

Senate Environment and Communications References Committee
Inquiry into environmental offsets
Friends of the Earth Australia submission

Friends of the Earth Australia welcomes the opportunity to comment on this Inquiry. It is an important and welcome - if not overdue - opportunity to examine the real value of offsets in protecting biodiversity in Australia.

1. The history, appropriateness and effectiveness of the use of environmental offsets in federal environmental approvals in Australia, including:

Friends of the Earth Australia is deeply concerned about the Federal government's use of environmental 'offsets' under the *Environment Protection and Biodiversity Conservation Act 1999 (Cth)* EPBC Act. The definition of offsets in the Act rests on the assumption that impacts on unique sites of national environmental significance can be 'compensated' for. The Australian federal Government defines offsets as:

a conservation action that is intended to compensate for the negative environmental impacts of an action, such as a development. (Commonwealth of Australia, 2013b)

measures that compensate for the residual impacts of an action on the environment, after avoidance and mitigation measures are taken. (Commonwealth of Australia, 2012)

The role of offsets in Federal environmental regulation is relatively new. Over time, offsets have been increasingly used in Federal decisions under the 1999 EPBC Act, however they were instituted without systematic processes for doing so. In 2007, the government released a draft offsets policy for decisions under the Act, which was then replaced in 2012. Both iterations have not addressed the inherent limitations of offsets. And they have failed to produce assessment processes that ensure consistent and rigorous application of criteria. Nor do they guarantee the environmental outcomes promised with offset activities.

We oppose increasing reliance on offsets. Whilst we welcome further discussion about requirements for developers to contribute to conservation, it must be crystal clear in decision makers minds that offsets can never truly 'compensate' for development that damages land and water ecosystems already recognised as having national significance.

This submission argues against the concept of offsets as it is currently applied on ecological and political grounds. Importantly, we are not arguing against the Minister requiring developers to pay for the environmental and other externalised costs in circumstances where developments go ahead. We are however, arguing that the corrupt concept and use of 'offsets' be eliminated. More focused areas of reform should take precedence over 'getting the offset policy right' such as national strategies for land use and biodiversity conservation.

If the Federal government persists with the use of offsets, at the very least the policy for assessment, verification and monitoring should be made much more rigorous in order to match what is currently only rhetoric about 'equivalence' and 'additionality'. Much greater public accountability and stronger compliance procedures for offsetting are also crucial.

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a. the principles that underpin the use of offsets;

The key principle for use of offsets in the Act and the policy is that they are used to address ‘residual impacts’ of a development decision only after other avoidance and mitigation efforts are made. Put simply, the policy recognises that offsets should serve, and not contradict the objective of the EPBC Act, which is to:

to provide for the protection of the environment, especially those aspects of the environment that are matters of national environmental significance (Section 3(1)(a) Commonwealth of Australia, 2013a)

The overarching question for this inquiry should be: does the definition and practice of environmental offsets undermine the Act’s purpose?

For instance, the water quality offsets granted as part of the dredge approval at Abbot Point were hardly dealing with ‘residual’ matters. The proponents acknowledge that dredging and dumping at Abbot Point will have significant impacts on water quality, affecting fish, seagrass and corals. Water quality is one of the fundamental questions relating to the impacts of port expansion at Abbot Point and critical to the health of a number of matters of national environmental significance.

Offsets are only supposed to be granted if the damage can be neither avoided or mitigated. Unfortunately, proponents often avoid that obligation with ease – they simply claim it is too costly. There is no requirement for them to establish and verify those costs (although that was done in the case of Abbot Point for other legal reasons) nor is there any guidance on how ‘too costly’ should be judged. Costliness should be assessed against the total cost of the project, the cost of destruction (including environmental costs) and projected revenues over the life of the project.

