

12 July 2012

Dr Glen Brown  
Executive Director  
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Department of Environment and Heritage Protection  
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Environment  
Institute of  
Australia and  
New Zealand  
SOUTH EAST QLD DIVISION

Dear Dr Brown

### Response to Draft *Guideline: Triggers for Environmental Impact Statements (EIS)*

The Environment Institute of Australia and New Zealand South East Queensland Division (EIANZ SEQ Division) appreciates being invited to comment on the Draft *Guideline: Triggers for Environmental Impact Statements (EIS)*. The EIANZ SEQ Division strongly supports the production of such guidance material, and as the professional association of choice for environmental practitioners, it has a professional responsibility to contribute to and critique guidance materials that inform environmental practice.

Attached to this letter is a detailed review of the Draft *Guideline: Triggers for Environmental Impact Statements (EIS)* for your consideration. The EIANZ SEQ Division applauds the simplification of the criteria for determining when an EIS may be required to accompany the application documents for an environmental authority. However, the proposed document cannot be supported as presently drafted. The analysis by the EIANZ SEQ Division indicates that the present document is inconsistent with the provisions of the law, and that the criteria proposed to be used to guide decisions by the administering authority are unclear.

The EIANZ SEQ Division recognises that the process for making decisions about applications for environmental authorities under the *Environmental Protection Act 1994* is difficult to follow, and welcomes the proposed changes to be brought about by the *Environmental Protection (Greentape Reduction) and Other Legislation Amendment Bill 2012*. Given the imminent introduction of new arrangements for the environmental authority application and approval process, the scope of the proposed document could be narrowed to good effect, to deal only with the criteria to be used by the administering authority when considering whether to require an EIS to be prepared.

Members of the EIANZ SEQ Division would be pleased to meet with officers of the Department of Environment and Heritage Protection at a mutually convenient time to assist in finalising the document. In any event, we believe that the issues raised are sufficient to warrant the circulation of a revised draft for comment by those organisations that have taken the trouble to comment on the proposed document.

Yours sincerely

A handwritten signature in black ink, appearing to read 'David Carberry'.

David Carberry  
President