

Submission to the Queensland Productivity Commission

Impact of the Australian Government's 2025 EPBC Act reforms on property-level management of plants and animals in southwest Queensland

Submitted by: Guy Newell



Augathella, Queensland

Date: 23 July 2026

1. Executive summary

This submission is made from the perspective of a landholder managing a rural property in southwest Queensland. The property is managed as a working landscape where livestock production, native vegetation, threatened species habitat, pasture condition, water infrastructure, pest animal control, weed management and fire risk must be managed together.

I support effective protection of matters of national environmental significance. However, the most serious practical threat created by the EPBC Act reforms is the introduction of the so-called 15-year rule for vegetation that has not been cleared for at least 15 years. In southwest Queensland, this rule risks undermining both conservation and practical, productive land management by discouraging routine, beneficial and timely management of regrowth, pasture, access, fire risk and habitat condition.

2. Background and property context

Southwest Queensland properties operate in highly variable seasonal conditions. Management decisions often need to be made quickly in response to drought, flooding rain, grass growth, fire risk, pest animal movement and weed outbreaks. Good environmental outcomes depend on timely, practical action by landholders who know their country.

On our property, plant and animal management includes maintaining pasture condition, protecting useful native vegetation, managing regrowth where needed, maintaining access tracks and fence lines, controlling invasive plants, managing feral animals, maintaining watering points and reducing unmanaged fuel loads. These activities are not separate from environmental management; they are the means by which landholders maintain healthy and productive country.

3. Main concern: the 15-year rule

The 15-year rule is of particular concern because it treats time since previous clearing as a regulatory trigger, rather than focusing on the actual condition of the land, the purpose of the

proposed work, or the environmental consequences of doing nothing. In the rangelands, vegetation can thicken, shift, recover or decline depending on rainfall, grazing pressure, fire history and pest impacts. A simple 15-year threshold does not capture that reality.

For a working property, the rule may turn ordinary regrowth management into a federal compliance question. Landholders may become reluctant to manage regrowth before it creates greater problems, because allowing vegetation to pass an arbitrary age threshold could expose future management to assessment, referral risk or enforcement uncertainty. This creates a perverse incentive: instead of encouraging careful, planned and beneficial management, it may push landholders toward shorter clearing cycles or discourage conservation-minded decisions that allow country to recover between management events.

The practical effect is likely to be worse environmental outcomes. If landholders are penalised for allowing areas to rest, recover or remain lightly managed for more than 15 years, the law may discourage the very stewardship behaviours that conservation policy should support. A landholder who retains regrowth for habitat, shade, shelter, soil stability or drought resilience should not later be punished if selective management is needed to maintain pasture condition, access, fire control or ecological balance.

The key concern is that the reformed EPBC framework may make ordinary property management more uncertain where matters of national environmental significance may occur or be mapped. In practice, landholders may need to seek specialist advice or federal assessment before undertaking routine works, even where those works are lawful under Queensland systems and are intended to maintain or improve land condition.

This uncertainty is particularly serious where rules depend on mapping, species records, habitat models or broad environmental datasets that may not reflect current on-ground conditions. A property may be captured because of potential habitat or historic records, even where the proposed activity is small-scale, low risk or beneficial to the landscape.

4. Impacts on management of plants

4.1 Native vegetation and regrowth

Managing native vegetation and regrowth is a normal part of maintaining pasture, access, fire control and ecological balance in south west Queensland. If the reforms create additional approval triggers for clearing, thinning, mechanical treatment, firebreaks or maintenance of existing infrastructure, landholders may delay work that is necessary to prevent degradation.

There is a risk that landholders will avoid proactive management because they are unsure whether an activity could be considered to have a significant impact. This would not improve environmental outcomes. It could allow woody thickening, weeds and unmanaged fuel loads to increase, reducing pasture condition and potentially increasing fire intensity.

