

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

**Submission No:** 015

**Submission By:** Property Council of Australia

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17 December 2025

Health, Environment and Innovation Committee  
Queensland Government  
Via Email: [heic@parliament.qld.gov.au](mailto:heic@parliament.qld.gov.au)

Dear Members of the Committee,

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

The Property Council of Australia (PCA) welcomes the opportunity to provide feedback on the *Environmental Protection (Efficiency and Streamlining) and Other Legislation Amendment Bill 2025*.

The Property Council of Australia is the leading voice for Queensland's property industry, with over 400 member companies in Queensland across the property sector, representing organisations that invest in, design, build and manage the homes, precincts and workplaces that support Queensland's growth. Our members are committed to delivering the housing supply, community infrastructure and employment land needed to ensure Queensland remains an affordable, attractive and globally competitive market.

The Property Council is broadly supportive of the policy intent to modernise the Environmental Protection Act (EP Act), streamline processes, and remove unnecessary duplication, whilst maintaining strong environmental protections. Efficient regulatory systems enable industry to deliver housing supply, employment precincts, and economic growth in a timely and sustainable manner.

The Bill contains meaningful improvements that can reduce complexity and provide greater certainty for industry.

These include:

- **The removal of duplicative public notification requirements for Environmental Impact Statements**  
The removal of the requirement to publicly notify the terms of reference for an Environmental Impact Statement (noting that the requirement still applied to the impact statement)

- **The removal of duplicative approvals between environmental and state development acts**  
The amendments allow Impact Assessment Reports (IARs) under the State Development and Public Works Organisation Act (SDPW O Act) to satisfy equivalent EP Act requirements, representing a significant improvement.

- **Single Integrated Tourism Permission**  
The Property Council supports reforms that improve the efficiency of tourism approvals, particularly for tourism that interfaces with protected areas. The move to a single integrated permit is a positive step that will attract greater tourism investment.

However, we recommend several refinements to ensure that the reforms deliver practical benefits for the property industry, avoid unintended consequences, and provide a clear and consistent regulatory experience across planning and environmental frameworks.

Our key recommendation relates to proposed changes to **Timeframes for Commencing Proceedings**.

The Property Council **does not** support the proposed amendments to section 497 of the EP Act that extend the limitation period for summary proceedings from one year to two or three years. While we recognise the importance of robust environmental compliance, significantly lengthening the investigation window has material consequences for the property industry.

Longer limitation periods create prolonged uncertainty for projects, as proponents may remain subject to open-ended investigative processes well after construction or operational milestones have passed. This uncertainty can delay financing, stall critical project phases, and erode feasibility due to increased holding costs, contractor demobilisation risks and delays within supply chains. For large, staged developments, the risk profile becomes particularly acute: multi-year exposure to potential proceedings can deter investment decisions and inflate costs.

The Property Council therefore recommends:

- To provide for proceedings for summary offences within one year after the commission of the offence, and
- For a limited specified list of more serious and complex offences, a period of two years after the commission of the offence.

Further recommendations are set out below:

#### **Environmentally Relevant Activity(ERA) Codes**

The introduction of ERA codes for low-risk activities, coupled with a more consistent risk-based framework, is a welcome step toward a modern, proportionate regulatory system.

- The Property Council supports reducing reliance on individual environmental authorities (EAs) for low-risk activities; however, clarity is required as to how ERAs are assessed to determine if they are a low-risk activity. The criteria are not currently developed and consultation with industry in the development of ERA Codes is encouraged.

- ERA codes must integrate seamlessly with the Planning Act framework. Duplicate assessment, inconsistent conditions, or unclear roles between State and local governments would diminish the benefits of the reform.

#### **Nature Conservation Act (NC Act) Amendments**

Proposed amendments will mean that conservation officers will have the powers to investigate NC Act matters that are regulated under the Planning Act. This is currently the case for other pieces of legislation that interact with the Planning Act. An example of a NC Act matter would be koala priority areas and koala habitat area determinations that are made under the NC (Koala) Conservation Plan 2017. However, the regulation of development in these areas is established through the Planning Regulation 2017 and development offences are provided for in the Planning Act.

However, dual compliance pathways (Planning Act + NC Act) risk creating overlap. Developing clear guidelines to avoid duplication between the Acts, regulations, and the compliance officers' mandates is essential in achieving streamlined and efficient environmental and planning systems.

Thank you for the opportunity to provide feedback. If you require any further information or would like to discuss these matters further please do hesitate to contact me on [REDACTED] or via email [REDACTED]

Yours sincerely,



Jess Caire  
**Queensland Executive Director**