

Comment – Australian Environment Foundation

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Please find the accompanying submission. The AEF is a 'farmer friendly' environmental organisation that believes there is excessive environmental Red-Tape which often, perversely, damage the environment as much as it damages the economy. We believe there are serious problems with the scientific basis for many environmental regulations, and this should be the initial focus of the QPC on many environmental issues.



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Submission to QPC inquiry into EPBC legislation

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1 Preliminary Comment on Terms of Reference

Before going into detail commentary about the EPBC legislation, and associated issues, we wish to make some general remarks about the Terms of Reference for the Inquiry which, we believe, are not broad enough. Specifically, the inquiry misses two crucial points, *viz.*,

- (a) there is no focus on whether the supposed environmental problems EPBC is argued will solve, are significant. Is the scientific basis for the legislation sound, or are the environmental threats misplaced, erroneous, or exaggerated? An inquiry to check the scientific evidence motivating the legislation is a first step, which has been ignored by the Queensland government on this, and other, issues.
- (b) There is little that a state government, such as the Queensland Government, can do about Federal legislation. Instead of focusing on environmental red tape in federal legislation, the Queensland government and QPC, would do better to focus on the Red Tape emanating from State legislation – legislation that the Queensland government could easily amend or repeal. This would be a better use of QPC resources.

The AEF has made formal representation to the Queensland government asking it to start audits of the science behind state-based environmental legislation, using the QPC. We suggested that an audit of the science evidence for why 'Reef Regulations' legislation (Queensland government laws) has been applied to the Burnett and Mary Rivers would be an excellent initial audit. We would encourage the QPC, which is an independent body, to point out that the Queensland state government could achieve much more by focusing on its own Red Tape, and that the first place to start must be to audit the underpinning scientific evidence. For example, if the evidence claiming environmental damage from land clearing, or agricultural impacts on the Great Barrier Reef, is fundamentally flawed, there is little point in any aspects of any red tape that deals with those issues. All other considerations fall away if the scientific basis is unsound, and the supposed environmental problem is not significant.

There is considerable evidence that much of the scientific basis behind environmental Red Tape has been produced by organisations with insufficient quality-assurance protocols. More information on the problem of science integrity can be found in the document written by the Science Integrity Alliance (SIA) at

<https://documents.parliament.qld.gov.au/com/GEFC-11EE/QPCB2024-0DCD/submissions/00000010.pdf>

This SIA document was itself a submission to the Queensland parliamentary committee that was considering the enabling legislation for the QPC.

The rest of this submission focuses on the EPBC legislation and related matters.

Section 2. Queensland's Environmental Challenge

2.1. Introduction

Queensland possesses some of Australia's most productive agricultural land, extensive mineral and energy resources, valuable commercial fisheries, significant forestry assets and some of the world's most recognised environmental landscapes. The management of these resources has profound implications for regional communities, environmental values and the State's long-term prosperity.

In recent decades, environmental regulation has expanded substantially at both the Commonwealth and State levels. Land clearing controls have tightened, development approvals have become increasingly complex, protected areas have expanded and environmental assessments have become more time-consuming and costly. At the same time, Queensland continues to confront many of the environmental challenges that these regulations were intended to address, including invasive weeds, feral animals, biodiversity decline and increasingly severe bushfires.

This raises an important question. If environmental regulation continues to expand while environmental outcomes remain unsatisfactory, should governments simply impose more regulation, or should they examine whether current approaches are delivering the intended results?

Queensland has an opportunity to learn from other jurisdictions' experiences and avoid repeating policy mistakes that have often prioritised process over outcomes. Environmental stewardship, productive land use and regional prosperity should not be viewed as competing objectives. The most successful environmental policies are those that recognise the important role of landholders, regional communities and active land management in maintaining resilient landscapes.

2.2 Problems with the government barriers to productive ventures

Many projects, including several major development schemes, have faced significant delays, cost overruns, scaling back, or cancellation, primarily due to environmental regulations. These often involve legal challenges, court actions, prolonged approvals, community and Indigenous opposition, and assessments of impacts on threatened species, water resources, World Heritage sites, or sacred sites. The regulations are couched in such a way that activist organisations can prevent productive activities from proceeding on spurious grounds.

