

13 July 2026

The Commissioner
Queensland Productivity Commission
By email: enquiry@qpc.qld.gov.au

Dear Commissioner

Submission to the Queensland Productivity Commission Inquiry into the Productivity Implications of the 2025 EPBC Act Reforms for Queensland

Executive Summary

The Sunshine Coast Environment Council (SCEC) welcomes the opportunity to provide this submission to the Queensland Productivity Commission's inquiry into the impacts of the 2025 reforms to the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) on Queensland.

SCEC is the peak regional environmental advocacy organisation and Regional Conservation Council for the Sunshine Coast and Noosa regions, representing more than 55 member organisations and thousands of community members. The Sunshine Coast is recognised internationally as a UNESCO Biosphere Reserve, reflecting the region's globally significant biodiversity and the importance of balancing environmental protection with sustainable economic development.

SCEC considers that environmental assessment is not a cost to productivity but an investment in good decision-making. It is a regulatory responsibility associated with activities capable of causing significant or irreversible environmental impacts, protecting Queensland's productive natural capital, providing greater certainty for proponents, governments, communities and investors, and helping to avoid the substantially greater environmental, social and economic costs that arise from poorly informed decisions.

Queensland's long-term economic prosperity and community wellbeing depend upon the health of its natural assets. Agriculture, tourism, fisheries, water security, climate resilience, regional liveability and public health all rely upon healthy ecosystems and the ecosystem services and functions they provide. These natural assets also contribute to social capital by supporting recreation, cultural values, community identity, volunteer stewardship and resilience. Protecting biodiversity and maintaining ecosystem function are therefore fundamental to sustainable development, enduring productivity and thriving communities. Environmental protection and economic prosperity should be regarded as complementary objectives rather than competing priorities. Therefore, Queensland's natural capital underpins long-term economic productivity, social resilience, public wellbeing and the prosperity of regional communities.

Effective environmental governance should not privilege or serve one form of capital at the expense of another, but to ensure that economic development enhances prosperity without eroding the natural, cultural and social capital upon which Queensland's long-term productivity and sustainability depends.

This Inquiry should also consider the context of Queensland's continuing environmental decline. Successive Queensland and Australian *State of the Environment* reports¹ ²document ongoing deterioration in biodiversity, ecosystem condition and threatened species. The latest Statewide Landcover and Trees Study (SLATS)³ recorded more than 332,000 hectares of forest and woodland cleared in a single year, with more than one million hectares cleared between 2018 and 2022. Queensland is also home to more than 1,000 threatened plant and animal species, including over 700 found nowhere else on Earth. These trends demonstrate that stronger environmental governance is required to reverse biodiversity loss and maintain the natural systems that underpin Queensland's economy.

Against this backdrop, SCEC considers that robust Commonwealth oversight under the EPBC Act remains an essential safeguard for Matters of National Environmental Significance. Independent assessment ensures that actions capable of significantly affecting nationally protected environmental values are subject to rigorous scientific scrutiny, particularly where cumulative impacts may not be adequately addressed through other regulatory processes or where State assessment pathways have been modified, expedited or overridden.

SCEC supports improving the efficiency, transparency and effectiveness of environmental regulation. However, efficiency should not be equated with reducing environmental scrutiny. A productive regulatory system is one that delivers timely, scientifically robust and legally defensible decisions that provide certainty for proponents, governments, communities and investors while protecting environmental values and supporting sustainable long-term economic outcomes. Well-designed environmental regulation improves productivity by identifying environmental constraints early, directing investment towards appropriate locations, reducing avoidable conflict and minimising costly redesign, litigation and long-term environmental liabilities.

SCEC also notes that referral under the EPBC Act remains largely proponent-driven. Referral numbers should therefore not be interpreted as a reliable indicator of environmental risk or regulatory responsibility, as actions capable of significantly impacting Matters of National Environmental Significance may proceed without Commonwealth assessment where referral obligations are not recognised or fulfilled. Effective compliance, monitoring and enforcement remain essential components of an efficient, credible and outcomes-focused environmental framework.

