



Community Environment Network Inc.

An alliance of community & environment groups.



10 January 2025

Hon Paul Scully
NSW Minister for Planning
NSW Parliament House
6 Macquarie Street
Sydney NSW 2000

Submission on Draft Terms of Reference for the Strategic Assessment of the Central Coast Strategic Conservation Plan

Dear Minister Scully,

Please accept this submission in response to your exhibition of the first stage of the Central Coast Strategic Conservation Plan (the plan) - draft terms of reference - under section 146(1B)(b)(ii) of the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*.

We are thankful for the opportunity to respond to the exhibited terms of reference and we do so on behalf of the Community Environment Network (**CEN**) and a number of our member groups including the Central Coast Community Better Planning Group, Friends of COSS, Friends of Porters Creek Wetland, Future Sooner and Climate Future.

The Community Environment Network is an incorporated association and registered charitable gift recipient. We are the peak environmental organisation on the Central Coast and Lake Macquarie. We have been in existence for 27 years and our mission is to work in favour of Ecologically Sustainable Development and oppose threats to ESD.

Our submission is presented in three parts.

- Part A Over-arching Observations and Feedback
- Part B Suggested Amendments to Terms of Reference
- Part C Scope of Study Area

Part A Over-arching Observations and Feedback

Our position on the exhibited terms of reference is cautionary and we reserve our right to make further, in-depth submissions and enquiries to you and other members of the NSW Government Ministry, along with to the Federal Environment Minister, in relation to the plan and its implications on the future liveability, sustainability and biodiversity of the whole Central Coast region.

We fully understand that the origins justifying the need for this plan are identified in the Central Coast Regional Plans (2036 and 2041 iterations) based on the identification of particular areas earmarked for “growth” in those regional plans including a corridor from Somersby to Erina and Greater Warnervale.

We are somewhat perplexed that the terms of reference appear to indicate that the Central Coast Strategic Conservation Plan will not cover the whole region given the substantial size of the Central Coast local government area, the region’s particular vulnerability to the impacts of climate change, our array of unique biodiversity attributes and the clear threat of regional extinctions of flora and fauna by 2070 based on NSW Government land clearing and threatened species data.

We have reviewed the Cumberland Plain Conservation Plan (**CPCP**) as our reference point for examining and responding to the exhibited terms of reference as it was the first such plan to be developed and adopted under the *NSWBC Act* via the *Federal EPBC Act*.

Our understanding of the Cumberland Plain Conservation Plan is that its starting point was a vision to develop a “garden city” in Greater Sydney’s south-west with clear priorities including:

- Planning Priority W14 – protecting and enhancing bushland and biodiversity;
- Planning Priority W16 – protecting and enhancing scenic and cultural landscapes.

The geographic area covered by the CPCP extends from north of Windsor to Picton in the south, and from the Hawkesbury-Nepean River in the west to the Georges River near Liverpool in the east and comprises around 200,000 hectares of land. This includes parts of eight local government areas – Wollondilly, Camden, Campbelltown, Liverpool, Fairfield, Penrith, Blacktown, and Hawkesbury.

We are, therefore, left asking a philosophical question from the very outset of the consultation process for the Central Coast Strategic Conservation Plan. Why does it appear to be the “poor cousin” of the CPCP? Why is there no over-arching vision that acknowledges the unique conservation and scenic value of the Central Coast? Is the underlying philosophy of the Central Coast Strategic Conservation Plan to be over-development at the expense of liveability and biodiversity.

If we are to directly compare the overarching approach taken by the NSW Government to the CPCP versus the Central Coast Strategic Conservation Plan, we draw your attention to the following statements.

Under the CPCP, a conservation program has been designed to achieve the CPCP’s objective and outcome and offset the impacts of development on biodiversity values. It includes 26 commitments and 131 actions designed to protect biodiversity and improve ecological resilience.

Whilst we understand that we are commenting on the draft terms of reference and not the actual plan, we were hopeful that the stated objectives would be more in favour of the region’s biodiversity than: ... “a plan for the Central Coast that creates more land for jobs and homes while protecting important plants and animals. The plan aims to balance development and biodiversity on the Central Coast. It will: provide planning and investment certainty for developers; protect the environment for the long term; counterbalance the effects of growth and development.”

