KOALA ACTION INC.
Postal Address: 52 Poole Road
GLASS HOUSE MOUNTAINS QLD 4518
ABN: 92 282 853 793
http://koalaactioninc.org

Queensland Productivity Commission
Impact of 2025 EPBC Act reforms on Queensland inquiry

Dear Commissioners 11th July 2026

Re: Impact of 2025 EPBC Act reforms on Queensland inquiry Wildlife

For your information Koala Action Inc. (KAI) is a volunteer not for profit incorporated association designated as a charity dedicated to protecting and conserving Queensland's koala population, as well as retaining, conserving, replanting and rehabilitating koala habitat. Volunteers undertake a variety of tasks including raising orphaned koala joeys from their homes; rescuing and/or caring for sick, injured adult and orphaned koalas; providing free koala education and awareness presentations; creating koala food tree plantations; replanting koala food trees and other natives in parks, reserves and open spaces as well as rehabilitating secondary habitat to increase its' carrying capacity for koalas and other native wildlife. KAI has utilised some of the information provided by Wildlife Queensland in their submission on the above topic.

Queensland's economy, regional communities and future productivity depend on healthy landscapes, functioning ecosystems, clean water, resilient catchments, intact habitat and the recovery of threatened species. Accordingly, environmental protection should not be treated as separate from productivity. It is a foundation for long-term productivity.

Members believe that the scope of the inquiry as set out in the terms of reference are too narrowly focussed on perceived, and in our view incorrectly conceived, potential negative impacts of the EBC Act reforms on productivity in Queensland. Dr Ken Henry AC, a highly respected former Secretary of the Treasury for Australia, has argued that high-integrity, stronger environmental protection is a precondition for lifting Australia's productivity, rather than a drag on it.

He links better nature laws to clearer investment signals, faster and more predictable project approvals, and the structural shift to a net-zero, nature-positive, higher-value economy.
Dr Henry has said that fixing Australia's "broken environment laws will do more for our ailing productivity than tax reform," arguing that productivity ambitions are impossible to achieve without serious environmental law reform.

KAI urges the Commission to take a broad approach to the scope of the inquiry to identify the ways in which strong support for the strengthening of environmental laws and the application of the revised EPBC Act provisions, supported by strong and effective cooperation by Queensland Authorities can actually underpin sustainable productivity growth in Queensland.

The 2025 EPBC Act reforms and strong environmental standards will improve productivity when they reduce uncertainty, avoid late-stage conflict, protect natural capital, support regional stewardship and ensure that development proceeds within clear ecological limits. This can be achieved by:

1. Strong EPBC reforms can reduce uncertainty, delay and conflict. Dr Ken Henry argues that new national laws and a federal EPA can provide clearer standards, streamlined assessments, and more transparent, rules-based decision-making, which "allow for faster decision making… better decision-making and in that we'll see a boost in productivity." Strong national standards can improve productivity by creating clearer expectations at the start of a project.

   Proponents, governments, investors, landholders and communities benefit when the unambiguous rules are known early, high-value habitat is identified before project design is locked in, and unacceptable impacts are clearly understood. Delay is often caused not by strong environmental standards, but by unclear standards, poor early surveys, inadequate avoidance of important habitat, unrealistic offsets, incomplete information and late identification of environmental constraints.

   The standards must prioritise environmental outcomes, not just process. A project should not be considered consistent with a standard simply because a payment has been made or a procedure has been followed. It should only be approved where it is likely to deliver the relevant environmental outcome. Good regulation improves productivity when it reduces ambiguity, provides clear decision rules and directs investment away from high-conflict, high-risk proposals.

2. Protecting habitat protects Queensland's productive base. Queensland's productivity depends on its natural capital. Healthy ecosystems support agriculture, tourism, fisheries, water quality, soil stability, pollination, carbon storage, climate resilience, flood mitigation, recreation and regional liveability. Riparian vegetation, wetlands, remnant woodland, mature trees, hollow-bearing trees, grasslands, coastal systems and wildlife corridors provide services that are expensive or impossible to replace once degraded.

   Offsets must not become a mechanism for continuing habitat loss. Not all habitat can or should be offset. Some places are too important, too rare, too old, too connected, too species-specific or too difficult to replicate. Where a genuine, like-for-like, additional and durable offset is not available, the impact must not be approved and the habitat must not be cleared. The standards should clearly identify no-go zones for irreplaceable, high-risk or critical habitat, including threatened species breeding habitat, roosting sites, mature hollow-bearing habitat, climate refugia, key wildlife corridors and habitat essential to species recovery.

