

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

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17 December 2025

Committee Secretariat
Health, Environment and Innovation Committee
Parliament House
George Street
BRISBANE QLD 4000

By Email: HEIC@parliament.qld.gov.au

To Whom It May Concern,

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

AgForce is a peak organisation representing Queensland's cane, cattle, grain and sheep, wool & goat producers. The cane, beef, broadacre cropping and sheep, wool & goat industries in Queensland generated around \$11.2 billion in on-farm value of production in 2022-23. AgForce's purpose is to advance sustainable agribusiness and strives to ensure the long-term growth, viability, competitiveness and profitability of these industries. Over 6,000 farmers, individuals and businesses provide support to AgForce through membership. Our members own and manage around 55 million hectares, or a third of the state's land area. Queensland producers provide high-quality food and fibre to Australian and overseas consumers, contribute significantly to the social fabric of regional, rural and remote communities, as well as deliver stewardship of the state's natural environment.

AgForce has a strong policy position on representing members' interests in the protection of land use and is supportive of efforts by all authorities, at federal, state and local levels, that enable the effective coexistence of agriculture with other forms of land use. Please refer to AgForce's Land Use Protection Principles (*Appendix 1*), as endorsed by the AgForce Queensland Farmers' Limited Board, that are presented as Queensland's broadacre agriculture industry's expectations when working to achieve coexistence with other business sectors.

AgForce welcomes the opportunity to provide feedback on the Environmental Protection (Efficiency and Streamlining) and Other Legislation Amendment Bill 2025 ('the Bill').

Environmental Protection Act 1994 (Qld)

Currently, environmentally relevant activities (ERAs) are regulated through an environmental authority (EA) assessment and approval process, which provides regulatory visibility, environmental safeguards, and certainty for landholders and regulators, alike.

The Bill proposes to expand the use of self-assessable codes for low-risk ERAs, replacing individual environmental authorities in certain circumstances. While AgForce acknowledges the intent to streamline regulation, there are significant concerns regarding oversight, compliance and enforcement under a code-based model.

In particular, the Bill does not provide for a publicly accessible or departmental register of code-assessable ERAs. Without such a register:

- the Department may have limited visibility of what activities are occurring, where they are occurring, and when they commence;
- effective compliance monitoring and risk-based enforcement will be undermined;
- cumulative environmental impacts may go unidentified; and
- landholders and neighbouring producers may face increased uncertainty and reduced transparency.

This lack of regulatory visibility creates risk not only for environmental outcomes, but also for primary producers whose land, water or operations may be affected by nearby ERA activities.

Recommendation:

AgForce strongly recommends that a mandatory register of code-assessable ERAs be established. Such a register should record the location, nature and commencement of code-based activities. This will:

- **support effective environmental oversight and enforcement;**
- **enable appropriate risk-based compliance responses by the Department; and**
- **protect the interests of AgForce members and other rural landholders by improving transparency and accountability.**

Water Act 2000 (Qld)

The Bill proposes to extend the Underground Water Impact Report (UWIR) cycle from three years to five years.

The UWIR is a critical tool for:

- identifying groundwater impacts from resource activities;
- modelling risks to aquifers and connected water resources;
- enabling adaptive management to minimise harm to environmental values and landholder water supplies; and
- reviewing and updating monitoring and management strategies within cumulative management areas.

Importantly, changes to monitoring and management arrangements for cumulative management areas can only be made through the UWIR process. Extending the cycle to five years significantly reduces the system's responsiveness to emerging impacts.

AgForce is strongly opposed to extending the UWIR cycle from three to five years because:

- it diminishes adaptive management capability;
- it increases the risk that impacts to groundwater and dependent primary production businesses and regional/rural communities will go unmanaged for longer periods;
- it may delay identification and remediation of impacts affecting landholders' water supplies; and
- it is likely to result in poorer environmental and landholder outcomes.



There is already provision under the *Water Act 2000* for a responsible entity to apply for an extension of time to prepare a UWIR in special circumstances. This existing flexibility makes a blanket extension to five years unnecessary.

Recommendation:

AgForce considers the proposed five-year UWIR cycle to be unjustified and potentially detrimental to both environmental values and landholder interests, and strongly recommends the retention of the current three-year cycle.

Nature Conservation Act 1992 (Qld)

AgForce has the following concerns regarding the proposed and associated amendments to the *Nature Conservation Act 1992* ('NCA'):

- Reclassifications of fauna and flora species must be clearly communicated and easily accessible to landholders. AgForce recommends that all relevant reclassifications be reflected in the vegetation management report available through the Department of Natural Resources and Mines, Manufacturing and Regional and Rural Development website so landholders can readily understand their obligations.
- Routine and sustainable land management practices associated with broadacre agriculture must not be adversely impacted by flora and fauna reclassifications. Normal grazing, cropping, infrastructure maintenance and land stewardship activities should not be unintentionally captured by conservation regulation.
- Primary producers already operate under overlapping environmental and vegetation management frameworks. AgForce strongly advocates for streamlining and alignment of environmental and vegetation management regulation and opposes the duplication or creation of inconsistent regulatory regimes.

