



CLARENCE ENVIRONMENT CENTRE

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Ms Robyn Parker
Minister of Environment and Heritage
NSW Government
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Dear Minister

Ecologists Accreditation scheme

The Clarence Environment Centre has maintained a shop-front presence in Grafton for more than 22 years, and has a proud record of environmental advocacy. For many years we have been seriously concerned at the way developers, including government agencies, are able to employ 'development friendly' ecologists to prepare Environment Impact Statements (EIS), and similar documents to support their development applications.

As you may know the Green's MLC, Cate Faehrmann, plans to shortly introduce the Ecological Consultants Accreditation Scheme Bill into parliament, and this letter is to seek your support for the Bill.

The current system allows discrimination against ethical ecologists who find it difficult to obtain work simply because, by doing the job properly, they might add costs to the developer by requiring measures to be taken to avoid or offset the identified environmental impacts.

The Clarence Environment Centre can give a prime example of poor ecological assessment - the original EIS for the Coffs – Clarence Regional Water Supply Project, where our members identified serious deficiencies. Specifically, the Shannon Creek dam assessment which positively identified only one threatened flora species, claiming 3 plants "could be" inundated by the dam.

The public was denied access to the site, and as a result our own investigators were forced to trespass in order to check the facts. It took less than 6 hours for them to identify eleven threatened flora species and a new undescribed species (now listed as endangered), that have now been destroyed by the dam. No less than 3 endangered, 2 vulnerable, and 2 other RoTAP species were found near the proposed dam wall, on a bluff that was to be demolished to construct the spillway.

The spillway site was not assessed because the consultant botanists had been instructed by the project manager to only assess vegetation below the proposed high water line. That same officer subsequently altered a rainforest community description, identified by the consultant botanists, to read "Flooded Gum closed forest", which allowed a range of threatened flora to be left off the list of plants considered likely to occur there, and require targeted searches.

Again, in only a few hours, our botanists found 3 more threatened species in that rainforest, including one endangered species that extended its southern range by 40 kilometres.

The then National Parks and Wildlife Service accepted our advice, and forced the proponents, North

Coast Water and the then Department of Public Works to resubmit a Species Impact Statement that eventually totalled more than 1,400 pages, and correctly identified and assessed 5 endangered ecological communities, 13 threatened flora species, along with over 30 threatened fauna.

Unfortunately, by that time the project had progressed too far. Millions of dollars had already been spent on the project which, had the ecological surveys been undertaken properly, would have seen one of the less environmentally damaging options chosen for the site. As it is, all the identified threatened flora, and habitat for fauna has been destroyed, and the best part of \$200 million spent on this white elephant which has yet to see a single litre of water delivered to the community. In fact had the dam been completed and filled in 2003, as originally planned, still not a single litre would have been taken out.

The worst drought in the 175 year history of European settlement of the area, saw water levels in the Nymboida River, the current source of the region's water, drop to the level when water will now be taken from the Shannon Creek dam, lasted for less than six months. Yet currently hundreds of thousands of dollars annually are spent by ratepayers to maintain a facility which contains sufficient water to supply the entire region for three years without even imposing water restrictions.

This is now history, but all the environmental destruction and possibly a hundred million dollars could have been saved, if an ethical consultant had been used in the first instance.

Therefore, we believe it is imperative that the nexus between developer and consultant must be broken. We do have some concern over the proposed Bill, which still allows developers to choose consultants. However, stricter licensing, compliance monitoring and penalties for unacceptable performance should ensure a higher level of professionalism and ecological protection.

We sincerely hope you will support the Bill.

Yours sincerely
John Edwards
Honorary Secretary.