

Comment – Take Action for Pumicestone Passage Inc.

Comment

Please find attached Take Action for Pumicestone Passage Inc.'s submission to the Queensland Productivity Commission's Inquiry into the impact of the Australian Government's 2025 Environment Protection reforms on Queensland.

TAPP supports efficient, transparent and evidence-based environmental assessment processes that maintain strong environmental protection and improve environmental outcomes for current and future generations.

We appreciate the opportunity to contribute to this important inquiry.



*Protecting the Pumicestone Passage
and greenbelt for future generations.*

Smarter Environmental Regulation for Better Environmental and Economic Outcomes

13 July 2026

1. EXECUTIVE SUMMARY

Take Action for Pumicestone Passage Inc. (TAPP) welcomes the opportunity to provide this submission to the Queensland Productivity Commission's Inquiry into the impact of the Australian Government's 2025 *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) reforms on Queensland.

As a volunteer-led community organisation with more than a decade of experience in environmental stewardship, scientific engagement and participation in planning and environmental assessment processes, TAPP supports reforms that improve the efficiency, transparency and consistency of environmental regulation while maintaining strong protection for Matters of National Environmental Significance (MNES).

This submission is founded on a simple principle: strong environmental protection and regulatory efficiency are not competing objectives. Both are achieved through good governance, early scientific assessment, transparent decision-making and clear environmental standards.

The organisation supports reducing unnecessary duplication between Commonwealth and State assessment processes where environmental integrity is maintained. However, regulatory efficiency should not be measured solely by shorter approval timeframes. It should also be measured by the quality, certainty and durability of planning decisions, the confidence they provide to proponents





Protecting the Pumicestone Passage and greenbelt for future generations.

and communities, and the long-term protection of Queensland's natural assets.

Drawing on practical experience from the Pumicestone Passage catchment, this submission identifies several lessons relevant to Queensland's implementation of the reforms. These include the importance of undertaking key environmental investigations early in the planning process, improving transparency, recognising cumulative impacts at the catchment scale and valuing community knowledge and citizen science as complementary sources of environmental information.

The submission also highlights that discussions about productivity should consider not only the administrative costs of environmental regulation, but also the significant long-term economic costs associated with poor environmental decision-making. Healthy waterways, wetlands and coastal ecosystems are productive natural assets that support tourism, fisheries, recreation, biodiversity, flood resilience and community wellbeing. Protecting these assets through sound environmental assessment is an investment in Queensland's long-term economic prosperity.

TAPP further submits that effective implementation of the reforms will depend upon clear governance arrangements that provide consistent environmental standards, transparent decision-making, meaningful public participation and appropriate independent oversight for Matters of National Environmental Significance. Reducing unnecessary duplication should not result in reduced environmental scrutiny where nationally significant environmental values are at risk.

Accordingly, this submission recommends that Queensland's implementation of the reforms should:

- maintain strong, science-based protection for Matters of National Environmental Significance;
- reduce unnecessary duplication between Commonwealth and State assessment processes;





Protecting the Pumicestone Passage and greenbelt for future generations.

- encourage earlier environmental investigations and front-load scientific assessment;
- improve transparency throughout environmental assessment processes;
- strengthen assessment of cumulative environmental impacts;
- recognise catchment-scale environmental processes;
- appropriately incorporate community knowledge, citizen science and research partnerships;
- maintain effective independent oversight for nationally significant environmental values;
- promote clear, consistent and evidence-based environmental standards; and
- measure the success of the reforms through both regulatory efficiency and improved environmental outcomes.

Queensland has an opportunity to demonstrate that smarter environmental regulation can deliver both greater productivity and stronger environmental protection. TAPP respectfully submits that the objective of the 2025 reforms should not simply be to make environmental approvals faster, but to make environmental decisions better—through earlier science, greater transparency, efficient governance and the enduring protection of Queensland's nationally significant natural assets.

2. ABOUT TAPP Inc.

Take Action for Pumicestone Passage Inc. (TAPP) is a volunteer-led incorporated community organisation dedicated to protecting and enhancing the environmental health of the Pumicestone Passage and its catchment through education, advocacy, collaboration and community stewardship.

