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Our Ref: Aqua Doc # [REDACTED]  
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21 October 2011

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**RE: AUSTRALIAN GOVERNMENT BIODIVERSITY AND OFFSET POLICIES  
WATER CORPORATION COMMENT**

The Water Corporation of Western Australia is pleased to provide this comment with respect to the above policies. These are as follows.

**Biodiversity Policy**

The document is acceptable in its current form and contains no issues of concern to the Water Corporation.

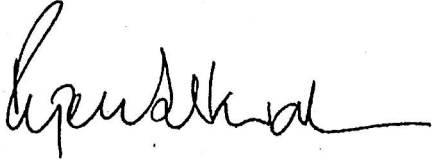
**Offset Policy**

The following comments are provided with respect to the Offset policy:

- Introduction: It is noted that the draft incorporates international best practice. However no mention is made of State based positions with regard to offsets, for example the current Western Australian Environmental Protection Authority Offset policy/guideline.
- Introduction: There is limited reference to Strategic approaches for offsets.
- Page 4: There needs to be an explanation as to how offset ratios are calculated to ensure that they are "of a size and scale proportionate to the impacts being offset". A specific example is the ratios for offsets for impacts on Black Cockatoo habitat which have changed significantly over the past two to four years.
- Page 11: There is a small difference in the magnitude of offsets as required by the Western Australian government and relevant departments. Ensuring the offsets as required by both State and Federal governments are of a similar nature if not the same would avoid misunderstandings by proponents.
- Page 12: The consideration of cost, ability to implement and previous environmental record is a positive measure.
- It is considered that the Environmental Offset Assessment Guide is unclear and confusing. It needs to be rewritten to improve understanding by all interested parties and users.
- The setting of a target of 75% as part of the Methodology is good. However there needs to be an explanation of how the target was derived.

We trust that the above provides information that is useful to the Department in the finalisation of the Biodiversity and Offset guidelines. We look forward to being able to provide further assistance if required and, on completion of the review and drafting, seeing the final document.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rupert Duckworth', with a long horizontal flourish extending to the right.

**Rupert Duckworth**  
Manager EIA & Approvals