Thus, the Carmichael Coal Mine, proposed to be one of Australia's largest coal mines, experienced significant delays (and a significant downsizing) due to multiple challenges with EPBC Act approvals. Some of these involve putative impacts on **threatened** species (e.g., yakka skink, ornamental snake) when the mine, like any other, is tiny compared to the range in which the species live. Others were concerned about groundwater (for which the mine's risk is minuscule compared with that stemming from long-standing conventional agricultural activities, which themselves pose no threat). And contrived threats are even seen to the Great Barrier Reef, which is 350 kilometres away! The cost to Australia would be counted in hundreds of millions of dollars.

[Sterilisation of land](#) from farming has been the means by which successive Australian governments have claimed to be meeting 90 per cent of their greenhouse gas reduction goals. The Howard Government conspired with the NSW and Queensland ALP governments to prevent land clearing, employing an internationally adopted formula for supposedly curtailing greenhouse gas emissions by preventing the conversion of unused or underutilised scrub into pasture. Barnaby Joyce has suggested that the expropriation of farmers for carbon sequestration alone had cost them \$200 billion in the year 2000 dollars.

This figure (which was not contested in the Parliament) was arrived at by comparing land values where regulation prevented productive use, to values of land that was unaffected. No compensation has been paid and in a notorious case, landowner Peter Spencer took his grievance to the NSW Supreme Court only to be informed that, although the Australian Constitution has a "just terms" requirement on the Commonwealth for compensation in such events, it was his hard luck that there is no such provision in state law.

These and countless other cases of a less significant nature illustrate that legislation, perhaps abetted by judicial activism and certainly fuelled by NGO funding, has taken a heavy toll on Australian economic development. With regard to activism, the [Guardian](#) has recently fulminated about \$1 million in funding from coal interests to a lobby group. It failed to report that the Sydney-based charity, the [Sunrise Project](#), has received hundreds of millions of dollars in donations from overseas financiers to push for net-zero emissions and has funded Australian conservation groups to support renewable energy projects, despite [mounting concerns](#) about their environmental impacts. Thus, Friends of the Earth received \$26 million to support plans to carve up pristine forest in North Queensland for a wind farm.

2.3 The missing measurable outcomes

One striking feature of Australian environmental regulation is that governments continually expand regulatory powers without undertaking any serious assessment of whether previous interventions have achieved their stated objectives.

Over the past three decades, successive governments have imposed increasing restrictions on agriculture, forestry, fishing, mining and energy development. Land clearing controls have expanded, native forest harvesting has been progressively curtailed, marine parks have restricted commercial fishing, and project approval processes have become increasingly complex and costly. Yet despite these interventions, governments continue to report declining biodiversity, expanding weed infestations, growing feral animal populations and increasing losses from major bushfires.

Before introducing new layers of environmental regulation, it is reasonable to ask whether existing regulations have delivered measurable environmental improvements. Public policy should be judged by outcomes rather than intentions.

There has been little effort to evaluate whether the economic and social costs imposed on landholders, regional communities and productive industries have generated environmental benefits commensurate with those costs. Instead, regulatory expansion has become an objective in itself, with each perceived environmental problem generating demands for additional controls, agencies and compliance obligations.

A more balanced approach would require governments to periodically assess whether environmental regulations are achieving their intended outcomes and whether alternative approaches based on active land management, local stewardship and property rights could deliver superior results at lower cost.

2.4 Property rights and regulatory acquisition

The Spencer case highlights a broader issue that has received insufficient attention in environmental policy. Increasingly, governments pursue environmental objectives not through public expenditure, but by imposing restrictions on the use of private land.

When regulations prevent landholders from clearing vegetation, harvesting timber, developing water resources, controlling pests, or otherwise using their land for productive purposes, the economic value of that land is diminished. In many cases, these restrictions are imposed without compensation.