TAPP's mission is to protect and enhance the Pumicestone Passage environment and catchment while working constructively with governments, Traditional Owners, researchers, industry and the broader community to achieve sustainable environmental outcomes. Our approach is evidence-based, collaborative and solutions-focused, recognising that long-term environmental protection





Protecting the Pumicestone Passage and greenbelt for future generations.

and sustainable development are best achieved through sound science, transparent decision-making and meaningful community participation.

The Pumicestone Passage is one of South East Queensland's most significant coastal ecosystems. It supports internationally recognised environmental values, including Ramsar-listed wetlands, habitats within the Moreton Bay Marine Park, migratory shorebirds, seagrass meadows, mangroves, fish habitat, turtles, dugongs and numerous threatened species. The health of the Passage is intrinsically linked to the management of its broader catchment and the cumulative effects of land use decisions across the region.

Since its establishment, TAPP has actively contributed to environmental monitoring, water quality initiatives, citizen science, revegetation, coastal restoration, community education and strategic planning processes. The organisation has worked constructively with all levels of government, researchers, community organisations and environmental experts to improve environmental outcomes while supporting informed and transparent planning decisions.

Through this work, TAPP has developed practical experience in the environmental assessment process, including reviewing technical studies, participating in statutory consultation processes, interpreting scientific information and advocating for improved planning outcomes across the Pumicestone Passage catchment. This experience has reinforced the importance of early scientific investigation, transparent assessment processes, effective community engagement and clear regulatory frameworks that provide certainty for both proponents and the community.

This submission reflects TAPP's practical experience in environmental governance and planning across one of Queensland's most environmentally significant coastal catchments. While our





*Protecting the Pumicestone Passage
and greenbelt for future generations.*

perspective is grounded in the Pumicestone Passage, the principles outlined in this submission have broader relevance to the implementation of the Australian Government's 2025 reforms to the *Environment Protection and Biodiversity Conservation Act 1999*. TAPP supports strong, science-based environmental protection alongside efficient, transparent and proportionate assessment processes that reduce unnecessary duplication while maintaining environmental integrity and public confidence.

3. TAPP's POSITION

Take Action for Pumicestone Passage Inc. supports strong, science-based protection of Matters of National Environmental Significance while also supporting reforms that improve the efficiency, transparency and consistency of environmental assessment.

We believe environmental protection and regulatory efficiency are complementary objectives. Better environmental information obtained earlier in the planning process reduces uncertainty for proponents, improves public confidence and leads to more durable planning decisions.

4. PRODUCTIVITY SHOULD MEAN BETTER DECISIONS, NOT FASTER!

Take Action for Pumicestone Passage Inc. supports reforms that improve the efficiency of environmental assessment and approval processes. However, productivity should not be measured solely by shorter approval timeframes. Rather, it should be measured by the quality, certainty and durability of planning decisions, and by the extent to which environmental risks are identified and addressed before they become sources of conflict, delay or long-term cost.





*Protecting the Pumicestone Passage
and greenbelt for future generations.*

From TAPP's experience, there are two distinct types of delay within environmental assessment processes.

Administrative Delay

Administrative delay occurs where assessment processes are unnecessarily complicated or poorly coordinated. It can arise through duplicated assessment requirements between jurisdictions, multiple referrals, repeated requests for information, inconsistent agency expectations or inefficient regulatory processes.

These forms of delay increase costs for proponents, governments and the community without necessarily improving environmental outcomes. TAPP supports reforms that streamline administrative processes, improve coordination between the Commonwealth and Queensland Governments, and reduce unnecessary duplication where environmental standards and outcomes are maintained.

Environmental Delay

A second, and often less recognised, form of delay occurs when important environmental information is identified too late in the planning process.

Critical investigations relating to hydrology, water quality, biodiversity, coastal processes, ecological connectivity and cumulative impacts are sometimes undertaken only after projects have substantially progressed through assessment or public consultation. This can result in additional studies, redesign of proposals, increased community concern, prolonged assessment timeframes and, in some cases, avoidable conflict between proponents, regulators and affected communities. TAPP's experience across the Pumicestone Passage catchment has consistently demonstrated that early investment in robust scientific investigation leads to better planning outcomes.





