Seafood Industry Australia
The Voice of Australian Seafood

13 July 2026

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

To whom it may concern,

Re: Impact of the Australian Government's 2025 reforms to the Environment Protection and Biodiversity Conservation (EPBC) Act 1999 (Cth) on Queensland

Seafood Industry Australia (SIA) is the national peak-body representing the Australian seafood industry including the wild catch, aquaculture and post-harvest sectors with strong membership from each of these groups. We are the voice of Australian seafood industry.

According to BDO (2025) the Australian seafood industry's GDP value has been estimated at $11.9 billion and the sector supports more than 79,491 Australian families, many in rural and regional Australia. Much of the sector's production is sold and consumed domestically, worth $7.58 billion (GDP). Between them Queensland, New South Wales and Victoria consume 71% of domestically produced seafood (reflecting population concentration).

SIA writes to the Commission to express our strong support for the detailed submission provided by Queensland Seafood Industry Association (QSIA) to this inquiry. The recommendations and concerns raised by QSIA through this process are for the most part nationally relevant and represent significant challenges with the implementation of the 2025 reforms. SIA has engaged consistently with the Department of Climate Change, Energy, the Environment and Water's (DCCEEW) EPBC consultation process during the last 18 months to represent the seafood sector's needs at a federal government level. Consistent concerns have been raised throughout the process including:

- The missed opportunity to streamline duplicative policy and legislation with the application of additional approval processes and obligations to sectors with existing comprehensive environmental regulation which are functionally equivalent.
- The need for comprehensive modelling and a Regulatory Impact Statement to be undertaken to quantify cumulative impacts regional employment, food security, investment confidence, productivity, supply chains or long-term profitability.
- Ongoing and unresolved ambiguity regarding definitions and the relationship between Objectives, Outcomes and Principles across Standards creating significant distress and investment uncertainty for industry.
- Application of a project-based framework to sectors operating in continuous, adaptive and cyclical land/ocean use rather than a discrete development activity.
- There is no legislated validity period for self-assessments, creating uncertainty regarding repeat activities undertaken within the same production system.
- There is no statutory safe harbour for producers/fishers acting reasonably and in good faith using available guidance where Government subsequently reaches a different conclusion.

SIA reiterates its support for well-designed environmental regulation that is clear, proportionate, and avoids duplicating existing frameworks. QSIA has provided strong evidence to support the recommendations provided in its submission with detailed case studies demonstrating the financial impact of the uncertainty created by the 2025 reforms.

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The Australian seafood industry faces increasing economic pressure from a variety of sources including competition for ocean access, increasing compliance obligations, climate change and the cumulative impacts of government policy. SIA welcomes the opportunity to work with government to resolve the concerns raised and co-develop a robust, efficient system that balances Australia's international conservation obligations with both food security and productivity.

Yours sincerely,

[redacted]

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