If biodiversity conservation, carbon sequestration, habitat protection and landscape connectivity are considered benefits to the Australian community as a whole, the costs should be shared by that community. Instead, environmental policy frequently transfers those costs onto individual landholders, many of whom purchased and developed their properties under entirely different regulatory frameworks.

No government would contemplate compulsorily acquiring land for a road, railway or defence installation without compensation. Yet environmental regulation increasingly achieves a similar outcome by removing productive rights from landholders while leaving ownership nominally intact. This amounts to a form of regulatory acquisition that raises serious questions of equity and natural justice.

Future environmental reforms should include mechanisms for compensation where regulatory restrictions substantially diminish the productive use or value of private property.

2.5 Queensland's Experience with Vegetation Management

Queensland provides one of Australia's clearest examples of how environmental regulation can progressively erode property rights while imposing substantial costs on landholders. Successive amendments to vegetation management laws have restricted the ability of farmers and graziers to manage regrowth, improve pasture productivity, control woody thickening and undertake routine property management activities.

What was once primarily a matter between a landholder and the State has evolved into a complex system involving multiple layers of regulation. A landholder seeking to clear regrowth or undertake vegetation management may now find themselves subject to Commonwealth environmental requirements, State vegetation management laws and local government planning schemes. In many instances, local government vegetation overlays and biodiversity provisions impose additional restrictions that effectively override or frustrate the intent of State legislation.

This raises an obvious question. Why should a single land management activity be subject to three separate regulatory systems administered by three separate levels of government? Such duplication increases costs, creates uncertainty and delays practical land management activities without any clear evidence that it improves environmental outcomes.

The consequences are not merely administrative. Across Queensland, many landholders have experienced a progressive loss of productive land as vegetation management restrictions have expanded. Areas that were once available for grazing, pasture improvement, or agricultural development are increasingly locked away to meet broader environmental objectives related to biodiversity conservation, carbon sequestration, habitat retention, and landscape connectivity.

These objectives may well provide benefits to the wider community. However, the costs are disproportionately borne by individual landholders. Farmers are effectively required to dedicate portions of their properties to deliver environmental services on behalf of society, often without compensation and frequently without recognition of the economic losses involved.

Queensland's experience demonstrates the need for a comprehensive review of vegetation management policy, with particular attention given to eliminating duplication between Commonwealth, State and local government requirements, improving certainty for landholders and establishing compensation mechanisms where regulatory restrictions substantially reduce the productive use or value of private property.

2.6 Resource Development and Regulatory Uncertainty

Queensland's prosperity has long been underpinned by agriculture, mining, energy production, forestry and regional industries. However, major resource and infrastructure projects increasingly face prolonged approval processes, legal challenges and regulatory uncertainty.

The Carmichael Coal Mine remains one of the most prominent examples. Despite receiving approvals through multiple assessment processes, the project faced years of legal and administrative challenges concerning threatened species, groundwater impacts and broader

environmental concerns. The result was significant delays, increased costs and a reduction in the scale of the original development proposal.

Queensland's gas industry has experienced similar challenges. Coal seam gas developments in the Surat and Bowen Basins have been subjected to extensive approval requirements, overlapping regulatory assessments and ongoing legal challenges. While environmental scrutiny is appropriate, excessive duplication and uncertainty can discourage investment, increase costs and undermine confidence in Queensland as a destination for future development.

The issue is not whether projects should be assessed. Rather, it is whether assessment systems are operating efficiently, consistently and proportionately. Environmental regulation should provide certainty and transparency while allowing projects that satisfy established environmental standards to proceed without endless cycles of review, appeal and delay.

2.6 Renewable Energy Development and Regional Queensland

Queensland is experiencing a rapid expansion of renewable energy developments and associated transmission infrastructure, particularly along the spine of the Great Dividing Range and the coastal ranges of central and northern Queensland. Many of these areas contain significant tracts of remnant native vegetation and provide important habitat for threatened species, including koalas, greater gliders and numerous other forest-dependent fauna.

Large-scale wind farms, solar developments, transmission corridors, substations and associated infrastructure require extensive vegetation clearing, road construction and landscape modification. In some cases, projects are proposed in areas that would be unlikely to receive approval if they were associated with more traditional forms of development.

