



Wheezer  
the lungfish  
says, "Save the  
Mary River!"

## Dam the Mary River? Save the Mary River!

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### Save the Mary River Coordinating Group

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ATTENTION: ENVIRONMENTAL OFFSETS  
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Dear Sir/Madam,

#### **Re: Queensland Government Environmental Offsets**

Thank you for the opportunity to provide comment on the discussion paper on Environmental Offsets. The Save the Mary River Coordinating Group Inc (STMRCG) is a community based group based in the Mary Valley. We have a membership of over 300 members, including qualified advisors from a wide range of professional backgrounds including expertise relevant to Environmental Offsets.

Environmental assets supply the ecological services that make human life possible and underpin the life of every community. Now is the time to reassess how we are treating them and therefore our quality of life. Development of major infrastructure is having a negative cumulative impact in SEQ. It is now time to plan a future of environmental stability and recovery and a renewed commitment to Ecologically Sustainable Development.

An Environmental Offsets Policy is just part of what is now needed to keep up with our high growth in SEQ. If we can retain and enhance our natural assets and the processes that they provide to the community we will be showing responsibility to the next generation at a critical time.

The following sections from the discussion paper are discussed using the current example of the Traveston Crossing Dam proposal

1. Do the draft policy principles address the important issues for using environmental offsets?

**Current Proposed Principles:**

1. **“Environmental impacts must be first avoided, and then minimised, before considering use of offsets for any residual impacts.** An offset is intended to counterbalance a negative residual environmental impact after all efforts have been made to avoid or minimize environmental damage.”

- We strongly support that the environmental impacts must be avoided and that there needs to be a value put on environmental services when assessing alternative projects and the environmental impacts. We are seeing only economic costs being considered in the Traveston Crossing Dam proposal and no value being put on environmental assets and their environmental services that potentially could be lost if this project goes ahead.

**Recommendation:** That a strategic EIS be conducted before a project goes ahead to evaluate alternatives where value is put on environmental services and included in the decision making process.

- Best Practice Community Negotiation rather than Consultation to involve all stakeholders is required to decide on an appropriate environmental offsets for a project. In the case of the proposed Traveston Crossing Dam, the community is being informed that in stage 1 an amount of 70,000 ML of water is being taken (150,000+ML by stage 2) and traditional land use is being changed from a diversity of rural business/lifestyle pursuits to one of plantation forestry (2000-5000 ha is being targeted for environmental offsets for clearing and greenhouse gas offsets) with no consultation let alone the Best Practice of community negotiation.

**Recommendation:** That Best Practice community negotiation involving all stakeholders be used to decide on an appropriate environmental offset for a project.

- In the Traveston Crossing proposal, inundating farming land is not being considered as requiring any environmental offsets. However carbon stored in the soil in the form of organic matter is now being recognized as a valuable carbon credit and so must be considered as requiring an environmental offset.

**Recommendation:** That carbon stored in the soil in the form of organic matter be recognized as a valuable carbon credit and environmental offsets be required for loss of that carbon sink.

2. **“Offsets will not be used to allow developments in areas where they could not otherwise occur, or be used for purposes not otherwise allowed.”**

- State recognized endangered regional ecosystem is being protected for a reason ie it has reached a threshold of remnant area. At some point we need to say broad scale clearing is no longer allowed. The proposed Traveston Crossing Dam Stage 1 requires that over 200ha of riparian vegetation be removed with potential for that figure to rise to over 500 ha if stage 2 goes ahead. Of this a majority is “Endangered” Regional Ecosystem being RE 12.3.1 even though the proponents are testing the guidelines to try to downgrade the “endangered” areas to “of concern” or “non-remnant” classification to reduce the amount of environmental offsets required.

- **Recommendation:** There needs to be some serious decisions made about protecting vegetation from clearing and not just in conservation areas or national parks.

- Environmental offsets must never be used to facilitate the clearing of vegetation that is protected by legislation.
- Environmental offsets should only be considered after all options to avoid and mitigate adverse ecological impacts have been exhausted.
- Environmental offsets must provide a net environmental benefit – offsets should be greater than the remnant loss.

3. **“Offsets must achieve an equivalent or better environmental outcome.”**

- We agree that offsets must achieve an equivalent or better environmental outcome. However this needs to have some clear guidelines.. eg if a functional ecosystem is planned to be cleared, the environmental offset if planting is being proposed, must meet similar species biodiversity criteria, also meet the habitat requirements of the wildlife displaced, and have a success criteria signed off at some future point which shows that the functional ecosystem has been truly offset. This then can be costed as a mitigation requirement against the initial project and may make other alternatives with less environment impacts more attractive.

For example in the EIS for the Traveston Crossing Dam proposal, desalination is costed at \$300M more expensive. However there are a number of costs not included in the Traveston Crossing Dam economic study including accurate mitigation costs for environmental offsets which would easily bring the 2 methods of providing water for SEQ on par.

**Recommendation:** Clear guidelines are required to budget for environmental offsets and these need to have targets, success criteria and consequences if not successfully meet by a given time.

- Social costs must also be compensated and budgeted for.

