November 2026

Impact of the Australian Government's 2025 Environment Protection Reforms on Queensland

Interim Report

Summary

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Foreword

Queensland has a vast landscape, unique bioregions and places of international environmental significance. The structure of Queensland's economy means there is a wide range of activities that both depend on, and affect, the environment.

The community's desire for housing, infrastructure (such as roads, water and energy), employment, improved living standards and other objectives require governments to make policy choices — *trade-offs* — between these priorities.

These trade-offs are made on behalf of the community. They may be overt or not apparent but seek to deliver a desired balance between environmental, economic and community concerns.

The Australian Government through the 2025 reforms of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) has set out how it will seek to address these trade-offs in terms of protecting matters of national environmental significance.

The impact of the EPBC Act is wide-reaching. Most activities integral to our basic needs interact with it — such as the construction of a house, food production, or new electricity generation.

Due to this, getting the regulatory settings right is an imperative for the environment, productivity and maintaining standards of living.

Following the receipt of the terms of reference on 13 April 2026, the Queensland Productivity Commission undertook an initial round of consultation, including releasing a Call for Submissions paper in May 2026 and regional visits across Queensland.

The level of interest from stakeholders has been very high and the Queensland Productivity Commission sincerely thanks all participants for their contributions to this Inquiry to date.

This Interim Report sets out the Queensland Productivity Commission's initial analysis and research, key issues raised by stakeholders and potential areas for further analysis.

This is a point in time report.

A wide range of regulatory changes, educational programs and guidelines have been issued by the Australian Government since the Inquiry commenced. So the Queensland Productivity Commission is keen to hear from stakeholders on whether its understanding of the current issues and their impact is correct and/or has changed since the initial Call for Submissions paper (May 2026).

This Interim Report also provides an opportunity for a further round of consultation.

The Queensland Productivity Commission looks forward to hearing from, and continuing to work with, stakeholders on this issue.

Contents

Foreword	1
Contents	2
The Inquiry	3
Key terms	4
Key points	6
About the Inquiry	7
Environmental regulation	8
The EPBC Act	10
Guiding Queensland's response to the reforms	18
Land management	20
Assessment pathways	22
Offsets	25
Landscape-scale planning	26
Findings, recommendations & information requests	29

The Inquiry

On 13 April 2026, the Queensland Treasurer directed the Queensland Productivity Commission (the Commission) to undertake an inquiry into the impact of the Australian Government's 2025 reforms to the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) on Queensland.

To prepare this Interim Report, the Commission met with stakeholders across Queensland, released a Call for Submissions paper in May 2026 and invited initial comments and submissions from all interested stakeholders. Public submissions received are available on the Commission's website www.qpc.qld.gov.au.

The Commission thanks all participants for their contribution to this Inquiry to date.

This Interim Report outlines the Commission's preliminary analysis, interim findings and recommendations, and where further information is being sought. It also provides an opportunity for a further round of consultation.

The Final Report will be provided to the Queensland Government by **13 April 2027.**



Make a submission

The Commission invites all interested stakeholders to make a submission or provide a short comment by **14 January 2027**.

Submissions and comments can be lodged at:

Stakeholder engagement - 2025 EPBC Act Reforms

Submissions, except for any confidential attachments, will be published on the Commission's website.

However, if you are submitting genuinely confidential material, please provide this material as a clearly marked separate attachment.

Further information on making a submission is available on the Commission's website www.qpc.qld.gov.au.

About the Commission

The Commission is an independent statutory body that provides independent advice on complex economic, social and regulatory issues.

The Commission has an advisory role and operates independently from the Queensland Government — its views, findings and recommendations are based on its own analysis and judgements.

Contact us

You can register your interest to receive our email alerts on key inquiry developments, including the release of reports, call for submissions and details of public consultation.

Email: enquiry@qpc.qld.gov.au

Phone: (07) 3096 6960

Key terms

Term	Meaning
Bilateral approval agreement	Agreement between the Australian Government and a state government for the state government to approve projects in accordance with the EPBC Act.
Bilateral assessment agreement	Agreement between the Australian Government and a state government for the state government to assess projects in accordance with the EPBC Act.
Bioregional plans	Bioregional plans are a landscape-scale approach to EPBC Act assessments and approvals that guide how cumulative impacts to the environment should be managed in an area of economic importance.
Continuing use exemption	An exemption from self-assessment and approval for actions that are a lawful continuation of a use of land that pre-dates the commencement of the EPBC Act. The exemption does not apply if the activity involves an 'enlargement, expansion, or intensification of the use' that would result in a substantial increase in its environmental impact.
Controlled action	An action that cannot proceed without assessment and approval under the EPBC Act because it is likely to have a significant impact on a matter of national environmental significance.
Environmental offsets	Activity undertaken to compensate for a significant, unavoidable impact on a matter of national environmental significance.
Landscape-scale planning	Tools, including bioregional plans and strategic assessments, that facilitate the assessment of multiple developments or activities, often over a designated area.
Matters of National Environmental Significance (MNES)	Environmental matters declared to be of national significance by their status as being protected under Division 1 of Part 3 of the EPBC Act.
Minister	The Australian Government Minister for the Environment.
National Environmental Protection Agency (National EPA)	The Australian Government's national environmental regulator. The National EPA has been newly established under the 2025 EPBC Act reforms.
National Environmental Standards	Legislative instruments that set principles that must be met when projects are assessed under the EPBC Act.

Term	Meaning
National interest exemptions and approvals	Allows an activity (excluding fossil fuel activities) deemed by the Minister to be critical to Australia's national interest to bypass standard EPBC Act assessment and approval processes: • through an exemption from certain provisions of the Act, such as assessment requirements; or • through the Minister approving a project even if it significantly impacts an MNES, fails the net gain test or causes unacceptable impacts. Such projects still go through a full environmental assessment.
Net gain	The requirement for an offset activity to deliver environmental benefits that exceed the damage done by a proposed activity, relative to a baseline scenario.
Protected matters	Matters protected by the EPBC Act
Reconsideration	A decision about whether a project is a controlled action can be reconsidered if new information becomes available, or if circumstances change, that would alter the initial decision.
Referral	A referral is an application for the approval of an action that could have a significant impact on any MNES. After a 10-day public comment period the Minister decides whether the action is not a controlled action, a controlled action that must be taken in a particular manner or a controlled action requiring further assessment.
Restoration contribution charges	A financial payment a project proponent makes to compensate for a significant impact their activity has on a MNES in lieu of designing and delivering an environmental offset themselves.
Rulings	Rulings allow the Minister or National EPA Chief Executive Officer to publish their opinions on the way in which provisions of environment law apply, including the EPBC Act, EPBC Regulations, or any other regulatory instrument under the Act.
Self-assessment process	A preliminary assessment undertaken by the proponent to assist in deciding whether an action is likely to have a significant impact on a MNES, which would require a referral under the EPBC Act.
Significant impact	An impact that, generally, is 'important, notable or of consequence, having regard to its context or intensity.'
Strategic assessments	A collaboration between the Australian Government and a strategic assessment partner that provides a means of obtaining upfront approval for a class of actions under the EPBC Act.
Streamlined assessment pathway	A faster assessment pathway with a 50-day time limit available to projects where proponents provide sufficient information.

Key points

- When managed well, environmental assets provide large economic and social benefits to the community, sustaining long run economic outcomes and quality of life for households. As such, it is critical these assets are utilised and maintained appropriately for the welfare of the community.
- There is a clear role for government in addressing environmental outcomes. However, policymakers need to manage the impacts of environmental regulation on competing priorities.
- The Samuel Review (2020) found the EPBC Act was resulting in additional costs to businesses without corresponding better environmental outcomes.
- The costs and impacts of these deficiencies on Queensland were material. The Commission estimates Act approvals just prior to the 2025 reforms were taking over 1,150 days on average in Queensland. Delay costs as a result of Act obligations were likely costing Queensland proponents in the order of $4.9 to $7.7 billion per year prior to the 2025 EPBC Act reforms.
- The 2025 reforms have been delivered in the context of a complex set of Australian, state and local government regulatory requirements and programs. They also interact with private incentives, quasi-regulation, regulator behaviour and the conduct of entities subject to regulation.
- The reforms materially amended the scope and operation of the Act. They codify and strengthen regulatory requirements on proponents, amend the assessment pathways available to proponents, introduce new tools to support the Act's objectives and strengthen compliance and enforcement.
- Implementation of the reforms is ongoing. However, there are several deficiencies in the way the reforms have been introduced.
  - Regulatory best practice was not followed. Elements of the reforms were introduced without consultation or rigorous assessment, without critical supporting material being available at the time of introduction, or have generated considerable uncertainty for stakeholders. New land clearing requirements mean the scope of regulation has effectively expanded, capturing small and family farming businesses. The Commission estimates the expanded requirements could cost the Queensland agriculture industry between $14 million and $41 million per year, while introducing unintended consequences for routine land management and some environmental outcomes.
  - Trade-offs are only partially considered. In some instances, proponents are bearing excessive costs of regulation or are being required to bear the costs of outcomes for which they are not responsible (such as the requirement to achieve a net gain). This has implications for other objectives desired by the community, such as housing, infrastructure delivery or other economic outcomes.
  - The reforms affect other national, state and local regulatory and policy settings. State and local governments will need to review the 2025 reforms along with all directly related and indirectly associated state and local obligations, to see what, if any, changes may be required.
  - Historically, the Act, in part, has relied on proscriptive limits, regulatory obligations and compensation requirements, coupled with regulatory monitoring and sanctions to deter non-compliance. The 2025 reforms continue this approach and may result in instances of disproportionate costs to some activities and entities.
- While aspects of the 2025 reforms have the potential to reduce costs, these benefits are yet to be realised. Interdependencies among the reforms mean stated benefits are reliant on outstanding reforms being successfully delivered. Much of the supporting guidance, regulation and implementation work to enable successful reform is still outstanding or is dependent on the activities of other entities.
- While there are potential long-term environmental and productivity benefits, stakeholders are currently facing increased costs. The Commission has identified potential measures to reduce costs on the Queensland community. As the implementation process is ongoing, the net effect of these actions remains subject to change. As such the potential measures are interim views.

About the Inquiry

On 13 April 2026, the Queensland Government asked the Queensland Productivity Commission (the Commission) to undertake an inquiry into the impacts of the Australian Government's 2025 reforms to the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) on Queensland.

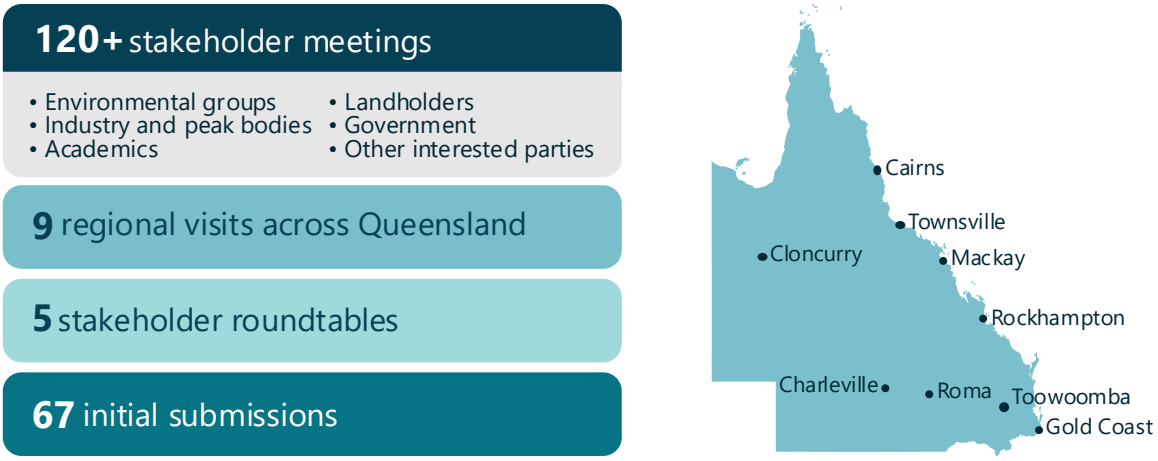
The Commission has been asked to examine how the 2025 reforms affect Queensland in practice, by focusing on regulatory burden, economic impacts, implementation risks and operational arrangements. The terms of reference for the Inquiry ask the Commission to investigate:

- the impacts of the 2025 reforms, including on costs, timeframes, uncertainty and across different industries, regions and types of proponents
- the implications of the 2025 reforms for investment (including housing delivery and infrastructure), business viability, productivity and economic activity in Queensland
- the extent to which Commonwealth–State bilateral agreements, accreditation frameworks and related arrangements provide opportunities to reduce duplication and improve certainty
- practical options to reduce unnecessary regulatory burden and improve efficiency, certainty and proportionality in the application of the 2025 reforms in Queensland
- opportunities to improve alignment between Australian Government and Queensland Government frameworks without undermining Queensland's regulatory autonomy
- the extent to which the 2025 reforms shift regulatory, administrative or financial responsibilities to the Queensland Government.

