

Wilderness Society Submission:

Impact of the Australian Government's 2025 environment protection reforms on Queensland

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About the Wilderness Society

The Wilderness Society is one of Australia's leading environmental advocacy organisations. We are committed to protecting, promoting and restoring nature in Queensland and across the continent. From community mobilisation to national campaigns we are powered by more than 150,000 supporters.

We appreciate the opportunity to provide feedback on the Queensland Productivity Commission's inquiry into the *Impact of the Australian Government's 2025 environment protection reforms on Queensland*.

Over recent years, the Wilderness Society has made several submissions to the Queensland Government highlighting the destructive role of deforestation for beef and the critical need to protect threatened species habitat across Australia's most biodiverse state. In this submission, the Wilderness Society highlights the Queensland Government's critical responsibility to protect the state's unique ecosystems in relation to national nature law. We also seek to underscore the unsustainable nature of business as usual - and what Queensland stands to lose without strong nature protections delivered by the federal and state government.

Queensland forest and bushland: nature like no other

Queensland is the most biodiverse state on the continent - there are more than 1000 threatened species of plant and animal across that call the state home. Yet, Eastern Australia is recognised as a global deforestation¹ front alongside the Amazon, the Congo, and Borneo.² **This alarming rate of deforestation is largely driven by the agricultural sector within Queensland.**

The latest Queensland Statewide Landcover and Tree Study (SLATS) reveals that pasture

¹ Accountability Framework initiative (2024) defines deforestation as the "Loss of natural forest as a result of: (i) conversion to agriculture or other non-forest land use; (ii) conversion to a tree plantation; or (iii) severe and sustained degradation." The Accountability Framework: Terms and Definitions. Available at: <https://accountability-framework.org/definitions>

² The Wilderness Society (2025), 'Drivers of Deforestation and Land Clearing in Queensland Report 2025'. Available at: https://wilderness.org.au/images/uploads/WEB_Drivers-of-Deforestation_2025-Report-V2.pdf (Accessed on 9 June 2025)

(responsible for 90% of land clearing activity) is the largest driver of deforestation in Queensland - with the vast majority of destruction taking place for beef.

Further, with Victoria ending native forest logging in January 2024, Western Australia in 2024, and the potential for New South Wales to follow suit, Queensland now holds the largest expanse of publicly-owned native forest that is still being logged for timber.

Queensland and the role of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)

Last year, the Wilderness Society welcomed new reforms that, if enforced, will finally bring more federal oversight of deforestation for beef - the biggest driver of deforestation in Queensland and Australia. Under environmental reforms introduced last year, the federal regulator must now assess the bulldozing of mature forest and bushland (over 15 years old) or clearing within 50 meters of Great Barrier Reef watercourses, where that destruction is likely to have a significant impact on threatened species or ecological communities (known as 'matters of national environmental significance').

However, even if the reforms are enforced and deforestation events are subject to federal scrutiny, the federal government's existing draft environmental Standards as part of the national nature law reform do not go far enough to stop deforestation, protect endangered species, or give the public a real say. The Wilderness Society is calling on the Federal government to implement Matters of National Environmental Significance (MNES) Standards that are robust, clear, outcomes-based which considers cumulative impacts and expand protection for threatened species' habitat. The Wilderness Society's MNES submission to the federal government (June 2026) is available on request.

The Wilderness Society urges the Queensland Government to work with the Federal Government to enforce the EPBC reforms and implement stronger environmental Standards to prevent ongoing nature destruction.

Any future bilateral agreement between the Federal and Queensland Governments will be undertaken in the context of Australia's biggest domestic buyers of Australian beef, Coles and Woolworths, implementing their no-deforestation commitments. By facilitating strong nature protections, the Queensland Government can back a sustainable beef industry and champion putting Queensland's environment - and the communities relying on it - first.

The importance of high conservation value native forests to Queensland³

- **Increased investment in QLD:** The economic value of forest and bushland to Queensland is significant, attracting multiple revenue streams each year. These include income from tourism, co-financing agreements, and additional capital for ongoing management and

³The Wilderness Society (2024), 'Deforestation Explained.' Available from: <https://wilderness.org.au/protecting-nature/deforestation/deforestation-explained> (Accessed on 3 Sept 2025)

investment.⁴ For example, state park visits across Queensland alone generate \$2.64 billion in spending annually and support thousands of jobs.⁵ Queensland forest and bushland is valuable habitat for the endangered koala; 75 percent of visitors to Australia report that seeing a koala is a primary factor in their decision to visit Australia.⁶ Further, koalas fuel a \$2.5 billion annual nature-based tourism sector across Australia.