Only 3,069 hectares of land will be included in the plan out of the region’s 243,800 hectares. Where is the vision or are the current residents and ratepayers of the Central Coast to simply accept we are about to become nothing more than an under-resourced, over-developed giant sleeper suburb for Newcastle and Sydney?

Specific responses to exhibited draft terms of reference

In this part of our submission, we attempt to provide recommendations in response to the terms of reference provided. It is our understanding that the terms of reference have been exhibited as required under section 146(1B)(b)(ii) of the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*. The exhibition is necessary because the EPBC Act requires the preparation of a **strategic assessment report** that must show how the impacts of development on biodiversity protected under the

Act will be assessed following the implementation of the plan. We do not believe this has been made clear in the public-facing materials about this exhibition.

The terms of reference make no attempt to explain to stakeholders, including the general public, the **definition of land that has “high biodiversity value”. Is this definition to be limited to “matters protected by a provision of Part 3 of the EPBC Act (protected matters)?”**

If the definition of “high biodiversity value” is thus limited to EPBC protected matters, this needs to be clarified so stakeholders and residents can accurately examine which land will be earmarked for development versus which land will be deemed to have high biodiversity value. **We request that a clear and complete definition of “high biodiversity value” be included in the final terms of reference or a reason made public for not doing so in response to this submission.**

We acknowledge that this plan is being developed in a period of heightened political pressure to deal with a NSW “housing crisis” but in the preamble made public during the terms of reference exhibition period it appears that the plan’s contribution to the **NSW Government’s housing priorities may take precedence over its contribution to healthier communities and environment.**

In principle, we believe the biodiversity certification of land at a broader landscape scale may aid conservation and protect biodiversity but we must draw your attention to the findings of the **Henry Review of the Biodiversity Conservation Act 2016**. We have attempted to incorporate some of the Henry Review findings in the second section of this submission.

The terms of reference mention the “Agreement” between the NSW Planning Minister and Commonwealth Environment Minister which “provides details on the process the parties will follow to complete the strategic assessment” but stakeholders are given no access to a copy of the agreement. Thus, we are expected to respond to the terms of reference without, for instance access to the definitions set out in the Agreement which we are informed also apply to those terms used in this draft Terms of Reference.

The requirements of the Agreement, for the State to prepare A Policy, Plan or Program (PPP) to provide opportunities for the sustainable development of the strategic assessment area in accordance with the requirements of the EPBC Act and a Strategic Assessment Report appear to be reasonable based on available information but **we recommend a copy of the Agreement be included in the final terms of reference and during the consultation period for the plan and assessment report or a reason be given in your response to this submission for not making the Agreement available.**

Information outlined in section 1. **PURPOSE OF THE STRATEGIC ASSESSMENT REPORT** appear to be reasonable expectations from the Commonwealth Government for the State to provide. We are concerned that the assessment report will be confined to the impacts of actions or classes of actions proposed to be taken under the Plan, on **protected matters**. This sets an extremely high bar that fails to take into account flora and fauna communities that fall outside the narrow definition of protected matters that may still be vulnerable to becoming protected matters within the decades covered by the plan.

We are thankful that the Report may identify ‘relevant’ protected matters that may be impacted directly, indirectly and/or cumulatively by actions proposed to be taken under the Plan. We recommend that the scope of the assessment report includes and pays careful attention to:

- The Central Coast Council’s Coastal Open Space System (COSS) which is unique to this region – this is a model that could be expanded to the whole Central Coast LGA and applied to other regions under the NPW Act via Regional Parks jointly managed by council, community and Traditional Custodians to provide needed climate refugia and protect future biodiversity at a regional level. We will provide more information about COSS in our response to the exhibited plan and assessment report.
- The Somersby Industrial Park Plan of Management entered into by the NSW Premier to protect the significant cultural heritage of the Somersby plateau

- The Barrington to Hawkesbury Climate Corridors Alliance reports into the regional extinction of flora and fauna by 2070 under current levels of land clearing.