The no project alternative is virtually never considered. It is the easiest and potentially the most valuable form of avoidance. Federally, over 99% of all developments are approved (or deemed not federal matters). The only contested space in an EPBC Act proposal are conditions and offsets. Bluntly, offsets have become one more cost of doing business – and are unrelated to environmental protection. They are clearly designed to justify and facilitate development. Generally, it is known that the objectives of the EPBC Act are not being met. The continuing use of offsets in their current form will only exacerbate the problem.

In one of the few cases regarding offsets – and few instances where offsets have been subject to critical review, the Bulga case ([2013] NSWLEC 48) found that attempts to avoid and mitigate impacts before putting offsets in place hadn’t occurred. The court also found that the offset package was inadequate to offset the damage and that the offsets would fail to address conservation needs in the short and medium term. That decision has now been upheld by the Supreme Court in NSW.

The government has developed a hierarchy of mitigation decisions in its offsets policy, and insists that offsets are one tool in the environmental impact process (Commonwealth of

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Australia, 2012: 7). This is welcome insofar as it privileges other more direct ways to mitigate and come to terms with the impact of developments in areas of national significance.

There are theoretical failings to offsetting that the government has not recognised. Offsetting the damage done to critical ecological areas is a deeply flawed concept, premised on the idea that bits of ‘natural capital’ or ‘ecosystem services’ can be reliably and ethically measured and traded against each other. Assuming that bits of ecological systems are like commodities and ‘services’ to human societies is worrying. Offsets assume fungibility between two forms of ‘ecosystem service’. Further, the offset policy assumes ecosystems can be weighed up against each other and their differences squared. This is a reductive and highly inaccurate view of ‘nature’ and encourages callousness in the negotiation of development decisions, where offsets become bargaining chips in a contest that is skewed toward unsustainable development.

Offsets, as Professor Hugh Possingham has stated, are likely to result in a net loss of habitat.

Biodiversity is not fungible, it is not possible to trade it from one place to another and hope to retain its value; biodiversity is dependent on where it is in the landscape (place) and when it is (time)..

He goes on to say that offsets mean we have decided to deplete half of the remaining land and related ecosystems left in Australia. (Possingham, cited in Tager, 2013). At a time where biodiversity has gone beyond limits within which societies must stay (Rockström et al., 2009), this is unacceptable.

Every development that threatens areas of unique ecological and social value should not become part of a ‘trade’ ethic, which fundamentally ignores the intrinsic ecological and social values of place. Offsets are like Papal dispensations that will somehow and magically atone for your destructiveness (Goodin, 1994). Offsets should not be negotiated within a pre-given commitment to development but within the ecological limits society knows it must begin to operate within (Farrier, 1995).

We are concerned that overemphasis on ‘getting the offsets policy right’ is allowing governments to further ignore more fundamental issues about our treatment of land, water and communities.

Equivalence

The tendency in the offsets policy is to vaguely refer to similarity between the threatened areas in question and potential offset sites. There is also a tendency to create vague, abstract reference to ‘aspects of the environment’ in need of protection. For instance offsets must:

deliver an overall conservation outcome that improves or maintains the viability of the aspect of the environment that is protected by national environment law and affected by the proposed development’ (Commonwealth of Australia, 2013b).

This has led to assumptions that other places and ecosystems can be considered as having the same value in that they have a similar enough ‘aspect’ of environment which the Act is supposed to protect.

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'Equivalence' is clearly an ecological concept critical to the workings of offsets, but it should also be understood in a broader cultural context. It involves constructing common metrics against which two sites / situations can be compared. Both ecological and cultural information is either lost, ignored or smoothed over in the process of commensuration, including cultural significance and deep uncertainty regarding ecological knowledge. Even on narrowly defined terms, the current measurement and assessment procedures for offsets does not undertake the kind of ecological analysis that would allow equivalence to be established. This kind of reductive notion of ecology is now creeping into the concept of protected areas - part of a dangerous trend towards undermining some of the fundamental precepts of conservation.