This has created growing concern amongst rural landholders and regional communities regarding the consistency of environmental regulation. Farmers seeking to manage regrowth, reduce woody thickening, improve pasture productivity or undertake routine vegetation management activities can find themselves navigating multiple layers of Commonwealth, State and local government regulation. In many circumstances, landholders are prohibited from clearing even relatively small areas of regrowth vegetation on their own properties.

At the same time, large-scale renewable energy developments are being approved that involve clearing substantial areas of remnant vegetation and fragmenting landscapes that provide habitat for threatened species. The contrast is difficult to reconcile. Landholders increasingly question why environmental values deemed sufficiently important to restrict agricultural activities are treated differently when the proposed development is associated with renewable energy generation.

The issue is not whether renewable energy projects should proceed. Rather, it is whether environmental standards are being applied consistently. If biodiversity conservation, habitat protection, vegetation retention and landscape connectivity are important environmental objectives, then those principles should apply equally to all forms of development, irrespective of whether the project involves mining, agriculture, forestry, renewable energy generation or transmission infrastructure.

Environmental policy risks losing public confidence when similar environmental impacts are treated differently based on governments' political preferences. Queensland's environmental laws should be based on measurable environmental outcomes and applied consistently across all industries and land uses.

Failure to do so creates the perception that environmental protection has become subordinate to broader political objectives. Such perceptions undermine public trust in both environmental regulation and the agencies responsible for administering it.

The increasing willingness of governments to approve substantial vegetation clearing for renewable energy developments, while simultaneously imposing stringent restrictions on farmers' routine vegetation management, illustrates a broader problem in environmental policy. Regulations are increasingly judged by the political objectives they support rather than by the environmental outcomes they produce. This inconsistency contributes to declining confidence in the regulatory system and reinforces the need for environmental policies to be assessed against measurable outcomes rather than ideology.

2.8 Unequal accountability between public and private land management

Environmental regulation in Australia has evolved into a system that imposes increasingly stringent obligations on private landholders while imposing comparatively little accountability on government land managers.

Farmers, foresters, fishers and resource industries must obtain approvals, prepare management plans, undertake environmental assessments, maintain records, and face substantial penalties for non-compliance. Environmental groups have extensive rights to challenge these activities through administrative and judicial processes.

By contrast, government agencies managing national parks, marine reserves and other public lands rarely face equivalent scrutiny when environmental outcomes deteriorate. Major bushfires, weed invasions, feral animal expansion, erosion, declining biodiversity and infrastructure failures on public lands seldom result in penalties, compensation claims or regulatory intervention.

This creates an imbalance whereby private landholders are held responsible for environmental risks on relatively small parcels of land, while governments are effectively shielded from accountability for environmental outcomes across millions of hectares of public estate.

This issue is particularly relevant in Queensland, where the protected area estate has expanded substantially over recent decades. While reservation can play an important role in conservation, the effectiveness of protected areas ultimately depends upon ongoing management. Expanding the national park system without corresponding investment in weed control, feral animal management, fuel reduction and infrastructure maintenance risks creating larger areas that are protected in name but increasingly difficult to manage effectively.

Section 3: The EPBC legislation

3.1 The latest review of the EPBC Act

Supposedly to improve the regulatory arrangements, the overhaul of the Environment Protection and Biodiversity Conservation (EPBC) Act passed into law in November 2025.

Comprising seven Acts in 1,500 pages, it emerged from the 2020 Samuel inquiry into the EPBC Act. The Act purports to be pursuing the commendable goal of rationalising the roles of state and Commonwealth in environmental regulations.

Graeme Samuel's 252-page report was founded upon the notion that "The environment is not sufficiently resilient to withstand current, emerging or future threats, including climate change. The environmental trajectory is currently unsustainable." Based on such canards, the Samuel report promoted a vast new role for the Commonwealth as the only means of reversing the supposed and prospective damage from modern agriculture and mining in a "holistic" manner based on 'matters of national environmental significance' (MNES).

