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SUBMISSION

to

Department of Sustainability, Environment, Water, Populations and Communities,

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on the

EPBC ACT ENVIRONMENTAL OFFSETS POLICY

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(Scientific licence - No SL 100126)
Honorary Secretary
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Environmental offsets policy

Introduction.

The Clarence Environment Centre has maintained a shop-front in Grafton for over 22 years, and has a proud record of environmental advocacy, particularly relating to biodiversity conservation and inappropriate development.

Our focus has always been on the protection of biodiversity as a whole, not just those species that have been fortunate enough to receive a degree of supposed protection as a result of being listed as a “Matter of National Environmental Significance” (MNES) under the Environment Protection and Biodiversity Conservation Act.

Across the nation we have scores, possibly hundreds of species, that meet the criteria for listing as threatened, but miss out on consideration because nobody has the time or resources to present their case, and the vast majority of Australian native species are in decline, but we only focus on listed species and justify the destruction of all species to support economic growth. Now, with offsets, we are asked to consider the justification of destruction of MNES for the sake of the economy.

Preamble

There is nothing more alarming to conservationists than to read that proposed changes to environmental protection laws will “provide flexibility”, will “remove red tape”, or “streamline processes”; all terms that have become synonymous with plans to degrade, devalue, or remove environmental protection. Time and again over the past 6 years we have experienced disappointment at changes to legislation that weakens environmental protection, at a time when we should all be aware that that protection of biodiversity is critical for the survival of mankind.

What is more depressing is that this erosion of protection is driven by political expedience, directly linked to pressure from right-wing extremists, lobbyists working for cashed up property developers, multinational mining conglomerates and the like, which are driven by a profit motive and have no desire, or need, to consider the long-term consequences of their actions.

The Offset Philosophy

As the Clarence Environment Centre is fundamentally opposed to any offsets program, there is no need for us to submit the Offsets Policy to minute scrutiny, but rather attempt to justify our opposition.

Examples given in the consultation document back up our concerns, that offsets that allow high conservation value habitat to be destroyed, with a parcel of land with equal values conserved in its stead, simply equate to a net loss of habitat equal to that being destroyed.

At the same time, the perception conveyed that the offset land is conserved in perpetuity, is little short of fraudulent. It would only need (in NSW) the Roads and Traffic Authority to determine that a new highway needs to be built across that offset land, and that would be the end of it. Right now, in NSW, we have a State government which is actively cutting back the national parks estate, and the environmental protection they previously provided, and in our region, councils that are routinely approving rural residential developments in forested areas which are mapped as regional and local wildlife movement corridors.

Our letters of protest to the State planning department, and both State and Federal environment departments have done nothing to stop this destruction. While we endorse the concept (page 3) of offsets “*increasing connectivity across the landscape*” (to offset unavoidable impacts for critical infrastructure only), the reality is that there is no protection for these areas on the ground.

Also the concept that an offset can also be satisfied by rehabilitation of a degraded site to a similar standard as the land to be sacrificed is nonsense. Does the author of the consultation document have any concept of how long it takes to grow a habitat tree? It is a minimum 200 years process! If a Eucalypt forest had been planted by Governor Phillip upon his arrival in 1788, it would only now be considered to be an ecologically functional old-growth forest.

We were disappointed that the example provided, showing how offsets will work (Section 4.1, ***“How are offsets different to avoidance and mitigation measures?”***) was not accompanied by an explanation of just **how** it would work. That explanation relates to a challenge of *“putting in place measures to reduce sediment runoff from a development site that may otherwise affect a threatened fish species”*, and that: *“Only after all reasonable avoidance and mitigation measures have been identified (and presumably rejected as ineffective or impractical) will an offset be considered”*.

It needs to be understood that the determinations of the vast majority of species, listed as threatened, identify loss of habitat as the primary factor leading to their decline, and if that threat is not reversed, extinction will be inevitable. Our question is, what possible offset could be initiated to solve the impact of yet more loss of habitat on that threatened fish species – build another river?

In conclusion

The Federal Environment Department needs to take a much harder line to protect biodiversity, and put stronger measures in place to enhance and increase areas of native vegetation, particularly along identified fauna movement corridors to improve connectivity.

It is our firm belief that offsets for the destruction of native vegetation should only be considered to allow the construction of essential infrastructure, and then only after all options to minimise impacts have been rigorously explored.

Where offsets are the only option, those offsets should not consist of existing habitat, which is already protected to a lesser or greater degree, but involve the rehabilitation of degraded land, with priorities given to enhancing habitat connectivity, particularly along wildlife movement corridors, which should in turn be protected from development.

We thank the Minister for this opportunity to comment, and urge the Department which, after all is responsible for environmental protection and biodiversity conservation, to take that responsibility seriously.

Yours sincerely

John Edwards
Honorary Secretary.