

EPBC Review: submission guide

The process (in a nutshell)

1. Let your Wilderness Society Organiser or your team leader know you would like to write an individual submission, or to contribute to writing a team submission.
2. Download the cover letter, complete and save.
3. Write your submission using this guide and seeking assistance if required.
4. Get someone to proofread your submission.
5. Send your cover letter and submission via email or post (this is in preference to the electronic form). Submissions can be emailed to: epbcreview@environment.gov.au or posted to:

EPBC Act Review Secretariat
Department of the Environment and Energy
GPO Box 787
CANBERRA ACT 2601

NB: you will need to download complete and attach a specific cover letter which can be downloaded here.

6. Make sure you send a copy of your submission to your Wilderness Society Organiser or your team letter, and they can work with you on who to send it to next.
7. Let your Wilderness Society Organiser or your team leader know if you receive any response.

This guide is designed to support Movement for Life teams, leaders, and community members in making submissions into the 2019-2020 EPBC Review. This guide has been developed to compliment the support of your well trained Movement for Life Community Organisers and your local Movement for Life teams. If you feel like you need further guidance just ask and we will be more than happy to assist.

Why is the EPBC Review important and why are we putting in submissions?

Every 10 years, the Australian Government is required to independently review how well our national environment law, the Environment Protection and Biodiversity Conservation Act 1999 (EPBC), is protecting the wildlife and places we love. In October 2019, Environment Minister Sussan Ley announced that the second ten year review is expected to take 12 months and should be delivered to the Minister for the Environment by October 2020, with community input sought between Nov 2019 and Feb 14 2020.

This is a once-in-a-decade chance to have a real national conversation about how we protect our environment. We want to get as many community submissions as possible into the Review to:

1. Ensure the Independent Reviewer and Review Panel hear your lived experience of nature destruction, understand your concerns and the solution we know Australia's nature needs;



2. Balance the voice of vested interests who want to see Australia's nature protections weakened even further; and
3. Use the big opportunity of the Review to call on politicians and decision-makers to take concrete action to end our extinction and deforestation crises.

Why is important that you make a submission

Community members often feel like they don't have enough technical expertise or knowledge to input into government processes. This couldn't be further from the truth: the Review needs to hear your lived experience about the natural values you loved and the changes you've seen in them.

Your stories powerfully illustrate the larger problems we're talking about and will demonstrate the breadth and depth of Australian's love of their natural world. You can back your experience up with data or studies to link it to national issues like Australia's deforestation or extinction crises if you would like, and if you are having trouble finding the data you need your Wilderness Society Organiser is there to help..

If you can't point out specific parts of the EPBC that you think aren't working, don't worry! You can look at the overall outcomes to show if the Act is working e.g. *the EPBC is meant to protect native species, but koalas, numbats and northern-hairy nosed wombats numbers keep declining.*

The most important thing is to be concise and get across your thoughts and lived experiences, rather than external expertise: your submission will not be more effective because it is long, overly technical, or opinionated.

What should you include in your submission

The broad questions that the Review is seeking to answer are:

- Is the EPBC effectively delivering what was intended? Is it up to future challenges?
- How well is the Act being administered (e.g. enforcement, funding, implementation etc)?
- What are the priority areas for reform?
- What changes are needed? Why?

You should aim to include the following elements in your submission:

1. Introduce yourself and your stake in the issue:
 - a. Identify which of the broad questions above you'll cover. Dot points are fine.
 - b. You can find the Terms of Reference for the Review and further questions [in the Review discussion paper](#) if you want to address them. It is fine to just address the questions above, however, or only some aspects of the Terms of Reference.
 - c. Identify your stake (e.g. concerned community member) in the issue. This establishes you as an 'expert' in your lived experience.
2. What issues are of concern to you:
 - a. Identify one or more issues you'd like to draw to the Reviewer's attention. Use headings to clearly mark the different issues in your submission.
 - b. **Use your own personal experience** to support and illustrate statements you make. Write from what you know.
 - c. Where possible, provide third party evidence to support each of your statements and demonstrate how it is part of a larger problem with Australia's nature laws.



This evidence doesn't have to be scientific papers - it can be reports from reputable charities, governments or local wildlife carers. However, ideally this should not be things you heard or were told.