The Sunshine Coast provides a contemporary example of why Commonwealth oversight continues to be important. The proposed Coochin Creek developments, located adjacent to the internationally recognised Moreton Bay Ramsar Wetland and within the Sunshine Coast UNESCO Biosphere Reserve, were approved following Queensland Ministerial call-in despite significant environmental concerns and recommendations for refusal by the State Assessment and Referral Agency. These developments demonstrate the importance of independent Commonwealth assessment where nationally significant environmental values, cumulative impacts and public confidence in environmental decision-making are at stake.

As the 2025 EPBC reforms have only recently commenced, SCEC considers it premature to draw definitive conclusions regarding their impacts on productivity, investment or assessment timeframes. Equally, it is too early to determine whether the reforms will achieve improved environmental outcomes. The success of the reforms should ultimately be measured by whether they deliver stronger environmental protection alongside greater regulatory certainty, investment

¹ <https://www.stateoftheenvironment.detsi.qld.gov.au/>

² <https://soeaustralia.com.au/state-of-the-environment-reporting2026> - includes previous reports

³ <https://www.qld.gov.au/environment/land/management/mapping/statewide-monitoring/slats>

confidence and sustainable long-term economic prosperity, rather than by reductions in approval timeframes alone.

Accordingly, SCEC recommends that the Queensland Productivity Commission recognise that:

- Environmental assessment is a regulatory responsibility proportionate to environmental risk, not simply categorised or described as a 'regulatory burden.'
- Queensland's natural capital underpins long-term productivity, economic resilience, sustainability and community wellbeing.
- Strong environmental regulation provides investment certainty and supports sustainable economic development.
- Independent Commonwealth oversight remains essential to protect Matters of National Environmental Significance, particularly where cumulative impacts or limitations in State assessment processes arise.
- The effectiveness of the 2025 EPBC reforms should be evaluated through measurable environmental, social and economic outcomes rather than approval timeframes alone.

1. Introduction

The Sunshine Coast Environment Council (SCEC) welcomes the opportunity to provide this submission to the Queensland Productivity Commission's inquiry into the impacts of the 2025 reforms to the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) on Queensland.

SCEC is the peak regional environmental advocacy organisation for the Sunshine Coast and Noosa regions, representing more than 55 member organisations and thousands of community members. For more than four decades, SCEC has worked collaboratively with governments, Traditional Owners, community organisations, industry and researchers to promote evidence-based environmental policy, protect biodiversity and support sustainable development across the region.

The Sunshine Coast occupies a unique position within Queensland. It is recognised internationally as a UNESCO Biosphere Reserve and contains nationally and internationally significant environmental values, including Matters of National Environmental Significance protected under the EPBC Act, Ramsar wetlands, threatened ecological communities, critical habitat for nationally listed threatened species and internationally important migratory bird habitat. These environmental assets also underpin the region's economy, supporting tourism, agriculture, fisheries, recreation, water security and community wellbeing.

For more than 45 years, SCEC has worked collaboratively with governments, Traditional Owners, community organisations, researchers and other stakeholders to advocate for the protection and restoration of the Sunshine Coast's unique natural environment through evidence-based policy, community engagement and informed environmental decision-making.

This submission draws on SCEC's extensive experience in environmental policy, planning and advocacy, informed by practical examples from the Sunshine Coast. It offers a regional perspective on the role of the EPBC Act in protecting Matters of National Environmental Significance and demonstrates why independent, evidence-based environmental decision-making remains fundamental to achieving enduring environmental, social and economic outcomes.

3. Environmental Protection as a Foundation for Productivity

SCEC considers that the Queensland Productivity Commission's assessment of the 2025 reforms to the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) should be undertaken within the broader context of Queensland's environmental condition and the long-term productivity of the State's natural capital. Environmental governance is not separate from economic performance; it is fundamental to sustaining the natural systems that underpin Queensland's prosperity.

