Wildlife Preservation Society of Queensland Upper Dawson Branch

PO Box 262
Taroom Q 4420
E: upperdawson@wildlife.org.au
13 July 2026

Queensland Productivity Commission
Impact of 2025 EPBC Act reforms on Queensland inquiry

Dear Commissioners

Re: Impact of 2025 EPBC Act reforms on Queensland inquiry

The Upper Dawson Branch of the Wildlife Preservation Society of Queensland has for more than 40 years advocated to protect the Upper Dawson's native wildlife and the habitats that sustain them. We are a separately incorporated one of the 13 branches of Wildlife Queensland, who deeply value our unique wildlife and natural areas, and hope to safeguard these environmental assets for current and future generations.

Upper Dawson Branch welcomes the opportunity to provide this submission to the Queensland Productivity Commission's inquiry into the impacts of the Australian Government's 2025 reforms to the Environment Protection and Biodiversity Conservation Act 1999 on Queensland.

We endorse the preamble of Wildlife Qld's response to the inquiry "Queensland's economy, regional communities and future productivity depend on healthy landscapes, functioning ecosystems, clean water, resilient catchments, intact habitat and the recovery of threatened species. Environmental protection should not be treated as separate from productivity. It is a foundation for long-term productivity.

"Our key message is that 2025 EPBC Act reforms and **strong environmental standards will improve productivity** when they reduce uncertainty, avoid late-stage conflict, protect natural capital, support regional stewardship and ensure that development proceeds within clear ecological limits."

From the perspective of members from "family farm" backgrounds, many still actively engaged in grazing or farming enterprises, we have experienced the expansion of extractive industries into our landscapes, communities, and enterprises and attempted to inform Government over the decades about our concerns about the impacts of those industries on the landscapes, the social fabric, and economies of our communities.

It is out of this experience including reading Environmental Impact Statements, making submissions, and watching the fragmentation of our ecosystems that we respond for ourselves, while endorsing the submission of the wider Wildlife Preservation Society of Queensland, copied below as an over-arching presentation of our values in response to this inquiry.

The TORs

The Context

1.The context (hereinafter The Context) itself sets up an expectation that the 2025 EPBC Act and its not-yet-clarified regulations will be antithetical to “growth and economic security”

Comment - It seems premature and adversarial to inquire into the reforms in the 2025 Act given that (p.1 TORs) *“Many of these elements (of the reforms) are yet to be fully implemented and will rely on subordinate legislation, standards, guidance and administrative practice. Of concern is that the legally binding National Environmental Standards remain under development, with little transparency about their potential impact on Queensland,*”

Recommendation 1 – Seek clarification from the Commonwealth re the NES and negotiate with them about unclear or undesirable elements before proceeding with this inquiry.

Comment – Furthermore, the “intended purpose” of the EPBC Act is to protect and conserve environmental values including biodiversity. It seems incongruous therefore that (TORs p.1) “*It is critical that regulation across all levels of government serves its <u>intended purpose</u> and not act as a handbrake on vital projects that support growth and economic security”.* This seems to presuppose that protecting and conserving the environment is likely to be antithetical to both “growth” and “economic security”. Given that all human life depends on healthy environments, any “growth” which endangers the environment ultimately endangers human well-being and life, and therefore human security. Even “growth” and “economic security” do not always support each other in reality. Similarly, tying “*sovereign capability*” to *“bolster(ing) Australia’s energy security by unlocking new oil, gas and coal production”* contains a contestable presupposition given that there is a risk that these could become stranded assets with the present volatility in the world, particularly in the Strait of ‘Ormuz; likewise conflating “*productivity*” with “*investment in new projects*”. While initially stimulating the economy, many of the last century’s “new projects” are now rusting among and spreading weeds and/or polluting streams in the Dawson Valley – disastrous real “cumulative impacts” not considered in the rush to invest and take the profits overseas while leaving the impacts to now apparently impoverished Queensland. They seem to have failed to produce “economic security”.

Further to our experience of past “growth” - In the Surat Basin, the “natural” gas wells hailed in the sixties are now abandonned, and the location of many of them can’t be found. Worse, no one knows what the long-term impact may be or has been of having those wells cutting through aquifers, possibly inter-mixing them or draining them while also potentially leaking the earth’s flatulence (gas) into its nostrils (via the air).

