



13 July 2026

Queensland Productivity Commission
PO Box 12078
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Brisbane QLD 4003
Via [Website](#)

Dear Queensland Productivity Commission

Impact of 2025 EPBC Act reforms on Queensland

Thank you for the opportunity to provide a submission on the impact of the Australian Government's 2025 environment protection reforms on Queensland, following the Queensland Productivity Commission's call for submissions announced on 29 May 2026.

Queensland Cane Growers Organisation Ltd (CANEGROWERS) is a not-for-profit public company that has promoted and protected the interests of sugarcane growers since 1925.

CANEGROWERS is the peak body for the Queensland sugarcane industry. Through its state, national and international affiliations, and 13 district offices across Queensland, CANEGROWERS provides services and advocacy in local communities and at the highest levels of industry and government decision-making.

Background

CANEGROWERS acknowledges the objectives of the Australian Government's 2025 reforms to the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) to strengthen environmental protection and improve Commonwealth environmental decision-making. For Queensland cane growers, the key issue is how these reforms are implemented alongside Queensland's existing regulatory framework. Implementation should avoid duplication, recognise existing Queensland systems where equivalent environmental outcomes are achieved, and provide clear, practical guidance for landholders.

Sugarcane production already operates within a comprehensive and rigorous system of Queensland legislation governing vegetation management, biosecurity, water quality and environmental stewardship. The practical impacts of the reforms are therefore expected to arise mainly where new or revised Commonwealth assessment requirements intersect with these existing state processes.

Several key implementation elements, including National Environmental Standards and bilateral agreements, remain under development. Changes to continuing use exemptions have already created uncertainty about how Commonwealth assessment requirements may apply to some land management activities, highlighting the need for clear, practical implementation guidance.

This submission focuses on the incremental impacts of the reforms on Queensland cane growers and identifies opportunities to improve implementation.

Key impacts for Queensland cane growers

Regulatory interaction

For Queensland cane growers, the most significant impact of the 2025 reforms is the need to understand how Commonwealth requirements will apply alongside existing Queensland vegetation management provisions.

Where both Commonwealth and Queensland assessment processes apply, duplicated pathways will increase the time and cost involved in determining regulatory obligations and create opportunities for inconsistent interpretation between jurisdictions.

The reforms also place greater reliance on landholders to self-assess whether an activity is likely to have a significant impact on a Matter of National Environmental Significance. Without clear guidance on this threshold, growers may need to seek specialist ecological or legal advice, increasing compliance costs and delaying operational decisions. This would be an entirely unacceptable outcome.

Areas requiring greater certainty

Several practical areas require clearer guidance where Commonwealth, state and local government requirements interact.

For example, while the EPBC Act provides for the management of many weeds, the interaction between Commonwealth requirements, Queensland vegetation management rules and local government biosecurity plans is not always clear. This is particularly relevant for weed management near waterways in Great Barrier Reef catchments and for some locally declared weeds. Clearer guidance would help growers meet their obligations across all levels of government while supporting timely and effective weed management.

Similar clarity is needed for remediation activities, including streambank stabilisation and gully repair, where works have historically proceeded under existing Queensland regulatory arrangements. Growers and delivery partners need to understand when, if at all, Commonwealth assessment is required so environmental improvement works can continue without unnecessary delay.

Ongoing implementation

The practical effects of the reforms will depend heavily on how key implementation elements are finalised, particularly National Environmental Standards, supporting regulations and future bilateral agreements between the Queensland and Australian Governments. With all these elements unclear or unresolved the assessment of actual impact on the industry is exceedingly difficult to assess.

These settings will be critical to ensuring the reforms achieve their environmental objectives while minimising unnecessary duplication, compliance costs and delays for landholders.

Opportunities to improve implementation

CANEGROWERS considers there are three practical opportunities to improve implementation of the 2025 reforms while maintaining strong environmental outcomes.

Improve alignment between Commonwealth and Queensland regulatory systems

Queensland already has well-established legislative and regulatory frameworks for vegetation management, water quality and land management. Future bilateral agreements should better integrate Commonwealth and Queensland assessment processes where Queensland systems already achieve equivalent environmental outcomes.

Recognising existing Queensland approvals, mapping systems and assessment processes would reduce duplication and compliance costs for landholders while maintaining environmental standards. Where an activity is already subject to robust Queensland assessment, a duplicate Commonwealth process should not be required unless there is a clear additional environmental benefit.

Improve environmental mapping

Reliable spatial information is fundamental to informed environmental decision-making. The Protected Matters Search Tool (PMST) is an important screening tool, but it can produce inaccurate or misleading results. For example, CANEGROWERS is aware of a PMST report that identified potential habitat for an endangered shark species on a sugarcane property. Examples like this create unnecessary uncertainty for landholders and reduce confidence in Commonwealth assessment processes.

Queensland and Commonwealth mapping systems serve different purposes and can identify different environmental values or regulatory outcomes. Where both systems are relevant, landholders need clear guidance on which information applies and how discrepancies should be resolved. Queensland datasets, including Property Maps of Assessable Vegetation (PMAVs) and other established state vegetation mapping products, should be more effectively recognised within Commonwealth assessment processes where appropriate. Landholders should also have access to a simple and transparent process to identify and correct mapping errors.

Improve regulatory certainty

Continued engagement with industry will be important as implementation progresses, particularly to ensure requirements are practical, clearly understood and applied consistently. Guidance on concepts such as "significant impact" should help landholders understand when Commonwealth assessment may be required and how those requirements operate alongside existing Queensland vegetation management and biosecurity obligations.

The self-assessment process should also be clear, practical and proportionate. Growers need to be able to confidently determine whether referral is required, so Commonwealth assessment remains focused on activities with the potential to significantly impact Matters of National Environmental Significance.



Conclusion

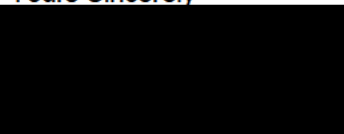
CANEGROWERS supports the intent of the 2025 EPBC Act to improve Commonwealth decision-making. CANEGROWERS does not support the reforms being used to duplicate or make even more onerous the already very level of regulatory burden the farmers in Queensland are asked to operate within. For Queensland cane growers, the key issue is ensuring the reforms are implemented in a way that works effectively alongside Queensland's existing environmental regulatory framework.

This requires effective bilateral agreements, recognition of existing Queensland systems where equivalent environmental outcomes are achieved, reliable mapping, a clear and proportionate self-assessment process, and practical guidance for landholders. Together, these measures would help deliver strong environmental outcomes while avoiding unnecessary duplication, regulatory burden and delays for growers.

CANEGROWERS appreciates the opportunity to contribute to this inquiry and would welcome continued engagement as implementation of the reforms progresses.

Please contact Clancy Mackaway - Manager Environment and Sustainability at [REDACTED] if you require any further information about this submission.

Yours Sincerely



Dan Galligan
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