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Online Response: BRU.NCS@ehp.qld.gov.au



Environment
Institute of
Australia and
New Zealand
SOUTH EAST QLD DIVISION

Mr. Andrew Mullens
Business Reform Unit, Conservation and Sustainability Policy
Conservation and Sustainability Services
Department of Environment and Heritage Protection
GPO Box 2454
BRISBANE QLD 4000

Re: EIANZ's Comments on the Draft Revised Flora Survey Guideline

The Environment Institute of Australia and New Zealand (EIANZ) South East Queensland Division is pleased to submit its comments on the Draft Revised Flora Survey Guideline. The Institute acknowledges the efforts being made by the Queensland Department of Environment and Heritage Protection to revise the guideline, particularly by introducing a point system for determining who is a "suitably qualified person".

The EIANZ is the leading professional body in Australia and New Zealand for environmental practitioners, and promotes independent and interdisciplinary discourse on environmental issues. On all issues and all projects the Institute advocates good practice environmental management delivered by competent and ethical environmental practitioners.

The focus of our comments is as follows:

- The trigger maps are a reflection of where previous surveys have been undertaken and not necessarily where protected plant species are likely to occur. Therefore, we suggest that a habitat based approach is required to supplement areas that are survey poor;
- Where the survey buffer of 100m includes medium to high-density areas, these should be excluded from the required survey area. If not, this presents an unreasonable onus on the proponent to gain access to sites which are outside of their immediate control or responsibility. Further, access onto third party properties imposes additional insurance issues, consultation matters (as access is often not forthcoming) and may not assist with the outcome. It is also unreasonable for a proponent to prove they have tried to gain access or rely on getting an exemption from the State which, in practice, is not practical to obtain. Based on the experience of our members, there is little likelihood that a threatened flora species naturally occurs within a suburban backyard and, if it does, there is very little the proponent can do to protect it if the species is off-site. We suggest that an exemption could be applied to low-level activities such as installing / maintaining cables or pipes where earth works are usually

limited, selective and require regular maintenance. These activities are often located next to urban properties and have the potential to require access to a very large number of properties. We consider that there is a low likelihood that these activities will have a negative effect on threatened flora species 100m away in a suburban back yard. There is a provision in the guideline to propose alternative buffers but, in practice, these are difficult to obtain and are time consuming to implement;

- Regional Ecosystem training (Table 1) in and of itself, is not a suitable measure of the experience for a Suitably Qualified Person (SQP), as it has very little to do with flora species identification. Accordingly, we agree with the allocation of only 5 points towards the SQP;
- Although being a member of EIANZ is not a direct measure of an individual's flora skills, there is an issue of professional integrity, as members of EIANZ are held to a high professional standard. The CEnvP program, which EIANZ supports, is a means for peers to determine the suitability of candidates against a range of criteria. In Table 1, a person certified as a CEnvP could only achieve 5 out of a possible 100 points, even though the CEnvP assessment criteria for certification are as rigorous as those outlined in the Table and include ongoing professional development. We recommend that a person certified as a CEnvP and demonstrating specific botanical / field flora skills, should be awarded at least 50 points to make it on par with someone who has 5 years experience (maximum of 60 points); and
- In addition, the assistants working with a SQP should have to meet some minimum standard for qualification and training.

We acknowledge and thank you for the opportunity to contribute to the consultative process and would be pleased to continue to provide advice regarding similar schemes. Please contact me directly on 0400 412 212 or at seq@eianz.org, if you have any questions regarding our submission.

Yours faithfully,



Dr. Mark Breitfuss
President EIANZ SEQ