



**Friends of Clontarf Hill and Adjacent Bushland Inc**

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

Dear Committee Secretary,

Friends of Clontarf Hill (FoCH) is a group that has been operating since 1992. We are a small group of people dedicated to the protection and enhancement of remnant bushland in Fremantle, Western Australia.

We wish to comment on the Amendment to the *Environment Protection and Biodiversity Conservation Act 1999* to: provide that, where an approval bilateral agreement declares that an action in a class of actions does not require approval, the action may not be referred to the minister for assessment and approval under Part 7 of the Act; enable the minister to complete an assessment and approval of an action where a bilateral agreement with a state or territory is suspended or cancelled, or an approval bilateral agreement otherwise ceases to apply to a particular action; remove the current prohibition on approval bilateral agreements applying to an action that has, will have or is likely to have a significant impact on water resources (the water trigger); allow the minister to accredit a broader range of state and territory approval processes for the purposes of approval bilateral agreements; enable the states and territories to make minor changes to environmental assessment processes without the need for the amendment of a bilateral agreement or the re-accreditation of a management arrangement or authorisation process; and make technical amendments in relation to the making and operation of bilateral agreements.

It is our view that:

- This is an extremely poor process.
- Legislative reform should not be rushed through prior to the release and consideration of the final report of the Samuel Review of the EPBC Act
- Any EPBC legislation amendments should include an independent regulator and strong national environmental standards, put together as a package to Parliament
- Any new national environmental standards should be made available for public scrutiny before being put to Parliament.
- Establishing this committee to have hearings and report in only two weeks is a box ticking exercise, and does not enable proper scrutiny or accountability.
- Places You Love are continuing to call for the Government to publicly release the Final Report of the EPBC review before any further discussion is undertaken.
- We also urge the Government to bring forward a full package of reforms to be considered by Parliament together, including a full suite of strong legally enforceable National Environmental Standards; an independent regulator for compliance and enforcement; and the robust accountability and transparency requirements for government decision making.

Yours sincerely,  
Christine Duckham  
Chair, Friends of Clontarf Hill and Adjacent Bushland Inc.