*Protecting the Pumicestone Passage
and greenbelt for future generations.*

Comprehensive environmental information collected at the beginning of the assessment process provides greater certainty for proponents, enables regulators to make more informed decisions and improves public confidence in those decisions.

In environmentally significant catchments such as the Pumicestone Passage, understanding cumulative impacts at the catchment scale is particularly important. Water quality, hydrology, biodiversity and coastal processes operate as interconnected systems rather than isolated site-specific issues. Early assessment of these broader environmental relationships can reduce uncertainty later in the approval process while delivering more effective environmental protection.

TAPP therefore considers that genuine regulatory productivity should focus on improving the quality and timing of environmental assessment rather than simply reducing the time taken to reach a decision. Earlier scientific investigation, greater transparency and better coordination between assessment agencies have the potential to reduce unnecessary delays while simultaneously improving environmental outcomes and increasing certainty for all stakeholders.

5. LESSONS FROM THE PUMICESTONE PASSAGE

Over more than a decade of community stewardship, scientific engagement and participation in planning and environmental assessment processes, Take Action for Pumicestone Passage Inc. has gained practical insights into how environmental regulation can better achieve both environmental and economic outcomes.

While these observations are grounded in the Pumicestone Passage catchment, they have broader relevance to environmental assessment across Queensland.





*Protecting the Pumicestone Passage
and greenbelt for future generations.*

Lesson 1: Early Environmental Science Creates Greater Certainty

One of the most consistent lessons from TAPP's experience is that robust environmental science should inform planning decisions from the outset, rather than being commissioned or considered late in the assessment process.

Early investigation of hydrology, water quality, biodiversity, coastal processes and cumulative impacts enables environmental risks to be identified before significant investment has occurred. This improves decision-making, reduces uncertainty for proponents, minimises the likelihood of costly redesigns and increases confidence in regulatory outcomes.

Investment in early scientific assessment should be viewed as an investment in regulatory efficiency.

Lesson 2: Transparency Builds Community Confidence

Communities are more likely to support planning decisions when they have timely access to clear, evidence-based information explaining environmental risks, assessment methodologies and decision-making processes.

Where information is difficult to access, incomplete or released late in the assessment process, community confidence can decline, resulting in increased conflict, duplication of effort and reduced trust in regulatory institutions.

Transparent environmental assessment benefits proponents, regulators and communities alike by creating a shared understanding of the evidence informing decisions.





*Protecting the Pumicestone Passage
and greenbelt for future generations.*

Lesson 3: Catchments Function as Connected Systems

Environmental impacts rarely occur in isolation. The health of the Pumicestone Passage is influenced by the cumulative effects of land use, stormwater, water quality, habitat connectivity and coastal processes occurring throughout the broader catchment. Individual developments may appear to have relatively minor impacts when assessed independently, yet collectively they can contribute to significant long-term environmental change.

Assessment frameworks should therefore place greater emphasis on cumulative impacts and catchment-scale environmental processes, particularly where Matters of National Environmental Significance are concerned.

Considering environmental systems at the appropriate ecological scale provides greater certainty for future planning while supporting more effective protection of Queensland's natural assets.

Lesson 4: Community Knowledge Strengthens Environmental Decision-Making

Local communities possess valuable knowledge that can complement formal scientific assessment. Through citizen science, water quality monitoring, ecological observations, environmental education and ongoing stewardship, community organisations often develop detailed understanding of local environmental conditions over extended periods. This knowledge can assist regulators in identifying emerging issues, validating scientific findings and improving long-term environmental monitoring.

TAPP has worked collaboratively with researchers, government agencies, environmental organisations and volunteers to support water quality initiatives, scientific partnerships, community monitoring and environmental education across the Pumicestone Passage catchment.





*Protecting the Pumicestone Passage
and greenbelt for future generations.*

The organisation's experience demonstrates that community participation should not be viewed as an obstacle to efficient assessment. When appropriately integrated, it strengthens environmental evidence, improves public confidence and contributes to more informed and enduring planning decisions.

