

13 July 2026

Queensland Productivity Commission

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IMPACT OF 2025 ENVIRONMENT PROTECTION REFORMS

Australian Industry Group welcomes the opportunity to make a short submission to the Queensland Productivity Commission (QPC) regarding their inquiry into the impact of 2025 Environment Protection Reforms.

About Australian Industry Group

Australian Industry Group is a peak national employer organisation representing traditional, innovative and emerging industry sectors. We have been acting on behalf of businesses across Australia for 150 years.

Our membership includes businesses of all sizes, from large international companies operating in Australia and iconic Australian brands to family-run SMEs. Our members operate across a wide cross-section of the Australian economy and are linked to the broader economy through national and international supply chains.

Overall Comments

We supported national efforts to reform the Environment Protection and Biodiversity Conservation Act (EPBC Act) and would like to see the Commonwealth and States bed down the single-touch approval processes that are now more possible. The full effect of the reforms will not be known until there is an implementation track record, but the early signs are good and we are encouraged.

Benefits of the Reforms

There are multiple expected benefits from the reform effort. These are plausible but not yet observed given the recency of the changes.

Streamlined pathways for national project assessments should be more navigable than past assessment categories and processes.

Bioregional plans and regional assessment for particular types of development have great potential to help businesses — particularly SMEs — by:

- Cutting the cost of studies and analysis to support individual fragmented projects;
- Acting as a signal to help them identify where they can invest in operational sites.
- Potentially driving ecologically sustainable housing development to assist Queensland in achieving their goals towards developing sufficient new housing under the National Housing Accord.

But the biggest benefit would be from success in the effort to create a 'single touch' approvals system:

- National standards on key environmental matters that the Commonwealth is currently responsible for
- Negotiations between the Commonwealth and individual States to accredit the latter's approval processes as effective to uphold national standards
- Delegation by the Commonwealth of approvals on relevant matters to accredited States
- An ability for businesses and projects in accredited States to lodge proposals with a single jurisdiction for integrated consideration and decision, rather than two.

We want members to benefit to the fullest potential from this single touch system.

A single touch outcome will reduce vertical duplication in environmental approval processes. We are also hopeful it can support improved horizontal alignment, with States converging with each other as they establish consistency with national standards.

The addition of rulings by the Minister or the CEO of the National Environmental Protection Agency (NEPA) to the suite of powers — despite them being legally non-binding — can help to inform proponents of the thinking and interpretation behind decisions being made and guide the development of their proposals. It also sets a precedent for future proposals, which can enable proponents to raise questions if future decisions go against the rulings.

Implementation so far

Several draft standards have been consulted upon so far — Matters of National Environmental Significance (MNES); Environmental Offsets; Community Engagement; Data and Information.

These seem to be fit for purpose based on our read and member consultation.

Ideally Queensland would align with these, especially MNES, so all businesses seeking approvals can benefit from nationwide experience and support (internal or external). This should help streamline project development.

If NEPA wholly owns the compliance and enforcement portion of the responsibilities under the EPBC Act, it may be less an outright increase in administration by QLD, and more a shift in administrative burden from enforcement to approvals.

The opportunity for Queensland

The opportunity for Queensland is large given both the expected improvements from the reforms and Queensland's immense development potential. There would be significant lost opportunity if Queensland were unable to capitalise on the reforms, including the bilateral agreements process.

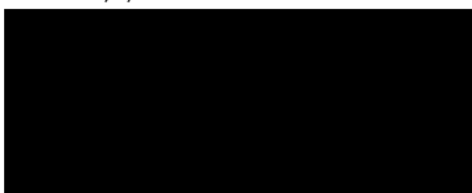
The Streamlined pathway and the NES will allow proponents to know what they need to include in their application upfront and give certainty on the maximum amount of time before a decision is made. This has the potential to enable economic development across the state, including in developing and growing sectors of the economy.

The use of bioregional planning regional assessments can have a material impact on both the development of land for industrial and housing uses in a reasonable timescale and with clear expectations of the impacts on the environment, and the protection of the environment and cultural heritage sites, which can in turn benefit the Queensland tourism industry.

Negotiations with the Commonwealth towards bilateral agreements will no doubt be complex and involve sensitive issues. We nonetheless encourage Queensland to keep working on this in good faith, including during the current QPC Inquiry, in order to secure the significant benefits to the State and the nation from faster, simpler, unified assessment processes. The valuable ongoing work, interim results and final recommendations of the Inquiry should inform these negotiations as and when available, rather than deferring the process.

If you have any further questions regarding this submission, please contact our Adviser — Circular Economy and Environment Policy [REDACTED]

Sincerely yours,



Michelle Farquhar
Head - Queensland