The full terms of reference are available in Appendix A.

Following the receipt of the terms of reference the Commission undertook an initial round of consultation, including releasing a Call for Submissions paper in May 2026 and regional visits across Queensland.

Figure 1 Overview of consultation for the Interim Report



The Interim Report sets out the Commission's preliminary analysis, interim findings and recommendations and where further information is being sought. It also provides an opportunity for a further round of consultation with stakeholders.

A Final Report will be provided to the Queensland Government by 13 April 2027.

Environmental regulation

When managed well, environmental assets provide large economic and social benefits to the community, sustaining long run economic outcomes and quality of life for individuals and households. As such, it is critical that these assets are utilised and maintained appropriately for the welfare of the community.

The community can be left worse-off when the use of environmental resources — renewable or exhaustible — results in one or more market failures:

- Negative externalities — where entities do not bear the full cost of their actions, which can lead to the over-provision of goods and services that harm the environment or over-use of common resources.
- Public goods — where private entities cannot charge for the exclusive use of a good, entities may underinvest in that good or service. For example, a healthy environment is a public good.
- Information asymmetries — where the community is unable to assess the full effect of an entity's actions, including through a lack of transparency, the market may be unable to incentivise 'good' behaviour.

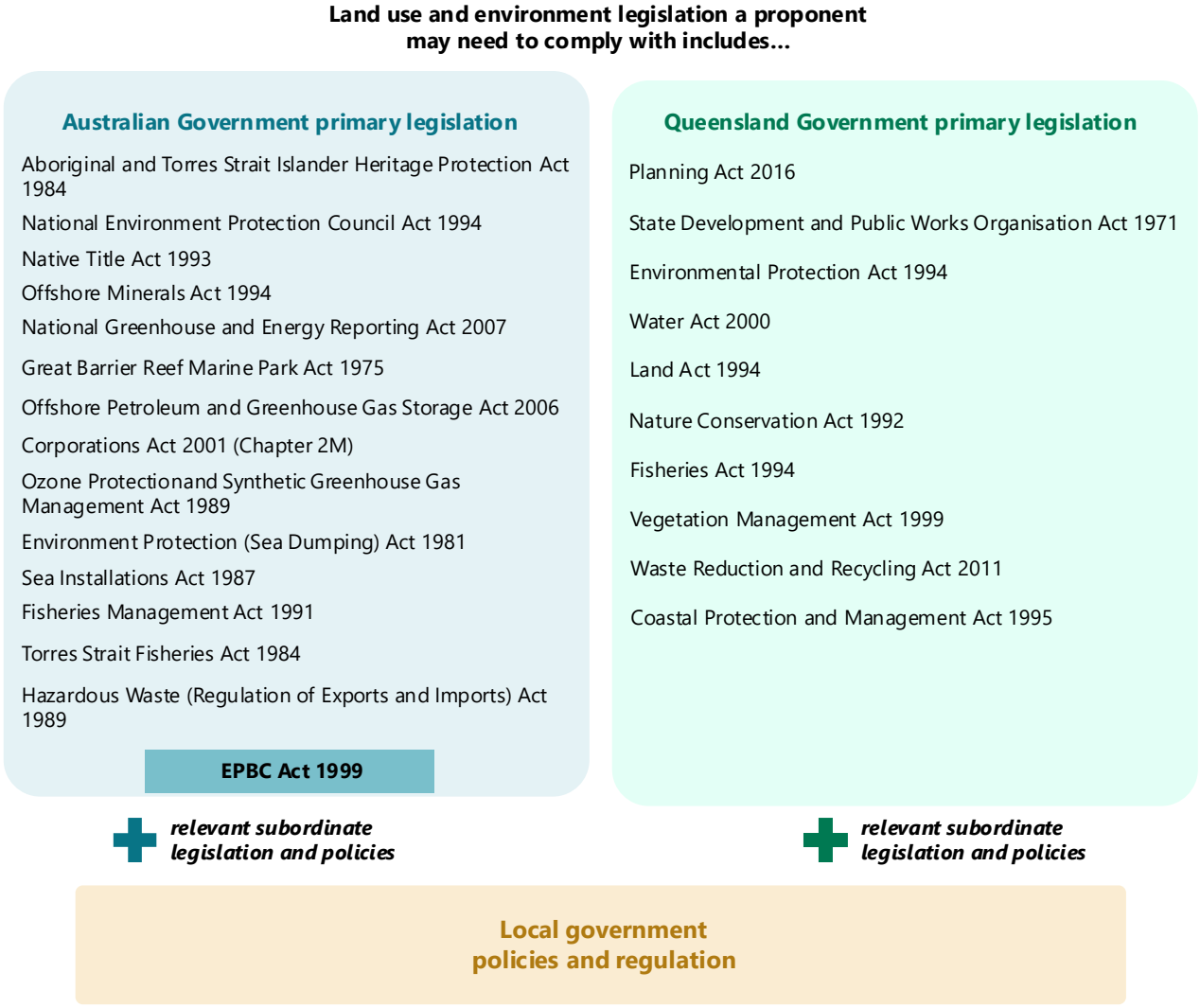
Due to these potential adverse impacts, there is a role for government to intervene to maximise community welfare.

In doing so, policymakers need to manage the impacts of environmental regulation on competing priorities. These trade-offs may be overt or not apparent but are central to the policy settings governments make, balancing environmental, economic and community concerns and objectives. The community's desire for housing, infrastructure (such as roads, water and energy), employment, longer-term living standards and other objectives both relies on healthy environmental assets, while at times competing with environmental objectives.

As is highlighted in Queensland's latest State of the Environment Report, many environmental values are under pressure. The number of threatened fauna species has increased (State of Queensland 2025b, p. 3), with the average population size of threatened species in Australia now less than half the size it was in 2000 (ABS 2026b).

Regulatory settings that address environmental outcomes (whether directly or indirectly) have increased over time, including for each level of government (Figure 2). In addition, there are a wide range of government-funded programs and other initiatives targeting the same environmental outcomes.

Figure 2 A large and growing volume of environmental regulation



In addition to regulatory settings and programs, an increasingly diverse range of private incentives, quasi-regulatory arrangements and commercial practices also affect entities' interactions with environmental assets:

- banks, investors and retailers are increasingly facing calls from third parties to address the environmental impacts of private activity associated with financing arrangements and supply chains. For example, Australian banks are investigating claimed instances of illegal land clearing and regulators are acting on matters raised by the public, based on publicly available information
- individuals and firms have, or are, increasingly taking a proactive stance on the way they interact with the environment because they have the private incentives to do so. This may take the form of stewardship, in seeing the importance of effective land management to their current activities, or looking to ensure what is passed on to the next generation is in a better state than how it was received
- industries are adopting a strategic response to do more than the minimum set of obligations and are 'self-regulating', due to the possible adverse impacts from an externally imposed regulatory response
- firms may wish to differentiate themselves in the market as 'doing more' or legacy building.

The result is an increasingly crowded and complex set of incentives and instruments that influence interactions with the environment.

This Inquiry is not about the case for or against environmental regulation — rather, it considers the extent to which the 2025 EPBC Act reforms deliver their stated environmental objectives effectively and efficiently.

To be most effective, the EPBC Act, and its regulatory agencies, must manage the resources and risks associated with its administration, and identify and target those activities that are likely to cause environmental harm. Regulation is most likely to be effective when:

- desired outcomes are well-understood and measurable, including where there is sufficient information to identify and target activities that affect desired environmental outcomes
- the regulatory problem, both in terms of environmental outcomes and regulated entities, is broadly homogenous; or rules are sufficiently flexible to handle complexity in outcomes and regulated entities
- the rules align economic incentives with desired outcomes, compliance burdens are low and enforcement is credible.[1]

To be efficient, the EPBC Act must deliver those outcomes at lowest cost and leave the community better off overall. This will include enabling activities to occur where impacts can either be avoided, mitigated or compensated. Regulation is most likely to be efficient when:

- it is administered by the level of government best able to do so effectively and efficiently
- it encourages outcomes to be delivered by the firms or government body best able to do so
- it does not lead to unintended adverse economic or environmental outcomes
- unnecessary regulatory burden is minimised, including through maintaining consistency with other policy and regulatory processes.

These regulatory processes are influenced by:

- the clarity and predictability of regulation and regulatory outcomes
- quasi-obligations, discretion and behaviour of the regulator, including how well the regulator understands the stakeholders and markets it is regulating
- the conduct of entities subject to regulation.

Poorly assessed or understood intervention increases the potential for unintended consequences (for the environment, community and economy) and unnecessary costs.

The EPBC Act

The EPBC Act (including accompanying regulations) is Australia's primary environmental legislation at the national level.

At the time of its introduction the EPBC Act sought to support Australia's obligations under international environmental agreements (Department of Parliamentary Services 2022).[2]

[1] These principles are reflected in best-practice regulatory principles. For example, see the Department of Finance, What are the 3 best practice principles? (Department of Finance 2026).

[2] It implemented aspects of the 1992 Intergovernmental Agreement on the Environment and the 1997 Heads of Agreement on Commonwealth and State Roles and Responsibilities for the Environment, and consolidated laws relating to environmental impact assessment, national parks, world heritage and endangered species (DCCEEW 2021b; Department of Parliamentary Services 2022, p. 44; Parliament of Australia 1998, pp. 5, 7–9).

The EPBC Act seeks to:

- protect the environment, specifically 'protected matters'
- conserve Australia's biodiversity
- protect and manage important national and cultural places
- assess the environmental impact of projects, and decide whether to approve them
- control how plants and animals, including specimens and products, move in and out of Australia
- promote ecologically sustainable development
- appreciate the role of Indigenous peoples in protecting and sustainably using the environment
- promote using Indigenous peoples' knowledge, with their permission and cooperation (DCCEEW 2026k).

In general terms, the EPBC Act aims to deliver on these broad objectives via the protection of nine matters of national environmental significance (MNES), along with biodiversity considerations, ecological communities and protected areas.

