



18 August 2026

Angela Moody
Productivity Commissioner and Chair
Queensland Productivity Commission
PO Box 12078
George Street QLD 4003
Australia

We build Queensland

Timber Queensland Ltd
ACN 092 686 756 ABN 50 092 686 756

Dear Angela

RE: Inquiry into Impacts of 2025 Environment Protection Reforms

30 Boothby Street,
Kedron Qld 4031

Thank you for offer of Timber Queensland meeting with the QPC regarding this inquiry.

Timber Queensland is the peak state body representing Queensland's forestry and timber industry to government and stakeholders. Our membership extends from forest growers, harvesters and haulers through to timber processors, fabricators, builders and traders. We have a strong objective to pursue industry development and promote the use of renewable timber products in the built environment and sustainable land management including through R&D and innovation.

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Following is a summary of issues impacting landowners around EPBC and vegetation management laws.

We look forward to your consideration of our application.

Yours sincerely



Greg Leach
General Manager

Regulatory Issues Stalling Queensland Landowners from Harvesting Timber

Recent EPBC Act amendments and reforms are creating increased compliance obligations and uncertainty for Queensland timber producers and landholders. This is on top of existing complex State regulations and the lack of a renewed Queensland and Commonwealth Bilateral Agreement on 2025 EPBC changes.

1. Regulatory complexity and approval uncertainty

- Landowners are uncertain whether harvesting is regulated solely under Queensland legislation or may also trigger Commonwealth EPBC Act requirements such as threatened species, ecological communities, wetlands or other Matters of National Environmental Significance (MNES).^{i ii}
- Multiple legislative frameworks can apply simultaneously, including:
 - **Vegetation Management Act 1999 (Qld) (VMA)**
 - **Environmental Protection Act 1994 (Qld) (EPA)**
 - **Nature Conservation Act 1992 (Qld) (NCA)**
 - Local government planning requirements, especially in southeast Queensland
 - Commonwealth **EPBC Act 1999** obligations where MNES may be affected.

2. Vegetation mapping and classification issues

- Disputes or inconsistencies in:
 - Regional Ecosystem (RE) mapping (which have existed since 1999)
 - Essential habitat mapping (which have existed since 2009)
 - High-value regrowth mapping (which have existed since 2009)
 - Watercourse and riparian mapping (which have existed since 2013)
 - Protected Plants habitat mapping (which have existed since 2014, with changes in 2019)
- Landowners often report mapped values do not always reflect on-ground conditions, creating delays, with progressive changes increasing compliance costs and reduced harvesting flexibility.

3. Forestry versus land clearing

- Public scrutiny often raises concerns that the harvest of timber is illegal. A landowner needs to demonstrate harvesting is a legitimate and ongoing **forestry operation** rather than clearing for agricultural conversion by lodging an official **Vegetation Management Notification Form**.
- Landowner awareness of documentation requirements including forest management plans, harvest schedules and regeneration programs to demonstrate compliance, is low.

4. Threatened species and biodiversity constraints

- Harvesting proposals may require assessment where habitat for protected species or ecological communities is present.
- Common concerns include:
 - Koalas
 - Glider species
 - Spotted-tail Quoll
 - Glossy Black Cockatoo
 - Threatened Regional Ecosystems and ecological communities

- Ecological surveys and specialist advice are costly, particularly for smaller forest holdings.
- 5. EPBC Act reforms and recent changes**
- Recent EPBC Act reforms have increased uncertainty around vegetation clearing, habitat protection and Commonwealth oversight of environmental impacts.ⁱⁱⁱ
 - Since December 2025, the "continuing use" exemption no longer applies to:
 - Vegetation not cleared within the previous 15 years (except genuine forestry operations)
 - Vegetation within 50 metres of waterways, wetlands in Great Barrier Reef catchments.^{iv}
 - Although forestry operations remain excluded from the 15-year rule, many landholders are uncertain about how EPBC regulators distinguish forestry from other land use changes.^v
- 6. Increased costs and delays**
- Forestry projects increasingly require:
 - GIS and mapping reviews
 - Biodiversity assessments
 - Threatened species investigations
 - Legal and compliance advice
 - These requirements can raise costs, reduce profitability and delay harvest operations.^{vi}
- 7. Great Barrier Reef catchment considerations**
- Additional scrutiny commonly applies in reef catchments where harvesting occurs near:
 - Watercourses
 - Drainage lines
 - Riparian areas
 - Landowners identify uncertainty around buffer requirements and watercourse mapping.