Queensland's economy relies heavily on healthy ecosystems and the essential services they provide. Agriculture, tourism, fisheries, clean water, climate resilience and regional liveability all depend upon functioning natural systems. These ecosystem services, including water filtration, soil stability, flood mitigation, pollination, carbon storage and biodiversity, support economic activity, community wellbeing and the resilience of regional communities. They also contribute to Queensland's social capital by supporting recreation, cultural values, volunteer stewardship, community identity and public health. Protecting these natural assets is therefore fundamental to sustainable development, long-term productivity and intergenerational prosperity.

SCEC considers that environmental assessment is not a cost to productivity but an investment in good decision-making. It is a regulatory responsibility associated with activities capable of causing significant or irreversible environmental impacts. Effective environmental governance provides greater certainty for proponents, governments, communities and investors while helping to avoid the substantially greater environmental, social and economic costs that can arise from poorly informed decisions. Environmental protection and economic prosperity should therefore be regarded as complementary objectives rather than competing priorities.

Queensland's current environmental trajectory demonstrates why this regulatory responsibility remains critical. Successive Queensland and Australian *State of the Environment* reports identify continuing declines in biodiversity, ecosystem condition and threatened species despite existing legislative frameworks. The latest Statewide Landcover and Trees Study (SLATS) recorded 332,015 hectares of forest and woodland cleared in a single year—an area larger than the Australian Capital Territory—with more than one million hectares of native vegetation cleared between 2018 and 2022. Alarming, almost 71,000 hectares of this clearing involved remnant vegetation, while almost half occurred within Great Barrier Reef catchments, contributing to declining water quality and the ongoing loss of habitat for nationally threatened species.

Queensland is home to more than 1,000 threatened plant and animal species, including over 700 found nowhere else on Earth. The Queensland Government currently lists 1,034 threatened plant and animal species under the *Nature Conservation Act 1992*, with additional species continuing to be listed as populations decline and scientific understanding improves. Habitat loss, fragmentation, invasive species and climate change continue to drive biodiversity decline, demonstrating that stronger environmental governance is required if Queensland is to reverse these trends and secure the natural capital upon which its economy depends.

Against this backdrop, robust Commonwealth oversight under the EPBC Act remains essential. The Act provides an independent safeguard for Matters of National Environmental Significance by ensuring that actions capable of significantly impacting nationally protected environmental values are subject to rigorous scientific assessment before decisions are made. This oversight is particularly important where cumulative impacts may not be adequately considered through other regulatory processes or where State assessment pathways have been modified, expedited or overridden.

SCEC supports initiatives that improve the appropriate evidence based, efficacy, transparency and of environmental regulation. However, regulatory efficiency should not be measured solely

by the speed of approvals. Rather, it should be measured by the delivery of high-quality, scientifically robust and legally defensible decisions that provide certainty for proponents, governments, communities and investors while protecting environmental values and supporting sustainable long-term economic outcomes. Well-designed environmental regulation improves productivity by identifying environmental constraints early, reducing avoidable conflict, directing investment towards appropriate locations and minimising costly redesign, dispute and long-term environmental liabilities.

Given the 2025 EPBC reforms have only recently commenced, SCEC considers it premature to draw definitive conclusions regarding their impacts on productivity, investment or assessment timeframes. We also note that Impact Analysis and targeted stakeholder consultation by the Commonwealth occurred (and is ongoing) as the EPBC reforms were being drafted and consulted on. Similarly, it is not yet possible to determine whether the reforms will achieve improved environmental outcomes. The success of the reforms should ultimately be measured by whether they deliver stronger environmental protection alongside greater regulatory understanding, investment confidence and measurable improvements in environmental outcomes, rather than by reductions in approval timeframes alone.

The economic costs of environmental degradation, including the loss of ecosystem services and function, declining biodiversity, reduced climate resilience and increasing expenditure on restoration and disaster recovery, are rarely fully accounted for in discussions of productivity. A comprehensive assessment of productivity should recognise both the value of Queensland's natural capital and the long-term costs associated with its continued decline.

