects the Institute advocates good practice environmental management delivered by competent and ethical environmental practitioners.

The Institute recognises that the goals of the Bill are to reduce duplication and to provide greater certainty around offset requirements. However, we must not lose sight of the fact that our biodiversity is in decline and our decisions today will affect biodiversity into the future. The consequences of our past and present actions, even with increasing scrutiny, are yet to be realised and the trend of processes that threaten biodiversity continue to reduce flora and fauna abundance. Expectations around offsets vary from recreating a vegetation community or habitat and protecting in them in perpetuity, to purchasing land to secure the future biodiversity or making an offset payment to enable funds to be used to protect these resources elsewhere, thereby enabling a project to proceed. The Institute supports the need for offset requirements to be tailored to each species or community being considered.

Against this backdrop we wish to express concern regarding some aspects of the proposed Bill and Policy (recognising that the associated Regulations are yet to be released). Specifically, our concerns are as follows:

- The proposed Bill and Policy appears to the Institute to have been written in response to present difficulties in establishing and enhancing offsets (e.g. land use conflicts and limited knowledge regarding restoration science), without focusing on the likely outcomes of implementation. We are not convinced that offsets will achieve the desired goal of protecting biodiversity in many cases.
- We are concerned that the drafters of the Bill are overly optimistic about both the low cost of landowner incentives and administration. We believe that these two aspects could consume much more money, leaving fewer funds for actual on-the-ground offsetting.
- A key solution to offsets appears to be in providing readily available offsets in the Galilee Strategic Corridor. However, this will disconnect the offset from the impact both in distance and climate. Also, the areas in the Galilee are not under significant pressure and, therefore, arguably do not need protection.
- Careful thought should be given to the implications of defining significant impact. It is possible that 'insignificant' impacts assessed for a number of proposals separately, may cumulatively make up a significant impact. The Department should develop strategies to address cumulative impacts that are the result of numerous minor impacts to an individual environmental value.

- Whilst we understand the logic in focussing on strategic offsets, and also appreciate the efficiencies in managing larger areas being easier, the costs would appear to be some compromise in favourable geographic and climatic conditions relevant to the affected values being offset. Furthermore, very little of Queensland is free of some existing land use tenure, (e.g. grazing leases or mining or petroleum permits). The availability of sufficient land for strategic offset development should be tested, rather than deferring to already over-stretched local governments, which we consider to be a questionable approach.
- The possibility of Offsetting an Offset to enable a new development is troubling. This suggests that one developer's obligation is temporary and appears to ignore the difficulty in establishing biodiversity offsets. This smacks of expediency and compromise.

In summary, we recognise that offsetting is difficult and support the move to provide greater certainty. However, the EIANZ is concerned that a significant potential outcome of implementing this Bill and Policy will be a reduction in the quality of offsets, which would not be in the best interest of the people of Queensland.

The EIANZ would be pleased to assist in and contribute to the further development Offsets Bill and Policy. Please don't hesitate to contact me if you have any questions regarding our submission. I can be contacted directly on (07) 5429 8480 or at seq@eianz.org.

Yours Sincerely,



Vicki Low
President, South East Queensland Division
Environment Institute of Australia and New Zealand