

I am deeply concerned by the suite of reforms proposed in the Productivity Commission's interim report *Investing in Cheaper, Cleaner Energy and the Net-Zero Transformation (2025)*. Though presented as efficiency measures, these reforms would fundamentally weaken the statutory and constitutional safeguards currently protecting our natural and cultural heritage.

Key mechanisms under consideration include:

- **Replacing EPBC Act legal triggers with national environmental standards** – This change would dismantle the legally binding thresholds that trigger federal assessment under the *Environment Protection and Biodiversity Conservation Act 1999 (Cth)* (EPBC Act), replacing them with discretionary, policy-driven standards.
- **Establishing a centralised delivery agency or Coordinator-General** – By concentrating approval powers in a single body, the proposal seeks to bypass and undermine independent, evidence-based decision-making.
- **Expanding bilateral agreements to devolve decision-making to the states** – This would fragment protection standards and erode the national consistency essential for holistic environmental management. It would also increase the damage that can be done by our openly corrupt state governments.
- **Introducing fast-track or “priority” pathways for Net-Zero-aligned projects** – Such pathways would allow certain developments to bypass the EPBC Act's rigorous assessment processes, sacrificing environmental integrity for corporate profits.

Taken together, these measures represent more than administrative streamlining — they amount to a deliberate dismantling of the mechanisms that ensure scientific rigour, procedural fairness, and compliance with Australia's international environmental commitments. They directly challenge:

- **Part 3 of the EPBC Act**, which defines matters of national environmental significance;
- **Sections 136 and 391**, which mandate robust assessment standards and decision-making frameworks; and
- **Public participation, transparency, and standing provisions**, which underpin the Act's legitimacy and democratic accountability.

If enacted, these reforms would significantly weaken the legal architecture designed to protect biodiversity, cultural heritage, and ecosystem health. They would also curtail opportunities for meaningful community engagement and limit the capacity of courts and regulators to hold project proponents to account.

Given the profound implications, I urge policymakers, stakeholders, and the broader public to examine these proposals critically, insist on strong safeguards that uphold the EPBC Act's protective intent, and ensure that the pursuit of net-zero goals does not come at the expense of Australia's environment.