A Broader Lesson

Collectively, these experiences demonstrate that environmental protection and regulatory productivity are not competing objectives. Earlier scientific investigation, transparent assessment processes, consideration of cumulative impacts and meaningful community participation all contribute to more efficient approvals, greater investment certainty and stronger environmental outcomes.

For Queensland, the opportunity presented by the 2025 EPBC reforms is not simply to make environmental approvals faster, but to make them better.

6. IMPLEMENTING THE REFORMS SUCCESSFULLY IN QUEENSLAND

The Queensland Productivity Commission's inquiry presents an opportunity to consider not only the design of the Australian Government's environmental reforms, but also how Queensland can implement those reforms in a manner that improves both environmental outcomes and regulatory efficiency.

From TAPP's experience, successful implementation should be guided by the following principles.





*Protecting the Pumicestone Passage
and greenbelt for future generations.*

Earlier Environmental Assessment

Queensland should encourage proponents to undertake key environmental investigations as early as practicable in the planning process. Early assessment of hydrology, water quality, biodiversity, coastal processes and cumulative impacts provides greater certainty for proponents, enables more informed decision-making and reduces the likelihood of significant issues emerging late in the assessment process.

Better Integration Between Governments

Where Commonwealth and State assessment processes address similar environmental issues, information should be collected once and used by both jurisdictions wherever appropriate. Better coordination between governments can reduce unnecessary duplication while maintaining rigorous assessment of Matters of National Environmental Significance (MNES).

Greater Transparency

Timely access to environmental information builds public confidence and contributes to more efficient assessment processes. Wherever possible, environmental studies, supporting technical reports and assessment documentation should be publicly available early enough to allow meaningful participation by communities, researchers and other stakeholders before key decisions are made.

Catchment-Scale Assessment

Many environmental values extend well beyond individual development sites. Queensland's implementation of the reforms should continue to recognise cumulative impacts across connected catchments, particularly where developments have the potential to affect waterways, wetlands, estuaries and other MNES.





*Protecting the Pumicestone Passage
and greenbelt for future generations.*

Recognising Local Knowledge

Community organisations, research institutions, Traditional Owners and citizen science programs can provide valuable local knowledge that complements formal environmental assessment.

Appropriate consideration of this information can strengthen environmental evidence, improve long-term monitoring and enhance public confidence in planning decisions.

Taken together, these principles demonstrate that improving regulatory efficiency does not require weaker environmental protection. Rather, earlier scientific assessment, greater transparency, improved coordination and stronger use of existing knowledge can reduce unnecessary delays while maintaining Queensland's commitment to protecting nationally significant environmental values.

7. THE COST OF POOR ENVIRONMENTAL DECISIONS

Discussions about environmental regulation often focus on the direct costs associated with assessment processes, compliance requirements and approval timeframes. These costs are important and should be minimised wherever possible through efficient, transparent and proportionate regulation.

However, regulatory efficiency should also recognise the economic consequences of poor environmental decision-making.

Where significant environmental risks are not identified or adequately addressed, the resulting impacts can impose substantial long-term costs on governments, businesses and communities. These costs may significantly exceed the administrative costs associated with undertaking robust environmental assessment at the outset.





Protecting the Pumicestone Passage and greenbelt for future generations.

For coastal catchments such as the Pumicestone Passage, the consequences of poor environmental decisions can include:

- declining water quality requiring ongoing management and remediation;
- accelerated erosion and increased expenditure on shoreline protection and maintenance;
- recurring dredging and sediment management costs;
- degradation of wetlands, estuaries and fish habitats;
- declining biodiversity and reduced ecosystem resilience;
- increased flood and coastal hazard risks;
- reduced recreational opportunities and community wellbeing; and
- impacts on tourism, commercial and recreational fisheries, and other nature-dependent economic activities.

Many of these costs accumulate gradually over decades and are ultimately borne by the broader community through increased public expenditure, reduced ecosystem services and the loss of natural assets that support regional economies.

Healthy ecosystems should therefore be recognised as productive infrastructure. Estuaries, wetlands, waterways and coastal habitats provide valuable services including water filtration, flood mitigation, shoreline stabilisation, carbon storage, fisheries habitat, recreation and tourism opportunities. Protecting these assets through sound environmental assessment is not simply an environmental objective; it is an investment in Queensland's long-term economic productivity.

