



Reference: 031-26JM

Environment Law Reform Taskforce
EnvironmentLawReform@dcceew.gov.au

Tuesday, 13 October 2026

Re: Environment Protection Reform Consultation: Shaping the Next Phase of Environmental Reforms

Dear Taskforce,

Thank you for the opportunity to make a submission on the Australian Government's Environment Protection Reforms. The Sydney Coastal Councils Group (SCCG) welcomes the opportunity to provide feedback on the proposed reforms relating to bioregional plans and strategic assessments under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), chiefly Consultation Paper 2: *Enabling Landscape Scale Pathways*.

The Sydney Coastal Councils Group (SCCG) is a regional organisation of councils, established in 1989 to promote collaboration among member councils on environmental issues relating to the sustainable management of the urban coastal and estuarine environment. The group comprises eight councils adjacent to Sydney marine and estuarine environments and associated waterways and represents nearly 1.3 million Sydneysiders. We are guided by the SCCG's 2019-2029 Strategic Plan which includes the following goals that are highly relevant to this consultation:

- People and places adapt to a changing climate and future shocks and stressors;
- Waterways and the foreshore are protected and healthier;
- Marine biodiversity is protected in the bioregion;
- There is a collaborative, effective and consistent approach to coastal and estuarine management.

Our Comments

SCCG is broadly supportive of the proposed amendments relating to strategic assessments under Part 10 of the EPBC Act, noting the intent of the proposed reforms is to strengthen landscape-scale environmental planning and assessment pathways.

Environmental values, ecosystems and ecological processes frequently extend beyond local government boundaries and are often affected by cumulative impacts that cannot be adequately addressed through project-by-project assessment alone. The proposed reforms recognise the importance of considering environmental impacts at broader geographic scales and provide mechanisms to better integrate planning, conservation and restoration outcomes through bioregional plans and strategic assessments.

SCCG supports the introduction of a strengthened framework for bioregional planning and the proposed requirement that bioregional plans align with relevant National Environmental Standards, including:

- Matters of National Environmental Significance
- Community Engagement
- Offsets
- Data and Information.

The proposal for the EPBC Regulations to contain specific requirements under Part 10 of the Act for the consideration and application of the standards is highly supported. SCCG considers that



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application of these standards should improve transparency, consistency and confidence that environmental values will continue to be adequately considered in landscape-scale assessment processes.

Our Recommendations

The SCCG recommends that local government be recognised as a key stakeholder in the preparation, implementation, monitoring and review of bioregional plans. Councils hold significant environmental information and possess valuable place-based knowledge that can contribute to improved environmental outcomes and practical implementation.

The consultation materials identify new consultation, monitoring and review requirements for landscape-scale planning mechanisms. SCCG considers local governments have an important role to play in these processes given their responsibilities in land use planning, environmental management, coastal management, community engagement and climate adaptation.

As implementation details continue to be developed, SCCG encourages the Australian Government and National EPA to ensure that strategic assessments:

- appropriately consider cumulative environmental impacts;
- incorporate climate resilience considerations;
- support protection and restoration of coastal ecosystems;
- utilise the best available environmental data and information; and
- maintain meaningful opportunities for community and local government input.

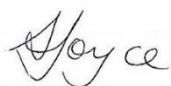
SCCG recommends the development of implementation guidance that supports:

- early engagement with local councils;
- incorporation of local environmental monitoring data;
- participation of councils in review and monitoring processes; and
- recognition of regional coastal management priorities.

I trust that the feedback provided above will be helpful in concluding this phase of environmental reforms.

If you have any queries, please contact me by email at sarah@sydneycoastalcouncils.com.au

Yours sincerely,



Sarah Penny Joyce
Executive Director



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