4. Why Commonwealth Oversight Remains Critical

The EPBC Act performs a distinct and complementary role within Australia's environmental governance framework by protecting Matters of National Environmental Significance (MNES) that extend beyond State and local interests. Its purpose is not to duplicate State assessment processes, but to ensure nationally significant environmental values are consistently considered through an independent assessment framework informed by the best available scientific evidence.

Queensland's environmental challenges—including ongoing biodiversity decline, extensive land clearing, habitat fragmentation and the cumulative impacts of development—demonstrate that existing regulatory frameworks have not been sufficient to halt the decline of many nationally significant environmental values. In this context, Commonwealth oversight remains an essential safeguard that complements State processes by providing an additional level of scrutiny where nationally protected environmental values may be significantly affected.

This complementary role has become increasingly important where State planning and environmental legislation has evolved to provide greater Ministerial discretion, streamline approval pathways or modify existing assessment processes. While administrative efficiency is an important objective, it should not reduce the rigour of environmental assessment where actions may significantly impact Matters of National Environmental Significance. Independent Commonwealth oversight provides an important assurance that nationally protected environmental values continue to receive consistent consideration regardless of the assessment pathway adopted at the State level.

SCEC also considers that effective environmental governance requires the assessment of cumulative impacts. Incremental losses resulting from multiple developments can collectively have significant consequences for biodiversity, ecosystem function and ecological resilience,

even where the impacts of individual proposals appear relatively minor in isolation. This is particularly relevant in rapidly growing regions such as South East Queensland, where multiple developments may affect the same ecological communities, threatened species populations, wildlife corridors, catchments or internationally recognised wetlands over time. Robust Commonwealth assessment provides an important mechanism for considering these broader cumulative effects in a manner that individual project assessments may not adequately address.

The operation of the EPBC Act also relies heavily on proponents recognising and fulfilling their referral obligations. As referral is largely proponent-driven, referral numbers should not be interpreted as a reliable indicator of either environmental risk or regulatory responsibility. Developments capable of significantly impacting Matters of National Environmental Significance may proceed without Commonwealth assessment where referral obligations are not recognised or fulfilled. Effective compliance, monitoring and enforcement are therefore essential components of a credible, efficient and outcomes-focused regulatory framework.

SCEC considers that the role of the Commonwealth extends beyond project assessment to maintaining public confidence in environmental decision-making. Transparent, scientifically robust and independent assessment helps build confidence that nationally significant environmental values have been appropriately considered, provides greater certainty for proponents and investors, and reduces the likelihood of disputes arising from perceived deficiencies in assessment processes. This confidence is itself an important contributor to regulatory efficiency and long-term investment certainty.

The importance of this complementary Commonwealth role is illustrated by recent development proposals at Coochin Creek on the Sunshine Coast, where nationally significant environmental values, cumulative impacts and the interaction between State and Commonwealth assessment processes demonstrate why independent oversight under the EPBC Act remains essential.

The EPBC Act is not intended to nor does it duplicate State assessment processes; it exists to provide an independent safeguard for nationally significant environmental values where broader national interests and cumulative environmental risks are at stake.

5. Case Study: Coochin Creek – Why Independent Commonwealth Oversight Matters

The proposed Coochin Creek developments on the Sunshine Coast provide a contemporary Queensland example of why independent Commonwealth oversight under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) remains an essential safeguard for Matters of National Environmental Significance.

The developments comprise two large-scale proposals located within the Northern Inter-Urban Break at Coochin Creek: a major tourist park and the Coochin Fields music festival and events venue. Together, these developments have the potential to introduce substantial new development pressures into an environmentally sensitive landscape immediately adjoining the internationally recognised Moreton Bay Ramsar Wetland (including the Pumicestone Passage), the Sunshine Coast UNESCO Biosphere Reserve and regionally significant ecological corridors.