We look forward to the DESCRIPTION OF THE PLAN BEING ASSESSED being as comprehensive and supportive of this region’s future biodiversity as those included in the CPCP particularly the information included in (2.1.1) detailed commitments under the Plan, and the conservation outcomes to be delivered for protected matters and **we recommend the inclusion of detailed commitments on other matters unique to this region, such as COSS, the potential for regional extinctions and this community’s substantial vulnerability to the impacts of climate change, that may be impacted directly, indirectly and/or cumulatively by actions proposed to be taken under the Plan.**

We note that the CPCP provides for the following and recommend that the Central Coast Strategic Conservation Plan also includes:

- **Strategic conservation areas: area of important biodiversity value / ear-marked to deliver long-term conservation outcomes using development controls aimed at preserving native vegetation in the strategic conservation area and a Ministerial Direction restricting the rezoning of strategic conservation area.**
- **Avoided land: (Chapter 13, Biodiversity and Conservation SEPP) that includes development controls aimed at preserving native vegetation on avoided land and a Ministerial Direction that restricts the rezoning of avoided land.**

All requirements outlined in 2.1.3. the legal and administrative frameworks to implement the Plan and the persons and authorities responsible for implementation appear reasonable.

We look forward to the assessment report giving an in-depth description of the need and justification for the Plan (2.2) including the environmental, social and economic drivers for its development, including **best-practice engagement** with relevant landowners, communities, developers and delivery partners.

We are, however concerned that as both the NSW Government and the Commonwealth Government progress to a “Nature First” framework for addressing biodiversity and conservation issues, the exhibited terms of reference do not acknowledge this shift or its implications on the outcomes for the plan or assessment report. **We have attempted to recommend amendments to the draft terms of reference in the second section of this submission and we recommend their adoption.**

In response to the DESCRIPTION OF THE PROTECTED MATTERS IMPACTED BY THE PLAN we must draw your attention to CEN’s concerns, expressed throughout 2023 and 2024 to the Minister for Planning and the department about substantial problems with the Central Coast Local Environmental Plan 2022 and inaccuracies in the mapping used by the Central Coast Council to determine land use zoning boundaries. **We recommend that the NSW Planning Department takes all necessary steps to ensure any mapping used in the process of identifying protected matters (3.1 to 3.3) is accurate and undertakes in the final terms of reference to inset the word “accurate” before any mention of maps or mapping.**

In relation to the reference to protected matters in 3.4, **we recommend that the final terms of reference broadens its definition and uses the following wording: “The Report may also consider matters that are potentially eligible for listing as a result of inclusion in a final priority assessment listing held by the Commonwealth, or a recommendation to the Commonwealth Minister for listing by the Threatened Species Scientific Committee prior to the Report being submitted.**

We look forward to an in-depth assessment of the “likely direct, indirect and cumulative impacts of actions taken under the Plan on all relevant matters including an assessment of impacts of clearing, disturbance and fragmentation and the failure of offsetting for projects that have already occurred on the Central Coast to protect any bushland in the region since the inception of the BCA in 2016.

We believe 4.2 (i. to iii) provides the NSW Government with a convenient way out of ensuring that all steps are taken to protect biodiversity on the Central Coast and **we recommend the deletion of 4.2 (i. to iii) or the strengthening of these provisions to notate best practice in the final terms of reference.**

Likewise, we question the inclusion of 4.3 in the terms of reference if, indeed, the purpose of the assessment report and the plan is to protect endangered matters. **We recommend the deletion of 4.3 or a justification for its inclusion.**

In relation to 4.4. **we recommend the final terms of reference should read:**

4.4.2. *The adequacy of the commitments under the Plan in protecting, restoring and managing relevant protected matters, including: i. discussion of the specific predicted effectiveness of the commitments. ii. funding arrangements. iii. who will be responsible for delivering on commitments iv specific timeframe for achievement of commitments.*

We note that the first mention of environmental offsets in the terms of reference is made at 4.4.3. **We recommend that the final terms of reference must include a definition of environmental offsets and how they are proposed to be implemented under the plan in addition to how they will meet the principles of the Environment Protection and Biodiversity Conservation Act Environmental Offsets Policy (2012).**

We support the report describing climate change scenarios (4.5) and refer you to the Barrington to Hawkesbury Climate Corridors Alliance analysis of the impacts of climate change on flora and fauna in the Central Coast LGA.

We recommend (4.7) that the final terms of reference must state that the assessment report MUST consider other Commonwealth policy guidelines on protected matters and must name those guidelines in the terms of reference.

