

28 April, 2016



Environment Institute
of Australia and
New Zealand Inc.

Review of the native vegetation clearing regulations
Regulatory Strategy and Design
Department of Environment, Land, Water and Planning
PO Box 500
East Melbourne VIC 8002

Dear Sir/Madam,

***Review of the native vegetation clearing regulations - consultation paper submission –
Environment Institute of Australia and New Zealand***

The Environment Institute of Australia and New Zealand (EIANZ) is pleased to have this opportunity to provide a submission to the review native vegetation clearing regulations – consultation paper.

About EIANZ

EIANZ is the peak professional body for environmental practitioners in Australasia. Our mission is to promote independent and interdisciplinary discourse on environmental issues. The Institute advocates that 'best' environmental practices be delivered by competent and ethical environmental practitioners.

I am forwarding this submission to you on behalf of the Victorian Division of the EIANZ¹, which represents approximately 230 members out of a total membership of 1,800 (approximately 13% of total membership in Australasia). Our membership is represented by a diverse range of technical disciplines including scientists (including ecological consultants), policy makers, engineers, lawyers and economists.

EIANZ has developed and implemented the Certified Environmental Practitioner Scheme (CEnvP) (www.cenvp.org), to assess and certify competent experienced environmental practitioners working in government, industry and the community. This includes specialist competencies' such as Ecology and Impact Assessment. The EIANZ is an advocate for environmental assessment 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.

Feedback on the review

A review of the native vegetation clearing regulations is welcomed by the EIANZ as is a positive step in ensuring these regulations are efficient and effective in reducing clearing and enhancing biodiversity outcomes within Victoria. EIANZ advocates that the development of policies and regulations should be underpinned by and reviewed against rigorous and up to date science.

¹ While this submission is made on behalf of the EIANZ Victorian Division and has been drafted with the input and review of members, it does not purport to represent the diverse views of all individual members.

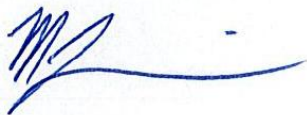
EIANZ is supportive of the consultative approach that has been undertaken by DELWP through the review, including surveying ecological consultants on their views. We request that this targeted approach be extended to broader environmental practitioners (such as environmental planners, environmental impact assessment specialists and Certified Environmental Practitioners) who administer the regulations on behalf of proponents and engage ecological consultants. EIANZ has a diverse membership that includes both ecological consultants, environmental planners and environmental impact specialists and would be well placed to provide targeted input and advice through the subsequent stages of the review.

The key issues identified through the first round of consultation provides for a sound basis for the development of the proposed improvements that are detailed in the consultation paper. The following are general comments provided based on a review of the consultation paper:

- Clarification of the principles of the regulations and policy is important to set expectations for all stakeholders as to how the review improves the biodiversity outcomes, whilst ensuring efficient and effective processes.
- High quality, up to date information tools (such as mapping, reports, guidelines) are critical for assessment of impacts by proponents, and local Councils and DELWP to base decisions on rigorous and accurate science.
- Competency of ecological consultants, planners and decision makers requires further consideration in the review. This may include considerations such as qualifications, certification/accreditation, delivery of training programs and adherence to technical and ethical standards.
- An efficient, effective and transparent process with clear guidance will assist in providing certainty for proponents and enhance the opportunities for better biodiversity outcomes.
- The level of effort required to comply with the regulatory processes should be commensurate with the potential impact to native vegetation.
- A market based delivery of offsets with incentives will drive behaviours that result in positive environmental outcomes and a certainty to proponents.
- Regular, consistent and reasonable approaches to compliance and enforcement are supported as a means effectively implementing native vegetation policy.

EIANZ welcomes any further opportunities to discuss details of this or other policy reviews by the Department. For further clarifications on this submission, the EIANZ Victorian Division can be contact on vic-events@eianz.org.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'M. Juniper', with a long horizontal flourish extending to the right.

Martin Juniper, BAppSci(EnvSc)(Hons) CEnvP

EIANZ Victorian Division – President