

Friends of Mt Majura ParkCare Group (FoMM)  
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## **Submission addressing the ACT Environment Offsets Policy and Delivery Framework**

### **Background**

- (1) One of the ACT Government's most significant sources of revenue is to be able to release land for development.
- (2) Increasingly, this land release involves nationally and globally unique, Critically Endangered Ecological Communities, such as Grassy Woodlands.
- (3) There is thus a conflict of interest within the ACT Government, between revenue raising and its international and national obligations to protect globally unique, Critically Endangered Ecological Communities.
- (4) Offset-Policies attempt to compensate for the resulting loss of unique Critically Endangered Ecological Communities by assigning other land to be sustainably managed.
- (5) **It needs to be acknowledged and clearly recognized that – by definition – the irreversible damage to biodiversity, the destruction of unique, Critically Endangered Ecological Communities, of functional connectivity, and of one hundred year old trees cannot be offset.**

### **Recommendations**

- (1) It would be most rational to remove the pressure at the root of the need for the development of an offset policy, by **Quarantining from Development** in perpetuity all land that can presently be identified as including Critically Endangered Ecological Communities, regardless of the degree of modification. ParkCare has demonstrated repeatedly that such modified Critically Endangered Ecological Communities can be rehabilitated.
- (2) **Developments Should be Restricted to Infill**, recognizing that ample opportunities exist to make use of land that is currently being wasted in the ACT, for instance, for surface car-parking and unnecessarily wide road reserves in Canberra suburbs.

**(3) A policy framework including recommendation (1) and (2) would be cheaper, would cause less conflict, would provide certainty to developers, to policy makers, to the conservation community and to the wider public, while allowing the ACT Government to claim Canberra to be a truly innovative and ecologically sustainable city.**

(4) If the implementation of (1) and (2) appears politically too hard at present and instead, an offset policy is being developed, we recommend the following:

- (a) Any offset scheme requires an **Independent Panel of Environmental Experts** that has the last say in offset decisions, with the power to overrule any other considerations – in particular – revenue considerations and considerations of vested interests.
- (b) This Independent Panel of Environmental Experts is the only bulwark against the obvious and inherent **Conflict of Interest** of the ACT Government, currently being the proponent of land release, the conservation land manager, the offset policy developer, the offset decision maker and the overseer of offset management.
- (c) Offsets should be the **Last Resort** and should not be allowed to become the default option. The only way to assure that offsets are being used as a last resort is a very significant price signal: **offsets must be costly**.
- (d) Offsets should be **Like for Like**. It must be made very clear that the destruction of specific Ecological Communities cannot be offset by actions in other, unrelated communities and that high-quality land cannot be offset by offset actions in low-quality land.
- (e) Offsets should be **Local**. The destruction of Critically Endangered Ecological Communities here in the ACT cannot be offset by actions beyond the ACT border, especially because connectivity on a local scale is of critical importance and because compliance is virtually impossible to ensure.
- (f) Offsets must demonstrate **Additionality**, meaning that actions must be implemented that go beyond the present and ongoing duty of care, such as erosion control, pest and herbivore control, track maintenance and re-vegetation. Offset actions must improve biodiversity and it must be made very clear that offset management cannot involve existing, in-kind, chronically underfunded and understaffed land management resources.
- (g) Offsets must demonstrate **Perpetuity**, meaning that clear organizational and budgetary plans have to be established that assure the appropriate and long-term

management of offset sites. These plans need to be immune against budget-cycles and changes of government.

- (h) Areas under current biodiversity conservation management, such as Canberra Nature Reserves must not be used as offset sites.
- (i) In an offset policy, the loss of functional connectivity should be considered as severe as the loss of habitat and the loss of Critically Endangered Ecological Communities.
- (j) It is crucial for an offset policy to include funding, staffing, clearly structured responsibilities and very strict rules for compliance monitoring and for actions to be taken in case compliance is lacking.

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