   The experience in Queensland (and in other jurisdictions) where the predominant approach used by proponents is to make a financial contribution and transfer responsibility for finding and implementing the offset to government has been a major failure

3. Better standards can improve investment certainty Queensland needs efficient, predictable and credible assessment processes. KAI supports efficiency, which should come from better planning, better environmental information, clearer rules, stronger avoidance of harm and upfront decision-making, not by-passing them. Failing to consider sustainability and long-term environmental protection is not sound management strategy.

   The Oxford University's Smith School of Sustainability and Environment argues that strong, credible environmental laws and regulations are essential to manage transition risk, avoid disorderly asset stranding, and safeguard long-term economic and financial stability. In their framing, weak or delayed regulation actually increases systemic risk and future productivity losses, whereas clear, ambitious policy creates a more orderly, lower-cost transition.

Strong standards can improve investment certainty by clearly identifying which environmental values must be avoided, what survey effort is required, how cumulative impacts must be assessed, when impacts are unacceptable, when offsets are not appropriate, and how compliance will be monitored and enforced and the adequate consequences for non-compliance. The concept of required net gain must be defined in an actionable and assessable way.

If net gain is not clearly defined through regulation, an offsets calculator or another objective method, its application may fall largely to Ministerial discretion. This would weaken certainty for proponents, communities, regulators and investors. Net gain should be measurable, additional, attributable, durable and directly relevant to the impacted matter. It should not be used to justify clearing habitat where the environmental values cannot be replaced. In those circumstances, the only appropriate regulatory outcome is avoidance, redesign or refusal.

4. Nature-positive reform can support regional jobs and capability. Strong EPBC reform can support regional productivity by creating practical work in restoration, threatened species monitoring, weed and pest control, ecological surveys, Traditional Owner ranger programs, private land conservation, citizen science, environmental consulting and nature-based tourism. EPBC reform should help mobilise this capability, not treat environmental protection only as a compliance cost.

   Community data and local knowledge are productivity assets. Local communities often detect environmental change early, hold detailed knowledge of wildlife and habitat, and contribute records that improve assessment and recovery planning. However, regional opportunities depend on reform settings that direct investment into genuine, additional and measurable outcomes. Restoration contribution charges should be governed by the same principles as other offsets, including additionality, like-for-like outcomes, transparency, monitoring, accountability and a clear connection to the impacts being offset.

5. Cumulative impacts and intergovernmental cooperation must strengthen outcomes. Many environmental impacts in Queensland are cumulative. A single project may appear manageable, but repeated clearing, infrastructure corridors, roads, water extraction, light, noise, weeds, fire regime change, edge effects and climate pressures can progressively degrade biodiversity corridors, habitat and reduce species viability.

   Cumulative impact assessment must be elevated into enforceable standards and assessment requirements, considering past, present and reasonably foreseeable impacts across the relevant landscape, bioregion, catchment, ecological community or species range. Commonwealth, State and Local Government systems should work efficiently together, but streamlining must not weaken protection.

   Accreditation, bilateral arrangements or delegated assessment processes should only proceed where Queensland systems meet or exceed national standards and maintain public confidence, environmental integrity, transparent decision-making and strong compliance and enforcement. Efficient intergovernmental arrangements can reduce duplication, but only if they strengthen outcomes rather than dilute them.

6. Queensland offset funds need clear guiding principles for how existing and future offset funds are spent, including the reported $129 million in Queensland offset funds. Offset funds should not operate as a general environmental grants pool or substitute for core government conservation responsibilities. They should be directed to genuine, additional, measurable and accountable outcomes that are clearly linked to mitigating the impacts for which the funds were collected, with transparent criteria for habitat.

outcomes, threatened species recovery, long-term protection, monitoring and regional delivery.

Conclusion - Koala Action Inc. supports EPBC reforms that deliver stronger protection for nature while improving Queensland's long-term productivity. Clear, enforceable and outcome-focused national standards can reduce uncertainty, protect natural capital, support regional jobs and improve confidence in decision-making.

The reforms must not rely on process compliance, discretionary offsets or restoration payments that fail to deliver measurable gains for wildlife and habitat. Some habitat is too important or irreplaceable to offset, and where impacts cannot be avoided, minimised and genuinely offset, approval should not be granted.

Queensland also needs clear, transparent and accountable guiding principles for how existing and future offset funds are spent, including the reported $100 million-plus in Queensland offset funds, to ensure these funds deliver genuine, additional and measurable outcomes linked to the impacts for which they were collected.

Members look forward to a positive and meaningful response to this submission and joins Wildlife Queensland in its efforts to conserve, protect and enhance this state's unique flora and fauna. Should you need any further information, do not hesitate to contact me on the landline 07 5438 7537.

With thanks Vanda (aka Wanda) Grabowski
President/Secretary
Koala Action Inc.