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Research Director,  
Agriculture, Resources and Environment Committee,  
Parliament House,  
George Street, Brisbane, Q 4000  
By email only: [AREC@parliament.qld.gov.au](mailto:AREC@parliament.qld.gov.au)

Dear Sir,

**Submission re: Environmental Offsets Bill 2014**

Bundaberg Branch of the Wildlife Preservation Society of Queensland thanks you for the opportunity to make a submission. We are extremely concerned about the proposed Environmental Offsets Bill 2014, which appears to be aimed primarily at providing benefits to industry at the expense of good environmental outcomes.

We sincerely hope that our concerns will be taken into account, and that changes will be made which will provide greater security for maintenance of Australia's diverse ecosystems.

**1. Offsets approved to date have not provided satisfactory solutions:**

How can any level of government suggest it is acceptable to damage the environment by clearing an entire ecosystem, and counterbalance that damage elsewhere?

- Destruction of a threatened and/or endangered ecosystem results in an immediate and irreversible decline of the total area of the existing ecosystem.

**2. Threatened and endangered ecosystems must be protected:**

Areas identified as containing threatened or endangered ecosystems must be retained, and protected from the 'edge' effect which degrades the area over time. Such ecosystems are irreplaceable, and should be valued for the ecosystem services they provide.

**3. Offsets should be a solution of last resort:**

- Land offered for offset is unlikely to compare favourably with the ecosystem that has been cleared,
- Revegetation of the area offered as an offset would take many years to reach maturity,
- With decimation of a whole ecosystem many species of birds, mammals, invertebrates, etc. lose their habitat, and are unable to move elsewhere. In many cases it is unlikely that populations of species will recover.

#### **4. Exclusion provisions for major projects are not acceptable:**

It is concerning that coordinated projects ie. major projects such as the Abbot Point terminal expansion are excluded from the standards and criteria expressed in the Bill.

- We request that this section of the Bill be revisited, and all projects be required to take into account the likely impacts on irreplaceable and highly valuable species and ecosystems.

#### **5. Significant residual impacts:**

The Bill only deals with what is referred to as “*significant residual impacts*”, not with all the known likely residual impacts of a proposed development, or those which are perceived to be unable to be avoided.

- Clearly residual impacts of any kind are likely to create a cascade effect resulting in loss of species within the ecosystem. It is not sufficient for someone to decide what is to be considered a “*significant residual impact*” without considering all residual impacts.

#### **6. Need for accountability:**

- Offsets should be monitored by qualified consultants appointed by the Queensland Government, and be subject to an annual audit that is publicly available to ensure that the public interest is being maintained, and that endangered ecosystems being genuinely enhanced and protected within offset areas.
- Financial contributions in lieu of provision of an offset area, or for research or environmental rehabilitation, should not qualify as valid offsets as these do not contribute to the conservation of the endangered ecosystem.
- If financial contributions are accepted as valid compensation for loss of endangered ecosystems then that money should be held in a trust account, and used specifically for purchase of land with high ecological values to be protected in perpetuity.
- Legislation should ensure that offsets are legally secured. It is inappropriate for developers to commence development prior to an offset area being legally secured and an approved offset delivery plan in place.

Unfortunately time constraints have limited our ability to completely address all matters contained in the Bill.

It is regrettable that the Bill appears to be aimed at providing benefits to industry rather than clear environmental outcomes, for instance, describing offset mechanisms as “shelf-ready products.”

We are also concerned that the Queensland Government appears to anticipate the Commonwealth will give accreditation to what, in our opinion, is an ineffective State offset policy which will do little to protect the existing high value ecosystems of Queensland.

We would appreciate receiving feedback on any changes that are made to the Bill.

Yours sincerely,

Ann Jarman,  
Hon. Secretary,  
WPSQ Bundaberg Branch Inc.

