



Every Queensland
community deserves
to be a liveable one

13 July 2026

Queensland Productivity Commission
PO Box 12078
George Street QLD 4003
enquiry@qpc.qld.gov.au

Dear Commissioner,

RE: Response to Inquiry: Impact of the Australian Government's 2025 environment protection reforms on Queensland

The LGAQ welcomes the opportunity to provide feedback to the Queensland Productivity Commission (QPC) on the inquiry into the *Impact of the Australian Government's 2025 environment protection reforms on Queensland*, following the call for submissions paper released on 29 May 2026.

The LGAQ is the peak body for local government in Queensland. It is a not-for-profit association established solely to serve councils and their needs. The LGAQ has been advising, supporting, and representing local councils since 1896, enabling them to improve their operations and strengthen relationships with their communities. The LGAQ does this by connecting councils to people and places; supporting their drive to innovate and improve service delivery through smart services and sustainable solutions; and providing them with the means to achieve community, professional and political excellence.

As proponents of essential community infrastructure, local planning authorities, land managers and major investors in natural resource management, Queensland councils support strong and transparent environmental protections and seek to work cooperatively with Federal and State governments to protect biodiversity values and threatened species.

Since 2024, the LGAQ has actively engaged in consultation on the reforms to the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), including through previous submissions made to the Federal Government on matters affecting Queensland councils.

Overall, Queensland councils have supported the intent of the 2025 reforms to improve environmental outcomes and provide greater clarity under the EPBC Act, noting concerns with the previous framework. However, given the reforms are new and implementation is ongoing, many supporting statutory instruments, standards, guidance materials and implementation tools remain under development or subject to consultation. This, combined with the pace of reform and staged commencement mean councils cannot yet fully assess the practical implications for local government, landholders, industry and communities.

As a result, the LGAQ is not yet in a position to provide a full assessment of the practical regulatory, financial, administrative or operational impacts for Queensland councils. This response is therefore focussed on identifying the key areas where councils seek further clarity, including how the reforms will operate in practice, how they will interact with Queensland planning and environmental frameworks, and how duplication or unintended additional regulatory layers will be avoided.

At this stage, councils seek further clarity on matters including:

- **Referral triggers and thresholds** – when council projects, land management activities or planning decisions may trigger referral requirements, how “significant impact” will be defined and applied in practice, and how thresholds will be applied consistently across different matters of national environmental significance.



- **Interaction with Queensland planning and environmental frameworks** – how the proposed Federal reforms will interact with existing Queensland planning, environmental assessment and approval processes, and how duplication, conflicting requirements and parallel assessment pathways will be avoided.
- **Cost recovery** – how cost recovery mechanisms and fees will operate under the reforms, including the circumstances in which fees may apply and the financial implications for councils delivering community infrastructure and public works.
- **Regulation and resourcing** – the nature and extent of any new assessment, reporting, compliance and administrative obligations, and what guidance, training, technical support and resourcing will be available to assist councils in meeting these requirements.
- **Routine and urgent council land management activities** – how the reforms will apply to routine operational activities and urgent works, including fire mitigation, weed and pest management, asset maintenance, and disaster response and recovery activities.
- **Bioregional plans and local planning schemes** – the purpose, statutory effect and practical application of bioregional plans, including how they will interact with existing State and local planning instruments and incorporate local government input.
- **Environmental offsets** – how environmental offsets and emerging environmental markets will operate under the reforms, including how offset requirements will be determined, implemented and monitored, and how local environmental and community outcomes will be considered.
- **Environmental data and mapping** – how environmental datasets, mapping products and spatial information will be developed, maintained and applied to support assessment, planning and decision-making processes.

The LGAQ provides the following overarching recommendations for the Queensland Productivity Commission's consideration in developing the inquiry report:

Recommendation 1: The LGAQ recommends the Queensland Productivity Commission, through the next stages of the Inquiry, considers the matters requiring further clarification as outlined in this submission.

Recommendation 2: The LGAQ recommends the Queensland Productivity Commission considers including a recommendation in the Inquiry interim report for the State Government to establish a Queensland EPBC reforms implementation working group, with local government representation to:

- understand the practical implementation of the reforms as the Federal Government's standards, statutory instruments, guidance materials and supporting implementation tools are developed and released
- develop, test and refine how State Government statutory instruments and tools to implement the reforms will operate in practice and align with existing planning and environmental frameworks.

The LGAQ would welcome the opportunity to continue working with the QPC, and the State and Federal governments as the Inquiry progresses and supporting instruments, standards, guidance materials and implementation tools for the national environment reforms are developed.

Ongoing engagement with councils will be important to ensure the reforms improve environmental outcomes while remaining practical, proportionate and workable for Queensland councils and the communities they serve.



If you would like to discuss any aspect of this submission further, please do not hesitate to contact Crystal Baker, Manager – Strategic Policy at [REDACTED] or Cass Liney, Lead – Environment & Climate at [REDACTED] or call 1300 542 700.

Yours sincerely,



Alison Smith
CHIEF EXECUTIVE OFFICER