



Environment Institute
of Australia and
New Zealand Inc.

27 June 2014

Mr Alex Hawke MP
Chairman
House of Representatives Standing Committee
on the Environment
PO Box 6021
Parliament House
Canberra ACT 2600

Dear Mr Hawke

Re: Evidence by EIANZ to the Inquiry into streamlining environmental regulation

I am writing to thank the Committee for the opportunity to appear before it and provide evidence in support of the submission made by the Environment Institute of Australia and New Zealand (EIANZ).

In that evidence we sought to highlight four key areas where the Institute believes that streamlining of environmental regulations would produce a more effective and efficient regulatory approach. Those areas were:

- the professional certification by "suitably qualified and experienced" persons that documentation relied on in environmental assessment and approvals met legislative requirements and good practice environmental management standards;
- early risk based assessment of the hazards and consequences of activities to ensure that the terms of reference for environmental impact assessments are focused on the important matters that need to be avoided, mitigated, remediated or as a last resort, offset;
- harmonisation of the regulatory frameworks for threatened species across jurisdictions with a particular emphasis on the categorization of species, especially where their range extends across multiple jurisdictions, and the rapid appraisal of new and existing listings so as to ensure that listings remain accurate and relevant; and
- achieving on going value from the data and analysis that is acquired through environmental assessment and approval processes by systematizing its collection and analysis within a national data base that is accessible to project proponents and governments, so as to develop a better understanding of cumulative impacts and the state of the environment more generally.

The EIANZ believes that the first of these matters will be a low cost way for governments to engage the skill and expertise of professional environmental practitioners in achieving appropriate standards of environmental performance.

For too long the system of environmental regulation has relied on governments alone to apply standards of good practice environmental management. Robust and efficient regulatory systems share that responsibility across all actors in the system, especially with professional practitioners. We had a good discussion in evidence of how this applies in the accounting and engineering professions. The risks of doing otherwise are:

- continuing financial demand on governments to validate the standard of assessments, condition approvals, and assure low level compliance issues;
- continuing poor performance by project proponents, operators and practitioners who depend on governments to tell them what to do or to check documentation and designs; and
- a lack of confidence by the community in the regulatory arrangements and the environmental outcomes that are achieved.

The EIANZ would be pleased to assist the Standing Committee further as it develops its report, in writing or by giving further evidence.

Yours sincerely

Jon Womersley
President