The surrounding landscape supports Matters of National Environmental Significance protected under the EPBC Act, including nationally listed threatened species, threatened ecological communities and migratory species. The area also performs important ecological functions through its wetlands, coastal habitats, wildlife movement corridors and hydrological connections with the Moreton Bay Ramsar Wetland. These environmental values underpin the ecological

integrity of the region while also supporting tourism, recreation, water quality, climate resilience and the broader regional economy.

Both developments were initially recommended for refusal by the State Assessment and Referral Agency (SARA) due to significant planning and environmental concerns. Following requests from the proponent, however, both applications were called in by the Queensland Planning Minister and subsequently approved outside the standard development assessment framework. While Ministerial call-in powers are provided for under Queensland planning legislation, their use in this instance concentrated decision-making within a single Minister, removed normal appeal rights and reduced opportunities for independent scrutiny, contributing to significant community concern regarding transparency and accountability.

The Coochin Creek proposals also demonstrate the importance of assessing cumulative impacts. While each development may be considered individually through planning processes, their combined environmental effects have the potential to extend well beyond individual development footprints. Increased traffic, noise, lighting, vegetation clearing, habitat fragmentation, altered hydrology, recreational pressure and associated indirect impacts may collectively affect nationally significant environmental values, particularly when considered alongside existing and reasonably foreseeable development within the broader landscape.

Despite these nationally significant environmental values and the potential for cumulative impacts, Commonwealth assessment has not occurred because referral under the EPBC Act remains primarily the responsibility of proponents. This demonstrates why referral statistics alone should not be relied upon when evaluating the effectiveness or efficiency of the EPBC framework. Developments capable of significantly impacting Matters of National Environmental Significance may proceed without Commonwealth assessment where referral obligations are not recognised or fulfilled.

The Coochin Creek proposals also demonstrate the importance of considering development proposals within their broader strategic context. The developments are located within the Northern Inter-Urban Break, a strategically important landscape intended to maintain separation between the Sunshine Coast and the rapidly expanding urban areas of South East Queensland. The ecological, hydrological and landscape values of this area extend beyond individual development sites and contribute to the resilience of the broader Moreton Bay and Sunshine Coast region. Assessment of proposals affecting these values should therefore extend beyond site-specific impacts to consider cumulative, landscape-scale and long-term consequences.

For SCEC, the Coochin Creek developments illustrate why the EPBC Act continues to perform an essential and complementary role within Australia's environmental governance framework. Independent Commonwealth assessment provides an important safeguard where nationally significant environmental values may be affected, ensures cumulative impacts are appropriately considered, and strengthens transparency, scientific rigour and public confidence in environmental decision-making.

6. SCEC's Position on the 2025 EPBC Reforms

SCEC supports reforms that improve scientifically robust, evidence-based, transparent decision-making which provides transparent and effective environmental regulation while maintaining strong environmental standards and independent oversight. Queensland may pursue more efficient administrative processes without reducing the scientific rigour, accountability or environmental outcomes that underpin public confidence and investment

certainty. These reforms were well overdue and are necessary to deliver stronger protections for nature and climate.

6.1 It is premature to assess the impacts of the 2025 reforms

As the 2025 EPBC reforms have only recently commenced, there is currently insufficient evidence to draw reliable conclusions regarding their effects on productivity, investment, regulatory efficiency or environmental outcomes. Any assessment at this stage is necessarily prospective. SCEC therefore considers that the effectiveness of the reforms should be evaluated over time against measurable environmental, social and economic outcomes rather than assumptions regarding reduced approval timeframes or so-called 'regulatory burden.'

6.2 Productivity should be measured by outcomes, not approval speed

SCEC considers that productivity should not be measured solely by the speed of approvals. A productive environmental assessment framework is one that delivers timely, scientifically robust and legally defensible decisions that provide certainty for proponents, governments, communities and investors while protecting Queensland's natural capital.

Poorly informed decisions can result in project redesign, legal disputes, community conflict, environmental degradation and substantial long-term economic costs. Conversely, evidence-based assessment undertaken early in the planning process improves investment certainty, reduces regulatory risk and supports more efficient decision-making over the life of a project.