- Environmental offsets must ensure net environmental benefit – receiving areas protected and restored will be greater in size than that being cleared.
  - Environmental offsets must ensure a long-lasting environmental benefit, and “receiving” areas must be afforded long-term protection from development; and
- 4. **“Offsets must provide environmental values as similar as possible to those being lost.”**
  - We agree with this principle. However there may be a social cost associated with taking private owned land for environmental offsets which needs to be compensated. Recommendation as per principle (3)
- 5. **“Offsets must be provided with a minimal time lag between the impact and the offset.”**
  - We agree with this principle. As per comments in principle (3), there need to be a success criteria sign off at some future point in time.  
**Recommendation:** Agreed time lag between impacts and offset with clear guidelines for success criteria and sign off.
- 6. **“Offsets must provide additional protection to values at risk or additional management actions to improve environmental values.”**
  1. We agree with this principle. However when a project is staged, such as proposed Traveston Crossing Dam Stage 1 & 2, we do not support that suitable nonremnant vegetation offsets for the clearing in Stage 1 may be located and selected within land designated for the stage 2 project area. When stage 2 is brought on-line the stage 1 offsets will be destroyed, and new offsets will be required to be found in the area or worse, if the stage 1 offsets in the stage 2 area is still classified as ‘non-remnant vegetation’ the original intent of the off-sets from stage 1 could easily be overlooked or challenged.

### **What could the policy apply to?**

**“For the offsets policy, ‘the environment’ will mean the natural environment. The policy would not include amenity, social, economic or aesthetic impacts, but will be limited to living and non-living things that occur naturally on Earth or some part of it.”**

We consider that the social and aesthetic impacts are integrated with the environment and should be considered with the decisions of acceptable environmental offsets for the community.

**Recommendation:** That Best Practice community negotiation involving all stakeholders be used to decide on an appropriate environmental offset for a project so as to take into account the social and aesthetic impacts. [Examples of](#) environmental offsets...

- Goal to restore vegetation communities to “Remnant Status” with realistic timeframes and management costs. Eg restoration to endangered riparian rainforest can cost about \$25,000/ha and take at least 50 years of management.
- Promoting natural regeneration through weed removal and ecological management best practices.
- Habitat restored or protected to offset the loss of vegetation, must be of same regional ecosystem and comparable species composition of that cleared.
- A strong emphasis on restoring environmental core habitats and corridors linking natural areas and reserve networks
- Acquisition of environmentally significant land (consistent with core-biodiversity mapping, corridor plans, enhancement of nature reserves and core biodiversity areas – (Local Growth Management Strategy, SEQ Nature Conservation Strategy)
  - Implementation of fauna movement and replacement habitat solutions – road crossings i.e. over/under passes; possum rope ladders, glider poles, nest boxes, ground timber, fauna proof fences and strategic revegetation at pinch points
  - Exclusion zones for boats near sea grass and marine biodiversity hot spots.
- Protection and rehabilitation of foreshore habitat areas (wading birds)
  - e.g. fencing around breeding sites; exclusion zones, revegetation of foreshores and vegetated buffers to habitats.
- Water conservation remediation earthworks undertaken (i.e. swales/ biofilters/ overland flow/ spring recharge) for drought proofing of sites

### **Who will take part in environmental offsets?**

We consider that the community must be a stakeholder in the setting of environmental offsets.

**Recommendation:** Community representatives eg catchment care, landcare, environmental groups etc must be considered stakeholders in the setting of environmental offsets.

### **Example of an offset for development assessed under specific state-level assessment processes**

The example used where an endangered regional ecosystem is being offset by a neighboring landholder’s non-remnant area with a legally binding agreement for protection and management causes many concerns.

- Firstly, where are the details of the legally binding agreement – does it mean forever, to be reviewed at a future date, if another pipeline comes along - will it get cleared? Once it reaches remnant status, does the agreement expire.
- Will it be compulsory acquired?
- Will the landholder get fair compensation as they may have affected the value of his property? Ongoing management may require more than the owner is prepared to do.. who will check the management is done?

- What about the other environmental values – eg wildlife habitat, corridor connectivity that will be lost from clearing.
- Mitigation costs for the environmental offset – are they truly costed into the project and would there have been a better alternative to building the pipeline ie desalination instead of diverting water from another community's catchment.
- The offset policy is not clear whether there could be compulsory acquisition of environmental offsets on freehold land within areas where state significant projects under the SDPWO Act are located.

**Recommendation:** The reading of this example makes it sound like environmental offsets are being used to allow development to continue to clear more and more land. There needs to be more strategic definition around true value of environmental clearing so developers will look at truly minimizing clearing requirements.

### **How can gains and losses to the environment be measured?**

An environmental metric is a tool that can be used to measure the amount and types of environmental loss due to impact, and gains that will be provided with an offset.

- The description of an environmental metric is very poorly written and leaves us with no understanding of what is trying to be described.

**Recommendation:** Rewrite the definition of an environmental metric and use examples.

### **Green Invest functions**

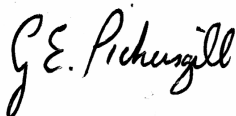
#### **1. Exchange Service**

- “Cancellation of the offset when, due to external or unforeseeable circumstances, it is not possible for the supplier to deliver the offset”
  - We are concerned about how this would work if there were legally binding contracts for protection and management and then the supplier (landholder) can't deliver the offset. Would the landholder be fined? Once an area is cleared and an offset defined, surely this cannot be cancelled?

**Recommendation:** More detail needs to be given around how a cancellation of an offset would be managed.

Finally, if you require further information please contact the undersigned.

Yours Sincerely,



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