There are other aspects of equivalence that are not even considered. For instance, the Waratah Coal Mine approval requires an offset for the destruction of the Bimblebox Nature Reserve. The health and condition of that reserve is a result of thousands of hours of voluntary work weeding and caring for the area by local residents. Making a reserve twice as large will not 'offset' the loss of the devotion, passion and dedication of the current managers.

Indirect offsets

'Indirect offsets' should be abolished immediately. There is no evidence that indirect offsets protect anything. Ensuring that developers are responsible for the damage they cause and contribute to conservation are both necessary, but that is very different from the kind of quid pro quo that indirect offsets represent.

Some indirect offsets provide money for purposes that should already be funded. For instance, EPBC approval 2011/5846 requires \$350,000 be used for maintain the insurance population of the Tasmanian Devil. In light of its threatened status, funding to protect both insurance population and to rehabilitate and revitalise populations should be a legal obligation of the Federal Government. Instead, that is replaced with an offset. Offsets are being used in lieu of government funds and government regulation.

We are being forced to make a dangerous and impossible choice. As Governments continue to reduce funding for and commitment to conservation, we are asked to allow destruction in order to secure some environmental protections or some funding for conservation. This semi-privatising of environmental protection is incredibly reckless.

Additionality

'Additionality' of an offsets refers to a project being additional to what is already protected either by circumstances or law.

Additionality of offset programs cannot be legitimately established when they are setup to replace activities where the government have removed funding or other forms of regulatory enforcement of protection for a habitat or species. It is, in fact, a concern of FoEA that offsets create a perverse incentive to reduce existing government protections and replace them with a private funding system that is *ad hoc*, ineffective and contrary to the objectives of the EPBC Act.

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There are a number of examples of offsets being offered that do not provide additionality. Offsets within the Great Barrier Reef Marine Park have been used several times to permit the destruction of seagrasses (eg Abbot Point). Seagrasses are protected under both State and Federal legislation. Failure to protect seagrasses and then protect them through offsets is does not satisfy any test of additionality.

A similar and equally perverse incentive occurs on private land as well. Gibbons has already outlined this in a previous consultation.

If you simply calculate gains as those relative to what was there prior to development then, in my experience from developing an offset policy in NSW, this creates a perverse incentive on the part of proponents to degrade the offset site to the lowest condition as allowed under their statutory duty of care (e.g., using grazing by livestock) and then claim an improvement by reducing this pressure to its former level...offset funds should not be used to pay for management required within a land manager's statutory duty of care such as the control of noxious weeds (Submission to Draft Offset Policy, Dr Philip Gibbons, ANU, 2011)

Offsets generally create a perverse incentive to reduce public funding or not expend public funds, if there is a possibility that the funding will come from offsets. The Draft Water Quality Offsets Framework 2013 provides examples of how offsets may result in perverse outcomes. A sewage treatment plant wants to exceed its permissible nutrient discharge level. They can accomplish this by paying another plant discharging into the same waterway to reduce their nutrient discharges by an even greater amount. This would, they argue, result in a net improvement in water quality. The paper then posits that this may represent a more cost effective approach than upgrading waste water treatment technology (page 4). The implications of this approach are that:

1. There is no incentive to upgrade wastewater technology.
2. There is no incentive to regulate to upgrade wastewater technology
3. Offsets are not being used as a last resort but as a tool to avoid more systemic means of improving water quality
4. Water quality is not improved as much as it should be

The potential for these kinds of perverse outcomes are inherent in the current policy and practice. A much stronger definition of additionality is needed that includes:

- A presumption that a legal obligation to protect prohibits the use of offsets in those regulatory areas (ie lack of resources or funding cannot be used as a basis for justifying offsets);
- A presumption that technology will be upgraded regularly (a constant improvement standard) and any offsets must be assessed against the likely outcomes of that improvement.

FoEA is aware that cutting off offset funding for core responsibilities of government or landholders won't guarantee that conservation needs are properly funded or met. One of the most common complaints in submissions to the Threatened Species Inquiry was that

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Government wasn't funding, monitoring, enforcing or protecting the species it is legally obliged to protect.

