



The Research Director

Agriculture, Resources and Environment Committee

Dear Sir/Madam,

24 March 2014

Re The Environment Offsets Bill 2014

The Logan and Albert Conservation Association thanks you for the opportunity to make the following comments in regard to the Government's Environment Offsets Bill 2014:

1. By any assessment, offsets do not provide an opportunity to improve biodiversity values across the landscape. Offsets result in a net loss of biodiversity values, genetic diversity and functionality across a landscape.
2. This is about developing a method of commodifying landscape values so they may be easily transacted. This is an appalling, unscientific concept. Each ecosystem is unique, has a connection to its place and cannot be recreated, within any human timescale, to replace the site lost. The natural landscape in Queensland has now been historically compromised, with enormous levels of tree-clearing and severe changes to hydrology, huge feral pest species and significant alteration of biodiversity values etc. The balance is long gone. To propose ecosystem trading across this landscape is totally inappropriate and scientifically naive. Rather than compensating for "genuinely unavoidable damage", LACA believes offsetting will simply be used to justify avoidable destruction.
3. The genetic diversity of each particular species in each place is a unique expression of the environmental pressures on that species over time in that location. This is how species ultimately survive across a landscape against disease, climate change etc. By steadily removing parts of a total landscape population through offsetting, the total genetic pool available for each species' long term survival across that landscape is limited.
4. Offsets are touted by its proponents as a way of providing 'certainty' for development and mining interests. Yet 'offsets' reduce even further any 'certainty' that might remain for the environment because the landscape will be subject to a kind of 'offsets ping-pong' where 'corridors', to which offsets will be added, may well in turn be subject to further offsetting. This will limit the capacity of environmental planners, protection agencies and legislation to effect positive long term environmental improvements across the landscape.

5. The offsetting concept is falsely underpinned by a view that the ecological values of any given site are well known and understood, This is not the case. Most of Queensland remains very poorly surveyed for its biodiversity values.

6. There is no independence in the environmental impact assessment process when proponents of a development employ their own consultants to examine the ecological values of a site. In this way consultants are compromised. This means that there can be no clear certainty in this process that the 'avoid' and 'minimise' stages of such an assessment will be given any serious consideration before moving onto the convenience of offsetting.


7. There is no compliance-based certainty that areas of landscape set aside to balance the loss on a development site of vulnerable ecosystems may not be properly assessed for their 'comparable' ecological values.

8. LACA believes that offsets may also be discounted "in exceptional circumstances", where compensation "may make the project unviable" or the project demonstrates "significant overall social or economic benefits". This will be an unacceptable outcome.

9. LACA believes that through repeated cycles of deregulation like off-setting, the Government is releasing big business from its duty of care towards both people and the environment.

10. Further potential trends in offsetting are a concern:

- Rehabilitation of mine sites may well be assessed as part of an offset, while so-called "like-for-like" requirements will be "broadened" where exact eco-systems aren't available elsewhere for protection, possibly to include offset discounting, ta complete departure from "like-for-like" conservation, and the use of spending on education as an option.
- New mechanisms aimed at reducing the amount of agricultural land locked up in offsets to help improve relations with farmers and other landowners may over-ride any environmental compensation that might arise from offsetting.



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