In two decades of experience of our Branch members in regional Qld, landholders have been encouraged by the assumptions in The Context to feel afraid of not being able to “do what they want” on the land, until it is explained to them how they can comply with the guidelines of the Act. On the other hand, proponents of large scale projects are quite certain they can avoid the intent of some environmental law/regulation by pulling levers such as the danger to “growth and economic security”, or “jobs” or regional population loss, or by threatening the removal of their proposal to another jurisdiction, or buying their way out of obligations by means of “offsets” or contributing to political parties and small community enterprises. They can avoid taking responsibility for environmental damage by “expanding” their operations piecemeal with each “piece’s” environmental impact being assessed discretely instead of as a contribution to a cumulative impact of all environmentally relevant activities in a district, region, state or nation.

For instance, in the “Statement of Reasons” to uphold the EA of the expansion of the “Ironbark” gas field, given this month by Qld’s DETSI in **response to objection to EA for APLNG Ironbark Project for 46 new wells** the objection that the impacts of 46 more gas ‘wells’ would add to the impacts of the existing or proposed other 1,695 wells – i.e. the environmental damage would accumulate over space as well as over time – is repudiated - e.g. to four separate objections pp 6-25 *“When an EA amendment application is submitted, the administering authority assesses only the scope of the proposed changes and any new, related impacts to environmental values.* ***It is not a full reassessment of the entire site or baseline operations or potential future operations outside of the application.”*** (Our emphasis). This is clearly antithetical to the accepted meaning of “cumulative”. These are <u>concurrent</u> impacts. Calling them “cumulative” in the regulatory framework is not even a “fig leaf”. (Try Casuarina cladode.)
It is clear that the existing application by Queensland of the former EPBC Act is not, in this, and presumably not in most other “expansions” either “protecting” or “conserving” the environment which is it’s “intended purpose”. Productive rural Australian families must sacrifice land they have long tended and cherished so that those proponents can exploit the land from which Queensland families produce agricultural exports. In the long-term, after the “booms”, the security and productivity of Queensland will depend on the health of the soil, air and water, and the well-being of its communities.

Recommendation 2– Strengthen Queensland legislation and lobby the Commonwealth to include cumulative rather than discrete assessments of environmental impacts of all environmentally relevant proposals.

Comment - After quoting its own conclusions from its own enquiries into construction (“homes” are the current “heart-stopper” for the public), primary industries (always a “heart-stopper”), The Context suggests that Queensland might not be able to make sure its environment is protected if required to do so.

Recommendation 3– (a) Lobby the Commonwealth to tax windfall profits from gas extraction and share with the State to help pay for environmental protection.
(b) Legislate increased State “royalties” from extractive industries.

Comment - During the Bligh Government our Branch frequently asked that gas companies be required (regulated) to keep enough supply for the local market because selling it overseas would result in – surprise, surprise! – Australia having to pay global prices for locally sourced gas. But no. “Move fast: break things” :– things like high gas prices : things like 1000+ km of countryside dozed for pipelines, increasing fire danger and weed infestation: like hundreds of thousand tonnes of chemical waste accumulating in the bush as we speak in the Upper Dawson Catchment: things like chemical contamination of the Dawson River resulting in impoverishment of in-stream aquatic life. These are the very things that The Context says might be made worse by the 2025 Act which is supposed to increase protection of the environment and decrease duplication: - “*unintended consequences for land management in Queensland, including constraints on the ability of landholders and governments to manage fire risk, flooding, weeds and pests, stewardship and biodiversity, with flow-on implications for community safety, infrastructure resilience and biosecurity.”*

We have already registered our opposition to those aspects of the Act that might have such consequences.

On the other hand, the Queensland government is seeking more rights to acquire land for "Projects of State Significance" which could more easily completely override landholders' rights of tenure let alone right to manage for good environmental outcomes. See our submission to the State Development and Public Works Organisation (Critical Minerals) and Other Legislation Amendment Bill 2026. Choosing to extract critical minerals will require a serious and evidence-based assessment of the long term risks and benefits, not only to the economy, but also to the environment, to agriculture, and to social cohesion in rural communities.

Recommendation 4 – (a) **Withdraw the State Development and Public Works Organisation (Critical Minerals) and Other Legislation Amendment Bill 2026.**
- (b) Failing (a) approve land resumption for critical minerals only on urban and suburban land.
- (c) Carry out an open and evidence based investigation into the feasibility and desirability of giving critical mineral extraction precedence over other land uses such as farming, conservation, places of worship, data centres, banks, sports fields highways …..