Requirement for independent reviews

Under the EPBC Act, an independent review of its operations is required to be conducted every ten years (s.522A). The most recent review was led by Professor Graeme Samuel, running from late 2019 and released in early 2021 (Samuel 2020). The Samuel Review (Samuel 2020, pp. 1, 26) found the EPBC Act was not effectively achieving its environmental objectives:

> *The evidence provided to this Review about the state of Australia's environment is compelling. Overall, Australia's environment is in a state of decline and under increasing pressure. There are localised examples of good outcomes but the national outlook is one of decline and increasing threat to the quality of the environment. At best, the operation of the EPBC Act has contributed to slowing the overall rate of decline. (Samuel 2020, p. 44)*

It suggested the EPBC Act was unable to effectively protect and conserve nationally important matters because the Act lacked clear outcomes for MNES and had operational deficiencies, including:

- a focus on project-by-project assessment rather than landscape-scale assessment
- attention being placed on the identification of threatened species and ecological communities that needed protection rather than identifying how to effectively manage those MNES
- incentives to prepare plans rather than to achieve environmental outcomes (Samuel 2020, p. 47).

The Samuel Review also found the EPBC Act did not meet best practice principles for modern regulation and duplicated state regulatory processes, sometimes resulting in additional costs to businesses without delivering commensurate environmental benefits (Samuel 2020, pp. 8–9).

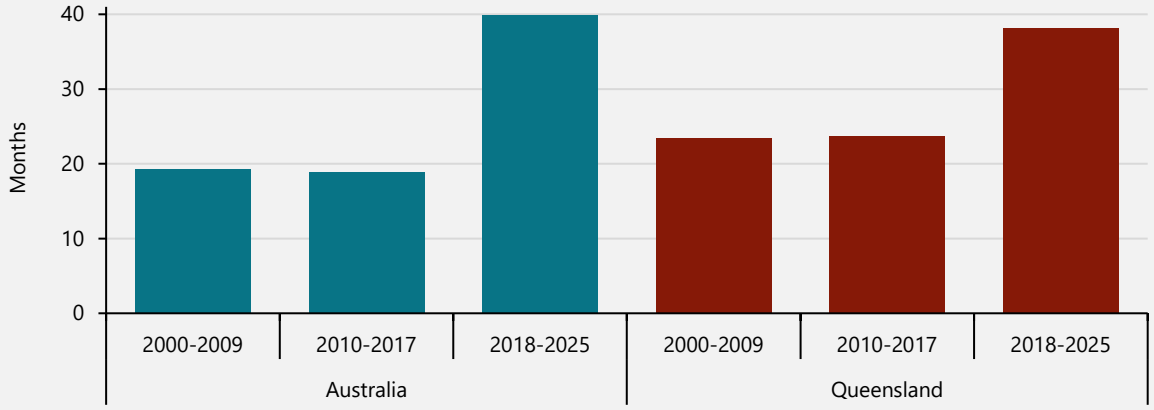
The ongoing costs and impacts of these deficiencies on Queensland are material (Box 1).

Box 1 Cost of EPBC Act processes in Queensland, pre-2025 reforms

EPBC Act approvals are taking increasingly longer, both nationally and in Queensland (Figure 3).

Figure 3 **Median predicted approval time**

Approvals are long and taking longer



Note: In addition to approval decisions, the Australian Government also makes a referral pathway decision. However, the time taken to make a referral pathway decision is a small portion of the overall assessment time frame, typically being less than a month.

Source: QPC based on National EPA 2026b

These delays have a disproportionate impact on Queensland due to the state's relatively high number of EPBC Act referrals (Figure 4). Based on Australian Government information, delay costs as a result of EPBC Act obligations were likely costing Queensland proponents in the order of $4.9 to $7.7 billion per year. When controlling for industry, Queensland referrals are also 1.24 times more likely to result in a controlled action when compared to the rest of Australia (Figure 5).

Figure 4 **Proportion of referrals by state over time**

Queensland consistently has one of the highest rates of referrals

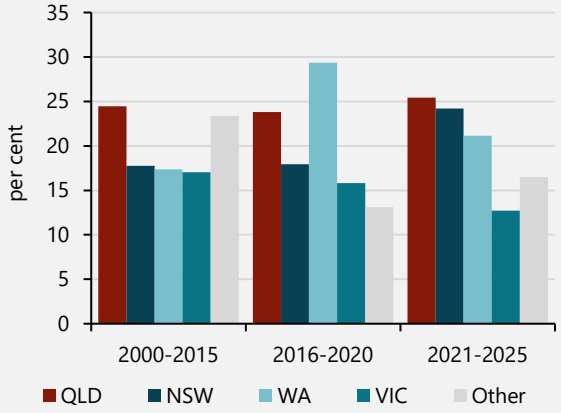
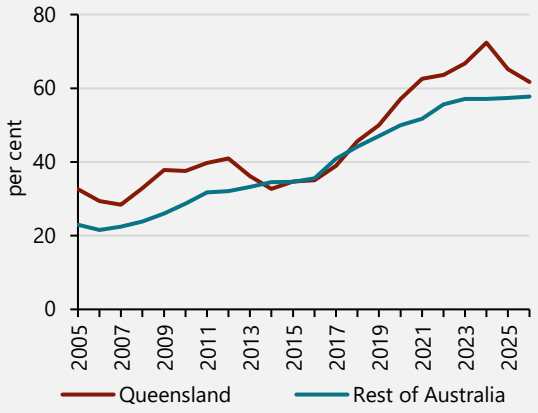


Figure 5 **Proportion of referrals assessed to be a controlled action (five-year moving average)**

Referrals in Queensland are more likely to be controlled actions



Source: QPC based on National EPA 2026b

The Samuel Review made 38 recommendations for improving the operation of the EPBC Act. These focused on:

- the use of legally enforceable Standards, which would set the boundaries for decision-making on the delivery of the protections needed
- restoration of the environment and facilitation of the scale of investment required to deliver better environmental outcomes
- taking an adaptive approach, through planning, measuring the effectiveness of implementation and making adjustments where needed
- harnessing the knowledge of Indigenous Australians to inform environmental management (The Senate 2026a, pp. 109–110).

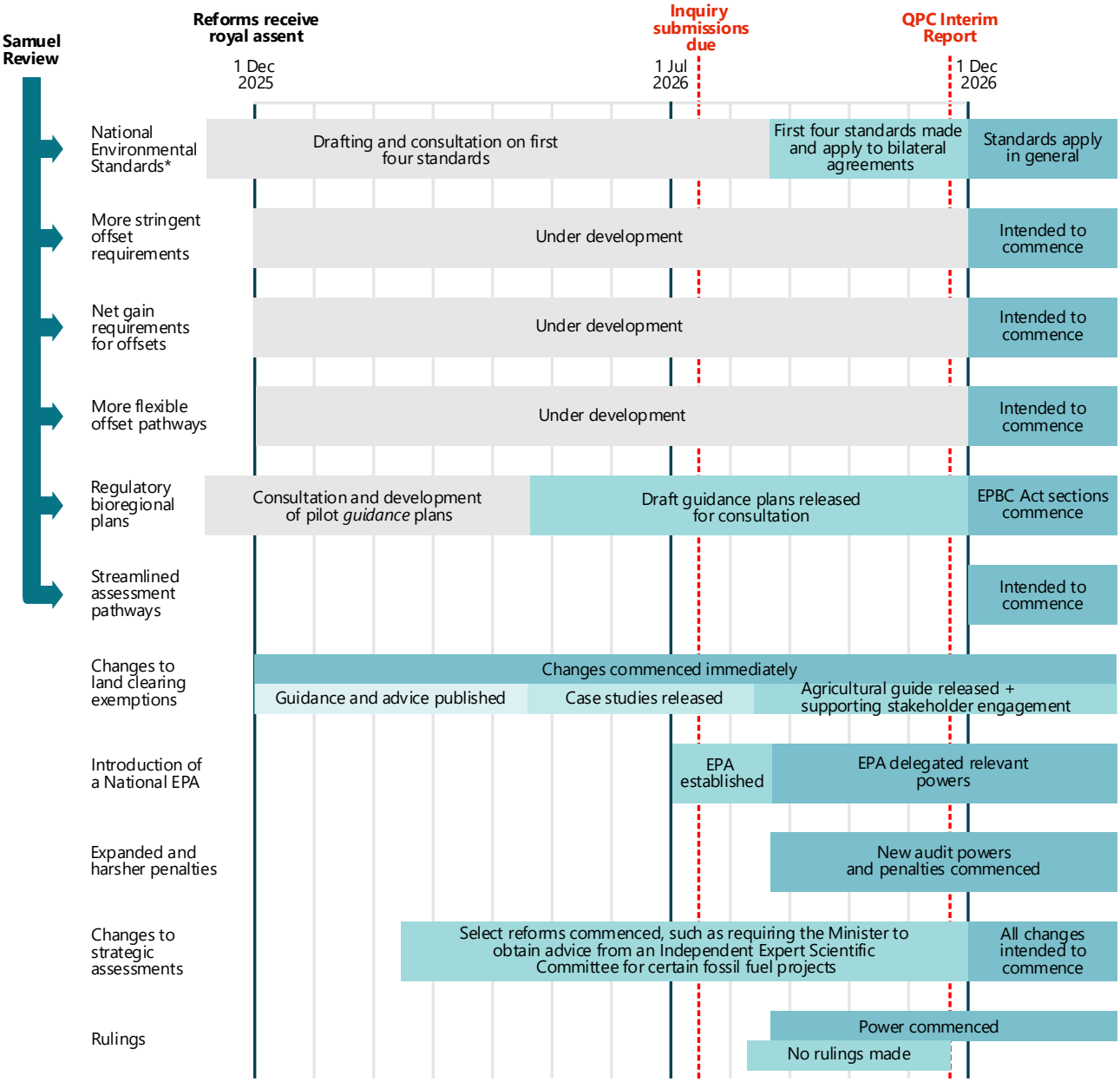
The Australian Government's 2025 reforms

In October 2025, the Australian Government introduced the Environment Protection Reform Bills to amend the EPBC Act and 11 other Acts, with the stated objectives to deliver:

- stronger environmental protection and restoration
- more efficient and robust project assessments
- greater accountability and transparency in decision making (Parliament of Australia 2025d, p.2).

These Bills were passed by the Australian Parliament on 28 November 2025. The 2025 reforms are being delivered progressively (Figure 6). Several reforms are yet to be drafted, shared for consultation or implemented. As a result, there is limited observable evidence on the impacts of the reforms in their entirety.

Figure 6 Key reforms and their progress



Note: *Future standards are still to be developed, including a National Environmental Standard for First Nations engagement.

The reforms materially amended the scope and operation of the EPBC Act. They codify and strengthen regulatory requirements on proponents, amend the assessment pathways available to proponents, introduce new tools to support the Act's objectives and strengthen compliance and enforcement powers.

Regulatory best practice was not followed

While the EPBC Act reforms followed the delivery of the Samuel Review in 2020, its introduction and the process for developing and implementing the reforms have not followed regulatory best practice. In particular:

- a regulatory impact statement was not prepared on the legislative changes
- the land clearing amendments resulting from parliamentary negotiations were not subject to consultation or a rigorous regulatory impact assessment process
- reforms were made without supporting information being made available for affected parties at the time of assent
- the process for development has been fragmented, with regulatory obligations and the National Environmental Protection Agency (National EPA) established ahead of several supporting guidance materials being finalised
- aspects of the amendments continue to provide broad ministerial and regulator discretion, generating considerable uncertainty.

Further, some elements of the reforms departed from Samuel Review recommendations, including the land clearing changes, establishment of the National EPA[3], and continuing operation of duplicative groundwater assessments.

Trade-offs are only partially considered

One of the EPBC Act's underlying principles is that those whose activities harm the environment should bear the resulting costs. In doing so, environmental costs are internalised into project decisions, encouraging proponents to modify behaviour and mitigate environmental harm. This principle can provide an efficient mechanism to manage trade-offs between environmental harm and the benefits of economic activity.

However, strict adherence to this approach can result in proponents paying for costs that extend beyond the environmental impacts they cause or for outcomes for which they are not responsible. This includes having proponents pay for the inefficient costs of regulation or for benefits that accrue to the community more broadly.

