

Environmental Protection (Efficiency and Streamlining) and Other Legislation Amendment Bill 2025

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INQUIRY INTO THE ENVIRONMENTAL PROTECTION (EFFICIENCY AND STREAMLINING) AND OTHER LEGISLATION AMENDMENT BILL 2025

A SUBMISSION FROM SOROPTIMIST INTERNATIONAL OF BRISBANE INC

TO: The Committee Secretary
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1. INTRODUCTION

Soroptimist International of Brisbane Inc (SI Brisbane) is part of a global volunteer advocacy movement (Soroptimist International) dedicated to transforming the lives of women and girls through education, empowerment, and the creation of enabling opportunities.

Soroptimist International's position papers on Climate Change, Women in the Urban Environment, and Water & Sanitation affirm that **environmental governance must explicitly centre gender equity, inclusion in decision-making, protection of livelihoods, and intergenerational justice** (Soroptimist International, 2024a; 2024b; 2024c).

We welcome the Bill's intention to modernise environmental regulation and improve administrative efficiency. However, we submit that **efficiency should not reduce community participation, weaken safeguards for rehabilitation and remediation, or shift environmental costs and risks onto vulnerable communities.**

Environmental policy is not gender neutral. Recent Australian and international research shows that environmental degradation, cumulative impacts, and regulatory weakening have **gendered and social effects** that must be explicitly recognised and mitigated in law and regulation (WELA, 2024; IPCC WGII, 2022; Lancet Countdown, 2024; UN Women, 2024).

2. WHY A GENDER-RESPONSIVE LENS MATTERS

Contemporary evidence demonstrates that environmental harm and climate risks are distributed unequally:

- **Disproportionate Impact:** Women and gender-diverse people are disproportionately affected by disasters, water insecurity, pollution, and resource loss. They often carry increased, unpaid care burdens during recovery and adaptation (WELA, 2024; UN Women, 2024).
- **Health Vulnerabilities:** Health and climate analyses show gendered differences in vulnerability to heat, vector-borne disease, pollution, and mental health impacts following environmental shocks (Zavala et al., 2024; Lancet Countdown, 2024).
- **Exclusion Harms Outcomes:** When women and marginalised groups are excluded from decision-making, environmental outcomes and resilience suffer. Conversely, inclusion leads to more equitable and sustainable results (IPCC WGII, 2022; Soroptimist International, 2024a).

For these reasons, regulatory reforms that undermine transparency or reduce remediation safeguards could entrench inequality and damage long-term community and ecosystem health.

3. KEY CONCERNS AND GENDER-RESPONSIVE RECOMMENDATIONS

Queensland’s reforms must support efficiency **without** weakening safeguards that protect community health, rights, and environmental integrity. Evidence shows that **environmental harm and legacy costs disproportionately affect women and marginalised groups**, particularly through water insecurity, caregiving burden, and reduced livelihood resilience (Gibb & O’Leary, 2014; Hilson, 2025; WELA, 2024).

3.1 Transitioning Environmental Relevant Activities (ERAs) to Code-Managed Regulation

Concern: Replacing site-specific Environmental Authorities (EAs) with generic ERA Codes for a broader range of activities risks **underestimating cumulative and long-term impacts**, especially groundwater and landscape disturbance. Removal or reduction of financial surety would increase public liability for remediation. These harms have demonstrated **gender-differentiated consequences** (see Case Example B).

RECOMMENDATION	DETAIL AND JUSTIFICATION
Retain Financial Surety	Require surety for any ERA posing land, water or contamination risks to avoid shifting legacy costs to communities and taxpayers.
Mandate Public Consultation on Codes	Publish proposed ERA Codes for community review; include triggers requiring site-specific EA where location-specific or cumulative impacts arise.
Require Periodic Independent Review	Review code-managed ERAs every 3–5 years with publicly reported cumulative-impact assessments and performance data.

3.2 Public Notification and Community Participation

Concern: Limiting public notification when project conditions or risk contexts have evolved since the prior assessment reduces local communities' ability to identify harms and advocate for protections, particularly affecting groups that are already underrepresented in decision-making (e.g., women, Indigenous peoples, culturally and linguistically diverse communities).

RECOMMENDATION	DETAIL AND JUSTIFICATION
Retain Notification Flexibility	Ensure notification is required where project details, risks, or contextual factors have changed since the original EIS.
Gender-Responsive Engagement Protocols	Provide accessible formats, translation, and targeted outreach to women's groups, carers, and Indigenous women to ensure genuine inclusion.
Resource Community Participation	Provide grants/technical assistance so communities (including women's advocacy groups) can meaningfully engage.

3.3 Progressive Rehabilitation and Closure Plans (PRCPs)

Concern: Removing a transparent public-interest evaluation weakens accountability around mine closure and relinquishment, increasing risks of incomplete rehabilitation and long-term contamination impacts (see Case Example A).

RECOMMENDATION	DETAIL AND JUSTIFICATION
Reinstate Public-Interest Evaluation	Require a reviewable, evidence-based public-interest test for PRCP approvals.
Public Disclosure	Publish all PRCP decisions, monitoring data, and financial guarantees.
Binding Guarantees	Financial assurance should remain enforceable until rehabilitation success criteria are independently verified and publicly reported.

3.4 Codifying Best-Practice Environmental Management

Support being conditional: Codification is beneficial where standards are co-designed, gender-responsive, science-based, and regularly updated to respond to risk environments (climate, land use, cumulative activity).