From TAPP's perspective, the objective of environmental reform should be to reduce unnecessary administrative costs without increasing the likelihood of far greater environmental and economic costs in the future. Earlier scientific assessment, better coordination between governments and more effective consideration of cumulative impacts can help avoid costly environmental degradation while providing greater certainty for proponents and regulators alike.





*Protecting the Pumicestone Passage
and greenbelt for future generations.*

True productivity is achieved not only by making decisions more efficiently, but by making decisions that remain effective, resilient and economically beneficial over the long term.

8. GOVERNANCE, ACCOUNTABILITY and CONSISTENT ENVIRONMENTAL STANDARDS

Good environmental governance is fundamental to both environmental protection and regulatory efficiency. Regardless of how responsibilities are shared between the Commonwealth and Queensland under future bilateral arrangements, assessment systems should provide clear, consistent and transparent decision-making that maintains public confidence while providing certainty for proponents.

The EPBC Act was established to protect MNES, recognising that some environmental values extend beyond state boundaries and warrant nationally consistent standards. While TAPP supports efforts to reduce unnecessary duplication between jurisdictions, any changes to administrative arrangements should preserve the integrity of those standards.

Independent Oversight

Independent oversight plays an important role in maintaining confidence that nationally significant environmental values are assessed consistently, regardless of the approval pathway adopted. State planning systems necessarily balance a wide range of objectives, including housing, infrastructure, employment, economic development and environmental protection. The Commonwealth's role under the EPBC Act provides an additional safeguard where projects have the potential to affect MNES. This independent role should continue to provide assurance that nationally significant environmental values receive appropriate consideration within any future bilateral arrangements.





*Protecting the Pumicestone Passage
and greenbelt for future generations.*

Consistency Across Approval Pathways

One of the principles that should underpin environmental regulation is consistency.

Projects with comparable environmental risks should be subject to comparable standards of environmental assessment, irrespective of the statutory pathway through which they are assessed.

Maintaining consistent assessment standards improves certainty for proponents, strengthens public confidence and reduces the risk that environmental outcomes become dependent upon administrative processes rather than the nature of the environmental risks themselves.

Transparency and Accountability

Transparent decision-making is essential for effective environmental governance.

Clear assessment criteria, publicly available environmental information and well-documented reasons for decisions enable communities, proponents and governments to better understand how environmental outcomes have been evaluated.

Transparency also contributes to more efficient assessment processes by reducing uncertainty, improving accountability and strengthening confidence in regulatory decisions.

Clear Standards Rather Than Discretion

TAPP considers that effective environmental regulation should rely as far as possible on clear, evidence-based standards rather than broad discretionary decision-making.

Well-defined assessment requirements improve consistency, reduce uncertainty for proponents and regulators, and help ensure that environmental outcomes are determined through the application of scientific evidence rather than varying administrative approaches. This is particularly important where MNES are concerned. Regardless of future administrative arrangements, assessment requirements should remain clear, transparent and consistently applied.





*Protecting the Pumicestone Passage
and greenbelt for future generations.*

Governance That Supports Productivity

Effective governance is not an additional regulatory burden; it is an essential component of an efficient assessment system.

Clear responsibilities, transparent processes, consistent environmental standards and independent accountability provide greater certainty for proponents, improve community confidence and contribute to more durable planning decisions.

In TAPP's view, the success of Queensland's implementation of the 2025 EPBC reforms will depend not only on reducing unnecessary duplication, but on ensuring that governance arrangements continue to deliver efficient, transparent and scientifically robust environmental decision-making.

9. RECOMMENDATIONS

Take Action for Pumicestone Passage Inc. respectfully recommends that the Queensland Productivity Commission consider the following principles when assessing the implementation of the Australian Government's 2025 environmental reforms in Queensland.

Recommendation 1: Maintain Strong Protection for MNES

Queensland's implementation of the reforms should continue to provide strong, science-based protection for Matters of National Environmental Significance (MNES), recognising that nationally significant environmental values underpin both environmental sustainability and long-term economic prosperity.

