



Submission on the Queensland Environmental Offsets Framework

24/04/2019

About North Queensland Conservation Council

North Queensland Conservation Council (NQCC) is a peak organisation for the region and is part of a network of state-wide 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.

The Queensland Environmental Offsets framework is relevant to our organisation as we regularly have input into development application processes and Government policies. The protection of ecological biodiversity across North Queensland is a major part of NQCC’s focus and the offset policy is directly related to our work.

The improvements that NQCC would like to see relate to the need for this policy to help to improve the prospect of Queensland’s biodiversity which involves halting species decline, habitat loss and improving areas (e.g. creating habitat connectivity, rehabilitation and revegetation).

According to the IUCN, environmental offsets are:

... are measurable conservation outcomes resulting from actions designed to compensate for significant residual adverse biodiversity impacts arising from project development after appropriate prevention and mitigation measures have been taken. The goal of biodiversity offsets is to achieve no net loss and preferably a net gain of biodiversity on the ground with respect to species composition, habitat structure, ecosystem function and people’s use and cultural values associated with biodiversity¹

¹ Crow, M. and ten Kate, K. (2014) ‘Biodiversity Offsets: Policy options for governments An input paper for the IUCN Technical Study Group on Biodiversity Offsets’ International Union for Conservation of Nature and Natural Resources, pg7.

NQCC is concerned that the offsets framework will not achieve its purpose for the following reasons:

1. The policy can be used to facilitate development that could otherwise have been incompatible with a site's ecological values.
2. The policy can be used to facilitate inappropriate development.
3. The values that are offset relies on potentially subjective assessments and is unable to account for values that may exist but that are unknown in our current understanding of ecology for that particular site.
4. Ecological environments are not static and nor are their values. The valuation of a site's values does not account for the potential of that site (e.g. through rehabilitation and vegetation) and it's former or future contribution as habitat or wildlife corridors.
5. It is widely known that Queensland is losing more habitat through development and habitat clearing, and an offset policy **is** part of this larger system of net biodiversity loss. The offset framework needs to adopt a net gain for biodiversity to make its fair contribution to halting species extinctions.
6. The offsets policy gives proponents the signal that development can proceed albeit at a cost to their operations. Industry already seeks to reduce 'green tape' and compliance activities can turn into 'hoops' for industry to jump through to obtain approvals rather than being active stewards of functioning and healthy ecosystems. The Queensland Government needs to signal to industry that it is promoting an economy based on ecological sustainable development which in NQCC's view, means that development is shaped to accommodate ecological values and not the reverse.

It is interesting to note that in fact, the offset policy has produced an extra layer of 'green tape,' completely unnecessary if the Queensland Government adopted an ecological sustainable development framework, thus being able to reshape development proposals and refuse unsustainable ones.

Offsets must be a last resort

It is unclear to NQCC how this offsets framework could ever be applied such that it is only used as a last resort for development that has genuinely sought alternatives and altered proposals to not cause ecosystem damage. Without this principle in operation and a whole-of-government commitment, it is unlikely the concept of offsets will be anything other than an instrument that facilitates development over ecological sustainable development.

Relocating biodiversity values to another location or converting these values into a dollar value, risks that these activities do not lead to measurable and timely ecological outcomes. This whole process needs to be assessed as to the balance of successful outcomes for threatened species versus the losses.

NQCC believes a good offset policy is one that is rarely in use because it is genuinely applied only when a project can be shown to be of overwhelming benefit to the wider community AND where no other option is available to prevent ecological destruction AND where the absence of the project would be detrimental to the overall values of a community AND where the ecological values of an area can result in expanded ecological outcomes in its relocation, e.g. causing greater habitat connectivity in another location.

Science needs to be the focus of this review

The primary objective to review the offsets framework must be to ask if it successfully counterbalances residual environmental values resulting from development? Central to this review is the impact on ecosystems and a scientific assessment with a focus on ecological systems and to answer this question. It should also be mentioned that if the offset policy is not succeeding to achieve its primary objective, then it is questionable that the discussion paper states 'environmental offsets are here to stay.'

Other points that NQCC would like to raise:

- The Offset policy needs to place the emphasis on biodiversity preservation not development approvals
- Some areas should not be able to be offset due to their values that are difficult, unknown, undervalued, expensive or risky to relocate
- The majority of offsets are financial transactions, offsets that are yet to be achieved within an unspecified time in the future – is there sufficient accountability and ecological evaluation of this offset method in terms of ecological outcomes?
- Offset areas need to be set aside permanently – without this guarantee, this policy can endlessly relocate environmental values according to the development priorities of the day
- Compliance must be an active and strong element of this offset policy