While proponents must be responsible for the damage they cause, offsets are not creating an incentive to avoid damage but an incentive to avoid protection. Clearly, this raises (again) the critical question of ensuring adequate resourcing for environmental protection. The irony is that current practices are creating greater environmental damage, which creates a need for greater resources, which are not being provided, resulting in further acceleration of avoidable harm.

Timeframes for offsets

Offsets must be implemented and take effect within timeframes that ensure a transition from the destroyed habitat to the new without causing greater and additional loss. For instance, the proposed water quality offsets imposed at Abbot Point are likely, according to scientists, to take decades before any improvement in water quality is seen. The time lag between potential improvement and likely losses associated with poor water quality at Abbot Point could potentially see a permanent loss of seagrass beds at Abbot Point (see January 2014 FOI, GBRMPA, document 30, dated 2 August 2013).

State offsets

In light of the decision by the Federal Government to hand over approval powers under the EPBC Act to the States, it is important for this Inquiry to determine whether State offsets are appropriate or adequate. This is not simply a question of aligning offset policies, but of ensuring a critical assessment of whether State based offset schemes are succeeding in improving biodiversity.

If the recently amended NSW *State Environment Planning Policy (Mining, Petroleum Production and Extraction)* is any indication, there is cause for concern. It provides for 'certification' of offset policies by the Chief Executive of the Office of Environment and Heritage with no criteria and no standards. It is not clear if the assessment of offsets for purposes of certification is subject to the overarching goal of economic benefit that is embedded in the policy.

b. the processes used to develop and assess proposed offsets;

In practice, the definition and institution of offsets in recent federal decisions under the Act has meant 'stronger' versions of offsetting have not occurred. One of the current trends with offsets is to grant them outside of established public processes, particularly under the EPBC Act. Offsets are not necessarily identified in an EIA process. They are rarely assessed in the EIA process. Instead, they are imposed as post-approval conditions and are therefore not subject to review and not subject to public input. At the extreme end of this practice is to impose a condition to develop an offsets strategy or plan. This is black box politics.

For instance, Hancock Coal's approval at Abbot Point included the development of an offsets strategy. When the Department was asked in the Senate (question 2905) how they were going

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to overcome the problem of additionality, the Senate was told the answer would have to wait for the offset strategy.

There are instances where offsets plans are not only deferred, but are based on so little information that any offset must fail for lack of certainty. For instance, EPBC approval 2010/5642 includes measures to offset likely impacts on the Australian snubfin dolphin. Part of the offset is to fund basic research into the dolphin (which is listed as migratory based on its confusion with the Irawaddy River dolphin). Basic information on the snubfin, including population, behaviour, life-cycle and distribution in the affected area, should clearly have formed part of the impact assessment, not the post approval conditioning. This is another form of failure of an offset to be additional.

So little is known of the snub fin that this research will form the basis for a dolphin offset plan, which won't be developed until four years after approval. If the research shows that the species is sessile, not migratory, and the population cannot afford a single death (both real possibilities), will the development be stopped and the approval rescinded? Of course not, but like the lungfish, failed offsets will hold a fig leaf over significant failings in the current system of environmental protection and offsets.

Again, we are seeing offsets creating perverse outcomes. In this case, offsets are used as mechanisms to undertake the kind of studies and work that should be part of the impact assessment process. It has two results. It further excludes the public from participating in and influencing critical environmental issues and it allows proponents and government to paint what should be a basic requirement as a 'contribution' of the proponent.

As offsets often don't have reporting requirements and there is no reporting methodology or format. As a minimum, it would be useful to require all offsets to have standardised reporting requirements with additional reporting needs being imposed on a case-by-case basis.

The EPBC Act should be amended to require pre-approval identification and assessment of offsets. The criteria for assessing offsets must include explicitly identifying possible avoidance and mitigation measures (including a no project alternative) and ensuring additionality and equivalence. This work should be part of the public process.