Common landholder concerns

- "Which approvals do I actually need, and who do I talk to?"
- "The vegetation mapping does not reflect reality on the ground."
- "Environmental assessment costs are becoming prohibitive."
- "Where is the certainty for business investment? Regulatory requirements continue to change."
- "I am concerned about compliance challenges for harvesting timber."
- "The complexity of the system discourages active forest management."

Key Queensland legislation affecting timber harvesting

- **Vegetation Management Act 1999 (Qld)**^{vii}: regulates native vegetation clearing through regional ecosystem mapping, vegetation categories and regulated vegetation management activities.
- **Environmental Protection Act 1994 (Qld)**^{viii}: regulates environmentally relevant activities, environmental harm and general environmental duties.
- **Nature Conservation Act 1992 (Qld)**^{ix}: provides protections for native wildlife, protected plants, threatened species and conservation areas.
- Together with the **EPBC Act 1999 (Cth)**, these Acts form the primary regulatory framework affecting private native forestry and timber harvesting in Queensland.

- Many Queensland Councils have biodiversity, environmental significance, waterway, wetland or vegetation management overlays in their **Planning Schemes** that can trigger development assessment for vegetation clearing on rural land, including: Logan, Brisbane City, Moreton Bay, Sunshine Coast, Noosa, Gold Coast, Scenic Rim and Redland Councils

Recommendations

1. Queensland Government finalise development of instrument that protects 'private native forest reserves' in legislation, including the Vegetation Management Act and the Forestry Act. This will provide certainty required for preserving sovereign risk and long-term property business plans.
2. Queensland Government negotiate with Federal Government Agencies the protections afforded by 'private native forest reserves' to extend across Commonwealth legislation, including the EPBC Act.
3. Queensland Government renew Queensland and Commonwealth Bilateral Agreement on 2025 EPBC changes to remove overlap and increase landowner certainty of compliance requirements.
4. Queensland Government support an extension program for improving landowner awareness and understanding of forestry management best practice and legal requirements (note: in QFTP).

ⁱ National Environmental Protection Agency (2026), *Agriculture and the EPBC Act*, Australian Government.

<https://www.nationalepa.gov.au/sites/default/files/documents/agriculture-epbc-act.pdf>

ⁱⁱ Department of Climate Change, Energy, the Environment and Water (DCCEEW) (2026). *Reforms to Land Clearing Exemptions*, Australian Government. Available at: <https://www.dcceew.gov.au/environment/epbc/epbc-act-reform/agricultural-action-exemptions>

ⁱⁱⁱ Environmental Defenders Office. (2025). *Update on EPBC Act reforms: Changes to the application of the EPBC Act to forestry operations*. Environmental Defenders Office. <https://www.edo.org.au/wp-content/uploads/2025/12/251217-EDO-EPBC-Act-reforms-update-Forestry-amendments-1.pdf>

^{iv} Cairns and Far North Environment Centre (CAFNEC). (2025). *EPBC reform update: What's just passed and what it means for FNQ*. CAFNEC. <https://cafnecc.org.au/2025/12/15/epbc-reform-update-whats-just-passed-and-what-it-means-for-fnq/>

^v AgForce Queensland. (2025). *Federal environmental reforms (EPBC Act): Impacts, timelines and AgForce's response*. <https://www.agforceqld.org.au/knowledgebase/article/AGF-02774/>

^{vi} Forestry Australia. (2026). *What the EPBC reforms mean for forest managers*. Forestry Australia. <https://www.forestry.org.au/epbc-reforms-forest-managers/>

^{vii} Queensland Government 1999, *Vegetation Management Act 1999 (Qld)*, Queensland Legislation <https://www.legislation.qld.gov.au/view/html/inforce/current/act-1999-090>

^{viii} Queensland Government. (1994). *Environmental Protection Act 1994 (Qld)*. Queensland Legislation. <https://www.legislation.qld.gov.au/view/html/inforce/current/act-1994-062>

^{ix} Queensland Government 1992, *Nature Conservation Act 1992 (Qld)*, Queensland Legislation <https://www.legislation.qld.gov.au/view/html/inforce/current/act-1992-020>