RECOMMENDATION	DETAIL AND JUSTIFICATION
Multi-Stakeholder Co-Design	Include women's organisations, Indigenous representatives, community health experts, scientists, and industry.
Embed Equity and Intergenerational Safeguards	Include criteria for gender equity, climate risk, community health, and cumulative impacts.
Mandate Scheduled Review	Every 5 years at minimum, with published outcomes and community input.

4. CASE EXAMPLES: LEGACY COSTS, HUMAN RIGHTS AND GENDERED HARM

The following cases demonstrate how under-regulated or poorly remediated extractive activities create persistent environmental, economic, and gender-unequal impacts, reinforcing the need for strong oversight:

CASE EXAMPLE	SUMMARY	RELEVANCE TO THE BILL AND REGULATORY REFORM
<p>A. Mount Morgan Mine (Central Queensland)</p>	<p>Historic gold mining generated acid mine drainage (AMD) that contaminated the Dee River, leading to long-term environmental degradation and requiring government-funded remediation efforts and a water-treatment plant decades later. (Griffith Research Repository)</p>	<p>Highlights the danger of removing surety bonds or diluting site-specific Environmental Authority (EA) conditions: without mandatory financial guarantees and enforceable rehabilitation, legacy liability (including water-quality, ecosystem, and public-health risks) remains a burden on communities and taxpayers.</p>
<p>B. Cumulative and Gendered Harms from Small-Scale or Artisanal Mining (ASM)</p>	<p>Research on ASM globally and in Australia shows that clusters of small-scale sites can produce cumulative environmental degradation (including water contamination, heavy-metal pollution, deforestation, and soil degradation). These harms disproportionately affect women and gender-diverse people: through health risks (e.g., from pollutants), increased unpaid care burdens, loss of livelihoods, and reduced access to clean water or land. (Hilson, 2025; Gibb & O’Leary, 2014; Women’s Environmental Leadership Australia, 2024) (Docslib)</p>	<p>Underscores why “low risk” assumptions are often misleading. Relaxing regulation, code-based “low-risk” classification, or removal of surety can leave vulnerable communities — especially women — exposed to long-term cumulative harm and social inequities.</p>
<p>C. Bimblebox Nature Refuge — Human Rights, Biodiversity & Climate Justice (Galilee Basin, QLD)</p>	<p>In 2022, the Land Court of Queensland ruled in the case of <i>Waratah Coal Pty Ltd v Youth Verdict Ltd & Ors</i> [2022] QLC 21, recommending the refusal of a mining lease and an environmental authority for a proposed coal mine near Bimblebox. The Court’s decision cited risks of biodiversity destruction, subsidence, dust, noise, water-resource depletion, greenhouse-gas emissions, and human rights violations — including rights to property, culture, a healthy environment, and the protections of First Nations peoples. (law.uq.edu.au)</p>	<p>Demonstrates the imperative of robust, site-specific Environmental Impact Assessment (EIA), public-interest evaluation, and community consultation. Under code-based or generic ERA regulation, systemic and intergenerational risks (ecological, cultural, social and human rights) are likely to be under-recognised or excluded from assessment.</p>

Key Lessons and Risks Illustrated by These Cases

- **Legacy environmental liabilities.** Environmental damage can persist over decades (Mount Morgan), requiring costly remediation long after operations cease.
- **Cumulative harm from small-scale operations.** Even modest or dispersed mining activities can (in aggregate) cause serious ecological and health damage, often manifesting gradually and invisibly.
- **Disproportionate burdens on women and marginalised communities.** Environmental degradation often compounds existing inequalities: water insecurity, loss of livelihood, unpaid care burden, health risks, and social dislocation.
- **Human rights, cultural, and intergenerational injustice.** Mining and resource extraction near sensitive or protected areas (nature refuges, Indigenous lands) carries risks not just to biodiversity but to cultural heritage, community identity, property rights, and future generations' wellbeing.

These examples strongly support the need to maintain or strengthen environmental safeguards, transparent public-interest processes, enforceable rehabilitation and surety obligations, and gender-responsive, inclusive consultation and decision-making processes.

5. CONCLUSION AND CALL TO ACTION

We recognise the importance of modernising Queensland's environmental legislation to ensure clarity and administrative efficiency. However, we urge the Committee and the Queensland Government to **ensure that streamlining does not equate to deregulation, and avoid shifting long-term environmental, social, and financial costs onto communities, especially women and marginalised groups.**

Considering the evidence above, we call for the following measures before finalising the Bill:

1. Maintain **binding financial sureties and enforceable rehabilitation obligations** for any ERA involving land or water risk.
2. Publish proposed **ERA Codes for public consultation**, with clear triggers and criteria to demand case-by-case Environmental Authorities (EA) where site-specific or cumulative risks exist.
3. Reinststate a **transparent public-interest evaluation** process for closure and rehabilitation plans (PRCPs) with decisions and monitoring data publicly disclosed.
4. Adopt **gender-responsive consultation protocols** and provide resources to enable meaningful participation by women, First Nations peoples, and other marginalised groups.
5. Establish **multi-stakeholder co-design** of codified best-practice environmental management standards, including regular review cycles and community input.
6. Commission a **gender and social impact analysis** of the Bill's amendments before passage (to assess implications for human rights, health, equity, and intergenerational justice).

By embedding these safeguards, the Committee and the Queensland Government can ensure that efficiency and environmental protection go together, delivering sustainable, equitable outcomes for Queensland's ecosystems and communities.



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