In recent Estimates hearings, the Department of Environment noted that they don't publish management plans, offset plans etc on their website but leave that to the proponents. Failure of the proponents to publish that information does not seem to concern the Department nor do they appear concerned that a so-called independent report is paid for and managed by the proponent (Senate Estimates, 24 February 2014, Environment and Communications Legislation Committee, p90). Basic tenets of transparency and accountability aren't being met.

c. the adequacy of monitoring and evaluation of approved offsets arrangements to determine whether promised environmental outcomes are achieved over the short and long term;

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What is extraordinary about the extensive use of and reliance on offsets by developers and governments is that there is simply no evidence that they are working. Over a decade of offsets federally and it is impossible to say whether offsets are working as a whole or individually. There has been no review of offsets that have been implemented, no audit of the extent to which offsets are seeing a net gain – or at least no net loss of biodiversity and habitat.

The evidence we do have – trends and indicators from State of the Environment reporting is that offsets aren't working. We continue to see declines in almost every indicator of environmental health. Peer reviewed work looking at offsets globally also finds far more evidence of failure than success (Maron et al., 2012).

We do not believe that monitoring, and evaluation of offsets once they are put into place is anywhere near sufficient. The 2012 policy states:

Offset proposals will need to include clearly articulated measures of success that are linked to the purpose of the offsets and provide clear benchmarks about their success or failure. Annual reports will be required by the department and, where possible, will be made publicly available. (Commonwealth of Australia, 2012: 24)

FoE is unable to find any offset reports, either from the Department or proponents.

The most comprehensive body of public information on existing offsets is a table produced by the Department in 2013 in response to Question 0008 on Notice by Senator Waters. In answering those questions on notice, the Department identified 228 EPBC approvals with offsets between 2004 – 2012.

This document – which contains only summary information - suggests a number of problems with offsets that will be discussed below, but the most basic is the lack of public reporting on a host of issues related to the development, implementation, monitoring, enforcement and accomplishment of offsets.

The most obvious step would be to develop a centralised online public register of offsets, the current status of required actions, of compliance and review, any audits, and whether the offset is fulfilling its intended purpose. Further to the FOI Act reforms and the regulatory preference for publication of information, this information should be published regularly and should be on the EPBC website.

Offsets granted by the federal government rarely require outcomes. Sometimes certain actions are required (e.g. purchase of land to be put in reserve), but this is not an outcome. Sometimes, for instance, rehabilitation of habitat to a good condition is required, but rarely is the implicit outcome – ‘habitat for xxx species is effectively established’ – a requirement of offset strategies or plans.

In the list of offsets produced by the Department only one offset has an outcome requirement: Under EPBC approval 2011/5987 the development of Wallum Sedge Frog habitat must include monitoring and reporting on the ‘success of habitat utilisation’. Even that is a far cry from successful establishment of fully functioning Wallum Sedge Frog habitat.

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It is absolutely critical, if offsets are going to be used, that they are successful. Buying land, remediating land, putting land into a reserve is not an outcome. These are steps that at best form part of the achievement of an outcome.

The absence of required outcomes can have real and profoundly destructive impacts. As part of the Paradise Dam approval, a number of conditions were imposed relating to the construction of fish transfer devices intended to ensure the transfer of the unique lungfish upstream and downstream of the dam. A five year review of those devices made overwhelmingly clear that the devices didn't work and that lungfish were dying in completely unsustainable numbers. The response of the Department was that no action would be taken to remedy these failures because the conditions of approval (building the fish transfer devices) had been satisfied (Senate Question 2552) (NB these were conditions not offsets but the same principal applies).