4.2 Weed control and rehabilitation

Weed control often requires prompt action before seed set or spread after rain. Delays caused by referral uncertainty, mapping checks or consultant advice could make weed problems worse. The EPBC framework should clearly distinguish between harmful clearing and practical weed control or rehabilitation works that protect native vegetation and habitat.

4.3 Fire management

Firebreaks, track maintenance, strategic grazing and fuel reduction are necessary to protect people, stock, infrastructure and environmental values. A regulatory framework that discourages these activities may increase the risk of larger, hotter and less controllable fires, with worse outcomes for native plants and animals.

5. Impacts on management of animals

5.1 Threatened and native species

Landholders are often the people best placed to observe changes in native animal populations, habitat condition and seasonal pressures. Any system for protecting threatened species should make it easier for landholders to report observations and undertake practical habitat management, rather than creating fear that reporting a species will automatically trigger restrictions or future approval risk.

5.2 Feral animals and pest pressure

Feral pigs, wild dogs, foxes, cats, goats and other pest animals can damage habitat, prey on native wildlife, spread weeds, disturb watering points and reduce livestock productivity. Effective control requires coordinated and timely action. If new rules make access, baiting programs, trapping infrastructure or coordinated control works more difficult, the result may be poorer outcomes for native animals and land condition.

5.3 Adaptive management

Seasonal variability means that property-level environmental management cannot be reduced to a fixed plan that does not change. Drought, flood, fire, pest outbreaks and pasture response all require landholders to adjust management. The reformed EPBC system should recognise adaptive management and local ecological knowledge as strengths, not compliance risks.

6. Compliance burden and practical costs

The reforms may increase the need for legal advice, environmental consultants, mapping reviews, record keeping and referral decisions before landholders can undertake routine work. These costs fall heavily on family businesses and regional communities. The time taken to obtain certainty can also be damaging where seasonal conditions create short windows for effective management.

Duplication between Commonwealth and Queensland requirements is a major concern. Landholders need a clear, single pathway that recognises existing Queensland vegetation management, biosecurity, animal welfare, planning and natural resource management obligations. If an activity is already regulated and lawful under a Queensland framework, the Commonwealth system should provide clear exemptions or low-risk pathways unless there is a genuine and material risk to a matter of national environmental significance.

7. Recommendations

1. The Queensland Government should seek removal, amendment or clear limitation of the 15-year rule so that landholders are not penalised for allowing vegetation to recover or for undertaking selective, beneficial and routine management after a period of non-clearing.
2. The Queensland Government should seek strong bilateral arrangements with the Commonwealth so that Queensland landholders are not required to navigate duplicate approval systems for routine property management.
3. Clear guidance should be developed for southwest Queensland landholders on which routine activities are exempt, low risk, notifiable or likely to require assessment.
4. Mapping and habitat models should be ground-truthed and readily challengeable where they do not reflect current property conditions.
5. The EPBC framework should recognise beneficial management activities, including weed control, feral animal control, firebreak maintenance, fence line maintenance, water point maintenance and restoration works.
6. Compliance requirements should be proportionate to risk and scaled for family farming and grazing businesses, not designed only around major project proponents.
7. Landholders should be supported to participate in conservation and offset programs through practical, flexible and adequately funded agreements that recognise seasonal variability and local knowledge.
8. Any new standards, data systems or approval pathways should be tested with producers in regional Queensland before implementation.

8. Conclusion

The success of environmental reform in Queensland will depend on whether it works on the ground. In southwest Queensland, landholders manage complex landscapes every day. We manage plants and animals not as an abstract compliance exercise, but as part of keeping country healthy, productive and resilient.

The QPC should recommend that implementation of the EPBC reforms avoids duplication, protects routine and beneficial land management, recognises local knowledge, and provides clear, practical pathways for landholders. Without those safeguards, the reforms may unintentionally discourage the very actions needed to maintain habitat, control pests, manage fire risk and protect native plants and animals.

Contact: Guy Newell

Phone: [REDACTED] or Email: [REDACTED]