



24 October 2011

OUR REF: A1642857
CONTACT: [REDACTED]
PHONE: [REDACTED]
YOUR REF: [REDACTED]

EPBC.reform@environment.gov.au
Department of sustainability, Environment,
Water, Population and Communities
GPO Box 787
CANBERRA ACT 2601

Dear Sir/Madam,

Comments on Consultation draft of the EPBC Act Environmental Offsets Policy

I refer to the above Policy that was released for comment and provide the Port of Brisbane Pty Ltd response in relation to this paper.

Overall PBPL supports mechanisms to more accurately and transparently quantify potential offset requirements. Negotiating individual offset requirement is often time consuming and leads to inconsistent outcomes often to the detriment of the key objectives of the offset policy.

We consider that the policy is primarily designed for terrestrial situations and that most of the objectives would be difficult to achieve in the marine situation. In particular, the requirement for a majority of offsets to be direct offsets is extremely difficult to achieve in the marine situation as it is not possible to "purchase" marine areas. Additionally there are only a limited number of marine areas that are degraded and suitable for rehabilitation (unlike the terrestrial situation) and this complicates the potential to achieve "like-for-like" or offsets in the same geographic location.

The offsets assessment calculator is not easy to interrupt and requires more detailed consideration for its use especially in the marine area.

PBPL would be pleased to contribute to a joint meeting of Ports and SEWPaC should this be possible

Yours sincerely,

Dr Rick Morton
General Manager Planning & Development