The Samuel recommendations gave the Commonwealth a hand with which it could play a leading role in a vast new Commonwealth superstructure, developing comprehensive national rules and standards, predictably with indigenous engagement and participation in decision-making. It was, of course, music to the ears of the ambitious bureaucracy that ghost-wrote Samuel's report and to the green activists who had been chipping away at property rights and retarding the ability of landholders to continue building upon the productive enhancements of the two centuries following Captain Cook's arrival.

The recommendations seek to return Australia to a wilderness that has not existed since the Aborigines arrived 50,000 years ago. Mankind has irreversibly changed the pre-human environment. In Australia, Aboriginal peoples did so by using fire to convert forests into grasslands that better support game. Modern farmers have made the grasslands more productive by seeding them with new varieties and ensuring they are better and more consistently watered, fertilised, and protected from pests.

The assumptions underpinning the Samuel recommendations are that the custodians of the land – who are overwhelmingly Aborigines or modern farmers – are environmental vandals. And the land in all of its human-modified forms is a departure from some pre-human ideal.

3.2 The effects of the new EPBC Acts

The new Acts themselves were based on countless backroom deals with the Greens, bringing about what we are told is the dawn of a "nature positive" future.

In reality, this is another triumph of regulatory inflation dressed up as environmental salvation.

The new Commonwealth agency, Environment Protection Australia (EPA), is armed with 14-day stop-work orders and an ability to levy fines of up to \$1.5 million. A second agency, Environment Information Australia, will compile biennial State of the Environment reports and declare "national environmental information assets". The Commonwealth adds a new dimension: imposing penalties for breaches affecting matters of national environmental

significance, such as threatened species, World Heritage sites, wetlands, and emissions-intensive projects.

This fortifies the existing laws that have retarded developments in mining and agriculture – including those that [Louise Clegg](#) has documented that have sterilized farmland to provide the illusion that Australia is decarbonising but, in a zeal to preserve remnant native vegetation, is paralysing weed eradication activity. All this is amplified under the new provisions, which allow long-established land clearances to become caught in the approval process net.

Other practical effects of the new legislation include administering the final rites to wood production from state forests. Native forest logging has been regulated under Regional Forest Agreements (RFAs). These have progressively constricted output since 1990. Prior to that, the states had already been taking salami slices from the forest areas available for logging, reducing the available area from about 27 per cent in 1990 to under 10 per cent at present (with availability further constrained by a vast amount of additional red tape). Each amendment of the RFAs came with assurances that it was the final settlement. Victoria and WA have now formally closed all state forests to logging. The new EPBC ostensibly requires each logging coup to have an environmental review – an impossible task that would foreclose any logging activity. Commonwealth Environment Minister Murray Watt claims to have a plan that would prevent this, especially in Tasmania.

3.3 Native Forestry and the Unintended Consequences of Environmental Policy

For more than three decades, native forestry has provided a practical example of how environmental regulation can produce outcomes that are the opposite of those originally intended, i.e. damage the environment.

Since the early 1990s, successive governments have progressively reduced the area of public forest available for timber production. Each reduction was accompanied by assurances that the new arrangements represented a lasting settlement between conservation and production. Nevertheless, further restrictions followed, culminating in the complete closure of native forest industries in Victoria and Western Australia and increasing pressure on the remaining operations in Tasmania and New South Wales. The latest EPBC reforms threaten to add another layer of approvals and Environmental regulation increasingly uncertainty to an industry that is already among the most heavily regulated land uses in Australia.

Despite these restrictions, Australia's demand for timber has not diminished. Timber remains an essential construction material for housing, furniture, flooring, packaging, infrastructure and a wide range of manufactured products. Reducing domestic production does not remove this demand; it simply shifts production elsewhere. As local supply has contracted, imports have increased substantially, with much of Australia's hardwood demand now being met from overseas sources.

This raises an important question. Environmental success should not be measured by reducing Australian production while increasing reliance on imports from countries that may have lower environmental standards, weaker regulatory oversight or poorer transparency. Such policies do not eliminate environmental impacts; they merely transfer them beyond

Australia's borders while diminishing domestic employment, regional investment and national self-sufficiency.

