

Chris White, Senior Auditor | Performance Audit
Office of the Auditor General for Western Australia
Jordan.Langford-Smith@audit.wa.gov.au

COMMENT ON AUDIT OF EFFECTIVENESS OF ENVIRONMENTAL OFFSETS

Introducing the Urban Bushland Council

The Urban Bushland Council WA Inc. (UBC) is the peak WA community organisation for urban bushland recognition and protection. UBC is an incorporated, not for profit organisation registered as a charity. We are a voluntary community association with an active membership of more than 90 volunteer groups (each with their own local membership from 10-165 individuals) and an additional 100+ individual 'supporter' members – all with a common interest in conservation and protection of areas of urban bushland in WA. More details at <https://www.bushlandperth.org.au/> . We recently celebrated 30 years of advocacy for the protection of urban bushland.

UBC advocates to all levels of Government for natural areas protection. We do this with limited resources through the amazing efforts of our 'Friends Groups' and their many volunteers – from all walks of life 'working' to improve and maintain the health of patches of neighbourhood nature. UBC advocates for:

- Protection, conservation and active management of urban bushlands, wetlands and their ecological linkages
- Ending the clearing of native vegetation in urban areas
- Increasing tree canopy cover in urban areas to a minimum of 30 %
- More investment in our areas of native vegetation in urban areas
- Better detection, control, reduction and management of threatening processes in these areas
- Urban planning that results in net positive vegetation outcomes and conserves biodiversity

UBC Submission

Across UBC's network of Friends of groups there is our high level of dissatisfaction with offsets. We list below what we believe are the shortcomings in the current scheme.

1. **Projects should make greater use of the principle of Avoid**

UBC understands that the pricing of offsets excludes many costs and is not a true reflection of the true economic impact to the environment. It therefore seems that this leads to offsets being seen as a lower cost compared with changing design to create more avoidance. It is a commonly held view of our membership that developers rely on offsets rather than use the earlier stages of the mitigation hierarchy namely avoidance and minimisation.

We understand that previous advice has been provided to the Department about the offsets calculator and request that the OAG investigate whether the current DWER offsets calculator reflects the true cost to nature. Should it not reflect the true cost, whether that leads to a consequent distortion of the application of the mitigation hierarchy.

2. **Utilising expertise external to the Department**

UBC is aware that Professor David Pannell, from UWA was one of the stakeholders interviewed in the Round Tables. Professor Pannell has a rich background in publishing, consulting and communicating to a broad audience on environmental offsets. UBC refers the OAG to his blog

(numbers 432 – 440) at <https://www.pannelldiscussions.net/> . His publications on offsets are referenced with each discussion.

UBC requests the OAG investigate whether the Department has made use of external expertise in their deliberations on environmental offsets?

3. Identified offsets are often a poor representation of the environment lost

Nominated offset sites can be distant from the land proposed for development and therefore viewed by the community to be an unsuitable way to protect the population that will be impacted. One very notable example is the proposed development at [North Stoneville](#) where part of the proposed offset is 632 ha site located in Williams, WA, a distance of at least 150 km. Will the displaced black cockatoos know they could relocate to Williams?

Another example are those planned for the [Anketell Road Upgrade](#) with offset sites at Lake Mealup, St Ronans and Gabbadah (all between 50 and 100km away from Anketell Road). None of these would appear to be a good representation of the environment potentially lost to development.

UBC asks why such offsets are deemed appropriate when they would seem to have little relevance to the actual vegetation, flora and fauna communities being affected. Does the Department have a role in determining the suitability of offset sites?

4. Net Gain and the WA Native Vegetation Policy

We refer to the WA Government's commitment to net gain via the Native Vegetation Policy.

In some jurisdictions the calculation of offsets includes adding a percentage (say 10%) to represent a commitment to net gain for native vegetation and to acknowledge the impact on the environment generated by the immediate effect of clearing compared with the delayed impact of restoration.

Furthermore, there is community concern that, in some cases, the land identified as an offset was never intended to be cleared and hence proposing it as an offset is not genuinely adding to the natural environment.

UBC asks whether there are guidelines to proponents that deliver additionality from offsets and how are these managed and monitored? Are offsets making a meaningful contribution to Net Gain? UBC also asks whether there is any accommodation in more recent offset determinations to make provision for the risk of failures in outcomes.

5. Excellent economic and environmental outcomes should be the aim of all projects.

Given the lack of community friendly reporting and monitoring information, UBC will be very interested in the results of this audit to inform us whether the Department does have monitoring data, and whether it reports on the outcomes of offsets for now completed development projects. UBC is also very interested to know whether there has been any review of the efficacy of the Department's offsets calculator in offsetting environmental damage. We are aware of the review of the Pilbara Environmental Offsets Fund and its lack of success in protecting threatened species¹.

UBC asks whether we can have confidence that the offsets regime accurately offsets environmental damage. What reviews relevant to the Swan Coastal Plain have been carried out?

6. Cumulative impacts of development

As development encroaches further over the Swan Coastal Plain coupled with the impacts of climate change on our native vegetation, flora and fauna the urgency of quantifying cumulative impacts and making consequent adjustments to projects becomes even more important.

How is the Department factoring in cumulative impacts into consideration of offsets?

¹ <https://www.abc.net.au/news/science/2024-10-21/pilbara-threatened-species-environment-offset-fund-scheme-mining/103782178>

7. Land in the formal conservation estate (eg Bush Forever) can be subject to development

UBC contends that land in the conservation estate, including but not restricted to Bush Forever sites, has been set aside for conservation because of its high natural environment values. Nonetheless we often see development proposals where it is 'unavoidable' that conservation estate will have to be sacrificed for delivery of the current project. UBC contends that such areas should not be subjected to clearing.

How is the Department ensuring that avoidance is the overriding principle in developments potentially impinging on the currently gazetted conservation estate?

8. Restoration timelines

It is UBC's understanding that restoration is much more expensive than land purchase and we further understand that the availability of uncleared land for offsets is reducing. Given that restoration slots into the Mitigation Hierarchy above offsets, UBC supports efforts towards more restoration. We believe these efforts should be for an extended time (>20 years) to ensure the success of the restoration project and the delivery of the promised environmental outcomes.

UBC requests that the OAG investigate whether the Department has data from long term monitoring of restoration sites and whether such restoration is delivering the promised environmental outcomes.

9. Monitoring and reporting

From a community perspective there seems to be no easy way for us to access consolidated mapping, monitoring and reporting information. Furthermore, there also appears to be no publicly available reporting on status of offset areas.

UBC requests that the OAG investigate whether the Department has plans to make available community friendly reporting of environmental offsets.

Thank you for the opportunity to comment on the Audit of environmental offsets. This is a vexed area for our membership, and we appreciate your efforts in delivering the transparency inherent in such reviews.

Yours sincerely

Chairperson

christine.richardson@bushlandperth.org.au

Urban Bushland Council WA Inc
City West Lotteries House
2 Delhi Street
West Perth WA 6005
ubc@bushlandperth.org.au
www.bushlandperth.org.au