Comment - From our experience, any credible risk assessment needed for a community group to apply for government funds must include a presentation of opportunities as well as risks and the seriousness of their consequences. There is nothing in the wording of The Context to indicate any possible positive outcomes of the 2025 Act.

Recommendation 5– (a) Include in the findings of the Inquiry anything positive in either the Act or its intention and
(b) recommend that it be amended where it is inadequate for its "intended purpose" to protect and conserve environmental values.

Conclusion re The Context. We conclude that The Context of the inquiry biases responses in favour of speed towards less restricted exploitation and against the already severely damaged biodiversity of Queensland, including one of its best assets and pillar of our "economic security", the Great Barrier Reef. "Move fast: and break things". If what we break doesn't matter, that means rural communities, and the health of our river, our soils our air quality, our landscapes, and the Great Barrier Reef, don't matter.

The Inquiry

P2 "The inquiry will examine how the reforms affect Queensland in practice, with a primary focus on regulatory burden, economic impacts, implementation risks and the operation of Commonwealth–State arrangements. The inquiry will assess the extent to which the reforms alter compliance obligations, costs, decision-making processes and responsibilities for landholders, project proponents and Queensland Government agencies."

1. Regulatory Burden -

For Industrial/extractive/construction projects - Proponents of major projects were already required to provide an Environmental Impact Assessment to both State and Commonwealth jurisdictions, and they usually engaged ecologists to carry out such assessments. If this duplication is removed, costs and delays will be reduced. Should the interests of the jurisdictions differ, negotiations will need to occur and final decisions made on transparent publicly available bases.

Conclusion - this aspect of the regulatory burden on proponents appears to be no more burdensome than the previous one and could be reduced if the Commonwealth-State duplication of assessment requirements is removed through negotiation.

Recommendation 6 – Negotiate with the Commonwealth to agree on common assessment parameters, while maintaining the right to assess applications by both jurisdictions before issuing an EA.

Recommendation 7 – Apply the same principle used by DETSI in gauging "cumulative" impacts, and address only the impact of the current change rather than adding the burden of this change to existing burdens - e.g. the State Reef regulations for land clearing.

For landholders - At a recent Field Day conducted by the Dawson Catchment Coordinating Association, the Commonwealth's Cormac Farrell, explained to the landholders present, that the map of Matters of National Environmental Significance (MNES) would show them if their property contains any MNES and if not, they don't need to submit their plan for the change. If it does, their plan must show how the change will not impact MNES, or if it does, proposing ways to "make good" or minimise any possible environmental damage. Submission of a plan is free to landholders. Already a State map of Vegetation types exists for the guidance of property managers.

Conclusion - there is no obvious increase in regulatory burden for landholders

For State Agencies - The State has National Parks with custodial responsibility for areas of environmental significance that must not be damaged or exploited. Our experience is that rural Parks staff are among our best resource for fire management and pest control but they are understaffed, and their conservation role is undervalued by the State and the public.

Recommendation 8 - **Request a share of funds from the Commonwealth (gas tax?) to Increase State budget for protecting State Forests and National and Conservation Parks by -**
(a) engaging contractors to clean toilets, manage campgrounds, and charge campers.
(b) appointing well paid Rangers skilled in research, maintaining healthy ecosystems, surveying and recording flora and fauna, and engaging the public in understanding the natural values of the protected areas.

2. Economic Impacts

Again, major proponents will have the resources and political backing to undertake the assessment and variations needed to comply with the 2025 Act as they have done in the past. Assistance is available from the DEECW through the new Act to individuals or small business (including small farms) to reduce assessment costs in time and expertise. For Rural landholders this is free. A self-assessment tool is provided to help rule out unnecessary concerns and provide contact details to clarify or assist those unsure of navigating the requirements.

Conclusion – The 2025 Act should not be an increased impost on time or costs to landholders or major industries.

3. Implementation risks – It is difficult to conceive of additional risks incurred while complying with the 2025 Act unless the proposed action is undertaken without honestly utilising the self-assessment tool or EIS and without accepting the assistance offered. As the stated intention of the Act is to protect and conserve environmental values and biodiversity, it is unlikely that any risk will be incurred unless there is clear breach of this intention in the implementation of any plan or proposal.

Conclusion – No additional risks are anticipated

To aid in the implementation of the Act and provide positive outcomes to landholders or to achieve "the same environmental outcomes …… without additional regulatory burden or through the recognition of environmental stewardship that is being delivered." (TORs P 2)

We propose -
Recommendation 9– cooperate with the Commonwealth DCEEW to provide DETSI-endorsed clear guidance to proponents and landholders to assist them in conserving and protecting matters of national and state significance while maintaining the fertility, conservation, and productivity of their land.

