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Office of the Conservator of Flora and Fauna
Environment, Planning and Sustainable Development Directorate

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Re: Guidelines for preparing a Construction Environmental Management Plan (CEMP)

Friends of Grasslands (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 native grassy ecosystems, and carries out surveys and other on-ground work. FOG is based in Canberra and its members include professional scientists, landowners, land managers and interested members of the public.

The Conservation Council ACT Region (Council) is the leading environmental advocacy organisation and hub for community groups in Canberra. Our mission is to protect nature and create a safe climate future in the ACT and region.

Thank you for the opportunity to comment on the Guidelines for the preparation of a Construction Environmental Management Plan (CEMP Guidelines). We recognise CEMPs are vital documents that both guide and control how approved actions are undertaken.

We support the guidelines, but we note that there are some differences between the CEMP Guidelines and the *Environmental Management Plan Guidelines* published by the Federal Environment Department (DCCEEW).¹ Any proponent or approval holder drafting a CEMP for implementation following an approval would need to address both documents, so we suggest that consideration be given to incorporating relevant sections in the DCCEEW document.

Several sections of the *Environmental Management Plan Guidelines* that appear to be important do not appear to be covered in the CEMP Guidelines. For example, you may wish to consider including aspects of the *Environmental Management Plan Guidelines* found under the headings:

- 'key principles' listed on p. 5
- 'including commitments in management plans' on p. 6
- 'declaration of accuracy' and 'version control' on pp. 7-8
- 'environmental training' on pp. 9-10.

For any further information about our submission, please email matt.whitting@fog.org.au

Yours sincerely

Professor Jamie Pittock
President, Friends of Grasslands
4 October 2024

Dr Simon Copland
Chief Executive, Conservation Council ACT Region
4 October 2024

¹ <https://www.dcceew.gov.au/sites/default/files/documents/environmental-management-plan-guidelines.pdf>