As highlighted by the Samuel Review, EPBC Act processes are recognised as imposing inefficient costs on the community through the assessment process. In addition to being inefficient, excessive costs imposed on proponents can also be seen as inequitable, particularly where they affect pre-existing property rights.

While the reformed Act is intended to address these costs, benefits are yet to be realised. Further, some aspects of the reforms exacerbate these costs and undermine the intent to address costs. Concerns over who bears the costs and impacts on property rights are amplified in cases where:

- proponents are already engaged in conservation activities or are 'trying to do the right thing', but then bear high private costs from regulation, or find there is no acknowledgement of their best practice approaches under the 2025 reforms
- new land clearing requirements mean the scope of regulation has effectively expanded to capture activities and businesses (particularly small and family businesses) not previously captured
- new requirements such as 'net gain' have the potential to result in proponents bearing the costs of additional environmental protection beyond the direct impact of their own activities.

Under these conditions the effect of the reforms can be to move further away from an optimal assessment of trade-offs. Inefficient or excessive costs imposed on proponents will come at the expense of other objectives desired by the community, such as delivery of housing, infrastructure or other economic activity.

[3] While Samuel (2025a, pp. 3-4) criticised the dual roles the National EPA was assigned — as decision maker regarding assessment and compliance, and as the auditor — in his submission to the Senate Inquiry into the Environmental Protection Reform Bill, after the Bill passed into law, he commented that 'the legislation faithfully reflects in total the substance of the [Samuel] review' (Samuel 2025b).

The EPBC Act reforms will also affect other national, state and local regulatory and policy settings

EPBC Act requirements can interact, duplicate or cross-over with state and local government regulations and frameworks. Proponents are frequently required to meet the requirements of two or more regulatory systems, often assessing the same matters.

A wide range of environmental initiatives are also currently in place that seek to deliver similar objectives to the EPBC Act. For example:

- the $250 million Australian Bushland Program funds expansions to Australia's protected estate
- Natural Resource Management groups seek to support landholders to protect and improve natural assets
- carbon offset markets seek to deliver emissions reductions through land management practices.

Some landholders and proponents also have private incentives to support the same outcomes desired by the EPBC Act. Reformed EPBC Act requirements can inadvertently frustrate or add to the cost of these efforts.

For Queensland, the 2025 reforms will affect:

- Land clearing requirements — the reforms add new obligations on top of existing state vegetation mapping, including existing Property Maps of Assessable Vegetation (PMAVs), which were originally portrayed to landholders as 'locking-in' their ability to manage certain areas of vegetation.
- Assessment processes — existing bilateral assessment agreements are no longer compliant with new regulatory requirements and will need to be updated.
- Offsets — strengthened offset requirements do not align with state offset requirements, meaning state offsets may not be able to be used to satisfy Australian Government obligations.
- Compliance — strengthened compliance and enforcement measures may see the Australian Government adopt a stronger posture of EPBC Act compliance and enforcement, alongside existing state enforcement activities.

State and local governments will need to review the 2025 reforms along with all directly related and indirectly associated state and local obligations, to see what, if any changes may be required.

The regulatory costs can be disproportionate

The EPBC Act, in part, relies on proscriptive limits, regulatory obligations and compensation requirements, coupled with regulatory monitoring and sanctions to deter non-compliance. The reforms continue this approach and can result in instances of disproportionate costs to some activities and entities.

Some elements of the reforms, such as land clearing, were introduced on the basis that all activities should be treated the same, but other changes introduce carve outs for certain activities. For example, fossil fuel activities are treated differently through being denied access to streamlining initiatives, and they are excluded from the Minister's new power to approve projects in the national interest even where they are inconsistent with other requirements. Given environmental damage to MNES is agnostic to its contributing factors, this creates further inconsistencies in the application of the Act. Some projects will be prioritised over others, rather than under consistent frameworks that address overall impacts to environmental outcomes and community welfare.

Despite significant efforts by the Australian Government Department of Climate Change, Energy, the Environment and Water (DCCEEW) and the National EPA, the implementation approach has resulted in significant uncertainty, costs and potentially adverse environmental outcomes. For example, in relation to the new land clearing obligations, the Commission has been informed of instances of landholders avoiding clearing altogether to avoid any interaction with the EPBC Act; or undertaking additional clearing to avoid future EPBC Act obligations.

Uncertainty and unnecessary or disproportionate costs have implications for business investment, productivity and international competitiveness. Some sectors of the Queensland economy and regions are particularly affected. As shown in Table 1, the EPBC Act applies to proponents across a broad range of industries with vast differences in activities and capacity.

Table 1 Characteristics of key affected industries in Queensland

	Coal mining	Beef farming	Infrastructure construction	Housing construction
Nature of facilities	Concentrated among 58 active mines	Dispersed among 20,000 businesses across Queensland	Large energy, transport, telecommunications, water and waste developments	Greenfield residential development
Trade exposure	High — around 90 per cent exported	High — over 64 per cent exported	Domestic-focused	Domestic-focused
Past interactions with EPBC Act	Frequent — 24 referrals since 2024	Rare — No referrals since 2018	Frequent — over 100 referrals since 2024	Frequent — 27 referrals since 2024
Nature of EPBC Act interaction	New or expanded development	New development, expansion, intensification and routine land management	New development	New development
Capacity	Typically, large national or multinational businesses	85 per cent sole traders	Large private and public corporations or government agencies	Diverse range of businesses, from public companies to micro-developers and not-for-profits

Source: ABS 2025b; National EPA 2026b; Queensland Government 2026c, 2026f, 2026d, p. 11.

Even where regulatory obligations are well-designed and seek to directly address outcomes, poor information or regulator behaviour can result in unnecessary costs. Stakeholders have particularly raised concerns with time costs. Anecdotally, stakeholders have raised concerns that assessment and approval processes can involve lengthy negotiations over project design and mitigation measures, without sufficient recognition that:

- there may be insufficient information to effectively confirm the outcomes of a project
- some mitigation measures may not be feasible or practical
- proponents may not have feasible options to mitigate impacts, particularly where the project represents essential infrastructure (such as ports or existing water pipelines), where moving the proposed infrastructure is not an option, and where continuity of service is essential
- timely resolution may be imperative, such as to deliver housing or to ensure continuity of supply of essential services (such as water and electricity supply)
- lengthy negotiations can impede basic maintenance and operations
- protracted investigative processes have significant impacts where operations need to cease (this is particularly acute for sole traders and farmers).

With implementation ongoing it remains to be seen whether the reformed EPBC Act will effectively address time costs. However, in large part these costs will depend on the regulator's behaviour, irrespective of legislative requirements.

Collectively, these factors have a significant impact on environmental and economic outcomes

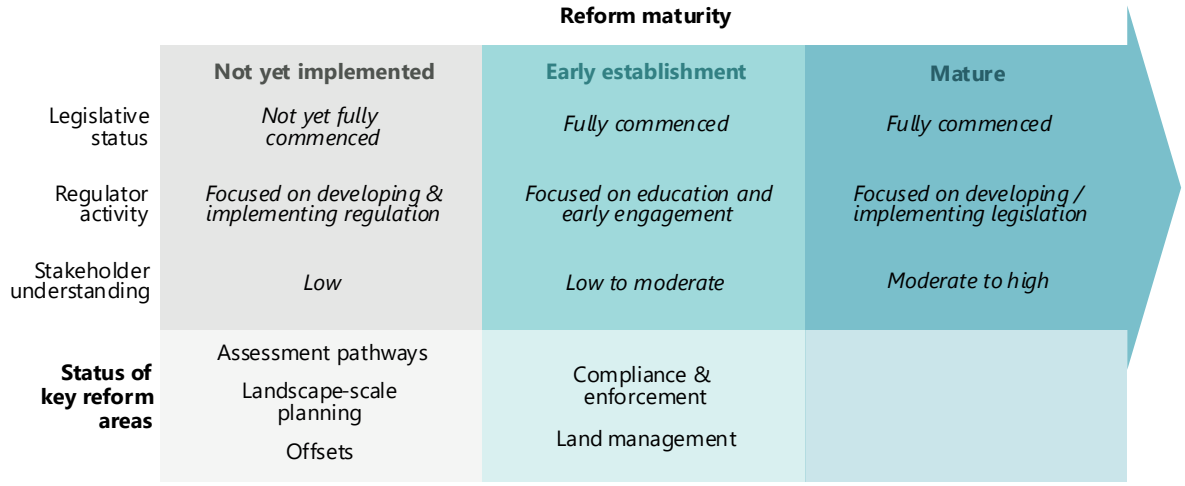
Taken together, the result of these factors is that the EPBC Act and the reforms can simultaneously deliver:

- 'under-protection' of the environment given information problems, and the rigidity of the regulation in relation to the varied nature of the environments it is protecting and the threats those environments face
- 'over-regulation' resulting in high costs on landowners and project proponents, particularly as the broader community and sometimes governments do not bear the direct costs of regulation
- unintended consequences, particularly where regulatory costs provide incentives to undertake sub-optimal conservation activities.

Guiding Queensland's response to the reforms

The 2025 reforms included a broad set of changes. Based on stakeholder feedback several reform areas were identified as being key issues for Queensland (Figure 7).

Figure 7 Key reform areas for Queensland



At the time of drafting this report (approaching 12 months since the reform Act's assent), stakeholders have a growing level of understanding of the key obligations relating to *land management* and *compliance and enforcement*. For these matters, regulator and proponent behaviour remains to be observed to provide a fuller understanding of the impact of the reforms. For the remaining key reform areas, a material level of understanding is yet to develop. A complete assessment or post-implementation assessment of the 2025 reforms may not be achievable for several years.

This is particularly due to elements of the reforms being designed to interact with each other. For example, whether more effective and faster approvals can be delivered is likely to depend, at least in part, on whether more effective and efficient offsetting arrangements can be delivered. Whether more effective and efficient offsetting arrangements are delivered can, in some cases, depend on whether landscape-scale planning approaches are successfully delivered. Much of the supporting guidance, regulation and implementation work to deliver successful reform is still outstanding or dependent on action from other entities.

However, some impacts are apparent and have been amplified by the implementation approach. Whether these are transitory or sustained impacts, will influence the net impact of the reforms on Queensland.

Stakeholders have identified specific elements of the 2025 reforms that are of concern. In some instances, these relate to the primary legislation. Where relevant, the Commission has identified these concerns irrespective of whether they relate to the primary legislation or more broadly. However, the Commission is cognisant of the position currently being communicated by the Australian Government on such matters:

> *Note that given the primary legislation (Acts) have passed the Parliament, we are not seeking feedback on the content of that primary legislation. Regulations and rules must align with that primary legislation. (DCCEEW, sub. 44, p. 9)*

As such, areas identified by the Commission for further consideration primarily relate to regulations, rules, inter-jurisdictional instruments and state-based instruments, even where there may be a case to reform the primary legislation. This is consistent with the Inquiry's terms of reference that focuses on actions the Queensland Government can take.

There are opportunities to take active steps to minimise regulatory and compliance costs associated with the reforms. This will require progressive development over time as the reforms are implemented but could include further education and guidance material, updated or new intergovernmental arrangements and amending or introducing state-level regulatory instruments that meet EPBC Act requirements in more effective and efficient ways.

The 2025 reforms will require changes to elements of Queensland's current legislative and regulatory framework to ensure compliance with the EPBC Act. There may also be opportunities to reduce the cost of the 2025 reforms on the Queensland community. Changes to Queensland legislation and regulation should be pursued where one or more factors are demonstrable, including:

- a net positive effect (where benefits exceed costs) for the community can be achieved
- risks are managed and actions are executable
- implementation is appropriately funded, particularly where actions address Australian regulation and benefits accrue to the Australian community
- Australian government funding is available to address its requirements
- the Queensland Government is best placed to deliver the required actions
- meeting EPBC Act requirements does not result in higher costs under state regulation.

