

20 October 2011

Department of Sustainability, Environment, Water, Population and Communities  
GPO Box 787  
Canberra ACT 2601

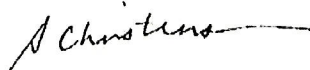
Dear Sir / Madam,

FBA welcomes this opportunity to comment on the EPBC Act Environmental Offsets Policy Consultation Draft. FBA is the leading community based organisation for sustainable natural resource management in Central Queensland. We are committed to long term sustainable use of our natural resources, and we value healthy ecosystems, a strong regional economy and a prosperous community. Membership of FBA comprises a broad cross section of the community, including representatives from sectors of Landcare, conservation, education, research, industry and agriculture as well as representatives from Indigenous groups and local and Queensland Government agencies.

FBA's regional plan – the *Central Queensland Strategy for Sustainability: 2004 and beyond (CQSS2)* – provides a blueprint for sustainable land use and development in Central Queensland. The CQSS2 has been developed collaboratively by FBA with regional stakeholders, is endorsed by the community and accredited by both Australian and Queensland Governments. This document can be downloaded from our website: <http://www.fba.org.au>.

Please find attached our submission on the EPBC Act Environmental Offsets Policy Consultation Draft. If you have any questions regarding our comments, please contact [REDACTED], on [REDACTED] or [REDACTED].

Yours sincerely,



Suzie Christensen  
Chief Executive Officer

## **Attachment 1: FBA's submission on the EPBC Act Environmental Offsets Policy Consultation Draft**

FBA has a strong interest in an EPBC Environmental Offsets Policy that is transparent and effective. This is particularly so given the scale of coal, gas, rail, port, water, resort and other developments proposed and approved in Central Queensland. The EPBC Reform Taskforce has indicated a very significant increase in referrals in recent years; a significant proportion of these come from our region.

FBA is currently reviewing the region's natural resource management plan, the *Central Queensland Strategy for Sustainability: 2004 and beyond*. A significant consideration of the revised plan is the cumulative impacts of the region's numerous new developments on agricultural land, water quality, terrestrial and marine biodiversity. While FBA is engaging with all stakeholders to manage these impacts, legislative and policy settings are critical to supporting our effectiveness. Our region has already seen regional scale impacts on water quality and the coastal zone around Gladstone adjacent the Great Barrier Reef World Heritage Area. While offsets will not manage the immediate impacts of these developments, they do have a longer term role in protecting overall regional environmental quality. This submission makes suggestions on how this can be achieved.

The aims of the draft policy and assessment guide are good. However, within the region the evidence of its aims on the ground is questionable. One of the issues is a lack of transparency. FBA is a well established natural resource management group but is very rarely consulted on offset development and implementation. When offsets are delivered there is no 'point of truth' that can be openly accessed by FBA or the public at large. This is partly driven by the 'offset market' with companies and brokers wanting to keep data out of the public realm for fear of losing market edge. The EPBC Policy should require all proponents to provide offset proposals and approvals to not only Australian Government but also State Government and Regional NRM Groups within the project boundary. The Australian and State governments should also work expeditiously towards a national offset database that is searchable by NRM region. This is already available for many environmental datasets so this development should be manageable.

Direct offsets that result in the greatest protection possible are preferred. Once again, given the scale of developments in Central Queensland, it is highly likely that offsets could be destroyed in the future. For instance, the Bimblebox Nature Reserve, while not created through an offset process, is nonetheless a nature refuge on covenant and represents a substantial taxpayer and private investment. Mining is now proposed for approximately fifty percent of the reserve. Environmental offsets that are registered as nature refuges or some lower level of protection are therefore only protected to the extent a future project is not developed on the site. Stronger protection is needed. Given that offsets are often established on recovering ecosystems, there needs to be a process set out for offset areas being 'upgraded' to higher levels of protection as their condition improves. With regards to indirect offsets, FBA is supportive of these being a minor part (10% - 25%) of the overall process as identified in the assessment guide. The

EPBC Policy should support the role of regional NRM groups who implement landscape-scale management programs (for example, on pests and weeds) that could benefit from indirect offset measures.

Environmental offsets are viewed by some in the community with a high degree of scepticism. It is imperative the Australian Government demonstrate leadership in this area and work more closely with the States and Regional NRM Groups. FBA has already demonstrated its value in providing on-ground knowledge through EIS processes that has been well received by EPBC officers. Without the research and knowledge of FBA, the knowledge about many EPBC listed ecosystems and species would be much more limited in this region. This role can be extended to environmental offsets to the extent resources allow. In addition to providing on-ground knowledge and GIS capabilities that could enhance the transparency of offsets, regional groups can also support implementation of offsets where appropriate. This is particularly the case with indirect offsets, as FBA has implemented programs that manage large areas under biodiversity stewardships; implemented pest control programs protecting threatened species and ecosystems; and invested in research about species ecology to fill knowledge gaps and enhance longer term management. To conclude, the Australian Government EPBC Environmental Offset Policy should focus on increasing the transparency of offsets development, aim for the highest level of protection for each direct offset, and require offset developers to engage stakeholders like Regional NRM Groups more effectively. Publicly accessible data is critical.

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