



The Moreton Bay Foundation

Date: 28 May 2026

Senator the Hon Murray Watt
Minister for the Environment and Water
PO Box 6100
Senate, Parliament House
Canberra ACT 2600

Submission on: Draft Policy Position Paper on the MNES Standard

1. Purpose & Context

The Moreton Bay Foundation (TMBF) welcomes the opportunity to comment on the *UPDATED Draft Policy Position Paper: National Environmental Standard for Matters of National Environmental Significance*.

As an independent, science-led organisation focused on the conservation of the Moreton Bay Ramsar site and its surrounding ecosystems and influences.

2. Core Position Statement

TMBF strongly supports the core objective of the MNES Standard to shift national environmental decision-making from an ad-hoc, project-by-project framework to a consistent, outcomes-focused model.

We endorse the structural requirement that the Minister may only approve an action if satisfied it is consistent with the Standard. However, for highly complex, marine and coastal ecosystems like Moreton Bay, the practical application of the standard by proponents and its enforcement by the National Environmental Protection Agency (NEPA) must be clear, rigorous, and legally binding to prevent further environmental degradation.

3. Key Pillars of TMBF's Response

Our submission focuses on the application of the four core Principles outlined in the position paper:

- **Principle 1: Rigorous Application of the Mitigation Hierarchy** TMBF welcomes the strict sequencing of *Avoid, Mitigate, Repair, and Offset*. We support the legislative stance that compensatory measures (offsets) cannot be used to make an unacceptable impact acceptable. TMBF advocates for clearer, quantifiable guidance on what constitutes "feasible" on-site *Repair* versus what will be classified as an *Offset*.
- **Principle 2: Comprehensive Assessment of Context and Compounding Impacts** The paper notes that context includes past, present, and "reasonably foreseeable future events." TMBF argues that in marine environments, this must explicitly mandate the calculation of *facilitated* and

upstream/downstream impacts (e.g., catchment runoff affecting downstream Ramsar wetlands). We advocate for strict, quantifiable threshold metrics for landscape-scale and strategic assessments.

- **Principle 3: Enforceable Compensation and Genuine Net Gain** We support the principle that residual significant impacts must be compensated to deliver a *net gain* relative to an agreed baseline. Baseline estimates need to be locked in at the point of approval to ensure that slow-moving environmental degradation does not artificially lower restoration targets.
- **Principle 4: Fit-for-Purpose Evidence & First Nations Co-Design** TMBF advocates for a seamless interface between the MNES Standard and localised data. We emphasise that "best available data" must dynamically incorporate regional frameworks (such as TMBF's *Blueprint for a Sustainable Moreton Bay*). Furthermore, we assert that First Nations knowledge contributions must be self-determined and securely integrated in compliance with Indigenous Data Sovereignty.

4. Commitment to Future Engagement

TMBF is committed to supporting a reformed EPBC Act framework that ensures the long-term survival and resilience of Australia's protected matters.

Yours sincerely,



Katie Walters

Chief Executive Officer

The Moreton Bay Foundation

Reply To: CEO@MoretonBayFoundation.org