Even if an outcome is required, there is no enforcement mechanism to ensure that it is accomplished except Ministerial discretion. For instance, the South of Embley Bauxite Mine (EPBC 2010/5642) requires rehabilitation of 28,800 ha of mine footprint. The Minister must be notified if the rehabilitation fails to meet the success criteria (unpublished) after 10 years of rehabilitation and then the proponent must develop an offset plan to address their failure. It is difficult to see any prospects of success in these conditions.

Responsibility for the success of outcomes

While initial responsibility for offsets seems to rest with proponents, it isn't clear where responsibility for the effective implementation or long term responsibility for offsets sits. In cases where the offset remains on private land, there do not appear to be any contractual or other binding agreements that ensures the habitat or species is properly protected in perpetuity. A number of offsets transfer land into reserves, but in the absence of adequate funding for eradication of weeds and other invasives and management of fire, the offset will fail.

Perhaps this inquiry should look at the lessons we haven't yet learned in relation to abandoned mines. There are an estimated 50,000 abandoned mines across Australia. This represents an enormous failure of governance in terms of ensuring responsibility of the owners for rehabilitation. How do we ensure that offsets don't suffer the same fate? The current absence of enforcement and binding long term provisions suggest we are heading down a similar road.

Funding of offsets is problematic. Offsets often require an initial expenditure by proponents but protection in perpetuity will fall on the taxpayer. So, if development in area A, which is on public land, is permitted, government will have to monitor and oversee the development in perpetuity, increasing costs to the taxpayer. If offsets are required that create more public land (eg land goes into reserve) that will require active management, then an additional impost on taxpayers is created. Simply, this means the taxpayer is subsidising developers and environmental destruction.

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Compliance and audits

The Department of Environment undertakes a limited number of compliance audits every year and a summary of these audits are provided in the Department's Annual Compliance Audits. There is evidence of failure to comply with some offset requirements (see, e.g., 2010, 2012 Compliance Audits), but there are much bigger issues:

1. The audits only examine the procedural compliance with offset requirements. For instance, whether a property has been purchased according to timeframes set out in approval documents, but none of the compliance audits (and no other documents found on the Department's website) look at the extent to which the offsets are successfully (or not) offsetting the damage that has been permitted.
2. There are no on ground reports regarding effectiveness, progress, benchmarking, etc
3. The lack of proper monitoring and auditing of offsets is matched by the complete absence of transparency in implementing them. It may be that there is no transparency because the Department does not bother to secure the kind of information essential to management and oversight of offsets.

FoEA recommends that outcomes are an explicit and enforceable component of all offsets;

- That offsets are subject to public processes as part of the EIA process, and
- That offsets are decisions subject to merits review by the AAT, and
- There are mandatory triggers in offsets so that failure to meet offset benchmarks and requirements will result either in immediate cessation of the development or of the activity or result in punitive and compensatory fines, and
- That there is regular and public reporting on the offsets, including benchmarks, breaches and steps critical to achieving outcomes.

FoEA recommends that comprehensive audits of implementation, benchmarks and other progress, breaches, enforcement are required until it is deemed that the habitat is a fully functioning system fulfilling the objectives of the offset.

FoEA recommends that proponents are responsible for paying for (but not undertaking) these audits. Selected audits should be subject to independent peer review and all audits should be published.

d. any other related matters.

To biodiversity, we can add climate change and cultural heritage to the list of issues at stake in Australia's remaining undeveloped land and water ecosystems. Offsetting erodes our capacity to recognise the unique cultural and social values of place. Further, offsetting displaces attention away from systemic issues such as fossil fuel dependence, and the political and ecological imperative for Australia to restrain coal export expansions in particular.

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In sum, offsets allow us to hide from the difficult political decisions Australian society needs to be making. What kinds and scales of development are we willing to undertake in the context of mass species extinction? Rather than tackle this question head on, offsets legitimate environmental damage.

We hope that the committee can move past the ‘get the offsets policy right’ approach in its discussions. Australian society desperately needs parliamentary leaders willing to tackle the urgent issue of unsustainable development and fossil fuel dependence head on.

Submitted 7/4/14
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