

8 July 2022

Department of Water and Environmental Regulation
8 Davidson Terrace
Joondalup, Western Australia, 6027

Email: offsets.metric@dwer.wa.gov.au



Environment Institute
of Australia and
New Zealand Inc.

Re: Submission on the Draft Procedure for environmental offsets metric inputs

The Environment Institute of Australia and New Zealand (EIANZ) Western Australia Division (EIANZ-WA) is pleased to provide feedback on the *Draft Procedure for environmental offsets metric inputs* (the Draft Procedure) released in May 2022.

EIANZ is a not-for-profit, professional association for environmental practitioners. The Institute promotes independent and interdisciplinary discussion on environmental issues and advocates good practice environmental management delivered by competent and ethical environmental practitioners.

We forward this submission on behalf of EIANZ-WA members. Currently, we have 215 members in WA while across Australia and New Zealand we have over 2,170 members. Our members come from a range of technical disciplines including environmental specialists working in government, industry and the community, certified environmental practitioners (CEnVP), ecological consultants, environmental advocates, heritage consultants, researchers, and natural resources advisors.

We support, in principle, the approach taken in setting out the Draft Procedure and commend the improved guidance in applying offset calculator inputs in Western Australia. EIANZ-WA acknowledges that this procedure forms part of a suite of government documents supporting the protection of environmental values in Western Australia. We promote and advocate for robust government policy and scientifically informed decision making, and to that end, encourage the Department to invest in regular reviews of the complete framework of documents (Offset and Native Vegetation Policies, guidance etc) to ensure that these are achieving their objectives. While the procedure provides clarification on how the calculator will work, it is the policy and guidance documents that should be driving the achievements in managing environmental values for which the policies have been developed.

The ability of offsets to achieve meaningful outcomes will continue to be limited without a more strategic and collaboratively approach. There is limited ability to establish offsets outside of freehold land and the availability of freehold land across Western Australia is a limiting factor for many proposals. We encourage the Department to continue to explore other options as individual offsets may be unachievable in several regions unless a broader regional offset fund is available (such as the Pilbara Environmental Offset Fund). Regular review of the procedure should be undertaken to ensure it remains fit-for-purpose and achievable.

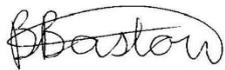
There continues to be misalignment between the State and Federal offsets guidance and calculators, and this is likely to result in discrepancies that may be difficult to resolve. We encourage further collaboration between State and Federal departments to streamline the offsets process as much as possible. Where fully aligned positions are not possible, we encourage an approach that focuses on facilitating the best achievement of the identified outcome and flexibility in application given these are non-statutory mechanisms.

Further consideration is required in relation to the quality scoring criteria. Our members have suggested that Keighery vegetation condition scale can be too subjective and a more precise criteria should be considered. Similarly, some species will not fit into the proposed quality score format. For example, Carnaby's Cockatoo foraging habitat is not dependent on vegetation condition but rather vegetation density. The Department should work on developing species-specific quality score frameworks such as the Banksia Woodlands and Cockatoo foraging habitat which have been endorsed by the Department of Climate Change, Energy, the Environment and Water (DCCEEW).

Our members have suggested that additional worked examples would be useful, particularly where there are overlapping values that need to be defined and considered. Additionally, a request for further definition of rehabilitation that can be used as a credit is required.

We trust that this feedback has been helpful. EIANZ would welcome the opportunity to provide a representative to contribute to the DWER offsets working group.

Yours sincerely

A handwritten signature in black ink that reads "B Bastow". The signature is written in a cursive style with a large, stylized initial "B".

Belinda Bastow
President
EIANZ – WA Division



Environment Institute
of Australia and
New Zealand Inc.

About EIANZ

The Environment Institute of Australia and New Zealand (EIANZ, the Institute) is a professional association for environmental practitioners. The Institute supports environmental practitioners and promotes independent and interdisciplinary discussion on environmental issues. The Institute also advocates environmental knowledge and awareness, advancing ethical and competent good practice environmental management.

The Western Australian (WA) Division currently has approximately 215 members while EIANZ has over 2170 members. Our members come from a range of technical disciplines and industries and include environmental consultants, ecologists, advocates, managers, and impact specialists working in government, industry and the community.

A Certified Environmental Practitioner Scheme (www.cenvp.org) is also in place to assess and certify competent experienced environmental practitioners working in government, industry and the community. This includes specialist competencies such as Impact Assessment, Ecology, Land Rehabilitation and Contaminated Lands.

The EIANZ is an advocate for environmental assessment, management and monitoring investigations and reports being certified by suitably qualified and experienced persons for the completeness and scientific rigor of the documents. One of the ways of recognising a suitably qualified practitioner is through their membership of, and certification by, an organisation that holds practitioners accountable to a code of ethics and professional conduct, such as the EIANZ.

The EIANZ is a not-for-profit, charitable organisation incorporated in Victoria, and a registerable Australian body under the *Corporation Act 2001* (Cwlth), allowing it to operate in all Australian jurisdictions.