- **Landholder management income diversification:** Beyond their environmental value, forest and bushland offer opportunities to support landholders to manage Country with increased feral animal and weed control and fire management in private protected areas, for income diversification and increased agricultural productivity as a result of healthier natural assets.
- **Climate change mitigation:** Forests are essential in the fight against climate change. They act as vital carbon sinks, absorbing and storing carbon dioxide and other greenhouse gases. The destruction of forests through deforestation and logging releases this stored carbon, contributing significantly to global emissions.
- **Biodiversity and ecosystem preservation:** The ecological integrity of Queensland's ecosystems is intrinsically linked to the health of its forests. Deforestation results in an immediate and significant decline in **biodiversity**, disrupts natural habitats, facilitates the spread of invasive species⁷, and increases the risk of extinction for native species, including some of Australia's most iconic wildlife. Continued deforestation has seen the decline of species like the Greater Glider. In 2022, the greater glider transitioned from vulnerable to endangered on the federal government's list of threatened species. The decline in glider populations nationwide is attributed to factors including native forest logging and habitat destruction.⁸
- **Cultural Heritage:** Australia's forests possess profound **cultural significance** for First Nations peoples. Many communities hold a deep, spiritual connection to and a custodial responsibility for Country. Around the state and Australia, deforestation often proceeds

⁴Protect Beautiful Queensland (2024), 'Protecting Beautiful Queensland', Available at: https://protectqueensland.org.au/wp-content/uploads/2024/08/PBO_policy_priorities_lowres.pdf pp. 7 (Accessed 12 March 2026).

⁵The University of Queensland, Australia (2020), 'Research reveals the economic contribution of Queensland's national parks' <https://news.uq.edu.au/2020-10-12-research-reveals-economic-contribution-queenslands-national-parks> (Accessed 13 March 2026).

⁶ Australian Koala Foundation, The Koala is worth \$2.3 billion and 30,000 jobs. Available at: <https://savethekoala.com/our-work/the-koala-is-worth-3-2-billion-30000-jobs/> (Accessed 9 July 2026).

⁷The Wilderness Society (2024), 'Deforestation Explained.' Available from: <https://wilderness.org.au/protecting-nature/deforestation/deforestation-explained> (Accessed on 3 Sept 2025)

⁸Department of Climate Change, Energy, the Environment and Water (2022). 'Conservation Advice for Petauroides volans (greater glider (southern and central))'. Canberra: Department of Climate Change, Energy, the Environment and Water. Available from: <http://www.environment.gov.au/biodiversity/threatened/species/pubs/254-conservation-advice-05072022.pdf>. In effect under the EPBC Act from 05-Jul-2022.

without the free, prior, and informed consent of First Nations communities, placing sacred sites at risk of damage and disrupting cultural practices.

- **Soil and water health:** Forests help regulate rainfall, enhance **water quality**, and prevent **soil erosion**. The root systems of trees stabilise the soil, preventing it from entering waterways, while also improving the land's capacity to retain water, thereby mitigating flood risks. Beef is the highest cause of deforestation in Great Barrier Reef catchments.⁹ Chemical and sediment pollution caused by deforestation remains a key threat to the globally significant Great Barrier Reef.

Cast studies: Business-as-usual bulldozing is destroying likely mapped threatened species habitat across Queensland

Using geospatial technology and on-ground verification, the Wilderness Society identified 26 major landclearing events between 2022 and 2025 across Queensland—a sample of the estimated one million hectares of forest and bushland destroyed while the Albanese Government has been in office. These events collectively flattened more than 5,500 hectares of mapped threatened species habitat, including forests home to at least 54 federally-listed threatened species including the koala, greater glider and red goshawk. Most of the detected landclearing was never referred to the Federal Government for assessment under the Environment Protection and Biodiversity Conservation (EPBC) Act, despite laws requiring referral when threatened species habitat is significantly impacted.

The worst-affected areas include Rockhampton, Bundaberg and Warwick, where thousands of hectares of functioning forest and bushland have been razed for beef pasture.

- See a compilation of these deforestation events and explanatory report [here](#).
- View the Wilderness Society's drone footage of deforestation in Queensland [here](#).