The decline of native forestry has also had consequences extending well beyond timber production. Production forests historically supported extensive road networks, fire detection systems, fuel management programs, pest and weed control operations and a skilled workforce with a continuous presence across large, forested landscapes. As active forest management has been progressively withdrawn, much of this capability has also been lost. In many areas, forests have not transitioned from production to active conservation management but rather from active management to passive management.

The assumption underpinning many policy decisions has been that ceasing timber harvesting will automatically improve environmental outcomes. Experience suggests the reality is far more complex. Many reserved forests continue to face increasing pressures from invasive weeds, feral animals, fuel accumulation and repeated high-intensity bushfires. In some landscapes, these threats now pose a far greater risk to biodiversity than the regulated forestry operations that previously occurred.

The experience of Australia's alpine ash forests illustrates this challenge. Repeated severe bushfires have destroyed extensive areas of these forests over recent decades, threatening their long-term persistence in ways that timber harvesting never did. The lesson is not confined to alpine ash. Across many Australian forest ecosystems, environmental resilience depends not simply on reservation but on active stewardship, including fire management, weed control, pest management and ongoing monitoring.

Environmental policy should therefore focus on measurable outcomes rather than assumptions about particular land uses. A forest does not become environmentally secure merely because productive management ceases. Indeed, where active management is abandoned, environmental risks may increase. The history of native forestry demonstrates that environmental protection and active management are not opposing concepts. In many Australian landscapes, they are inseparable, and policies that fail to recognise this reality risk undermining the very environmental values they seek to protect.

3.4 EPBC ‘fast tracking’ selectivity.

One feature of the new laws is fast-tracking procedures. These were originally seen as a means of circumventing the kind of lawfare previously addressed. They were also envisaged to overcome the objections that have forestalled new housing developments on the city's peripheries.

But the outcome is entirely different. [Gas and coal](#) projects are explicitly removed from the fast-track stream. And the Minister is forbidden to declare fossil fuel projects to be in the "national interest" and therefore exempt from compliance with these EPBC Act provisions. The Greens also ensured the retention of the "water trigger" for large coal mining and coal seam gas fracking projects, to ensure federal oversight where such a project may have significant impacts on water resources (including ground water tables).

In the case of housing, developers have a 30-business-day fast-track for “low-risk” projects and the promise of future “development zones” where red tape will supposedly melt away. But the fast-track excludes anything touching a threatened species or ecological community (which is most of Sydney’s remaining growth corridors).

One area explicitly included in the fast-track process is renewable energy developments together with the transmission systems that they require - often snaking through pristine wilderness. At this point in time, there are over 60 enquiries involving panels and hearings around which increasingly vocal opposition from rural landowners and other interested parties tends to coalesce. Almost all of these inquiries rubber-stamp the proposals, none of which would pass a commerciality test without subsidies, meaning they are, almost by definition, non-productive. Meanwhile, [Mining Weekly](#) identifies \$129.5-billion in projects, forecast to create demand for over 22,000 new operating-phase jobs – already a sharp reduction on previous periods – are likely to be bogged down in the enhanced regulatory morass.

Queensland is now experiencing many of these tensions directly. Large-scale wind, solar and transmission developments are increasingly proposed across regional and rural areas, including landscapes containing remnant vegetation, productive agricultural land and important wildlife habitat. Environmental standards should apply consistently regardless of the industry involved. If vegetation clearing, habitat fragmentation and impacts on regional communities are considered important for mining, agriculture and forestry developments, the same principles should apply to renewable energy projects and transmission infrastructure.

In aggregate, in \$2025 terms, exploration expenditure in Australia has remained at about \$4 billion a year over the past 15 years, though over time a far greater proportion of this has been spent on satisfying regulators rather than chipping rocks and drilling. In the case of development expenditure, the carnage created by the tightening regulatory corset is evident: in \$2025 terms, current spending is only one-third of what it was 15 years ago, due to the discouragement and outright rejection of new developments.

