

## Environmental Protection and Other Legislation Amendment Bill 2022

**Submission No:** 14  
**Submitted by:** Gecko Environment Council  
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**Submitter Comments:**  
**Submitter Recommendations:**



Gecko Environment Council Assn Inc. ABN 90 689 258 843  
Gecko House, 139 Duringan Street, Currumbin QLD 4223  
📞 +61 7 5534 1412 📧 office@gecko.org.au 🌐 gecko.org.au

25 October 2022

Committee Secretary  
Health and Environment Committee  
Parliament House

Email: [hec@parliament.qld.gov.au](mailto:hec@parliament.qld.gov.au)

Dear Committee Secretary

**Re: Submission on the Environmental Protection and Other Legislation Amendment Bill 2022**

Gecko Environment Council (Gecko) thanks the Committee for the opportunity to make a submission on the above Bill. Gecko Environment Council is a not-for-profit environment association founded in 1989 which has been active for the past 33 years in protecting the environmental values and ecological sustainability of the Gold Coast, Queensland and, when appropriate, nationally. Gecko's Mission is "To actively promote, conserve and restore the natural environment and improve the sustainability of the built environment of the Gold Coast region in partnership with our member groups and the wider community."

We have read the supporting documents and limit our comments to the amendments proposed to the Environmental Protection Act 1994 —amendments intended to support industry, streamline and clarify regulatory processes, better protect the environment, and improve community input and transparency,

Gecko offers its strong support for the entirety of the submission from the Environmental Defenders Office, which includes strong recommendations on provisions that will improve the environmental impact statement (EIS) process. We also welcome amendments aimed at improving compliance and enforcement powers to enable the more effective protection of the environment.

**Proposed amendments:**

**Clause 7- Removal of the requirement for an environmental management plan (EMP) in an EIS.**

As an important part of an EIS, and EMP outlines the scope of work that is proposed to manage the impacts of an action and informs the community of the sum of impacts that is envisaged. When going through lengthy and technically detailed supporting information it is helpful to the community to be able to understand where they might better focus their comments. In considering the impacts of a proposal, it is not possible for a layperson to

evaluate the full extent of an impact without information on how it could be ameliorated as part of a management plan. In particular it affords members of the community with on-ground knowledge or specialist information to highlight unforeseen impacts which need to be included in an EMP.

**Clause 8- Requirement that the terms of reference include a summary of the potential adverse environmental impacts of the project; and the measures proposed to avoid or minimise the adverse impacts.**

Gecko supports the recommendations made by EDO for a greater amount of information to be included in the terms of reference including the full extent of environmental impacts. Providing the fullest amount of information about a project might well enable a regulator to determine at the outset that an early refusal is warranted, saving considerable costs to a proponent or to stipulate areas which an EIS should address more comprehensively.

We further support the inclusion of impacts on cultural heritage to be include as grounds upon which a project may be refused or limited.

We thank the Committee for its consideration of our views.

Yours sincerely



Secretary

Gecko Environment Council.

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