Bulldozing for beef pasture continues in Queensland without notification to the federal government, despite EPBC reforms that took effect in December 2025

In late 2025, the Wilderness Society welcomed long-overdue changes to federal nature laws passed. Crucially, the reforms removed and are phasing out long-standing exemptions that had kept the biggest drivers of forest and bushland destruction outside national scrutiny including the "continuous use" exemption that allowed high-risk, agriculture-driven land clearing to proceed unchecked.

Specifically, deforestation of forest and bushland that has not been cleared for 15 years, or is within 50 metres of waterways in catchments that flow to the Great Barrier Reef, must now be submitted for assessment if it could have a significant impact on a Matter of National Environmental Significance (MNES). MNES include threatened species or ecological communities, for example.

However, since the national nature law reforms (Environment Protection and Biodiversity Conservation Act) were introduced on 1 December 2025, Wilderness Society has detected deforestation events of forest and bushland of mapped known and likely threatened species habitat over 15 years old which have **not** been referred to the Federal Government despite likely

⁹ The Wilderness Society (2025), 'Drivers of Deforestation and Land Clearing in Queensland Report 2025'. Available at: https://wilderness.org.au/images/uploads/WEB_Drivers-of-Deforestation-2025-Report-V2.pdf (Accessed on 9 June 2025)

meeting the criteria for referral under the national nature law. Wilderness Society has detected broadscale deforestation in Chinchilla (Traditional lands of the Barunggam people), West of Warwick (Traditional lands of the Githabul people) and near Carnarvon National Park (Traditional lands of the Bidjara and Karingbal (Garingbal) peoples) in Central Queensland. Together, these total over 700 hectares of mapped threatened species habitat, adding to growing concern about dozens of deforestation events across Queensland since the EPBC reform that have not been referred to the federal government for environmental approval. Wilderness Society has referred these events to the federal government.

In the spotlight: Business-as-usual bulldozing suffocates the Great Barrier Reef

The Great Barrier Reef faces a magnitude of threats, including global heating, coastal development, direct human use and notably, poor water quality from land-based run-off.¹⁰

Thirty-five catchments across World Heritage listed tropical rainforests, large rivers, tropical savannahs and wetlands, drain into the Reef. Agricultural grazing is the predominant land use of these catchments (77%).^{11 12}

Nearly half of all land clearing in Queensland occurs in Great Barrier Reef catchments. Tree clearing, particularly of waterways (riparian areas), remains among the largest drivers of water pollution.

Deforestation and land clearing in Great Barrier Reef catchments increases erosion and run-off of sediment and pollutants into the Reef.¹³ High concentrations of sediment interfere with filter feeding by organisms such as clams and barnacles, reduce coral recruitment, and alter the quantity and quality of light available for photosynthesis.¹⁴ This biological and chemical process is essential for plants like seagrass which provides a key food source for the endangered dugong, and algae, which have a symbiotic relationship with coral.^{15 16} Through interfering with these

¹⁰ Australian Marine Conservation Society (AMCS) (n.d.) 'Pollution & Water Quality in the Great Barrier Reef.' Available at: <https://www.marineconservation.org.au/pollution-great-barrier-reef/> (Accessed: 9 May 2025).

¹¹ Australian Government (2023), 'Reef 2050 Long-Term Sustainability Plan', Available at: <https://www.dcceew.gov.au/sites/default/files/documents/reef-2050-long-term-sustainability-plan-2021-2025.pdf> Accessed 2 October 2025.

¹² The Wilderness Society (2025), 'Drivers of Deforestation and Land Clearing in Queensland Report 2025.

¹³ Australian Marine Conservation Society (AMCS) (n.d.) 'Pollution & Water Quality in the Great Barrier Reef.' Available at: <https://www.marineconservation.org.au/pollution-great-barrier-reef/> (Accessed: 9 May 2025).