Recommendation:

AgForce emphasises that conservation outcomes are best achieved when regulation is coherent, practical and proportionate, and when landholders are supported as conservationists rather than over-regulated through layers of red-tape.

Conclusion

AgForce urges the Queensland Government to adopt the recommendations outlined above to ensure that the amendments proposed in the Bill:

- protect environmental values through effective oversight and adaptive management;
- maintain transparency and accountability in regulatory systems; and
- support the ongoing viability, resilience and stewardship role of broadacre agriculture in Queensland.

AgForce thanks the Health, Environment and Innovation Parliamentary Committee for the opportunity to provide feedback and looks forward to continued engagement to positively improve practices for all stakeholders involved.



If you have any questions or require further information, please contact AgForce Policy Advisor Anna Fiskbek by email [REDACTED] or mobile: [REDACTED]

Sincerely,

A handwritten signature in black ink, appearing to be 'Niki Ford', written on a light-colored rectangular background.

Niki Ford
Chief Executive Officer



Appendix 1

AgForce Land Use Protection Principles

Third Party Access to Farming and Grazing Lands Across Queensland

1. Access

- 1.1. Process for access shall include landholder negotiations. No access prior to activities being agreed or determined and compensated.
- 1.2. Full and frank disclosure of all likely impacts and liabilities associated with a project must be made to the landholder.
- 1.3. Landholder negotiations shall be carried out in a manner that minimises time and financial impacts on the land holder e.g. not to clash with planting harvesting or mustering activities.
- 1.4. Access roads and tracks must be maintained, or improved where necessary, at the proponent's cost so that they are fit for purpose, support safe road use and minimise impacts on the environment and surrounding lands.
- 1.5. Users of roads and tracks must operate in accordance with workplace health and safety (e.g. safe speed limit for conditions).
- 1.6. Landholders to have legal and relevant specialist representation fully funded by the proponent as incurred.

2. Impact on Agricultural Land Uses

- 2.1. Agriculture is essential to our economy, food security and integral to our communities.
- 2.2. Agriculture must be protected from development that compromises productivity, sustainability and accessibility.
- 2.3. Where the long-term costs of a project exceed the long-term benefit from existing land use, the project should not be approved.
- 2.4. Land uses that could have a detrimental impact on an existing agricultural land use or the health or safety of people in agricultural areas should require assessment by an independent, statutory authority.
- 2.5. The independent statutory authority should be comprised of members representative of rural interests / with practical experience in assessing the impacts to rural operations/grazing/farming businesses.
- 2.6. The authority should have strong governance standards that ensure transparency and accountability to all stakeholders.
- 2.7. The assessment process should require the project proponent to fund independent investigation of the project's potential impacts by experts chosen by the authority.
- 2.8. The independent experts' reports should be made publicly available alongside the project proponent's plans for the project and own assessment of likely impacts.
- 2.9. To be properly made and considered by the authority, submissions should not need to be supported by the submitter's own evidence, it being important that a submitter's financial resources should not prevent the authority's ability to consider and address legitimate concerns.
- 2.10. The authority's decisions should be supported by reasons and published publicly.
- 2.11. Appeals from the authority's decisions should be considered by a court in which submitters can be heard at relatively low cost with principles similar to the Land Court, e.g. not bound by the rules of evidence, may inform itself in the way it considers appropriate and must act according to equity, good conscience and the substantial merits of the case without regard to legal technicalities and forms or the practice of other courts.



3. Compensation

- 3.1. Landholder must be involved in assessment of impacts and calculation of compensation.
- 3.2. Compensation must include payment for landholders' time calculated at commercial rates and payment for any negative impact on the peaceful enjoyment of land.
- 3.3. Compensation must encompass the loss/impact on natural capital and livestock/crop production losses.
- 3.4. Material change in circumstances and/or unexpected consequences must trigger ability of landholder to re-negotiate compensation.
- 3.5. Impacted neighbours must be compensated.

4. Compliance

- 4.1. Compliance is a regulatory role that shall require landholder contact and on-ground inspections at not more than 6-month intervals.
- 4.2. Landholders should have the right but not the responsibility to compel regulator investigation and enforcement of compliance.
- 4.3. Proponents and regulators must proactively identify, disclose and manage cumulative impacts.
- 4.4. Non-compliance should be immediately reported to the landholder and should trigger cease work.
- 4.5. All projects must have comprehensive monitoring and transparent reporting.

5. Rehabilitation

- 5.1. Land needs to be progressively rehabilitated and revegetated.
- 5.2. All plants and other materials used in rehabilitation must have demonstrated safe practices for biosecurity including appropriate permits, forms and checklists.
- 5.3. Rehabilitation and revegetation must achieve pre-existing conditions, or better.
- 5.4. There should be financial assurance for rehabilitation and revegetating for farming and grazing land use.
- 5.5. Rehabilitation must be up to date and financial assurance re-assessed prior to additional approvals or tenures being granted or renewed.

6. Biosecurity

- 6.1. Proponents must comply with the landholders' farm biosecurity plan.