At 5.1.3 in the draft terms of reference we learn that the Agreement between the NSW Minister for Planning and the Commonwealth Environment Minister includes Attachments but we are not given access to those attachments to determine their adequacy. Thus, we repeat our earlier **recommendation that the Agreement and attachments are annexed to the final terms of reference and made available during the public exhibition of the plan and assessment report.**

We note at 7.2, the draft terms of reference indicate that *“If the State undertakes any independent peer review(s) as part of the strategic assessment, the Report must include summaries of the independent peer review(s) process. **If the review(s) are publicly available, the Report will provide details of where they are publicly available.**”*

We recommend that the final terms of reference must state at 7.2, that “If the State undertakes any independent peer review(s) as part of the strategic assessment, the Report must include summaries of the independent peer review(s) process and the review(s) must be publicly available with details of where they are publicly available.”

Part B – Suggested Amendments to Terms of Reference

Within the following text, suggested amendments to the terms of reference have been presented in blue text. These amendments are intended to ensure that the Draft Terms of Reference fully integrate the recommendations from the Independent Review of the Biodiversity Conservation Act 2016.

Our revisions aim to:

1. Align the terms of reference with nature-positive principles by emphasizing biodiversity restoration, net positive outcomes, and resilience to climate change.
2. Strengthen conservation planning by incorporating robust spatial tools, improved decision-making frameworks, and prioritization of restoration zones.

3. Enhance stakeholder engagement, particularly by tailoring processes for Aboriginal communities and ensuring their knowledge and participation inform every stage of the strategic assessment.
4. Address gaps in monitoring, evaluation, and transparency, ensuring the Plan's commitments and outcomes are rigorously tracked, publicly reported, and adapted as necessary.

These key elements are designed to support the overarching objective of achieving meaningful and measurable biodiversity gains while upholding cultural, social, and economic values.

Draft Terms of Reference for strategic assessment of the Central Coast Strategic Conservation Plan

On 11 November 2024, the NSW Minister for Planning and Public Spaces entered into an agreement (**the Agreement**) with the Commonwealth Minister for the Environment and Water (**the Commonwealth Minister**), pursuant to section 146(1) of the *Environment Protection and Biodiversity Conservation Act 1999* (**EPBC Act**), to undertake a strategic assessment of the impacts of actions taken under the Central Coast Strategic Conservation Plan (**the Plan**) on matters protected by a provision of Part 3 of the EPBC Act (**protected matters**).

The Agreement provides details on the process the parties will follow to complete the strategic assessment. The definitions set out in the Agreement also apply to those terms used in this draft Terms of Reference.

The Agreement requires the State to prepare the following documents which will be considered by the Commonwealth Minister:

- A Policy, Plan or Program (**PPP**). The purpose of the PPP is to provide opportunities for the sustainable development of the strategic assessment area in accordance with the requirements of the EPBC Act.
- A Strategic Assessment Report (**the Report**).

These Terms of Reference specify what must be included in the Report to satisfy Commonwealth requirements under Part 10 of the EPBC Act

1. Purpose of the Strategic Assessment Report

- 1.1 [The Strategic Assessment Report](#) ("the Report") must assess the impacts of actions or classes of actions proposed [under the Central Coast Strategic Conservation Plan](#) ("the Plan") on protected matters.
- 1.2 [The Report must ensure alignment with a "nature positive" framework as outlined in the Independent Review of the Biodiversity Conservation Act 2016. This includes commitments to halting and reversing biodiversity loss, restoring ecosystems, achieving zero human-induced extinctions of threatened species, and delivering a net gain in biodiversity.](#)
- 1.3 The Report must consider all matters protected by Part 3 of the EPBC Act and [include specific mechanisms to:](#)
 - [Protect and enhance ecosystem services.](#)
 - [Address cumulative impacts of biodiversity loss.](#)
 - [Promote resilience and adaptive capacity to climate change.](#)
 - [Incorporate principles of equity and intergenerational sustainability.](#)
- 1.4 The Report [must be prepared to](#) enable the Commonwealth Minister to evaluate the ability of the PPP to ensure the long-term protection and conservation of relevant protected matters [including how to:](#)

- Protect and enhance ecosystem services;
- Address cumulative impacts of biodiversity loss; and
- Promote resilience and adaptive capacity to climate change.

