



10 July 2026

Ms Angela Moody
Productivity Commissioner and Chair
Queensland Productivity Commission
PO Box 12078
George Street
QLD 4003

By email: enquiry@qpc.qld.gov.au

Dear Ms Moody

Submission on the impact of the Australian Government's 2025 environment protection reforms on Queensland

The Minerals Council of Australia (MCA) welcomes the opportunity to provide a submission to the Queensland Productivity Commission's inquiry into the impact of the Australian Government's 2025 environment protection reforms on Queensland.

The MCA is working closely with the Queensland Resources Council and this submission intends to complement QRC's input to provide a national perspective given MCA engagement in reforms to the Commonwealth's *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Queensland's is a major resources state and contributor to Australia's export income. The sector makes a substantial contribution to regional employment, export income, energy security and the supply of minerals needed for modern infrastructure, defence, manufacturing and the energy transition. The sector recognises it operates in regions with significant environmental values and supports strong, clear and credible laws that protect matters of national environmental significance while enabling responsible development.

While Queensland has primary responsibility for environmental regulation, most resources projects also trigger the EPBC Act. The Act was amended in December 2025 with a 12-month implementation period for regulations to be made and elements of the reforms to enter into force. This process is ongoing and the full effects of the changes remain to be seen.

The 2025 reforms have the potential to deliver positive outcomes if well designed and implemented. In particular, clearer national environmental standards, better environmental information, more consistent assessment processes and improved bilateral arrangements could support more predictable decision making and better environmental outcomes. These elements could also help reduce duplication between Commonwealth and Queensland processes, provided they are designed in a way that recognises and accredits robust state processes.

However, there are also significant implementation risks for the state's resources sector. The reforms introduce legally binding standards, new assessment concepts, changes to environmental offsets, expanded information requirements, and stronger compliance and enforcement powers. If these elements are overly prescriptive or poorly aligned with Queensland processes, they could increase costs, extend approval timeframes, and reduce investment certainty.

For resource projects, it is not a question of having strong environmental regulation, but whether it is efficient, proportionate, consistent and practical to administer. This will depend on the national standards, supporting guidance, the National Environmental Protection Agency's operation and how Commonwealth processes recognise, duplicate or conflict with Queensland's assessment, land use planning and environmental regulatory frameworks.

Many of the most important elements of the reforms are still being developed through subordinate legislation, standards, guidance and administrative practice. Accordingly, the MCA recommends the Queensland Government engage in the design of these to support timely decisions, balanced consideration of social, economic and environmental factors and workable offset regime that are interoperable with Queensland assessment and approval processes.

The Commission's inquiry can make an important contribution by identifying key issues – both challenges and opportunities - for Queensland and Commonwealth governments to work together on. A balanced approach is needed to support environmental protection and restoration while maintaining investment confidence, regulatory efficiency and project delivery for Queensland's resources sector and regional communities.

The MCA looks forward to providing input into the Commission's inquiry. For further information, please contact Steven Brown, Principal Adviser – Environment via email

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Yours sincerely

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TANIA CONSTABLE
CHIEF EXECUTIVE OFFICER