



## CLARENCE ENVIRONMENT CENTRE Inc

87-89 Skinner Street  
South Grafton 2460  
Phone/ Fax: 02 6643 4611  
Web site: [www.cec.org.au](http://www.cec.org.au)  
E-mail: [admin@cec.org.au](mailto:admin@cec.org.au)

---

Date: 5<sup>th</sup> March 2021

### Submission to the EPA's Draft Regulatory Strategy

#### Introduction

The Clarence Environment Centre (CEC) has maintained a shop-front presence in Grafton for over 30 years, and has a proud history of environmental advocacy. The conservation of Australia's natural environment, both terrestrial and marine, has always been a priority for our members, and we believe the maintenance of healthy ecosystems and biodiversity is of paramount importance.

As an organisation we have had a lot of interaction with the EPA over that period, unfortunately, little of it positive. We acknowledge that the EPA's responsibility extends well beyond our particular 'sphere' of interest, and includes pollution, toxic spills, emissions etc, and point out that the following comments are specifically those relating to our local rural issues, forestry, land-clearing, erosion, etc.

#### The Strategy

The latest Strategy opens with the encouraging objective to, "*protect, restore and enhance the quality of the environment having regard to the need to maintain ecologically sustainable development*". This is what we will be commenting on below.

#### Our view of the EPA's responsibilities

This submission will be brief, because we strongly believe that the EPA's responsibility is simple. **It is to monitor and enforce regulations**. As a result, we do not see: "*bringing community, government, industry and other stakeholders together to solve problems*", as being something the EPA should be doing, in fact, we believe it would lessen your ability to effectively regulate.

*"Responding in a timely manner to requests, queries and incidents, and communicating clearly and respectfully with meaningful content"*, on the other hand, is something the EPA needs to do and frequently doesn't.

Another responsibility, which is directly linked to the above, is to work with legislators to correct badly written legislation, i.e., legislation that is open to interpretation, or contains wording that makes enforcement impossible, thus ensuring that regulations are effective.

Over the years, the vast majority of cases our organisation has reported to the EPA, have failed simply because of badly written legislation. We cannot continue to allow environmental protection to be waived because of legislative statements such as: “damage to threatened species must be minimised” or “avoided where possible”. These “weasel words” must be eliminated, or we might just as well have no legislation, or the EPA.

## **Our view on how you engage with stakeholders.**

We view the most important stakeholders as the general public, after all, it’s our environment that is at stake. In the past, because of the inability, or simply unwillingness, on behalf of the EPA to prosecute offenders that have been reported by organisations such as ours, stakeholder relationships have become adversarial. This situation is singularly unhelpful, and illegal activity often goes unreported because reporting is seen as a waste of time!

## **Discussion**

We would like to specifically comment on “Ecologically Sustainable Development” (ESD), something the EPA aspires to uphold. Governments around Australia have clung to this principle since the phrase was first introduced more than a quarter of a century ago. It was introduced, we believe, to facilitate growth by tricking the general public into believing development can continue without damaging the environment.

ESD was introduced along with 2 other principles, Intergenerational Equity and the Precautionary Principle, both admirable aims. However, after 25 years, has this supposed ESD led to intergenerational equity? The answer is, it has not. In fact, climate change, which was already occurring and acknowledged before those principles were enacted, has remained unaddressed in Australia, with outcomes now likely to become catastrophic as a result. Certainly, there is no equity there for future generations!

We believe the ESD scam needs to be exposed, because development means growth, something essential to our economic wellbeing under current political philosophy, which has been adopted by all governments around the world. However, the reality is that the use of finite resources to underpin that growth, iron ore, copper, bauxite, uranium, gold, and other heavy metals, oil, plastics, silica; in fact, anything at all that is not renewable, **is not sustainable because they will ultimately run out.**

We sincerely hope that someone will take this message seriously. We live on a planet with amazing natural qualities, and **real** sustainability, not some meaningless 3-word slogan, is the only hope for human survival over the long term.

We thank you for the opportunity to comment

Yours sincerely

John Edwards  
Honorary Secretary.