2. Description of the Plan Being Assessed

2.1. The Report must provide a **comprehensive** summary of the Plan **including**

- Key elements **and objectives of the Plan**;
- **Its** spatial extent, timeframes, **and expected duration** including how long the Plan will be in effect.

The key elements of the Plan include:

2.1.1. The commitments under the Plan, and the conservation outcomes to be delivered for protected matters.

2.1.2 **The Coastal Open Space System (COSS) along with the potential for regional extinctions as a result of the substantial vulnerability to the impacts of climate change, that may be impacted directly, indirectly and/or cumulatively by actions proposed to be taken under the Plan.**

2.1.3. The actions likely to be taken under the Plan over the short, medium and long term.

2.1.4. The legal and administrative frameworks to implement the Plan and the persons and authorities responsible for implementation, including:

- i. The reasons for developing the Plan and its legal standing under New South Wales law, including any existing or proposed planning mechanisms giving legal effect to relevant components of the Plan.
- ii. The relationship of the Plan to other relevant policies, plans, guidelines, commitments, regulations and legislation, including existing approvals under Commonwealth legislation.
- iii. Governance, responsibilities, other approvals required for development under existing federal and state

2.2. The Report must **detail**:

- **How the Plan will incorporate principles of ecologically sustainable development and the nature-positive approach.**
- **Legal and administrative frameworks supporting its implementation.**
- **Intersections with other legislative instruments and strategic programs, including the Kunming-Montreal Global Biodiversity Framework.**

2.3. The Report must describe how the principles of ecologically sustainable development (as set out in section 3A of the EPBC Act) are considered and promoted in the development of the Plan.

3. Description of the Protected Matters Impacted by the Plan

3.1 The Report must provide a detailed description of the environment within the strategic assessment area, including:

- Current and historical land uses and indigenous land values.
- Habitat connectivity, fragmentation, and ecological processes.

- Protected areas, including Areas of Outstanding Biodiversity Value (AOBVs) and other high-priority zones.

3.2 The Report must integrate the recommendations from the Independent Review by identifying and mapping:

- Critical habitats and priority restoration areas.
- Climate adaptation zones and biodiversity corridors.
- Areas of high cultural and ecological significance, incorporating traditional Aboriginal ecological knowledge.
- Consider matters eligible for listing under the final priority assessment or recommended to the Commonwealth Minister by the Threatened Species Scientific Committee before submitting the Report.

4. Assessment of Impacts

4.1 The Report must:

- Evaluate the direct, indirect, and cumulative impacts of actions on protected matters, including impacts on landscape connectivity, threatened species, and climate resilience.
- Use nature-positive spatial tools to identify "no-go" areas for development and areas prioritized for restoration.

4.2 The Report must outline the methodology used for:

- Assessing biodiversity impacts and calculating offsets based on the Biodiversity Offsets Scheme's enhanced net-positive principles.
- Ensuring the quality and transparency of biodiversity data and decision-making.

4.3 The Report must assess how unavoidable impacts will be offset using best practices aligned with the EPBC Act Environmental Offsets Policy.

4.4 The Report must include mechanisms to ensure alignment with national and global biodiversity objectives, including the Kunming-Montreal Global Biodiversity Framework.

4.5 The Report must identify the adequacy of the commitments under the Plan in protecting, restoring and managing relevant protected matters, including:

- Discussion of the specific predicted effectiveness of the commitments.
- Funding arrangements.
- Who will be responsible for delivering on commitments
- Specific timeframe for achievement of commitments.

5. Evaluation of Outcomes

5.1 The Report must evaluate the overall conservation outcomes of the Plan, including:

- Alignment with nature-positive principles.
- Long-term biodiversity benefits, including ecosystem recovery.
- Cultural, social, and economic outcomes from the Plan's implementation.

5.2 The Report must compare the conservation outcomes of the Plan to scenarios without strategic conservation planning.

5.3 The Report must analyse the extent to which the Plan achieves net-positive biodiversity outcomes and addresses key risks to biodiversity persistence.

6. Addressing Uncertainty, Monitoring, and Adaptive Management

6.1 The Report must identify key uncertainties and outline adaptive management strategies, including:

- Addressing knowledge gaps and integrating new data into planning frameworks.
- Regular monitoring, evaluation, and public reporting of outcomes.