6.3 Environmental assessment is a regulatory responsibility

Environmental assessment is a regulatory responsibility associated with activities capable of causing significant or irreversible environmental impacts. The extent of assessment should be proportionate to the environmental risk presented by a proposal and should not be characterised as an unnecessary regulatory burden. Appropriate environmental assessment protects Matters of National Environmental Significance while reducing the risk that environmental, social and economic costs will be transferred to future generations.

6.4 Opportunities to improve efficiency

SCEC supports practical measures that improve regulatory processes, including:

- clearer environmental standards and guidance;
- improved coordination between Commonwealth and State agencies;
- greater use of strategic and regional planning for landscape scale conservation outcomes
- improved information sharing and digital assessment systems;
- early identification of environmental constraints; and
- transparent compliance, monitoring and reporting.

These measures can improve regulatory efficiency while maintaining confidence that nationally significant environmental values are being appropriately protected.

6.5 Measuring the success of the reforms

Ultimately, the success of the 2025 EPBC reforms should not be judged simply by reductions in approval timeframes. Success should instead be measured by whether the reforms:

- improve environmental outcomes for Matters of National Environmental Significance;
- reduce cumulative environmental impacts;
- provide greater certainty for proponents, governments and communities;
- reduce unnecessary duplication without weakening environmental safeguards;
- improve compliance, transparency and public confidence; and
- contribute to Queensland's long-term economic productivity by protecting the natural capital upon which many industries and communities depend.

The case study also demonstrates that effective environmental governance contributes to regulatory certainty. Thorough, transparent and scientifically robust assessment undertaken early in the decision-making process reduces uncertainty, improves community confidence, assists proponents to identify and avoid significant environmental risks, and helps minimise the potential for conflict, redesign, legal challenge and long-term environmental and economic costs. Far from representing an unnecessary regulatory burden, independent environmental assessment is a regulatory responsibility that supports better decisions and more durable outcomes for Queensland's environment, economy and communities.

7. Recommendations to the Queensland Productivity Commission

SCEC respectfully recommends that the Queensland Productivity Commission recognise the following principles in its assessment of the 2025 reforms to the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Measuring the success of the reforms

Recommendation 1

That the Commission recognise Queensland's natural capital as fundamental to the State's long-term productivity, economic resilience, community wellbeing, sustainability and international competitiveness, and acknowledge that environmental protection and economic prosperity are complementary objectives.

Recommendation 2

That the Commission assess the effectiveness of the 2025 EPBC reforms using measurable environmental, social and economic outcomes, including improvements in biodiversity, ecosystem condition, investment certainty and public confidence, rather than reductions in approval timeframes alone.

Recommendation 3

That the Commission recognise environmental assessment as a regulatory responsibility proportionate to environmental risk, rather than characterising it as a regulatory burden, acknowledging that robust assessment reduces long-term environmental, social and economic costs while improving regulatory certainty.

Improving regulatory efficiency

Recommendation 4

That the Commission support measures that improve regulatory efficiency through better administrative coordination, strategic planning, digital systems, clearer environmental standards, improved information sharing and early identification of environmental constraints, rather than reducing the scientific rigour or independence of environmental assessment.

Recommendation 5

That the Commission recognise that productivity is best supported through high-quality, scientifically robust and legally defensible environmental decision-making that provides certainty for proponents, governments, communities and investors while protecting Matters of National Environmental Significance.

Commonwealth oversight and environmental governance

Recommendation 6

That the Commission recognise the continuing importance of independent Commonwealth oversight under the EPBC Act as a complementary safeguard for Matters of National Environmental Significance, particularly where cumulative impacts, nationally significant environmental values or limitations within State assessment processes warrant independent consideration.

Recommendation 7

That the Commission recognise that referral under the EPBC Act remains largely proponent-driven and that referral numbers alone should not be relied upon as an indicator of regulatory efficiency or environmental risk. Effective compliance, monitoring and enforcement should remain integral components of an efficient and credible environmental framework.

