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Department of Natural Resources  
Mines and Energy  
PO Box 15216  
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4/10/2018

Dear Madam/Sir,

Please accept North Queensland Conservation Council's submission on your **Improving resource approval efficiency consultation.**

#### **Who we are**

North Queensland Conservation Council (NQCC) is a peak organization for the region and is part of a network of statewide conservation councils. Established in 1974, NQCC is a not-for-profit incorporated association with a broad mandate to protect the "land, waters and atmosphere of the region" and since then has worked continuously on a number of environmental issues of significance to North Queensland and beyond. NQCC covers an area along the coast from Bowen in the South, North to Cardwell and inland to Mt Isa, through to the border of Northern Territory. We are the voice for the environment and represent over 1500 members and supporters.

Our feedback relating to this consultation is in the following:

#### **Require resource development applications to be reviewed in accordance with recommendations resulting from the Land Court**

NQCC recommends that government decision-makers be required to give greater consideration of recommendations resulting from merit appeal processes in the Land Court. These stronger requirements should also include greater transparency and accountability for the community. Without this, taking matters to the Land Court is time-consuming, complex and contributes no improvements to resource development applications.

#### **'No go areas' for biodiversity outcomes AND greater clarity for business**

Scientists and ecologists are clear that to preserve Queensland's biodiversity, we need to ensure areas with significant ecological values are 'no go areas' for resource activities. This also provides greater certainty for businesses, investors and other land users. Such a policy would result in more sustainable and more strategic use of land across Queensland.

### **Gaps at the cost of our state's biodiversity and ecological assets**

There is an inherent problem built in to the resource assessment process. This starts with consultancy firms undertaking environmental impact assessments (EIA) for their clients, the proponents of development applications who want approvals in their favour. In many cases, these are then reviewed by under-resourced government assessment units. A suggested alternative would be for proponents to provide to the Department a fee that is equivalent to expenditure of consultancies to conduct EIAs. This fee would resource the department to undertake the impact assessment process by the Department or through consultancies that are accountable to the Queensland public.

### **Repeal rights to implement world-class ecological sustainability criteria**

The repeal rights of the Coordinator-General to overrule other departments and the land court undermines the Environment and Science department's evaluation of impacts on Queensland's biodiversity and prevents their ability to set conditions on these development applications. NQCC would suggest that these repeal rights of the Coordinator-General be removed. Alternatively, require the Coordinator-General to comply with a world-class standard of ecological sustainability and biodiversity preservation, and allow for the Minister for the Environment to also have repeal rights.

In conclusion, NQCC welcomes this process to review the approvals process of resource activities and we trust that improvements will lead to outcomes for Queensland's environment and for the greater clarity for business. It is important that the ecological assets and services of this state are granted adequate protection in decision-making processes. The environment is the basis of our economy and of the well-being of all Queenslanders.

Please contact our organisation if you would like to discuss any of these matters further.

Kindest regards,



Tarquin Moon  
Campaigns Manager  
North Queensland Conservation Council