Recommendation 10 – Fund NRM associations and extension officers to assist landholders with remnant or re-growth vegetation to draw up plans for purposeful restoration and/or protection of an ecosystem or habitat and -
(a) Provide funding into perpetuity on a pro-rata basis for productivity fore-gone and
(b)Monitor progress annually to ensure desired outcomes and -
(c) Assist in succession planning and property sale plans to incorporate gains made in one generation/ownership to another.

Recommendation 11– fund or continue to fund NRMs in providing peer to peer support in land management for rural enterprises.

Recommendation 12– Draw up digital resources for land managers and students to highlight strategies for maintaining biodiversity on rural land.

Recommendation 13– Require schools to include science lessons on Australian flora and fauna throughout the curriculum extending to the science of conservation and land management in upper years.

Recommendation 14 – Forbid the entry of exotic plants and their sale in nurseries unless they have been stringently tested for the tendency to become weeds or harbour pests.

We believe that these strategies, while by no means exhaustive, will assist both the Commonwealth and the State in achieving the intent of the 2025 EPBC Act and in conserving Queensland's biodiversity for the long term.

While this is submission arises from the experience of our Branch, we also endorse the submission of the Wildlife Preservation Society of Queensland as copied below.

Thank you for the opportunity to contribute.

Regards,
Secretary,
Upper Dawson Branch

Wildlife Preservation Society of Qld
wildlife.org.au
CELEBRATING 60 YEARS

Wildlife Preservation Society of Qld

www.wildlife.org.au

15 June 2026

Queensland Productivity Commission
Impact of 2025 EPBC Act reforms on Queensland inquiry

Dear Commissioners

Re: Impact of 2025 EPBC Act reforms on Queensland inquiry

Wildlife Queensland is one of the state's most respected conservation organisations. For over 62 years we have worked to protect Queensland's native wildlife and the habitats that sustain them. We have 13 branches across Queensland, over 20,000 supporters and members and engage over 520,000 Queenslanders annually through research, monitoring, community conservation programs, policy engagement and digital outreach. Queenslanders deeply value our unique wildlife and natural areas and Wildlife Queensland exists to safeguard these environmental assets for current and future generations.

Wildlife Queensland welcomes the opportunity to provide this submission to the Queensland Productivity Commission's inquiry into the impacts of the Australian Government's 2025 reforms to the Environment Protection and Biodiversity Conservation Act 1999 on Queensland. Queensland's economy, regional communities and future productivity depend on healthy landscapes, functioning ecosystems, clean water, resilient catchments, intact habitat and the recovery of threatened species. Environmental protection should not be treated as separate from productivity. It is a foundation for long-term productivity.

Our key message is that 2025 EPBC Act reforms and **strong environmental standards will improve productivity** when they reduce uncertainty, avoid late-stage conflict, protect natural capital, support regional stewardship and ensure that development proceeds within clear ecological limits. This can be achieved by:

1. Strong EPBC reforms can reduce uncertainty, delay and conflict

Strong national standards can improve productivity by creating clearer expectations at the start of a project. Proponents, governments, investors, landholders and communities benefit when the rules are known early, high-value habitat is identified before project design is locked in, and unacceptable impacts are clearly understood. Delay is often caused not by strong environmental standards, but by unclear standards, poor early surveys, inadequate avoidance of important habitat, unrealistic offsets, incomplete information and late identification of environmental constraints.

The standards must prioritise environmental outcomes, not just process. A project should not be considered consistent with a standard simply because a payment has been made or a procedure has been followed. It should only be approved where it is likely to deliver the relevant environmental outcome. Good regulation improves productivity when it reduces ambiguity, provides clear decision rules and directs investment away from high-conflict, high-risk proposals.

2. Protecting habitat protects Queensland's productive base

Queensland's productivity depends on its natural capital. Healthy ecosystems support agriculture, tourism, fisheries, water quality, soil stability, pollination, carbon storage, climate resilience, flood mitigation, recreation and regional liveability. Riparian vegetation, wetlands, remnant woodland, mature trees, hollow-bearing trees, grasslands, coastal systems and wildlife corridors provide services that are expensive or impossible to replace once degraded.