With mining, agriculture, forestry and fishing, as well as, of course, energy, Australian governments have sought to constrain wealth-enhancing activities with regulation, especially in the name of the environment. These measures have greatly diminished our potential wealth as a nation.

3.5 Environmental Consequences of Passive Land Management

Environmental regulation, including the EPBC legislation, increasingly prioritises passive ‘preservation’ over active management. In many forested landscapes, restrictions on fuel reduction, access, mechanical treatment and active management have coincided with larger and more severe bushfires. Biodiversity conservation cannot be separated from landscape resilience. An unmanaged forest is not necessarily a protected forest.

The disparity is particularly evident in bushfire management. Private landholders can face substantial legal liability if fires originating on their land cause damage to neighbours. Government agencies, however, frequently enjoy statutory protections and immunities that make it difficult or impossible to establish equivalent accountability, even when inquiries identify management failures or inadequate preparedness.

As a consequence, environmental policy increasingly focuses on regulating productive activities on private land while paying insufficient attention to the active management of public lands where some of Australia's most significant environmental degradation occurs.

The assumption that public ownership automatically delivers superior environmental outcomes is not supported by experience. Across Australia, public lands face escalating challenges from fuel accumulation, invasive species, weed infestations and repeated high-intensity bushfires. In many cases, these threats are exacerbated by restrictions on active management.

Environmental policy should focus on outcomes rather than tenure. A well-managed private property may deliver better environmental results than a poorly managed public reserve. Regulatory frameworks should therefore assess environmental performance consistently across all land tenures rather than presuming that public ownership itself guarantees environmental protection.

4 Concluding comments

Queensland has an opportunity to pursue a different environmental policy path from that increasingly adopted elsewhere in Australia. Rather than continually expanding regulatory frameworks, the focus should be on whether environmental policies are delivering measurable improvements in environmental outcomes.

Recent decades' experience demonstrates that increased regulation does not necessarily translate into better environmental performance. Despite expanding controls over land use, resource development, forestry, fishing and agriculture, governments continue to report biodiversity decline, escalating weed infestations, increasing feral animal populations and severe bushfire impacts.

Environmental stewardship is best achieved when governments work with landholders, regional communities and productive industries rather than treating them as obstacles to conservation. Property rights, active land management and environmental protection are not mutually exclusive objectives. Indeed, they are often complementary.

Queensland's environmental future will depend not upon the volume of regulation imposed but upon the effectiveness of the policies adopted. The State should focus on measurable outcomes, active stewardship, accountability across all land tenures and practical environmental management that strengthens both ecological resilience and regional prosperity.

5 Recommendations

We offer the following practical recommendations:

1. The QPC should be instructed by the government to start science audits on science evidence behind environmental legislation. Large swathes of regulation could likely be removed if it was found, as is likely, that the science basis was unsound.

2. Streamline approval processes and eliminate unnecessary duplication between State and Commonwealth environmental assessments.
3. Introduce statutory timeframes for environmental approvals to provide greater certainty for investment and regional development.
4. Restrict standing provisions to parties directly affected by proposed developments.
5. Establish compensation mechanisms where environmental regulations substantially diminish the productive use or value of private property.
6. Require periodic independent audits of environmental regulations to assess whether they are achieving measurable environmental outcomes.
7. Apply equivalent environmental standards to renewable energy developments, conventional energy projects, agriculture, forestry and other productive industries.
8. Explicitly recognise bushfire resilience, fuel management, weed control and feral animal management as legitimate environmental objectives.
9. Apply equivalent accountability standards to public and private land managers for environmental stewardship and land management outcomes.
10. Ensure future expansion of Queensland's protected area estate is accompanied by adequate resources and measurable performance indicators for active management.
11. Promote environmental policies that encourage stewardship, innovation and active management rather than simply restricting productive land use. Despite decades of increasing regulation, Australia continues to report declines in many environmental indicators, escalating bushfire impacts, expanding feral animal populations and increasing weed infestations. Before creating new agencies, imposing penalties, and setting approval requirements, governments should demonstrate that existing regulatory interventions have produced measurable environmental improvements.