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Committee Secretary
Senate Standing Committee on Environment and Communications
PO Box 6100
Parliament House
Canberra ACT 2600
Australia

By email: ec.sen@aph.gov.au

24 March 2011

Dear Sir or Madam

**Re: Environment Protection and Biodiversity Conservation Amendment
(Bioregional Plans) Bill 2011**

Humane Society International (HSI), the world's largest conservation and animal welfare organisation, welcomes the opportunity to provide the following submission to this Senate inquiry on behalf of 11 million supporters worldwide, and 40,000 Australian supporters. HSI has been an active stakeholder in the marine bioregional planning process that is currently underway.

The EPBC Amendment (Bioregional Plans) Bill proposes to make bioregional plans disallowable instruments in Parliament. HSI considers this to be an unnecessary amendment, as there are already significant periods of public consultation built into the decision making process to ensure stakeholders are able to provide input into this process. We consider the current checks and balances already built into the existing legislation, including review in Parliament, to be more than adequate. The benefits of further parliamentary oversight or scrutiny that would be required as a result of the Amendment Bill are therefore not clear.

HSI considers stakeholder consultation to be an essential element of the bioregional planning process. We do not consider the proposed Bill will provide for improved outcomes for new Commonwealth marine reserves. In fact, we are concerned that the Bill will add unnecessary bureaucracy and delay to the development of marine bioregional planning and hinder Australia's ability to meet its international commitments. In addition, such delays will only create uncertainty for industry, coastal communities, conservation groups and the public, this uncertainty will have a financial impact

Marine reserves are a best practice management tool to protect our marine environment and a tool that is used and recognised worldwide. With the marine bioregional planning process already underway, further unnecessary parliamentary scrutiny will result in failure to meet this international commitment

HSI also believes that the Bill is likely to have significant cost implications. The current cost of the program alone is \$8 million a year and it's been at that level since inception in the late 1990s. We believe that the Bill would lead to an increase in the costs of marine bioregional planning process and cause significant delays to improving the protection and management of our ocean life. We therefore disagree with the statement in the explanatory memorandum that there are no financial impacts of the proposed Bill. In contrast, we consider there to be substantial financial impact should a bioregional plan be disallowed.

As an organisation actively engaging in this issue, HSI is of the opinion that the proposed Bill seeks to politicize not improve the process, and is in spite of significant community effort undertaken to date. We therefore urge the Committee to take these points into account when considering the *Environment Protection and Biodiversity Conservation Amendment (Bioregional Plans) Amendment Bill 2011*.

Yours sincerely

Alexia Wellbelove
Senior Program Manager