

Submission re EPBC Act

In the department's facts sheet about the EPBC Act, the first aim is to provide for the protection of the environment, especially matters of national importance. I submit that all environmental matters, no matter how large or small, must be considered as being of national importance.

So I approach this from the point of view that, the Commonwealth must have overriding authority in all environmental matters. The states have consistently proved that they are either incompetent and/or corrupt in conserving the environment. I would like the Commonwealth Government to consider the environment as a whole, from the smallest land subdivision to the country's river systems.

From this, I strongly object to the last aim, that of "working with the states ... in delivering a national scheme ...". The states have had their chance, and they have failed dismally.

1. Land Planning

As above, the overriding authority for the land-planning of any public land must be a Commonwealth responsibility. The States and Local Councils have shown overwhelmingly that they are incapable of competently and honestly administering Crown Land, National Parks and Public Reserves.

In NSW there is a strong hint of corruption in all its dealings. We are even facing the prospect of national parks being given over to tourist hotels.

2. Water Conservation

The proliferation, both planned and actual, of desalination plants is deeply concerning. They should not proceed without prior investigation into longterm environmental effect.

As for rivers, there is the Victorian north-south pipeline and the totally incompetent administration of the Murray-Darling system by both Qld and NSW. And there are totally inappropriate dams planned which would have enormous adverse environmental consequences e.g. Traveston Crossing (Qld) and the Tillegra (NSW).

There is an urgent need for a competent, independent body to oversee water management for the whole of Australia.

3. Coastal Buffer

All 3 levels of government have prevaricated on what sort of coastal buffer to provide for in the face of rising sea levels. The States and Local Councils have been approving developments without allowing any coastal buffer at all. As an example, the local council here in Coffs Harbour recently approved a 9-storey high-rise barely 100 metres from the sea.

There have been far too many weather/climate events to ignore this any more.

From an environmental viewpoint, allowance should be made for a receding

shoreline, otherwise shoreline flora and fauna will be decimated. Damage to vulnerable buildings will create massive pollution, both inland and out to sea.

Without entering into scientific arguments, a reasonable buffer would appear to be a "3 x 3" - allow for a 3 metre rise in sea levels and a 3km buffer to allow for storm damage. There is already a precedent in Australia for a coastal buffer

A longterm plan should be introduced to evacuate and demolish at-risk properties and demolish the sea walls which will thereby have become superfluous.

4. Forestry

Here is a glaring example of the inability of the states to manage forestry. For far too long, we have had environmentally-precious forests given over to timber interests. Forests must be considered a national asset.

5. Removal of Political Interference

This year we have had the curious situation where the (then) NSW Planning Minister actually appealed against a court decision that his Departments be required to consider climate change flood risk.

I propose that, like the courts, the administration of the EPBC Act be given to an independent, expert body.

6. An Environmental Code

I have no idea if the Act allows for any firm standards, so I would like to propose my own for consideration:

- a. **Coastal Buffer.** This has been avoided for far too long. I submit that any standard is better than none. Estimate of rising sea levels by 2100 vary from a paltry 54cm to 7metres. With such a variation, I repeat my call, as above, for an allowance of at least 3 metres.
- b. **Developments on steep ground and close to rivers.** Again, a standard is needed to protect against erosion and pollution.
- c. **Indigenous culture, heritage and beliefs.** A recognised national authority is needed to assess impact on indigenous values, and preserve sacred sites. It must liaise with local aborigines.
- d. **The rivers** are generally in a parlous state. I would like to see a standard which allows rivers to flow as naturally as possible, at all times. In other words, the flow must take precedence over all else.

Dry riverbeds must necessarily soak up huge volumes of water, which would otherwise replenish downstream flows. We must try to avoid further acidification of the rivers, and any more damage to the Coorong.

- e. **Wildlife Corridors** There is an urgent need to restore, maintain and expand wildlife corridors.

f. Human population. I would like to see the Department, under the EPBC Act, come up with a recommendation, based on environmental guidelines, on future population growth. We are facing the loss of arable land, rising temperatures, more severe droughts and reduced rainfall. There has to be a breaking point at some time, and I would like to see the Environment Department play an active role in advising on this. Overpopulation will create (or has created already?) extreme environmental damage.

g. Biodiversity It's all very well for the Act to aim to "conserve Australian diversity". But to be more than just words, there is a huge task required to make this happen:

- * a serious effort to eradicate all noxious flora and fauna,
- * creating national parks in environmentally-sensitive areas,
- * better management of resources, including better policing and more severe penalties for poaching flora and fauna,
- * the immediate introduction of a tax on plastic shopping bags,
- * the immediate introduction of legislation for refundable deposits on drink containers.

Thank you,

Mal Anderson, Coffs Harbour NSW