

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

**Submission No:** 006  
**Submission By:** Wildlife Queensland  
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## **Submission to the Inquiry into the Environmental Protection (Efficiency and Streamlining) and Other Legislation Amendment Bill 2025**

**From: Wildlife Queensland**

**Date: 15<sup>th</sup> December 2025**

### **1. Introduction**

Wildlife Queensland welcomes the opportunity to provide feedback to the Health, Environment and Innovation Committee on the **Environmental Protection (Efficiency and Streamlining) and Other Legislation Amendment Bill 2025 (the Bill)**.

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.

We recognise the value of Queensland's protected area estate, State Forests and Timber Reserves for biodiversity, carbon sequestration, recreation, education, research, cultural values, and ecosystem services. Any legislative changes that alter the allowable activities within these estate categories must be carefully assessed against ecological risk, cumulative impacts, and long-term biodiversity outcomes.

Wildlife Queensland acknowledges that the environment and tourism sectors have long expressed frustration with duplicated permitting and supports administrative streamlining where it improves clarity, reduces duplication, and maintains strong environmental protections.

Wildlife Queensland supports modernising outdated elements of the Forestry Act 1959 and related instruments and we congratulate the government on its efforts to streamline administrative and approval processes, however we **do not support** any changes that weaken environmental safeguards, reduce transparency, or enable unfettered commercial activity inconsistent with sustainability principles.

### **2. Summary of Wildlife Queensland's Position**

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Suite 1, Level 1, 30 Gladstone Road, Highgate Hill Qld 4101. Phone: 07 3844 0129 Fax: 07 3846 4784

[wpsq@wildlife.org.au](mailto:wpsq@wildlife.org.au) · ABN 44 235 565 907

Wildlife Queensland **does not support the proposed open-ended amendments to the Forestry Act** that would allow unregulated or insufficiently regulated commercial activities in State Forests and Timber Reserves. We recommend clearer and explicit drafting to ensure strong statutory protections for biodiversity and ecological integrity.

Specifically:

- **Commercial activity agreements must be explicitly subject to ecological sustainability principles** and compliance with the Nature Conservation Act 1992 (NCA), Vegetation Management Act 1999, Biodiversity Conservation Strategy, and Commonwealth EPBC Act.
- **Commercial activity agreements must include mandatory biodiversity protections, impact monitoring, and public reporting obligations.**
- **Scientific Areas (Schedule 4) and Feature Protection Areas (Schedule 3) be fully exempt** from commercial activity agreements.
- **Spatial accuracy is essential:** agreements must specify precise mapped boundaries, not only the name of a forest or reserve.
- **Transparency and public accountability must be legislated,** with all commercial activity agreements (subject to narrow commercial-in-confidence exceptions) publicly accessible.

These amendments are necessary to ensure that public land held in trust for Queenslanders is managed primarily for conservation, ecological function, and long-term community benefit.

### **3. Concerns with the Proposed Amendments to the Forestry Act 1959**

#### **3.1 Risk of Unfettered Commercial Activity**

The Bill, as drafted, opens the door to broad commercial activities without adequate environmental constraints. State Forests and Timber Reserves are already fragmented and under pressure from:

- increased fire risk
- invasive species
- habitat loss and fragmentation
- recreational impacts
- climate change stressors

Introducing open-ended commercial activities without requiring explicit biodiversity protection measures risks undermining ecological resilience and accelerating species decline.

Wildlife Queensland recommends (1) inclusion of mandatory considerations for deciding first whether a permit should be granted i.e. the Chief Executive must be satisfied that the activity will not have adverse impacts on the environment and then (2) explicit statutory language requiring that any commercial activity agreement:

- **must not adversely impact wildlife, remnant ecosystems, threatened species habitat, ecological processes, or water quality**
- **must demonstrate ecological sustainability** through environmental impact assessments aligned with NCA and EPBC Act triggers
- **must incorporate measurable performance indicators**, including monitoring and audit requirements
- **must allow suspension or cancellation** of the agreement if monitoring indicates negative environmental impacts.

### **3.2 Inadequate Protection for Scientific Areas (Schedule 4)**

Scientific Areas are designated for high-value research, long-term ecological studies, and biodiversity conservation, many contain baseline datasets essential for climate and ecological modelling.