However, in some instances there is no, or limited, scope for the Queensland Government to reduce the cost of the reforms.

Where applicable, this report identifies potential measures to reduce costs on the Queensland community across key reform areas. However, as the implementation process remains incomplete, with several key regulatory instruments yet to be finalised and some reforms yet to commence, the net effect of these actions remains subject to change. As such, the potential measures identified in this report should be regarded as interim views.

Land management

The EPBC Act has applied to land management activities since 2000. Since 2001 there have been 134 referrals to the Australian Government for agriculture and forestry matters, of which 29 were in Queensland and at least 18 related to vegetation clearing.

However, prior to the 2025 reforms, the EPBC Act provided a broad 'continuing use' exemption, where some activities (such as vegetation clearing) did not require Australian Government approval if it was a continuation of an existing use of land that was immediately occurring before the EPBC Act commenced (Parliament of Australia 1998). This exemption did not apply if the activity involved an 'enlargement, expansion or intensification of the use' that would result in a significant increase in its environmental impact.

Stakeholders told us historically there has been a comparatively low level of awareness of the EPBC Act in the agricultural sector, due to:

- the continuing use exemption
- low levels of Australian Government regulator activity
- limited communication by the Australian Government regulator
- land management activities historically being a state matter.

In addition to the EPBC Act, land holders are required to also comply with the Queensland *Vegetation Management Act 1999* (VMA). The VMA regulates the management of native vegetation in Queensland and applies to freehold land, Indigenous land and some state land tenures.

The Samuel Review noted some confusion with how state legislation and the EPBC Act interacted, but no specific recommendations were made on land or vegetation clearing. Similarly, the original Environment Protection Reform Bill 2025 (Cth) (the Reform Bill) did not include any new explicit restrictions on land clearing, vegetation management or the operation of the continuing use exemption.

While the self-assessment process and significant impact tests are not new provisions under the EPBC Act, the continuing use exemption meant many landholders were generally not required to engage with these regulatory requirements. With the narrowing of the continuing use exemption — for the clearing of vegetation over 15 years old or for certain vegetation in a Great Barrier Reef catchment — there will be an increase in regulatory burden for many landholders.

Native vegetation regulations can improve environmental and conservation outcomes for the wider community. However, they can also impose significant costs, with the agricultural sector often bearing a disproportionate share of the financial burden (PC 2016, p. 18). Concerns over the increased regulatory burden have also been raised by essential infrastructure providers, quarrying and mining stakeholders.

Queensland has historically had some of the highest rates of land clearing in Australia, driven largely by agricultural expansion and other land-use changes. However, recent data that pre-date the reforms, from the 2023–24 Statewide Landcover and Trees Study (SLATS), indicates a decline in clearing rates of woody vegetation, including a 60 per cent decline in overall clearing activity and a 66 per cent decline in clearing of regulated vegetation compared to levels reported in 2018–19. Additionally, the Land Use, Land Use Change and Forestry (LULUCF) sector is now providing a net carbon emissions sink in Queensland, with annual LULUCF emissions falling by around 60 million tonnes of carbon dioxide equivalent since 2000. Clearing in Great Barrier Reef catchments accounted for 43 per cent of clearing in 2023–24 but has more than halved since 2018–19 (State of Queensland 2026).

It is too early to tell whether the reforms will be effective in further improving environmental outcomes. The narrowing of the continuing use exemption may prevent some clearing of environmentally valuable habitat. However, the regulatory obligations are not well-targeted with landholders required to interpret how requirements apply in their individual landscapes, soil types and climatic conditions, through self-assessment (and potentially referral) processes. This could result in assessment costs (such as consultant reports, fees, delay and time-costs of preparing assessment material) being imposed on activities that involve clearing but also support biodiversity or superior sediment run-off outcomes. It may also result in compliance costs being incurred on productive land clearing activities more generally, including those with low or no impact on MNES.

The Commission's analysis indicates:

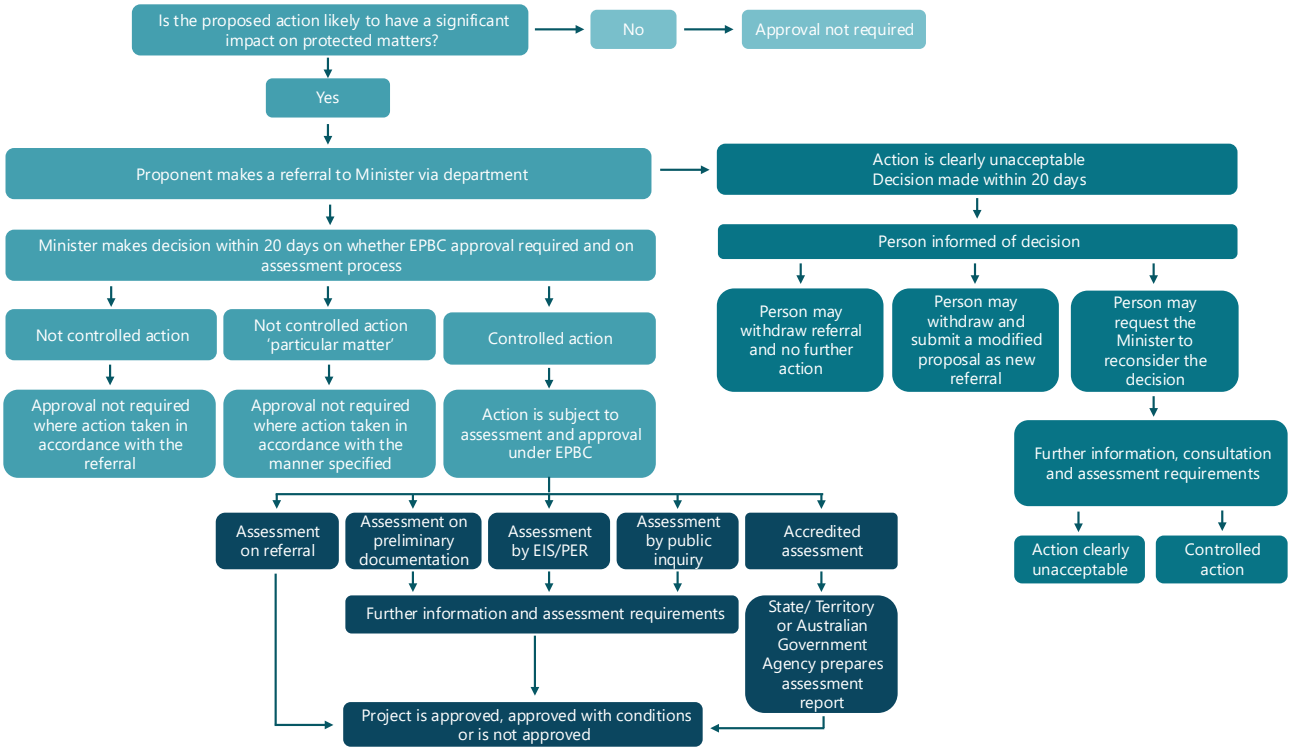
- a likely decrease in the productive capacity of agricultural land hosting regrowth of 15 or more years of age. 629,768 hectares, or 2.5 percent of Category X land with a PMAV in place, (representing 25,851 property lots) is potentially affected
- a likely decrease in the productivity capacity of agricultural land located in the Great Barrier Reef catchment. 4.3 million hectares of land (representing 143,834 lots) is potentially affected
- stakeholders suggest a self-assessment process, where an ecologist has been engaged to assist, could start from $30,000 in direct and indirect costs. These costs can be acute for small and family businesses whose activities may be newly captured by the reforms
- for a landholder who refers their proposed activity for assessment, referral fees start at $6,577 per activity. Dependent on whether the activity is considered a controlled action, an assessment fee is levied. For the most simple streamlined assessments, fees are proposed to start at $6,255. Higher fees are involved for more detailed assessment paths or where requests for more information are required. In these instances, landholders will also need to engage further advice or undertake further information gathering activities, with stakeholders suggesting total referral costs can start from $80,000
- declines in productivity and economic production are anticipated due to increased regulatory obligations, deferred, cancelled or brought forward land management activities, delay costs for EPBC Act assessments, unintended environmental outcomes and protracted enforcement activities
  - for instance, stakeholders are concerned assessment and approval timeframes could cause proponents to miss seasonal clearing or drought-related fodder harvesting opportunities, potentially making some projects unviable, as well as affecting access to finance and the competitiveness of farms where the ability to respond quickly to changes in consumer demand is critical
  - based on the results of a stylised economic analysis of the impact of additional land clearing assessments and referrals (for the agricultural sector), the reforms could cost landholders between $14 million and $41 million. However actual impacts — both in the short and long-term — remain uncertain and dependent on regulator and landholder behaviour
- a potential decline in environmental outcomes due to confusion over the new regulatory obligations or a landholder's capacity to pay the fees associated with a referral, leading to deferred or cancelled land management activities
  - such outcomes can arise from reduced flexibility to undertake routine land management to address thickening vegetation, weed and pest management, flood and fire mitigation, erosion control and sediment runoff, and the possibility of entrenching monocultures. Many of these consequences can also lead to poorer biodiversity or environmental outcomes
- the impacts of the reforms are unevenly distributed, with Queensland landholders disproportionately affected due to the inclusion of the Great Barrier Reef catchment. The narrowing of the continuing use exemption particularly impacts regional communities and small and family businesses, due to the requirement to undertake a self-assessment or referral process.

Stakeholders have identified a wide range of possible options to minimise the regulatory burden. Many are measures the Australian Government is best placed to consider or may be infeasible at present as they would require further legislative change to the EPBC Act. In the Queensland context, prospective opportunities to reduce regulatory costs include detailed exploration of whether specific state vegetation clearing codes can be utilised to streamline or remove assessment requirements.

Assessment pathways

Prior to the 2025 reforms, various assessment pathways could be taken when considering a proposed action (Figure 8). Depending on the likely impacts to MNES, a proposed action may not require approval, may be clearly unacceptable, or may require some form of assessment. Assessment may involve further information requirements (depending on the assessment pathway) that then lead to the project being approved, approved with conditions or not approved.

Figure 8 EPBC Act environmental assessment process, pre-2025 reforms



Source: DCCEEW n.d.; EPBC Act.

Assessment processes impose a range of costs. These can include:

- compliance costs — including preparing applications, fees and additional project costs from approval conditions
- delay costs — such as the cost of holding assets that are not being used productively
- investment risk — deriving from uncertainty over outcomes
- flow-on costs — such as lost activity from developments that do not proceed due to the costs of assessment
- costs to government — from administering assessments.

These costs derive from the legislative requirements and policy guidance that governs the assessment process. Accordingly, legislative reform can have a significant impact on the quantum of the costs. However, regulator behaviour, proponent capability and the availability of supporting information and expertise can also contribute to the overall cost. For example, regulator behaviour can contribute to the extent of compliance costs, delay and uncertainty involved in the assessment process. While legislation can mandate key matters such as assessment and approval timeframes, it is the *way* a regulator conducts themselves that can have a material impact on the overall assessment process. Stakeholders noted how regulator information requests (which 'stop the clock') can be a key contributor to delays in the decision-making process. They also noted the significant impact a pragmatic and capable regulator could have on a timely outcome.

Prior to the 2025 reforms, the Commission estimates the time taken to approve a project had increased materially. Between 2000–2009 it took around 700 days to reach approval, but between 2018–25 it took over 1,150 days. Infrastructure and residential projects had the longest approval times. According to the Committee for Economic Development of Australia (CEDA 2026) the time cost of a single referral review can exceed $250,000.

