

17 January 2013

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

Email: [ec.sen@aph.gov.au](mailto:ec.sen@aph.gov.au)

Dear Senate Committee,

**Environment Protection and Biodiversity Conservation Amendment (Retaining Federal Approval Powers) Bill 2012**

Thank you for the opportunity to comment on the *Environment Protection and Biodiversity Conservation Amendment (Retaining Federal Approval Powers) Bill 2012* (the Bill).

The Victorian Association of Forest Industries (VAFI) is the peak employer representative body for the Victorian forest and wood products industry. Our members include forest managers, harvest and haulage businesses, primary timber processors, pulp and paper processors, secondary processors and sellers and associated businesses and organisations.

VAFI is a member of the Australian Forest Products Association and supports their submission to the Bill.

VAFI is committed to promoting an economically robust, socially responsible and environmentally sustainable forestry industry. We support and encourage best practice in industry and in forest and land management. Biodiversity conservation, including threatened species, is an essential component of responsible forest management.

The Victorian forestry industry operates according to strict regulatory controls for responsible forest management. Timber production on public land managed by VicForests is certified to the Australian Forestry Standard. Approximately 90 percent of the total plantation area in Victoria is certified under the Australian Forestry Standard, the Forest Stewardship Council, or both.<sup>1</sup>

It is important that environmental regulation is clear and efficient to provide confidence to communities and industries alike.

In April 2012, the Council of Australian Governments (COAG) agreed to progress priority areas for major reform. A key priority for reform is addressing the duplicative and cumbersome environment regulation. COAG affirmed to reduce duplication and double-handling of assessment and approval

---

<sup>1</sup> [www.pefc.org](http://www.pefc.org) and [www.fscaustralia.org](http://www.fscaustralia.org)

<sup>1</sup> *Meeting Communiqué*, COAG Meeting 13 April 2012, [www.coag.gov.au](http://www.coag.gov.au)

processes by fast-tracking the development of bilateral arrangements for accreditation of state assessment and approval processes<sup>2</sup>.

VAFI supports the *Agreement between the Australian Government and Victoria relating to environmental impact assessment* (the agreement) as it ensures an efficient, timely and effective process for environmental assessment and approval of actions whilst protecting the environment; promoting the conservation and ecologically sustainable use of natural resources and minimises duplication of environmental impact assessment processes<sup>3</sup>.

The agreement recognises the comprehensive and integrated planning and environment assessment system in Victoria whilst also providing the Commonwealth Minister with the power to make the final decision to approve or refuse an action assessed under the agreement. It also provides efficiencies by removing unnecessary duplication and reducing business costs. VAFI believes that such agreements best support a well managed and sustainable environment, including biodiversity conservation, whilst also reducing green tape and administration and regulatory burden for businesses.

VAFI recognises that the Bill does not align with the COAG reform priority of addressing duplicative and cumbersome environment regulation, nor does it recognise the work of State and Territory Governments in undertaking actions that they are best placed to undertake.

VAFI believes the Bill would only reduce the efficiency and effectiveness of the current system and increase green tape, as well as administration and regulatory burden to Australian businesses.

VAFI believes there is no scope to amend the Bill to remove or restrict bilateral agreements and therefore does not support the Bill.

If you have any queries about our letter or would like further information, please don't hesitate to contact me.

Kind regards,

**Jillian Roscoe**  
Manager Policy and Projects

---

<sup>2</sup> *Agreement between the Australian Government and Victoria relating to environmental impact assessment*, 2009, Department of the Environment, Water, Heritage and the Arts  
<http://www.environment.gov.au/epbc/assessments/bilateral/pubs/vic-bilateral-agreement.pdf>