3. Recommendations: Tie your issues of concern back to the national nature laws that work ask - See the "New Nature Laws 101" for more detail.
 - a. Establish a new National Environment Act that enshrines Federal Government leadership over nature protections, contains real safeguards against extinction, including ending the destruction of endangered species habitat, and sets out clear rights of appeal and consultation for communities.
 - b. Establish an independent Environment Protection Agency to act as watchdog over the system and ensure our laws are properly enforced;
 - c. Establish an independent National Environment Commission to ensure we take a national approach to protecting nature and to publicly report every year on the impact of conservation action and funding, and show clearly whether natural values are recovering;
 - d. Ensure that sufficient money and resources are put in place so that nature can recover; and
 - e. Ensure a central role for community, with guaranteed rights and participation in planning and decision-making.

Top tips

- You don't have to cover every question asked by the Review or part of the EPBC: concise, clear and grounded in your personal story trumps comprehensive, academic and wordy.
- Submissions should not be shorter than 300 words and NOT longer than 4 pages.
- No swearing, abuse or threats... Ever.
- Don't target individual public servants or MPs.
- Do not include anything you would not like made public.
- Thank the decision maker for their time and consideration.

Double (or triple!) your impact

Get more impact out of your submission by sending it other stakeholders who can influence the outcome of the Review (e.g. your MP, Senators) so that they hear and respond to your concerns.

Don't just ask them to read your submission. Include a clear request for action on their behalf, such as writing to the Australian Environment Minister asking them to ensure the Review addresses the issues you raise in your submission. If you're unsure of what to ask, please contact your local TWS organiser.

You can also encourage and support family, friends, community members to put in their own submissions. Give them this guide and explain why you've put in a submission and why it's important to you: this is a great opportunity to engage them on the issues you care about!

Help us tell the story of an engaged and caring Australia

You will be among hundreds of Wilderness Society supporters who will be making submission, and this in itself can inspire others to voice their concerns.

Make sure you let us know when you make a submission, and any response you get. We also want to know when you forward your submission onto any MP or third party. This will help us



communicate the momentum gathering behind the need for a thorough and credible review process.

Your Movement for Life organiser has been well informed on our theory of change, and how to help you ensure you get maximum benefit from your submissions so keep them in the loop.

Further information

You can find more information via these channels:

- The official EPBC Act Review page: <https://epbcactreview.environment.gov.au/>
- Ask your TWS organiser for our guide on “how to write effective submissions” and other materials that will help you impactfully engage with decision makers.



Example submission (intended as a guide only: please don't copy)

Dear Professor Samuel and Independent Review Panel,

I would like to make a submission into the 2019-2020 Independent Review of the EPBC Act. This submission will cover:

- Major issues I see with how the EPBC Act protects our native wildlife, especially in light of the increasing threat posed by climate change;
- The Government's failure to ensure that the funding and actions need to protect our wildlife are in place;
- Where I think the EPBC Act and related Government policy needs to be reformed.

I live in Port Macquarie, NSW. I have lived here my entire life. I have been a part of the Port Macquarie Wilderness Society local group for three years, as well as a member of the local bushcare group for the past 13 years. I also volunteer at the Port Macquarie Koala Hospital.

I personally care about the protection of Australia's native species and our spiralling extinction crisis. I care passionately about this issue because while I was growing up, Port Macquarie was a very important spot for koalas. In the 1960s, my mother drove me to school in town and I would count a koala in every tree on the way there and on the way back.

Over the last 20 years, this area has seen widespread logging and deforestation, and the koalas have disappeared along with most of their habitat. Now there are very few koalas in my area, and the recent bushfires have likely killed off the last remaining koala colony near me. This was a state significant colony, important for the future of the species.

This is backed up by national data showing a decline in koalas all around NSW, Qld and the ACT (WWF-Australia Report (2017) *Current status of the koala in QLD and NSW*). The 2016 State of the Environment Report found that this decline is happening across the board to nearly all of our threatened native species. The recent Senate Inquiry into Australia's faunal Extinction Crisis found that was because the EPBC Act "is incapable of addressing" our current extinction threat.

I am disappointed that the situation is not being dealt with and I expect the Australian Government to:

1. Reform our failed national environment laws so that all our native species and the habitat critical for their survival are strictly protected;
2. Establish an independent Environment Protection Agency to act as watchdog over the system and ensure our laws are properly enforced;
3. Establish an independent National Environment Commission with the authority to ensure we take a national approach to protecting threatened species and to publicly report every year on the impact of conservation action and funding, and show clearly whether native species are recovering;
4. Ensure that sufficient money and resources are put in place so that species that are on the brink of extinction can recover; and
5. Ensure a central role for community, with guaranteed rights and participation in planning and decision-making.

Thank you for your consideration of my submission.