In addition to timeframes, project proponents incur material costs in preparing, engaging and consulting on its application. Assessment processes also present costs to government — as the regulator, project proponent (for example, as a delivery authority) or to facilitate economic development opportunities.

These costs can be exacerbated by overlaps or duplications with state environmental obligations. Uncertainty also has a material impact, especially, the predictability of regulatory outcomes.

Where EPBC Act assessments deter or prevent development it can impose costs to economic activity. Assessment processes also allow for the management of environmental impacts. However, if assessment processes are ineffective, they can also inadvertently detract from environmental outcomes. This can occur where assessment activities deter or delay an activity that is beneficial to the environment or reflect a narrow perspective of environmental impacts.

Streamlined assessment pathway

The Samuel Review noted regulator performance had varied significantly over time but did not recommend the introduction of a streamlined assessment pathway. Similarly, the original Reform Bill did not include any explicit restrictions for fossil fuel projects.

The 2025 reforms introduced a Streamlined assessment pathway that has shorter statutory timeframes, with a 20-day reduction to the preexisting Assessment on Referral Information pathway. This change is not expected to deliver a large benefit. Nationally, this referral information pathway has historically been accessed by 2 per cent of proponents and overall average assessment times for all pathways were over 1,150 days prior to the reforms. Even where projects benefit from streamlined assessments, proponents still devote considerable time and effort to the referral application, information requests and engagement processes. While new standards and requirements may clarify proponent's obligations they also risk increasing the time and effort devoted to the assessment process.

At the time of drafting the Interim Report, key elements of the amended assessment process are not complete and as such, their impacts are uncertain:

- reform to assessment pathways, including the introduction of the new Streamlined assessment pathway, is ongoing and scheduled to commence from 1 December 2026
- new rulings powers are yet to be utilised. In principle, rulings may provide proponents, environmental and community groups, and regulators with greater certainty. Whether greater certainty can be achieved is dependent on implementation and use in practice. However, it is limited to some extent by rulings being a guiding rather than binding position
- provisions to allow minor works and new reconsideration rules may increase certainty for projects and address some of the causes of delay but are dependent on ministerial discretion and may apply to few projects.

The 2025 reforms also introduced several specific restrictions or additional regulatory obligations for fossil fuel activities. These include:

- exclusion from the Streamlined assessment pathway
- denial of access to national interest exemptions and approvals
- the expansion of groundwater assessment requirements to include unconventional gas projects
- denial of access to bioregional planning instruments.

While many fossil fuel projects are typically of sufficient scale and complexity that the streamlined process would have been unavailable even without the exclusion, smaller, lower impact fossil fuel projects will now face higher assessment costs than other projects that have comparable impacts on protected matters.

The rationale for industry-specific assessment restrictions when addressing impacts to MNES is not efficient or consistent with regulatory best practice. Requiring fossil fuel projects to pass through more costly assessment processes may inform broader greenhouse gas emission considerations, lead to delays in project development or less fossil fuel actions occurring. However, the restrictions are inconsistent with the stated objectives for the regulatory reforms. Further, they represent an inefficient means of reducing greenhouse gas emissions, given the existing legislative, regulatory, policy and market mechanisms already in place to achieve such an objective.

A decision that a project is 'not a controlled action' will now automatically lapse after five years if the action has not substantially commenced. This change aims to ensure assessments and approvals reflect current environmental conditions. Whilst the intent of this change aligned with the Act's objectives, it has the potential to impose additional costs on proponents. Due to the complexity of, and need for, multiple approvals from separate regulatory bodies, funding decisions, procurement processes and resourcing requirements, a project may not progress sufficiently over five years.

The Commission estimates around 6 per cent of projects can take longer than 5 years to begin.[4] Lapsing may also be an issue that disproportionately affects Queensland, as 40 per cent of projects with a start time over five years were in Queensland. Projects were more concentrated among residential, water and fossil fuel projects.

Bilateral agreements

Where an activity is subject to both state environmental requirements and the EPBC Act, bilateral agreements have the benefit of minimising unnecessary regulatory imposts of achieving environmental outcomes sought by both regulatory regimes. This can be done by:

- avoiding administration and process costs for both proponents and regulators
- supporting timely and efficient processes, such as by allowing state and EPBC Act requirements to be assessed concurrently (as opposed to sequentially)
- promoting a collaborative and consistent approach to environmental protection, including in relation to regulator practice
- improving communications between parties, which creates greater certainty for proponents
- providing certainty for proponents and regulators about the demarcation of state and Australian government assessment, approval, enforcement and monitoring responsibilities.

Queensland's most recent bilateral assessment agreement provides for the Queensland Government to conduct environmental assessments used by the Australian Government to make approval decisions under the EPBC Act. The substantial scope of Queensland's most recent agreement covers resource proposals and 'coordinated projects' declared by Queensland's Coordinator-General. Compared to other states, Queensland's current assessment agreement is narrow in scope, and relatively few proposals (around a fifth since 2015–16) are assessed using accredited processes.

[4] Based on all 'controlled action' projects since 2000. Data is not available for 'not a controlled action' projects.

The EPBC Act reforms will require the existing bilateral agreement to be updated. Under the revised arrangements, assessments accredited under the agreement and undertaken by Queensland Government agencies will need to comply with the new National Environmental Standards (Standards). Importantly, the changes to the EPBC Act will apply to Queensland activities that significantly impact protected matters regardless of whether a new bilateral agreement is signed.

Even if an updated bilateral agreement (that is, to comply with the 2025 reforms and Standards) is unchanged in substance, the reforms are likely to have an immediate resourcing impact on the Queensland Government due to the administrative costs involved in developing new agreements and processes, and ongoing costs in applying the additional EPBC Act requirements.

Stakeholders generally identified bilateral assessment and approval agreements as being capable of reducing compliance or administrative costs while achieving the same environmental outcomes. However, bilateral agreements can also shift regulatory costs to the states.

As noted in the Samuel Review, additional efficiency benefits are attainable through an approval bilateral. However, no approval bilateral agreements currently exist. Stakeholders had mixed views on the merits of an approval bilateral. Some noted the potential efficiencies while others suggested potential increased environmental risk resulting from having states responsible for addressing Australian Government environmental protections.

The expansion of any bilateral process, to cover a larger range of assessment processes or to incorporate an approval mechanism, is likely to create fiscal costs for the Queensland Government. Due to the broad range of matters related to the 2025 reforms that are yet to be completed and as costs are dependent on the number of projects, establishment and recurrent costs cannot be fully estimated. However, were Queensland to conduct accredited assessments at the average rate of other states there would be additional fiscal cost to Queensland associated with those assessment processes across the Department of Environment, Tourism, Science and Innovation, the Office of the Coordinator-General and any other agency to which the expanded bilateral applied.

Bilateral agreements are the primary mechanisms by which the Queensland Government can engage with the EPBC Act. As such, these agreements represent an opportunity to minimise regulatory burden on stakeholders. At a minimum, the Queensland Government should 'renew' the most recent agreement, such that bilaterally accredited processes under the *Environmental Protection Act 1994* (Qld) (EP Act) and *State Development and Public Works Organisation Act 1971* (Qld) (SDPWO Act) remain available to relevant classes of action. In some instances, the case could be made to expand the coverage of accredited assessment processes to a broad range of actions, including potentially other assessments under the EP Act and the *Planning Act 2016*. However, in doing so the EPBC Act requirements should be treated as an 'overlay' to state level environmental protections, and that no additional obligations or processes are applied to activities that would not otherwise be affected by the EPBC Act.

The fiscal costs of such arrangements should also be considered to ensure they deliver an overall net economic benefit through improved regulatory efficiency. For example, the benefits of agreements may be limited where the Australian Government provides inadequate additional funding, or where it routinely intervenes or contradicts accredited decisions, thereby reducing the efficiency gains available.

Offsets

Environmental offsets are a critical component of environmental regulation — from 2011 to 2021, almost 80 per cent of Queensland projects approved under the EPBC Act required an offset. While offsets are viewed as a last resort option to address development impacts, they are materially important to the delivery of desired environmental outcomes, timely development (for example, building of homes) and overall economic activity.

Stakeholders involved in the delivery of projects generally acknowledged the policy basis for offsets but noted offset requirements can be complex and costly, do not always deliver their environmental objectives, or are often an expensive mechanism to deliver the desired objectives. The ability to purchase offsets was noted as an important option given inherent complexities in meeting obligations.

Evidence suggests the cost of state and EPBC Act offsets can be material. The Commission's analysis shows that:

- prior to the 2025 reforms, requirements can add up to $24,000 per dwelling in greenfield residential developments in Queensland, with average costs of approximately $4,300 per dwelling
- for major infrastructure, mining and energy projects, data from New South Wales[5] indicates offset costs can be substantial, typically ranging from around 2 per cent to 43 per cent of total project capital costs in reviewed case studies.

The Samuel Review found the previous offsets framework was not delivering effective environmental outcomes, identifying poor compliance, inadequate monitoring, weak governance and the use of offsets as a default approval mechanism rather than a last resort.

The 2025 EPBC Act reforms establish:

- a legislated offsets framework, replacing a largely policy-based approach and introducing legally enforceable National Environmental Standards
- stricter conditions for offsetting, including increased application of avoidance and mitigation measures, a requirement for offsets to achieve net gain and narrow like-for-like requirements
- new offset delivery mechanisms including advanced offsets, market instruments and a restoration contributions scheme.

This reform architecture is broadly consistent with international evidence on effective offset design.

However, offset and restoration contribution tools are yet to be developed. Key guidance materials, methodologies, calculators and implementation arrangements are, at the time of drafting, still under development. As a result, the effectiveness of the reforms and their impact on economic efficiency are subject to change and potential benefits are likely to only accrue over the long term, depending on successful implementation.

In the meantime, other elements of the reforms may raise the cost of offsetting in the short term.

A key change in the 2025 reforms was the requirement for offsets to achieve net gain. Stakeholders have widely raised concerns over the lack of transparency that has been provided on how this obligation will be determined and applied in practice.

While the restoration contribution scheme is to be established by 1 December 2026, it seems unlikely that proponents will widely use this option, at least initially, due to the cost. Case study material suggests restoration contribution charges could add around $40,000 per dwelling for some greenfield housing and increase offset costs by several hundred per cent for some non-residential projects.

Other key elements of the reform, such as settings to support market operation and conservation planning documents are yet to be developed, with no detailed published implementation timetable in place. Collectively these yet to be defined elements create uncertainty and transitional risks for proponents and offset providers.

Landscape-scale planning

The EPBC Act includes two main provisions for landscape-scale planning pathways to facilitate the consideration of planning, assessment and approvals over a designated area. These provisions include bioregional planning and strategic assessments. These planning tools are intended to support streamlined approvals processes while also seeking to improve environmental outcomes though better addressing cumulative impacts.

Prior to the 2025 reforms, these provisions had a limited history of use. In Queensland, only two strategic assessments have been attempted, with one completed (The Great Barrier Reef strategic assessment 2014).

[5] The Commission has not been able to access equivalent data for Queensland. Data for New South Wales is likely to be broadly representative of offset costs.

The Samuel Review noted the absence of landscape planning tools hindered effective assessment of cumulative development impacts. While an individual project may have a minimal or acceptable impact on the environment, the combined impact of multiple projects can exceed an acceptable impact threshold and result in significant, long-term damage.

