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## **Australian Government Biodiversity Policy – Consultation Draft**

### **Environmental Offsets Policy – Consultation Draft**

The Bunbury Wellington Economic Alliance (BWEA) welcomes this opportunity to provide comment in relation to the reform of the Environment Protection and Biodiversity Conservation Act (EPBC Act).

BWEA is a partnership between the six local governments of the City of Bunbury, Shires of Capel, Collie, Donnybrook-Balingup, Dardanup, and Harvey, and significant local companies involved in the resources sector, construction, transport, engineering, water supply, timber processing, telecommunications, consulting, health, education, accounting, finance and tourism industries.

BWEA has been an advocate for sustainable economic development in our region for more than a decade.

It is clearly important to regularly review legislation to ensure it is appropriate in achieving intended outcomes. The Department's report, *Reforming National Environment Law Overview* provides evidence that the EPBC Act needs to be revised in light of changed circumstances.

We believe it is reasonable to expect world class environment protection and biodiversity conservation, without compromising thriving economic development.

The *Reforming National Environment Law Overview* states that *Assessment decisions under the EPBC Act are not keeping pace with growth*. Also that *The percentage of project approval timeframes met is now below 70 per cent compared with a target of 95 per cent*.

The report correctly identifies that projects often require multiple environmental approvals from different levels of government imposing significant, and at times unnecessary, costs to proponents and the economy.

The shortcomings clearly call for a more streamlined assessment process, and closer integration of environmental assessment processes between the Australian Government and state and territory governments. Bilateral agreements between the Australian Government and state and territory governments enabling a single timely assessment process under state and national environmental laws is a desirable outcome.

## 1. Biodiversity Policy

The ten principles contained in the Biodiversity Policy Consultation Draft appear to be an appropriate foundation for responding to the challenge of biodiversity decline. These principles are:

- it is better to prevent biodiversity decline before it happens
- biodiversity should be valued according to its real worth
- an adaptive approach is needed to build the resilience of biodiversity to climate change
- Effective conservation requires well-targeted investment
- Biodiversity is a complex issue and a shared responsibility, requiring cooperation and a mix of approaches
- Solutions need to be at a landscape and seascape scale, over time periods that make ecological sense
- Biodiversity is a renewable resource, but we must not undermine its capacity to re-new itself
- Credible information and knowledge is essential for good decisions
- The conservation estate is the backbone of our efforts
- Commonwealth environmental regulation should be strategic, focused on matters of national environmental significance, and complementary to state and territory legislation.

We recognise the Biodiversity Policy Consultation Draft is a high level document, and will be keen to monitor how these principles guide the design and delivery of policies, programs and laws related to biodiversity.

## 2. Offsets Policy

The stated intent of the policy is to:

- Ensure the efficient, effective, transparent, proportionate, scientifically robust and reasonable use of offsets under the EPBC Act
- provide proponents, the community and other jurisdictions with greater certainty and guidance on how offsets are determined and applied under the EPBC Act
- deliver improved environmental outcomes by consistently applying offsets policy

- explain the Federal Government's position on a range of issues, including:
  - when it is appropriate to consider offsets as part of a project
  - the appropriate nature and scale of offsets
  - the use of market-based instruments for the delivery of offsets

We see merit in the application of a transparent, proportionate and scientifically-based system of offsets, to compensate for environmental impacts that cannot be adequately reduced through avoidance or mitigation.

BWEA suggests more discussion is required surrounding the measures which should constitute suitable direct and indirect offsets. We also expect there should be harmony between offset policies at the state and Australian Government levels.

Offsets should not be applied as a blanket measure by government agencies, but should come into play when there is significant residual impact, after reasonable avoidance and minimising measures have been applied.

BWEA would welcome further engagement on the reform of the EPBC Act, and we look forward to legislation which is appropriate to meet the challenges of environment protection and biodiversity conservation, without unnecessarily stifling economic development.

Yours sincerely

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

Matt Granger  
Chief Executive Officer  
Bunbury Wellington Economic Alliance