Recommendation 8

That the Commission support continued consideration of cumulative impacts at appropriate spatial and temporal scales, recognising that incremental development pressures can collectively result in significant impacts on biodiversity, ecosystem function and Matters of National Environmental Significance.

Recommendations to the Queensland Government

Recommendation 9

That the Queensland Government continue to strengthen State environmental assessment frameworks by improving transparency, scientific integrity, compliance, monitoring and public

accountability while ensuring administrative reforms do not diminish environmental outcomes or public confidence in decision-making.

Recommendation 10

That the Queensland Government ensure that any future accreditation, streamlining initiatives or legislative reforms maintain environmental standards that are at least equivalent to those required under the EPBC Act and continue to provide independent, evidence-based assessment of nationally significant environmental values. For example, fossil fuel projects and forestry should not be subject to 'streamlined' pathways

Recommendation 11

That the Queensland Government strengthen strategic regional planning and cumulative impact assessment in areas of high environmental value, including internationally recognised wetlands, biodiversity corridors and rapidly growing regions, to improve both environmental outcomes and long-term investment certainty.

Ongoing evaluation

Recommendation 12

That the Queensland Productivity Commission recognise that the 2025 EPBC reforms are at an early stage of implementation and recommend that their effectiveness be evaluated over time using transparent performance indicators that measure environmental outcomes, regulatory certainty, administrative efficiency and long-term economic resilience before further substantive reforms are considered.

Collectively, these recommendations are intended to help improve regulatory efficiency while maintaining the environmental governance necessary to protect Queensland's productive natural capital. SCEC considers that enduring productivity depends not on reducing environmental scrutiny, but on delivering transparent, scientifically robust and accountable decision-making that supports both environmental stewardship and long-term economic prosperity.

8. Conclusion

Queensland can achieve meaningful administrative efficiencies through better coordination, strategic planning, clearer environmental standards and evidence-based decision-making without diminishing the environmental safeguards that protect the State's natural assets and long-term prosperity.

Queensland's economy is fundamentally dependent upon its natural capital. Healthy ecosystems underpin agriculture, tourism, fisheries, water security, climate resilience, regional liveability and the wellbeing of communities across the State. Protecting these assets is therefore not separate from economic productivity. It is indeed a prerequisite for sustaining it.

The continuing alarming decline in biodiversity, habitat condition and ecosystem health demonstrates that environmental governance must remain focused on achieving measurable improvements in environmental outcomes while providing certainty for proponents, governments, communities and investors. Robust environmental assessment is a regulatory

responsibility that supports informed, transparent and accountable decision-making, reduces long-term environmental and economic risk, and strengthens public confidence in development outcomes.

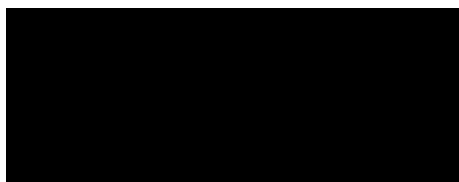
SCEC considers that independent Commonwealth oversight under the *Environment Protection and Biodiversity Conservation Act 1999* continues to perform an essential and complementary role in protecting Matters of National Environmental Significance, particularly where cumulative impacts, nationally significant environmental values or limitations within State assessment processes warrant independent consideration.

As the 2025 EPBC reforms are still in the early stages of implementation, it is premature to draw definitive conclusions regarding their impact on productivity or environmental performance. Their success should ultimately be measured not by the speed of approvals alone, but by whether they deliver stronger environmental outcomes, greater regulatory certainty, improved public confidence and sustainable long-term economic prosperity.

SCEC respectfully encourages the Queensland Productivity Commission to adopt a broad and evidence-based understanding of productivity whereby Queensland's natural capital is recognised and appreciated as fundamental to the State's enduring economic resilience, social wellbeing and international competitiveness. Protecting the environmental values that underpin Queensland's prosperity is not a constraint on productivity; it is an investment in the State's future resilience and sustainability.

Our thanks again for the opportunity to participate in the Inquiry with future engagement or discussion of this submission welcomed.

Yours sincerely



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