The Australian Government has historically encouraged the uptake of bioregional planning in terrestrial areas, most recently through several bioregional planning pilots. In Queensland, these pilot projects include the development of three bioregional guidance plans (Queensland Government 2026b), including the:

- Bigalow Belt North bioregional guidance plan (based in the Collinsville area in North Queensland), focusing on wind farm development
- Gulf Plains bioregional guidance plan (based in the Julia Creek and Richmond area in North West Queensland), focusing on critical minerals mining
- South Eastern Queensland and Brigalow Belt South bioregional guidance plan (based in South East Queensland), focusing on urban development and potential future growth areas.[6]

The 2025 reforms introduce new provisions to bioregional planning processes, the use of bioregional guidance and bioregional plans. Changes were also made to the pre-existing strategic assessment processes. These changes are aimed at making the assessments more flexible and efficient. In addition, further changes to the strategic assessment requirements will be introduced such that the Standards, net gain requirement and unacceptable impacts criteria will apply to strategic assessments. This change is expected to be enforced from late 2026.

The impacts of reforms to landscape-scale planning are entirely dependent on both the development of these tools and the use of these tools by stakeholders. The reforms set up the possibility of increased uptake by expanding the number of landscape-scale planning tools available, enhancing the attractiveness of existing tools, and, as part of the wider reform package, providing funding support for pilot projects to test landscape-scale planning approaches. In the absence of uptake, which is not mandatory, there will be no incremental impact.

The onus of development and uptake of these tools lies with the state government and industry, with some support provided by the Australian Government through DCCEEW.

Stakeholders are generally supportive of regulatory bioregional plans as they may deliver improved environmental outcomes, improved coordination of restoration and offsetting activities, potential reductions in regulatory and project approval costs and increased investor certainty. However, several of these positive attributes are dependent on the effective implementation of the regulatory bioregional plan and limited ministerial or regulator intervention.

The main costs associated with the reforms are expected to be the costs (primarily time and resources) involved in developing bioregional plans or strategic assessments. There is also the potential for bioregional plans to impact the amount of land available for development.

[6] The Queensland Government has stated findings of this plan 'will be considered as one of several inputs into the SEQ Regional Plan review rather than a standalone plan at this time' (Queensland Government 2026b).

Landscape-scale planning tools and several key supporting regulatory instruments are yet to be developed. As a result, it is too early to determine the effectiveness of the reforms and their impact. They have the potential to deliver improved environmental and economic benefits to the community. However, there are material establishment costs and information challenges that need to be considered. The costs of landscape-scale planning are likely to be justified where they deliver benefits through:

- the application to regions that have both considerable development activity and frequent interactions with, or development pressure on MNES
- minimising conflict between Australian Government requirements and state and local planning tools, particularly where development under state planning instruments is likely to affect MNES
- enabling regionally significant state environmental approval processes to account for Australian Government approval requirements
- reducing the cost of other elements of the EPBC Act and its reforms, such as where there is expected to be high demand for offsets.

Based on these criteria the use of landscape-scale planning tools could be further explored to address development pressure, assessment costs, offset requirements and conflicts with planning instruments in growth areas of South East Queensland. However, given potential costs, this should be explored in a measured way.

Findings, recommendations & information requests

INTERIM FINDING 1 REFERRALS UNDER THE EPBC ACT

Historically Queensland has one of the highest rates of EPBC Act referrals in Australia. Queensland has a higher proportion of energy, transport and agriculture referrals compared with the rest of Australia.

Compared to the national average, referrals relating to Queensland projects are more likely to result in a controlled action.

Land management

INTERIM FINDING 2 THE EFFECTIVENESS OF AMENDMENTS TO THE CONTINUING USE EXEMPTIONS IS UNCERTAIN

The effectiveness of expanded regulatory coverage in improving environmental outcomes, from the narrowing of the continuing use exemption, remains uncertain due to limited data and the risks of unintended consequences such as erosion and invasive regrowth.

INTERIM FINDING 3 IMPACTS OF AMENDMENT TO CONTINUING USE EXEMPTION

The narrowing of the continuing use exemption under the EPBC Act has increased compliance costs, regulatory complexity, and uncertainty for landholders, particularly in Queensland, while disproportionately impacting small businesses and regional communities.

These changes risk undermining agricultural productivity, impeding land management activities, creating conflicts between state and Australian government environmental and land use policies and generating poorer outcomes for the community.

INFORMATION REQUEST 1 COST OF UNDERTAKING LAND MANAGEMENT AND CLEARING SELF-ASSESSMENTS AND REFERRALS

The Commission is seeking further information from landholders and project proponents on the actual costs of preparing a self-assessment or referral for land clearing or management activities under the EPBC Act since the commencement of the 2025 reforms.

This could include compliance costs (such as the time taken to undertake an assessment and the cost of engaging any ecological or legal advice) and any other economic costs incurred (such as delays in undertaking an activity and any associated financial loss).

INTERIM FINDING 4 AMENDMENTS TO THE CONTINUING USE EXEMPTION INTRODUCE MATERIAL INEFFICIENCIES

The narrowing of the continuing use exemption under the EPBC Act introduces material inefficiencies by duplicating some protections under Queensland's VMA, imposing disproportionate compliance costs on landholders, and creating regulatory uncertainty that may deter necessary or low-impact clearing activities.

The reforms lack alignment with state frameworks and risk delivering uncertain environmental benefits relative to their economic and administrative burdens.

INFORMATION REQUEST 2 FEASIBLE PATHWAYS TO MINIMISE REGULATORY BURDEN ON LANDHOLDERS

The Commission notes stakeholders have sought the provision of pathways or exemptions from EPBC Act assessment and referral processes for more low-impact, routine land management activities such as management of weeds and pests, asset management and fire mitigation.

While improved guidance and the potential utilisation of Queensland vegetation clearing codes (see Interim Recommendation 1) may provide enhanced clarity, the Commission is seeking further information from stakeholders on feasible pathways (for example, rulings) to minimise the regulatory burden on landholders that do not conflict with EPBC Act legislative requirements.

INTERIM RECOMMENDATION 1 EXPLORE OPPORTUNITIES TO UTILISE QUEENSLAND VEGETATION CODES

The Queensland Government should work with the Australian Government to explore whether State vegetation regulatory codes and environmental processes can be utilised to streamline assessment for certain land management activities under the EPBC Act.

A review should be undertaken on whether the ability of landholders to meet other Queensland legislative requirements, in areas such as biosecurity obligations and reef protection standards, are affected by the reforms to the EPBC Act.

Standards

INFORMATION REQUEST 3 EXPECTED IMPACTS OF THE STANDARDS

The Commission is seeking further insights from stakeholders on the expected impacts of the finalised National Environmental Standards on both environmental outcomes and on compliance costs.

The Commission would also welcome any insights on the likely impacts of potential additional Standards yet to be prepared, including the under-development Standard for First Nations engagement.

INTERIM FINDING 5 THE EFFECTIVENESS OF THE STANDARDS IS YET TO BE TESTED

The National Environment Standards (Standards) have the potential to improve outcomes by outlining the EPBC Act's intended outcomes, which should reduce discretion in decision-making under the Act, and in doing so improve environmental outcomes and certainty for proponents.

However, there is still significant uncertainty as to how the Standards will be applied and some elements may have net costs on the community. The legislative requirements that aim to provide certainty by requiring 'no regression' in Standards, may equally prevent outcome-improving changes.

INFORMATION REQUEST 4 DO THE COMMUNITY ENGAGEMENT AND DATA AND INFORMATION STANDARDS IMPOSE NEW REQUIREMENTS OR FORMALISE THE REGULATOR'S EXISTING EXPECTATIONS?

The Commission is seeking information from stakeholders on whether the Community Engagement and Data and Information Standards impose new requirements relating to:

- how proponents are to engage the community in relation to projects they are seeking approval for
- the types and formats of data and information proponents provide to support their approval requests.

Or, do these Standards formalise requirements the regulator expected from proponents prior to the reforms?

INTERIM FINDING 6 UNACCEPTABLE IMPACTS PROVIDE AN ADDITIONAL ENVIRONMENTAL SAFEGUARD BUT RISK OTHER OUTCOMES

The 'unacceptable impacts' requirement provides an additional environmental safeguard but also has the potential to impede activities that seek to manage environmental outcomes while delivering other objectives valued by the community. Impacts will depend on further development of definitions and guidance, along with regulator discretion.

Compliance and enforcement

INTERIM FINDING 7 REGULATOR PRACTICE WILL BE A DETERMINANT OF THE IMPACTS OF THE REFORM

Heavy-handed enforcement, particularly for those who are willing to do the right thing but may not fully understand EPBC Act requirements, may deter stakeholders from undertaking activities with possible EPBC Act interactions. A risk-based, and educational approach is more likely to improve compliance behaviours among stakeholders over the long-run and improve environmental outcomes as stakeholders better understand their obligations under the EPBC Act.

Timely resolution of issues is essential to minimise negative economic, environmental and community impacts.

A risk-based approach will also help to direct the National EPA's resources towards enforcing more serious contraventions of the EPBC Act.

INTERIM FINDING 8 UNCERTAINTY HAS HAD ADVERSE IMPACTS

The introduction of the National EPA, coupled with increased penalties and expanded audit powers, has led to uncertainty and fear of compliance actions for stakeholders. The sequencing of the introduction of the reforms without guidance materials has also contributed to this uncertainty. In response, stakeholders, particularly landholders, are delaying activities that could have a possible impact on MNES, even if these activities would likely yield positive environmental or productivity outcomes.

INTERIM FINDING 9 SOME ENTITIES ARE CONCERNED THEY CANNOT ABSORB THE BURDEN OF EPBC ACT COMPLIANCE

There is particular concern from small businesses and local government of penalties under the EPBC Act, even for genuine mistakes.

When the cost of professional services and advice is prohibitive or not proportionate to the activity, this may result in stakeholders avoiding any actions that may trigger EPBC Act requirements altogether, rather than attempting an assessment. This can include activities that have a positive environmental impact.

INTERIM RECOMMENDATION 2 AWARENESS OF AUSTRALIAN GOVERNMENT COMPLIANCE AND AUDIT ACTIVITY

Where it minimises regulatory burdens and maintains effective compliance requirements, the Queensland Government should have regard to the audits, compliance and enforcement actions being conducted by the Australian Government. There may be opportunities to reduce the regulatory burden, in areas such as information collection and compliance activities.

Assessment pathways

INTERIM FINDING 10 IMPACTS OF REFORMED ASSESSMENT PATHWAYS REMAIN UNCERTAIN

The Commission estimates approval decisions in Queensland were taking over 1,150 days on average ahead of the introduction of a streamlined assessment pathway and that timeframe has increased over time.

Impacts of reformed assessment pathways remain uncertain, as they are yet to be implemented and remain dependent on regulator discretion in undertaking assessments. However, early evidence suggests the impact of the reform will be modest, with the 20-day reduction in the approval timeframe only applying to the most straightforward Streamlined assessment pathway. Historically, less than 2 per cent of Queensland projects have accessed the most straightforward pathway.

INTERIM FINDING 11 ADDITIONAL FOSSIL FUEL RESTRICTIONS ARE INEFFICIENT

The new restrictions on fossil fuel actions impose additional costs without a demonstrable additional direct benefit to protected matters.

INTERIM FINDING 12 HAVING APPROVALS LAPSE AFTER FIVE YEARS COMES AT HIGH COST TO AFFECTED PROJECTS

Lapsing provisions could allow environmental impacts to be more effectively managed where environmental conditions significantly change over time. However, it is not clear how common it is for environmental conditions to significantly change over a five-year period.

The new obligations have the potential to introduce considerable compliance costs, delay and uncertainty for any project that requires re-assessment.

Around 6 per cent of relevant projects may be impacted by the new lapsing provisions. Queensland-based residential, water and fossil fuel projects may be disproportionately affected as these types of projects require multiple approvals from separate regulatory regimes, which can be a contributing factor to projects not progressing within the five year period.

Commonwealth–State coordination

Interim Finding 13 Queensland's assessment agreement is relatively narrow

Queensland's bilateral assessment agreement is narrower in scope than those in other states, and relatively fewer assessments are conducted through accredited processes.