6.2 The Report must describe the procedures for updating the Plan based on:

- Advances in science and biodiversity conservation strategies.
- Changes in legislation or environmental conditions.
- [Emerging risks and opportunities identified through ongoing monitoring.](#)

7. Incorporation of Recommendations from the Independent Review

7.1 The Report must include mechanisms to implement the Independent Review's key recommendations, such as:

- Developing and integrating a Nature Positive Strategy, including spatial tools and priority restoration zones.
- Tailoring engagement with Aboriginal communities to ensure meaningful involvement in decision-making and implementation.
- Establishing independent review processes to regularly assess progress and alignment with biodiversity conservation objectives.

7.2 The Report must address barriers to conservation investment, such as:

- Incentivizing private sector and landholder participation in biodiversity stewardship programs.
- Streamlining processes for biodiversity certification and offsets.
- Aligning state and federal biodiversity frameworks for streamlined conservation efforts.

7.3 [If the State undertakes any independent peer review\(s\) as part of the strategic assessment, the Report must include summaries of the independent peer review\(s\) process and the review\(s\) must be publicly available with details of where they are publicly available."](#)

8. Information Sources and Stakeholder Engagement

8.1 The Report must:

- Identify sources of data and ensure the reliability, transparency, and currency of information used.
- Describe engagement processes with stakeholders, including developers, communities, Aboriginal groups, and conservation organizations.

8.2 The Report must outline how public consultation will inform the final Plan and ensure transparency in decision-making.

8.3 The Report must include tailored engagement plans for Aboriginal communities, ensuring that traditional knowledge informs all stages of the Plan's development and implementation.

9. Deliverables

9.1 The Report must deliver:

- A comprehensive assessment of biodiversity impacts and opportunities.
- Clear recommendations for ensuring compliance with a nature-positive framework.
- Metrics for monitoring and evaluating long-term biodiversity outcomes.

9.2 The Report must be submitted to the Commonwealth Minister for evaluation, ensuring it meets all legislative and policy requirements under the EPBC Act.

9.3 The Report must include a publicly available summary of findings and recommendations, emphasizing transparency and accountability.

Part C – Scope of Study Area

We note the Department's website states:

"Around 3,069 hectares of land will be included in the plan. The plan is aligned to the priorities in the Central Coast Regional Plan 2041, and includes land owned by Darkinjung Local Aboriginal Land Council."

With the utmost respect to the Darkinjung Local Aboriginal Land Council (LALC), the Department has provided no clear rationale for the expansion of the study area beyond the Regionally Significant Growth Areas defined in the Central Coast Regional Plan 2041.

If there is no compelling justification for extending the Conservation Plan outside the defined boundaries of the Regionally Significant Growth Areas, we respectfully request that the study remain confined to those boundaries.

Alternatively, if the Department elects to broaden the scope of the Strategic Assessment Report to include areas beyond the Regionally Significant Growth Areas as outlined in the Central Coast Regional Plan 2041, we strongly advocate for the inclusion of the properties at 29, 63, and 64 Ghilkes Road, Somersby, within the study area.

The inclusion of these properties is critical due to their unique and highly adverse circumstances. These rural residential properties, which directly border the Regionally Significant Growth Areas, have been severely impacted by the recent expansion of the Somersby Industrial Park. Residents have experienced significant and ongoing disruptions to their quality of life, including increased noise, diminished residential amenity, and a lack of effective mitigation measures to address these impacts.

Moreover, the industrial park's proximity to these properties has created a conflict between residential and industrial land uses, imposing constraints on the ability of multiple industries to operate efficiently, including potential restrictions on 24/7 operations. This situation not only affects the residents but also undermines the economic viability of the industrial precinct itself.

Expanding the study area to include 29, 63, and 64 Ghilkes Road would allow for a more holistic and balanced approach to planning. It would enable the Department to address the land-use conflicts, consider appropriate transition zones, and explore options for land use or zoning adjustments that benefit both the affected residents and the broader industrial precinct.

We urge the Department to recognize the unique challenges faced by these properties and to ensure they are incorporated into the Strategic Assessment Report for consideration and resolution.

Thank you for reviewing our submission.

Yours sincerely

A handwritten signature in black ink, reading "G Chestnut". The signature is enclosed in a thin black rectangular border.

Gary Chestnut

B. Nat. Res., MSc., B. Leg S., MBA.

Chairperson

Community Environment Network