Offsets must not become a mechanism for continuing habitat loss. Not all habitat can or should be offset. Some places are too important, too rare, too old, too connected, too species-specific or too difficult to recreate. Where a genuine, like-for-like, additional and durable offset is not available, the impact should not be approved and the habitat should not be cleared. The standards should clearly identify no-go zones for irreplaceable, high-risk or critical habitat, including threatened species breeding habitat, roosting sites, mature hollow-bearing habitat, climate refugia, key wildlife corridors and habitat essential to species recovery.

3. Better standards can improve investment certainty

Queensland needs efficient, predictable and credible assessment processes. Wildlife Queensland supports efficiency, but efficiency should come from better planning, better environmental information, clearer rules, stronger avoidance of harm and upfront decision-making. Strong standards can improve investment certainty by clearly identifying which environmental values must be avoided, what survey effort is required, how cumulative impacts must be assessed, when impacts are unacceptable, when offsets are not appropriate, and how compliance will be monitored and enforced.

The concept of required net gain must be defined in an actionable and assessable way. If net gain is not clearly defined through regulation, an offsets calculator or another objective method, its application may fall largely to Ministerial discretion. This would weaken certainty for proponents, communities, regulators and investors. Net gain should be measurable, additional, attributable, durable and directly relevant to the impacted matter. It should not be used to justify clearing habitat where the environmental values cannot be replaced. In those circumstances, the appropriate regulatory outcome is avoidance, redesign or refusal.

4. Nature-positive reform can support regional jobs and capability

Strong EPBC reform can support regional productivity by creating practical work in restoration, threatened species monitoring, weed and pest control, ecological surveys, Traditional Owner ranger programs, private land conservation, citizen science, environmental consulting and nature-based tourism. Queensland has significant regional capability in land management, conservation, science, natural resource management, Traditional Owner stewardship, volunteer networks and landholder-led restoration. EPBC reform should help mobilise this capability, not treat environmental protection only as a compliance cost.

Community data and local knowledge are productivity assets. Local communities often detect environmental change early, hold detailed knowledge of wildlife and habitat, and contribute records that improve assessment and recovery planning. However, regional opportunities depend on reform settings that direct investment into genuine, additional and measurable outcomes. Restoration contribution charges should be governed by the same principles as other offsets, including additionality, like-for-like outcomes, transparency, monitoring, accountability and a clear connection to the impacts being offset.

5. Cumulative impacts and intergovernmental cooperation must strengthen outcomes

Many environmental impacts in Queensland are cumulative. A single project may appear manageable, but repeated clearing, infrastructure corridors, roads, water extraction, light, noise, weeds, fire regime change, edge effects and climate pressures can progressively degrade habitat and reduce species viability. Cumulative impact assessment should be elevated into enforceable standards and assessment requirements, considering past, present and reasonably foreseeable impacts across the relevant landscape, bioregion, catchment, ecological community or species range.

Commonwealth and State systems should work efficiently together, but streamlining must not weaken protection. Accreditation, bilateral arrangements or delegated assessment processes should only proceed where Queensland systems meet or exceed national standards and maintain public confidence, environmental integrity, transparent decision-making and strong compliance and enforcement. Efficient intergovernmental arrangements can reduce duplication, but only if they strengthen outcomes rather than dilute them.

6. Queensland offset funds need clear guiding principles

Queensland needs clear guidelines or guiding principles for how existing and future offset funds are spent, including the reported $200 million-plus in Queensland offset funds. Offset funds should not operate as a general environmental grants pool or substitute for core government conservation responsibilities. They should be directed to genuine, additional, measurable and accountable outcomes that are clearly linked to the impacts for which the funds were collected, with transparent criteria for habitat outcomes, threatened species recovery, long-term protection, monitoring and regional delivery.

Conclusion

Wildlife Queensland supports EPBC reforms that deliver stronger protection for nature while improving Queensland's long-term productivity. Clear, enforceable and outcome-focused national standards can reduce uncertainty, protect natural capital, support regional jobs and improve confidence in decision-making. The reforms must not rely on process compliance, discretionary offsets or restoration payments that fail to deliver measurable gains for wildlife and habitat. Some habitat is too important or irreplaceable to offset, and where impacts cannot be avoided, minimised and genuinely offset, approval should not be granted. Queensland also needs clear, transparent and accountable guiding principles for how existing and future offset funds are spent, including the reported $200 million-plus in Queensland offset funds, to ensure these funds deliver genuine, additional and measurable outcomes linked to the impacts for which they were collected.

Yours sincerely

[redacted]

[redacted]

Emeritus Professor Marc Hockings, AO

President, Wildlife Queensland

John Tracey

CEO