Interim Finding 14 Bilateral agreements can provide net benefits to Queensland

Assessment agreements are highly valued by a wide range of stakeholders. They represent an important mechanism to minimise regulatory costs without compromising environmental objectives under Queensland laws and the EPBC Act.

Approval agreements represent an opportunity to further reduce regulatory process costs. However, they are untested and some stakeholders believe these agreements may increase risks of adverse environmental outcomes.

Bilateral agreements between the Australian and Queensland Governments create risks and costs, but can deliver greater offsetting benefits to the Queensland community if implemented appropriately:

- The Australian Government is responsible for the EPBC Act and, in principle, should be responsible for the cost of its administration.
- Accredited arrangements for classes of action, where Queensland and Australian regulators reach concordant conclusions in relation to EPBC Act matters can reduce regulatory and administration costs without introducing uncertainty.

Interim recommendation 3 Renew the previous assessment agreement

In negotiating a new bilateral agreement, the Queensland Government should develop an initial 'no regrets' approach that:

- preserves existing assessment pathways in the current bilateral agreement under the *Environmental Protection Act 1994* (Qld) and the *State Development and Public Works Organisation Act 1971* (Qld)
- retains an 'overlay' approach, in which EPBC Act considerations and assessments are only applied to activities regulated by the EPBC Act and broader changes are not made to Queensland Government frameworks.

Interim recommendation 4 Develop options to expand the scope of Queensland's assessment agreement

The Queensland Government should consider options to expand the coverage of a future bilateral assessment agreement. This could include an audit of state-level assessment processes that may be amenable to EPBC Act accreditation.

In the first instance, the Government should consider extending the coverage of the bilateral agreement to processes related to the granting and amendment of site specific and variation environmental authorities under the *Environmental Protection Act 1994* (Qld).

Information Request 5 The focus of future assessment agreements

The Commission is seeking additional information from stakeholders on:

- Queensland Government assessment processes for which accreditation would deliver material efficiency benefits to proponents
- views on the benefits, costs, risks, feasibility, or other relevant factors associated with accrediting those assessment processes
- the framework to be applied in determining which processes the Queensland Government should seek to accredit
- what framework could be used to prioritise accreditation proposals.

Interim recommendation 5 Develop an approval agreement supported by performance criteria

As an initial step, the Queensland Government should engage with the Australian Government to develop an approval bilateral that applies assessment processes accredited under the most recent bilateral agreement.

Noting approval agreements are untested, the Queensland Government should consider a risk-averse approach by:

- measuring the benefits realised through reduced regulatory costs to proponents and potential administrative cost reductions
- weighing those benefits against costs to the Queensland community including any increased fiscal burden
- only maintaining or expanding the agreement if clear net benefits from the above are identified.

The Queensland Government should also ensure that any agreement only applies to activities already regulated by the EPBC Act.

Interim recommendation 6 Continue general intergovernmental coordination

Alongside and in addition to any bilateral agreements, the Queensland Government should continue to work with the Australian Government to coordinate their approaches to data and monitoring to minimise overall administration and compliance costs.

Information Request 6 General intergovernmental coordination

The Commission is seeking further information on specific opportunities that exist to enhance cooperation and coordination between the Queensland and Australian governments beyond a bilateral agreement.

Offsets and restoration contributions

Interim finding 15 Offsets can provide benefits but are expensive and difficult to get right

Project proponents often require offsets to meet EPBC Act obligations. While the evidence suggests they can be an effective mechanism for delivering environmental outcomes, they have not always delivered cost-effective environmental protection due to issues with design, implementation and governance.

Offsets are typically expensive and time consuming to set up. Commission estimates show that pre-reform:

- offsetting requirements could add up to $24,000 to the costs of a dwelling in greenfield residential developments, with average costs around $4,300 per dwelling
- for major infrastructure, mining and energy projects, offset costs can be substantial, typically ranging from around 2 per cent to 43 per cent of total project capital costs
- for projects with smaller environmental impacts, direct offset costs may be modest, however, delays associated with offset approvals have often imposed significant costs.

Despite high costs, state and national offset schemes have often failed to deliver promised environmental outcomes.

Interim finding 16 Assessment of reforms to offsetting arrangements

Effective implementation of offsets reforms will depend on standardised methodologies, clear guidance, and robust evidence, which has not yet been developed. Restoration contributions can improve the strategic delivery of offsets, but their effectiveness depends on pricing, governance, and accountability arrangements.

There is also misalignment between Australian and Queensland offset requirements that can lead to duplicate obligations, increased compliance costs and barriers to using existing state-developed offsets for national environmental matters.

Interim finding 17 Reforms to offsetting are likely to be costly with few immediate benefits

While the new offsets regime is due to commence on 1 December 2026, much of the architecture to support the new framework has not been developed or published. As a result, there are likely to be significant transitional costs, including those arising from investor uncertainty, until these issues are resolved.

In the absence of complementary instruments such as conservation plans (including comprehensive bioregional plans), market instruments and effective regulations governing advanced offsetting, the reforms are unlikely to provide benefits to project proponents. Further, higher standards, particularly those relating to net gain, may significantly increase offsetting costs in Queensland.

While the option of using contribution charges could reduce delays for proponents, initial pricing advice from DCCEEW suggests contribution fees are likely to be significantly higher than current offsetting costs and only be available for a small number of matters. This is likely to limit uptake and prevent the contributions holder from achieving sufficient scale to enable landscape-scale approaches.

INTERIM RECOMMENDATION 7 BETTER TRANSITIONAL ARRANGEMENTS FOR NEW OFFSET REQUIREMENTS

The Australian Government is progressively developing arrangements for the new offset requirements. Several options could be undertaken to improve certainty for offset providers and project proponents during the transition:

- Prioritise the release of guidance on the application of the mitigation hierarchy to improve certainty regarding residual impacts and offset obligations.
- Adopt interim net gain requirements at very low levels and develop evidence-based methodologies and protected matter-specific guidance through consultation with stakeholders.
- Establish default baseline assumptions and assessment parameters to support consistent decision-making while more detailed technical guidance is prepared.
- Consult with state governments, industry and environmental stakeholders on the sequencing and commencement of reform elements that rely on undeveloped frameworks, policy or guidance material.

Pausing new offset requirements until these minimum requirements have been addressed could be considered.

INTERIM RECOMMENDATION 8 OPPORTUNITIES TO REFORM QUEENSLAND'S OFFSET SCHEME

The Queensland Government should consider options to enable the recognition of state-scheme offsets for matters of national environmental significance, with the aim of reducing duplication, improving regulatory certainty and supporting a more efficient environmental offsets framework.

In reforming the Queensland scheme, the Queensland Government should:

- ensure reforms do not impede future accreditation or recognition that would allow proponents to make a single financial contribution for matters of state and national significance
- work with the Australian Government to facilitate recognition of Queensland advanced offsets under the EPBC Act framework.

INTERIM RECOMMENDATION 9 OFFSET CONSIDERATIONS IN BIOREGIONAL PLANNING

The Queensland Government should ensure that any bioregional plans it develops include appropriate consideration for whether they support more effective and efficient use of offsets. This could include the provision of evidence that allows proponents to use more flexible offsetting approaches that enable effective threat management for threatened species and ecosystems, departures from strict geographical requirements, improved landscape-scale management and indirect offsetting where this is appropriate.

Where practical, accredited bioregional plans should appropriately consider future offset needs and provide sufficient certainty to encourage advanced offsetting.

Landscape-scale pathways

INTERIM FINDING 18 THE POTENTIAL BENEFITS OF BIOREGIONAL PLANS ARE CONTINGENT ON EFFECTIVE TARGETING AND DESIGN IN HOW THEY ARE IMPLEMENTED

Bioregional plans have the potential to deliver a range of potential cost savings for users, however the realisation of such benefits is contingent on addressing a range of design challenges.

To date, there are limited examples nationally of landscape-scale plans being effectively implemented.

INTERIM RECOMMENDATION 10 APPLY A LANDSCAPE-SCALE PLANNING DECISION-MAKING FRAMEWORK

The Queensland Government should identify and assess options for landscape-scale plans based on the nature of development, the region in consideration, the demand for future development, the cost of developing the plan and the possible benefits (such as the extent of adoption by stakeholders).

INTERIM RECOMMENDATION 11 STAGED PROGRESSION TOWARDS CONSERVATION AND DEVELOPMENT ZONES

The Queensland Government could consider adopting a progressive, risk-based approach to designating development and conservation zones in bioregional plans. This could involve starting with smaller designated development and conservation zones for the lowest (development zones) and highest (conservation zones) risk areas.

As part of the staged progression, the Queensland Government should monitor and evaluate the impacts of bioregional planning documents, including how they enable and prevent development and contribute to secondary impacts, such as a possible impact on the efficiency of land use. As the impacts of these zonings are evaluated over time and provided undue consequences from these classifications are not identified, the threshold for zoning conservation and development zones could be expanded.

INFORMATION REQUEST 7 APPLICATIONS OF LANDSCAPE-SCALE PLANNING

The Commission is seeking further insights from stakeholders on the potential of using landscape-scale planning tools to more effectively and efficiently address EPBC Act requirements. Specifically, the Commission is seeking insight on:

- the EPBC Act requirements that would yield the greatest benefit from the support of a landscape-scale planning tool
- the action or class of actions that would yield the greatest benefit from the support of a landscape-scale plan
- the most suitable landscape-scale planning tool to support specific reforms and/or actions
- the existing tools, capabilities, or policies the Queensland Government could leverage to support the development and ongoing delivery of a landscape-scale plan.

INTERIM RECOMMENDATION 12 CAPTURING MATTERS OF STATE ENVIRONMENTAL SIGNIFICANCE (MSES) IN BIOREGIONAL GUIDANCE PLANS

The Queensland Government should establish a minimum threshold of information on MSES, and possibly local matters, to include in bioregional guidance plans, such that the plans reduce future proponents' needs to undertake cumbersome data collection and to undertake other duplicative processes.

INFORMATION REQUEST 8 STATE ACCREDITATION OF REGULATORY BIOREGIONAL PLANS

The Commission is seeking further information to understand the feasibility of establishing a pathway to state-level recognition of bioregional planning tools. Specifically, the Commission is seeking information on:

- existing legal mechanisms that could enable the Queensland Government to endorse bioregional plans
- the extent of information that would need to be captured on matters of state environmental significance to enable state endorsement of regulatory bioregional plans.

Other reforms

INTERIM FINDING 19 GREENHOUSE GAS EMISSIONS REPORTING

Addressing greenhouse gas (GHG) emissions is best addressed through specific policy mechanisms, rather than through the EPBC Act. To the extent the GHG reporting requirements in the EPBC Act align with requirements under the Safeguard Mechanism, these impacts may be modest. However, there is unlikely to be an offsetting benefit.

INFORMATION REQUEST 9 GREENHOUSE GAS EMISSIONS REPORTING

The Commission is seeking further information on:

- the extent that proponents under the EPBC Act already prepare estimates of GHG emissions for prospective activities
- any additional costs, due to the 2025 reforms, associated with preparing estimates and information on potential GHG emissions and associated mitigation efforts.

INFORMATION REQUEST 10 ENVIRONMENT INFORMATION AUSTRALIA

The Commission is seeking further information on:

- the impact on regulatory burden from the reforms to Environment Information Australia
- any risks or concern with the sensitivity of data provided through this process.

INFORMATION REQUEST 11 WILDLIFE TRADE, OFFSHORE PROJECTS AND STATUTORY COMMITTEES

The Commission is seeking further information on amendments to the EPBC Act related to wildlife trade operations, offshore projects and statutory committees, including any potential benefits, costs or unintended consequences to the Queensland community from the reforms.


QPC