

Inquiry into the Nature Conservation and Other Legislation Amendment Bill 2025

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To the: Health, Environment and Innovation Committee
Parliament House
George Street
BRISBANE QLD 4000

QCC Response to: Nature Conservation and Other Legislation Amendment Bill 2025

Queensland Conservation Council welcomes the opportunity to provide comment on the *Nature Conservation and Other Legislation Amendment Bill 2025*. QCC is the peak body for environment groups in Queensland and has been supporting communities to protect their environment since 1969. Our member groups represent thousands of Queenslanders from the southern border to the Cape York Peninsula who care for and protect their environments.

The *Nature Conservation Act* and *Environmental Protection Act* are cornerstones of environmental law in Queensland and must be maintained and strengthened to achieve better outcomes for Queensland's environment. Currently, Queensland's environment is facing huge pressures from weed infestation, deforestation and development. Our nature laws are not up to the task of protecting the areas of high biodiversity that are left. Beyond these amendments, we urge the State Government to prioritise:

- Continuing to resource regional planning within the Department of Environment, Tourism, Science and Innovation, to enable effective mapping and modelling of environmental values to meet the commitments made in the review of Queensland's regional plans and in the bioregional planning MoU with the Commonwealth government.
- Expanding the protected areas estate in both public and private land and appropriately funding maintenance of these protected areas
- Implementing programs that will move towards ensuring no new species extinctions such as the Threatened Species Prioritisation Framework, Biodiversity Conservation Strategy Performance Framework, Species Recovery Plans, and 2026 Koala Conservation Strategy.

The proposed changes in the *Nature Conservation and Other Legislation Amendment Bill* relate to the enforcement and application of the *Nature Conservation* and *Environmental Protection*

The Queensland Conservation Council acknowledges that we meet and work across the many lands of Queensland. We wish to pay respect to their Elders - past and present - and acknowledge the important role all Aboriginal and Torres Strait Islander people play in protecting, conserving and sustaining Queensland.

Acts. Given the key importance of these acts, we urge strong checks and balances in both how automatic approvals are granted and the discretion for the Minister to make regulation.

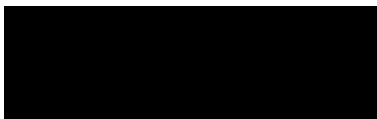
There have been many examples of automatic decision making processes going wrong, most notably Robo Debt. We urge the Department to implement robust oversight processes to ensure that the automatic assessment process is working as intended.


We are concerned about the scope of discretion left to the Minister to make regulation. Clause 16 introduces broad powers for the Minister to create regulations on which activities can be automatically approved. This could reduce the rigour of assessment for various authorities under the *Nature Conservation Act*. For example, section 260 of the Nature Conservation (Animals) Regulation 2000 relates to renewals of certain existing licences. Section 260(2) requires the chief executive to consider whether the existing licence was obtained on the basis of false or misleading information and whether the applicant has failed to comply with a condition of the existing licence. It is unclear how this consideration as part of the decision making function could/would occur in an automated system.

We are also concerned that Clause 9 reduces transparency and makes enforcement and public participation with Environmental Authorities more difficult, by replacing section 204 to provide that EAs for standard and variation applications are taken to include a condition of compliance, as opposed to compliance with eligibility criteria being imposed as a condition in the EA. We do not see a reason that this section should function in the way that other sections in the *Environmental Protection Act* do, given that it is more straight forward to have all conditions laid out in one place, in the EA.

We urge the final bill to improve the wording in Clause 12 and 18 to make it clearer that the application of the section is limited to unlawfulness or invalidity arising out of the approval or issuing of an EA by the operation of an automated system.

Kind regards,



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