



Friends of Grasslands

supporting native grassy ecosystems

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Dear Sir/Madam

Environmental Impact Assessment Improvement Project

Friends of Grasslands Inc. (FOG) is a community group dedicated to the conservation of natural temperate grassy ecosystems in south-eastern Australia. FOG advocates, educates and advises on matters to do with the conservation of grassy ecosystems, and carries out surveys and other on-ground work. FOG's members include professional scientists, landowners, land managers and interested members of the public. While based in Canberra, FOG has many members in New South Wales and has a long-standing interest in natural temperate grassy ecosystems in south-eastern New South Wales as well as the ACT. FOG has made submissions about a number of projects to which the 'Environmental Impact Assessment process for State significant projects' applies.

Initiative 2: Earlier and better engagement

FOG has an interest in any development impacting on grassy ecosystems in south-eastern New South Wales. We would like to find out about such projects before they reach the Commonwealth's EPBC referral process, but we are not always able to do that. It is our view that projects that are likely to have an impact on endangered grassy ecosystems, even if they are only small projects, are State significant and should be listed publicly on the relevant page of the NSW Planning and Environment site. There are some NSW projects appearing on the EPBC site we have not seen previously listed on this site.

As well, the labelling of projects on the "Major projects assessment" page needs to be clearer, giving region or nearby town as well as specific site name. Currently, the listing appears to expect commentators to be familiar with the specific localities. To illustrate, on the site on 8 November it is obvious where locations such as Perisher Valley, the Sydney Opera House and Crookwell are, but the locations of Goonumbla and Martins Creek are not at all obvious.

Initiative 7: Strengthening the monitoring, auditing and reporting of compliance

'Monitoring, auditing and reporting of compliance' is an area that is poorly supported in general. Some proponents go to considerable effort to comply with conditions of approval, but that is not always the case. As well it is difficult, if not impossible, for a community organisation such as FOG to discover whether or not conditions of approval have been met. FOG considers it essential that monitoring of construction impacts, long-term impacts and offset actions be part of the conditions of approval of any project that may have an impact on grassy ecosystems. Further, this monitoring should be reported publicly so the community has some assurance that the process is, in fact, effective.

Yours sincerely

Naarilla Hirsch
Advocacy coordinator
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