

Provided below are additional comments which I request be included as a supplement to my earlier submission.

### **Areas for improved efficiency and effectiveness of the regulatory framework**

- If the Department of the Environment is to improve the regulatory framework, then I am of the opinion that it must publish one or more supplements to the recently released [Standards for Accreditation of Environmental Approvals under the Environment Protection and Biodiversity Conservation Act 1999](#). In my view, the current standards lack the detail needed for undertaking environmental assessments and approvals under the EPBC Act and what is needed before the first approval bilateral comes into force is the following:
  - A list of definitions: In recent years, many approval decisions have included definitions and therefore it is reasonable to assume that the Department has a comprehensive list of such definitions. The incorporation of a list of definitions into the standards would ensure consistency in the way terminology is used.
  - A list of common approval conditions: Given that there are conditions of approval that have been used in the past for more than one decision, the incorporation of a list of common conditions into the standards would ensure transparency in that future decisions would be objective.

### **Legislation governing environmental regulation, and the potential for deregulation**

- The proposed one stop shop accreditation arrangements being sought appear to have neglected the governance arrangements for Norfolk Island and the potential burden that may be placed on local government across Australia.
  - In the case of Norfolk Island, there is no indication that this unique offshore territory will be permitted to enter into a new bilateral agreement to streamline environmental assessments and approvals. Is it the intention of the Department to retain environmental assessment and approval functions for matters of national environmental significance upon Norfolk Island?
  - With respect to local government across Australia, there is a lack of clarity about the role this type of consent authority might have under the new streamline environmental assessment and approval bilateral agreements. Does the Department intend to provide direct assistance to local government authorities who find that they are now the consent authority for matters of national environmental significance within their local government area?

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Richard Sharp