

Submission for Environmental Offsets Commission

I have several points to make about the problems with environmental offsets. In summary, my firm belief is that ideally we shouldn't have them, but if we must then the system must be radically overhauled and funding and review of all offsets drastically increased.

My first point is that the premise of offsets essentially assumes that we are going to continually lose high quality ecosystems. That is, it basically says that it's ok to destroy this community here as long as this other one won't be destroyed. Such a process continued indefinitely results in nothing remaining. In essence it is a "death by a thousand cuts" process, which, incidentally, the EPA Act doesn't consider either. We should be starting with, and firmly adhering to, the premise that we are going to conserve *everything* that remains in these fragmented and threatened communities.

If we must have offsets, and I would strongly advocate that we don't, then they should offset like for like. However, in practice, offsets that have been done often do not match like for like. Partly, this seems as though administrators/governments don't seem to place adequate importance on matching the communities. The greater difficulty, however, is that communities often change, seemingly subtly, over relatively short distances; the dominants in the community may be the same, and hence the community might have been classified as the same, but the species composition in the lower (vegetation) layers might have a new suite of species. Over larger distances this effect can be even greater, so the upshot of this is that broad-scale classifications can be very misleading – the ecological communities may actually be quite different in many ways. Community classification is often broad-brush in its approach - otherwise you'd have thousands of different community types, making all sorts of management decisions difficult. But the reality is that is how communities are, and so broadly classifying everything in the locality as the same community type will guarantee biodiversity loss, if one section of the land is destroyed and offset by another community of the "same" type.

Connectivity and corridors are another issue. There doesn't seem to be a concept of maintaining connectivity – we've lost so much native vegetation in many areas that the remaining smaller parcels provide the only connectivity essential for many plants and animals to connect and distribute. If you remove the "joining" parcels you lose the connectivity. This has important implications with climate change/global warming: animals and plants need to be able to move across the landscape to have any chance of surviving in the long term.

Rehabilitation is another issue. The notion that high quality vegetation can be destroyed so long as a degraded community is to be rehabilitated as an offset is, frankly, absurd. I implore you consult community restoration specialists to ascertain just how poorly we can restore many communities. At best, my guess is that restoring the community to roughly 30-60% of the pre-existing biodiversity is considered a "good" outcome. Some areas are much worse. And that's totally unacceptable if our aim is to prevent biodiversity loss.

As pointed out in a recent Background Briefing program there's another issue, which surely is not a case of a few "bad apples": incompetent/unscrupulous consultants can write a report, which doesn't get reviewed or checked, and approval is based on that report. Subsequently vegetation can be destroyed even if there are concerns about the accuracy of the report. The system doesn't have adequate checks and reviews, and will never have unless its funding is dramatically increased (and there's little chance of that happening). The result is a flawed system, working on flawed data, with little oversight and review: a recipe for disaster, which in this case means continuing loss of habitat and biodiversity.