Allowing commercial activity in these areas:

- undermines scientific integrity
- jeopardises long-term research investments
- risks damaging sensitive reference ecosystems

Wildlife Queensland asserts that **all Scientific Areas (Schedule 4) must be explicitly exempt** from commercial activity agreements.

### **3.3 Inadequate Protection for Feature Protection Areas (Schedule 3)**

Feature Protection Areas safeguard key ecological, geological, hydrological, or cultural features.

Commercial activity in these areas could:

- degrade critical habitats
- disturb threatened species breeding sites
- damage sensitive hydrological systems
- compromise Indigenous cultural sites

Wildlife Queensland recommends **full exemption** for all Feature Protection Areas (Schedule 3) from commercial activity agreements.

### **3.4 Requirement for Precise Mapping and Area Definition**

The Bill currently allows agreements to refer only to the “name” of a State Forest or Timber Reserve.

This is inadequate and does not:

- ensure clarity of impacts
- support enforcement

- allow for public transparency
- align with ecological planning frameworks

Wildlife Queensland recommends that all commercial activity agreements:

- **must include precise GIS-referenced spatial boundaries**
- cannot be enacted without a publicly accessible map
- must specify the total area affected, type of disturbance, and anticipated footprint

### **3.6 Lack of Transparency and Public Accountability**

State Forests and Timber Reserves are held in trust for the people of Queensland. Commercial arrangements on public land must therefore be publicly accountable.

Wildlife Queensland recommends that the Bill include provisions requiring:

- **public disclosure of commercial activity agreements**, except for narrowly defined commercial-in-confidence information
- public reporting of environmental monitoring results
- annual statements of revenue generated and how funds have been reinvested in State Forest management
- audit and compliance reports made available online

Transparency fosters trust, ensures proper use of public land, and allows communities to understand and assess impacts.

## **4. Implications for Wildlife and Biodiversity Conservation**

Queensland hosts the highest number of threatened species in Australia. Many rely on intact forest habitats, including:

- greater glider
- yellow-bellied glider
- mahogany glider
- brush-tailed rock-wallaby
- spectacled flying-fox
- numerous threatened plants and invertebrate species

Unrestricted commercial access or poorly regulated activities risk:

- clearing or degrading habitat
- disrupting wildlife movement and connectivity

- introducing noise, artificial light, pollution
- increasing human–wildlife conflict
- facilitating weed spread and feral animal incursions

In the context of accelerating climate change, Queensland’s forests require improved protection, not reduced safeguards.

The Bill must therefore ensure that **biodiversity protection remains the primary purpose** of legislated management frameworks for State Forests and Timber Reserves.

## 5. Recommendations

Wildlife Queensland makes the following recommendations:

1. **Insert explicit statutory requirements** that commercial activity agreements must be ecologically sustainable and consistent with the NCA and EPBC Acts.
2. **Mandate environmental monitoring and reporting** for all commercial activities, including pre-activity baseline assessments.
3. **Exempt all Scientific Areas (Schedule 4) from commercial activity agreements.**
4. **Exempt all Feature Protection Areas (Schedule 3) from commercial activity agreements.**
5. **Require precise GIS-defined spatial boundaries** for any agreement area.
6. **Legislate public transparency**, including publication of agreements, monitoring results, compliance reports, and financial contributions to land management.
7. Ensure all new commercial activities undergo **environmental risk assessment**, including cumulative impacts.
8. Include **mechanisms for suspension or cancellation** where impacts to wildlife, threatened species, or ecological processes are detected.
9. Commit to developing **guidelines and minimum environmental standards** for commercial activities undertaken on State Forests and Timber Reserves.

## 6. Conclusion

Wildlife Queensland strongly recommends that the Committee amend the Bill to ensure that commercial activity within State Forests and Timber Reserves is tightly controlled, transparent, ecologically sustainable, and consistent with Queensland’s obligations to protect biodiversity.

Queenslanders expect and deserve confidence that public forests are being managed for long-term ecological health and the protection of native wildlife, not short-term commercial gain. This approach will also help secure long-term economic sustainability for Queenslanders.

Wildlife Queensland welcomes further consultation and would be pleased to appear at Committee hearings to discuss the issues raised in this submission.



**Emeritus Professor Marc Hockings**

**President, Wildlife Queensland**



**John Tracey**

**CEO**

15 December 2025