¹⁴ Queensland Government (2019), 'How does sediment affect the Great Barrier Reef?' Available at: <https://www.reefplan.qld.gov.au/resources/explainers/how-does-sediment-affect-the-gbr#:~:text=Scientists%20now%20know%20that%20high,%E2%80%93%E2%80%93%20and%20even%20smother%20corals.> Accessed on 16 Sept 2025)

¹⁵ Coral Reef Alliance (2024) 'Corals Decoded: Animals or Plants? Common Myths Debunked'. Available at: <https://coral.org/en/blog/corals-decoded-animals-or-plants-common-myths-debunked/> (Accessed 2 October 2025)

¹⁶ Australian Marine Conservation Society (2024), 'Great Barrier Reef still threatened by tree clearing in Reef catchments. Available at: <https://www.marineconservation.org.au/great-barrier-reef-still-threatened-by-stubbornly-high-tree-clearing-rates-in-reef-catchments/> (Accessed 28 Sept 2025)

processes, run off from deforestation and land clearing prevents corals' recovery from bleaching events, with the Great Barrier Reef recently suffering its fifth mass coral bleaching event in five years.¹⁷

UNESCO has recommended the Federal and State Governments strengthen deforestation regulations to protect remnant and high-quality vegetation in Reef Catchments and other high priority areas, including vegetation along water courses.¹⁸

The Wilderness Society highlighted the following significant failings of the draft MNES Standard in our recent submission to the Federal Government:

- Approvals will be based on process, not protection. A developer or logging agency can satisfy the Standard simply by following a set of principles and a mitigation or compensation process, rather than by actually avoiding harm or delivering real outcomes for nature. This is a major lowering of the bar.
- When read alongside the draft Offsets Standard, the MNES Standard will drive offsets rather than the upfront protection of nature, establishing a dangerous "pay to destroy" precedent where proponents can buy their way past habitat destruction instead of avoiding it.
- Protections for threatened species habitat have been weakened. The objectives for threatened species, threatened ecological communities and migratory species have all been narrowed, leaving their habitat with weaker protection than before.
- The Standard fails to set robust and clear rules or thresholds for how decisions will be made on proposals that would impact matters of national environmental significance.
- Vague and discretionary language throughout the Standard undermines its ability to deliver better outcomes for nature, and weakens certainty and accountability in decision-making under the EPBC Act.
- Cumulative impacts are not an explicit requirement. The Standard limits consideration of context to bioregional plans and strategic assessments, rather than requiring it across all decisions.
- Climate change is not mentioned at all. The Standard fails to require that impacts on nature be considered in the context of different climate change scenarios, despite climate being a systemic threat to the species and places it is meant to protect.
- Monitoring, reporting and enforcement are left underdone with insufficient detail on what will be required to track whether the Standard is actually working.
- Indigenous Rights are not upheld. The Standard lacks rules for effective and genuine engagement with Indigenous people and for the contribution of Indigenous knowledge.
- The Standard is not clear on what counts as effective public consultation, leaving little guarantee of a meaningful role for the community in decisions.

¹⁷Australian Marine Conservation Society (2024), 'Great Barrier Reef still threatened by tree clearing in Reef catchments.' Available at: <https://www.marineconservation.org.au/great-barrier-reef-still-threatened-by-stubbornly-high-tree-clearing-rates-in-reef-catchments/> (Accessed 28 Sept 2025)

¹⁸ UNESCO World Heritage Centre (2024) 'State of conservation of properties' WHC/24/46.COM/7B.Add. 46th session of the World Heritage Committee, New Delhi, India, 21-31 July 2024. Available at: <https://whc.unesco.org/archive/2024/whc24-46com-7B.Add-en.pdf> (Accessed: 9 May 2025)

The Wilderness Society has also called on the Albanese Government to implement the following measures to ensure Federal Environmental Standards provide genuine protection for nature:

- The legal test for consistency should require that an action actually achieves the Standard's outcomes and objectives, not merely that a process has been followed.
- The objectives for threatened species, ecological communities and migratory species should be amended to protect all habitat, not only habitat defined in narrow and restrictive terms.
- The Standard should require explicit consideration of cumulative impacts, climate change scenarios and key threatening processes in all decisions, none of which the proposed Standard currently addresses.
- The Standard should be extended to apply to plans, policies and programs made under the Act, not just specified decisions, and should include requirements for ongoing monitoring and evaluation of whether the outcomes and objectives are being achieved.