Recommendation 2: Reduce Unnecessary Duplication Between Jurisdictions

Where Commonwealth and State assessment processes address the same environmental matters,





*Protecting the Pumicestone Passage
and greenbelt for future generations.*

information should be collected once and used efficiently by both jurisdictions wherever possible, provided environmental standards and assessment integrity are maintained.

Recommendation 3: Front-Load Environmental Assessment

Encourage the early completion of key environmental investigations, including hydrology, water quality, biodiversity, coastal processes and cumulative impact assessments, to improve decision-making, reduce uncertainty and minimise costly delays later in the approval process.

Recommendation 4: Improve Transparency Throughout the Assessment Process

Ensure environmental studies, technical reports and supporting assessment information are made publicly available at appropriate stages of the assessment process to facilitate meaningful community participation and improve confidence in regulatory decisions.

Recommendation 5: Strengthen Assessment of Cumulative Environmental Impacts

Assessment frameworks should continue to recognise cumulative impacts on Matters of National Environmental Significance, particularly where multiple developments may collectively affect connected environmental systems over time.

Recommendation 6: Adopt Catchment-Scale Environmental Assessment

Where appropriate, environmental assessment should consider the broader catchment context rather than focusing solely on individual development sites, particularly for waterways, estuaries, wetlands and coastal ecosystems where environmental processes extend beyond property boundaries.

Recommendation 7: Recognise the Value of Community Knowledge and Citizen Science

Appropriately incorporate local environmental knowledge, citizen science, Traditional Owner





*Protecting the Pumicestone Passage
and greenbelt for future generations.*

knowledge and partnerships with research institutions into environmental assessment and long-term environmental monitoring where they complement scientific evidence.

Recommendation 8: Maintain Independent Oversight of Nationally Significant Environmental Values

Any bilateral arrangements between Queensland and the Commonwealth should preserve effective independent oversight to ensure Matters of National Environmental Significance receive consistent assessment regardless of the administrative pathway adopted.

Recommendation 9: Promote Consistency Through Clear Environmental Standards

Reduce unnecessary reliance on discretionary decision-making by establishing clear, transparent and evidence-based assessment standards that provide greater certainty for proponents, regulators and communities.

Recommendation 10: Measure Success by Both Efficiency and Environmental Outcomes

The success of environmental reform should be evaluated not only through reductions in approval timeframes and administrative costs, but also through improvements in environmental outcomes, public confidence, regulatory certainty and the long-term protection of Queensland's natural assets.

10. CONCLUSION

Queensland has an opportunity to demonstrate that environmental protection and economic productivity are not competing objectives. When environmental risks are identified early, scientific evidence is transparent, cumulative impacts are properly assessed and governments work collaboratively, environmental assessment becomes more efficient, communities gain greater





Protecting the Pumicestone Passage and greenbelt for future generations.

confidence and proponents benefit from greater regulatory certainty.

The Pumicestone Passage demonstrates that healthy ecosystems are not constraints on economic prosperity—they are productive natural assets that support tourism, fisheries, recreation, coastal resilience, biodiversity and the wellbeing of local communities. Protecting these values through effective environmental assessment is an investment in Queensland's long-term environmental, social and economic future.

Take Action for Pumicestone Passage Inc. believes the success of the Australian Government's 2025 reforms to the *Environment Protection and Biodiversity Conservation Act 1999* should not be measured solely by faster approvals or reduced administrative burden. Success should be measured by better decisions—decisions that are informed by sound science, supported by transparent governance, recognise cumulative environmental impacts, provide certainty for proponents and communities, and protect MNES for future generations.

Queensland's implementation of the reforms provides an opportunity to demonstrate that smarter regulation can achieve both efficient approval processes and stronger environmental outcomes. By reducing unnecessary duplication while maintaining robust scientific assessment, independent oversight and clear environmental standards, Queensland can strengthen investment confidence, improve public trust and protect the natural assets that underpin the State's long-term prosperity.

TAPP respectfully submits that the objective of environmental reform should not simply be to make approvals faster, but to make decisions better. Well-informed decisions made early, transparently and consistently are the foundation of productive economies, resilient communities and healthy ecosystems.

