



Senate Environment Committee

Email: ec.sen@aph.gov.au

18 November 2020

Dear Senate Environment Committee Chair,

RE: Senate Inquiry into Environment Protection and Biodiversity Conservation legislation

Established in 1930, the National Parks Association of Queensland (NPAQ) is an independent, not-for-profit, membership-based organisation. The association has played a pivotal role in the establishment of many national parks in Queensland. NPAQ's purpose is achieved through promoting the protection, expansion and good management of the protected area estate in Queensland; fostering the appreciation and enjoyment of nature through a bushwalking and outdoor activities program; educating the community about national parks and their benefits; and supporting the development and application of scientific and professional knowledge in advancing national parks and nature conservation.

The current process to devolve responsibility of the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) to states and territories without sufficient process is inconsistent with democracy, as is the Senate Inquiry process. Excessively tight submission timeframes without public release and consideration of the Samuel Review and establishing this Senate Inquiry Committee to have hearings and report back within two weeks actively discourages meaningful scrutiny or accountability.

Any EPBC legislation amendments should include an independent regulator and strong national environmental standards as stated in the interim report of the Samuel Review. Robust and enforceable standards should be made available for public scrutiny, for comment and consideration, before being put to Parliament. Two Environmental Defenders Office audits found that no state or territory legislation met the full suite of existing national environmental standards required to protect matters of national environmental significance. In some jurisdictions, the environmental protections in state and territory laws have actually been weakened.

Under Queensland's Ecotourism Trails program, the State is the proponent in many instances resulting in a direct conflict of interest (i.e. proponent, approver and regulator). For private developments, the Queensland government has committed to "de-risking" the development process; NPAQ is concerned our rapidly declining biodiversity will be left unprotected.

NPAQ seeks release of the Final Report of the Samuel Review and national standards for public comment with matters considered before progressing the legislation.

Should you have any questions or require further information, please contact _____ at the
number below or

Yours sincerely

Laura Hahn
Conservation Principal
National Parks Association of Queensland