Beyond national environmental Standards, the Wilderness Society is urging the Federal government to undertake additional critical measures including:

- Substantially increase federal funding for nature protection and recovery, which currently sits at around 0.06% of the federal budget, far short of what the government's own commitment to end extinctions requires.
- Support a national deforestation monitoring program (vegetation mapping) and early-detection system, and fund a traceability system for agricultural products so they can be tracked from "farm-to-fork," demonstrating sustainability credentials and ensuring ongoing market access.
- Set a target for a national deforestation roadmap.
- Educate all stakeholders about their updated responsibilities under the national nature protection law, including landholders and the state and territory departments that often deal directly with them.
- Compel proponents to refer to proposed deforestation of threatened species habitat, and require the decision-maker to assess it.
- Urgently improve federal environmental compliance and enforcement by the new EPA through boosted funding, strengthened policies and a clear prioritisation of cracking down on illegal deforestation.
- Require large companies and financial institutions to publicly disclose nature-related impacts, risks and opportunities.
- Enshrine a fair say for the community in environmental decision-making, as well as the cultural and self-determination rights of First Nations, including the right to give or withhold free, prior and informed consent.

To safeguard Queensland's unique forests and bushland and the iconic Great Barrier Reef, Wilderness Society recommends the Crisafulli Queensland Government:

1. Release an up to date Statewide Landcover and Trees Study (SLATS) on an annual basis:

- The Queensland Government's 2023 independent review chaired by Professor Hugh Possingham, the *Native Vegetation Scientific Expert Panel report*, recommended that SLATS be released annually. The report recommended the releases include 'state-wide data and data breakdowns by Interim Biogeographic Regionalisation for Australia (IBRA) regions and show the full balance sheet of native vegetation, with clearing, re-clearing and recovering vegetation explicitly defined and accounted (for).'¹⁹
- **Strengthen and ensure the robust enforcement of Queensland's Vegetation Management Act (VMA) 1999:**
 - Close loopholes in the VMA to increase protection of remnant vegetation, high value regrowth, vegetation on watercourses and land subject to degradation, threatened species habitat and tightly restrict fodder harvesting.
 - Tree clearing, particularly of waterways (riparian areas), remains among the largest drivers of water pollution.²⁰ It is highly alarming that the targets for riparian vegetation in the 2050 Catchment Water Quality Strategy have been updated to be even less ambitious. The Strategy now only targets 'no net loss' instead of aiming for an increase in riparian vegetation. This will lead to sediment pollution posing a risk to coral and seagrass ecosystems.²¹
 - Address loopholes in and compliance with vegetation clearing codes. Wilderness Society observations using our satellite technology platform, *Watch on Nature*, has revealed the misuse of the weed management code as well as logging on private property of Category B (remnant vegetation) undertaken without Government oversight using the self-assessable vegetation clearing code, NFP.²² The Wilderness Society is concerned about clearing codes being exploited to expand agricultural land clearing.

¹⁹ Queensland Government (2023), 'Native Vegetation Scientific Expert Panel report'. Available at: https://environment.desi.qld.gov.au/_data/assets/pdf_file/0025/324574/expert-panel-report.pdf pp. 8 (Accessed: 30 April 2026).

²⁰ Australian Marine Conservation Society (2025) 'After two years of delays, the government's strategy to reduce water pollution in the Great Barrier Reef says little and promises even less' Available at: <https://www.marineconservation.org.au/governments-strategy-to-reduce-water-pollution-says-little-and-promises-even-less/> (Accessed: 30 April 2026).

²¹ Australian Marine Conservation Society (2025) 'After two years of delays, the government's strategy to reduce water pollution in the Great Barrier Reef says little and promises even less' Available at: <https://www.marineconservation.org.au/governments-strategy-to-reduce-water-pollution-says-little-and-promises-even-less/> (Accessed: 30 April 2026).

²² Queensland Government (2023), 'Clearing Codes' Available from: <https://www.qld.gov.au/environment/land/management/vegetation/clearing-approvals/codes/choose> (Accessed: 30 April 2026).

- Include a requirement that all land clearing and logging activities, including of Category X lands, require notification under the VMA and Federal *Environment Protection Biodiversity Conservation (EPBC) Act 1999*.
 - Boost investment in compliance and enforcement to monitor the efficiency of Queensland's *Vegetation Management Act (VMA) 1999* to protect high conservation value (HCV) forest and bushland and prevent unexplained land clearing and deforestation.
- Incentivise and support sustainable land management and stewardship:
 - Enhance stewardship programs (including the Land Restoration Fund) by increasing funding opportunities, deepening landholder engagement and take up and focussing on both regulated and unregulated lands (e.g. Category B, Category R, Category C and Category X lands).
 - Provide financial incentives, technical assistance, and extension programs for landholders adopting sustainable land management practices, including:
 - Improved management of existing cleared land for enhanced productivity.
 - Restoration of degraded lands and reforestation initiatives.