



Submission to the Amendments to the Environment Protection and Biodiversity Conservation (EPBC) Act that aim to accelerate approval processes

Due date: 15th September 2025

Contact: <https://engage.pc.gov.au/page/make-a-submission>

Organisation Overview

Protect the Bush Alliance (PTBA) is an alliance of over twenty five NGOs and community groups in Queensland representing over 60,000 people. Our goal is to implement ways of preventing the continuing loss of areas of high conservation values to inappropriate developments. One of the ways we do this is by conducting flora and fauna surveys on properties of high conservation value and on the properties which link them.

Why Amendments to the EPBC Act

We acknowledge and agree with the words of Dr Anne Smith of the **Rainforest Reserves Australia** Group in her Submission to the Productivity Commission (Net Zero Transformation Inquiry, Interim Report)

The Commission's proposal includes the replacement of EPBC Act assessment triggers with so-called National Environmental Standards, the devolution of Commonwealth approval powers to the States, the establishment of a centralised delivery or fast-track agency, and the reclassification of land including housing zones for industrial or infrastructure purposes without full environmental oversight. These mechanisms, if implemented, would enable approvals to proceed with reduced scrutiny, compromised scientific integrity, and limited public accountability.

They are not neutral reforms. They represent a coordinated attempt to dismantle the legal guardrails that ensure protection of matters of national environmental significance (MNES), including World Heritage properties, threatened species, Ramsar wetlands, and migratory species. The EPBC Act is a constitutionally grounded statute, enacted under the external affairs power (s 51(xxix) of the Constitution), and serves as Australia's legislative implementation of binding international environmental treaties. It mandates that all actions likely to significantly affect MNES must be referred, assessed, and approved under a Commonwealth process that considers the best available scientific advice (s 136), applies the precautionary principle (s 391), and is subject to public participation and transparency obligations (s 74). The Act is enforceable and reviewable, with public standing provisions (s 487), strict approval conditions, and remedies under both the Administrative Decisions (Judicial Review) Act 1977 (Cth) and s 75(v) of the Constitution.

For two decades, Queenslanders have been promised by consecutive governments, that the States irreplaceable biodiversity would be protected across diverse landscapes in line with international recommendations that 17-20% of our land be in the protected area estate. More recently, Minister Plibersek agreed to 30by30; we remain at 8.6% but less than 6% if private protected areas were not included: <https://www.qld.gov.au/environment/parks/protected-areas/private/program>

The Commission's recommendations propose a fundamental reconfiguration of Australia's environmental governance framework by seeking to replace or circumvent core protections established under the Environment Protection and Biodiversity Conservation Act 1999 (Cth) ("EPBC Act").

Writing on behalf of PTBA members and many individuals who bring their concerns to this group; we cannot accept that any attempt to weaken the current EPBC Act is acceptable, at any level. Critically, the current laws are weak and rarely implemented to their full capacity. Data available to guide development and industry across Queensland has been sorely lacking and only in May of this year, has the long awaited new WildNet platform become available.

Industry takes advantage of this weakness; the less we know about the presence and abundance of species the less industry is constrained by them. The fact government agencies condone these standards is negligence; in many cases, likely malfeasance in public service. Some are simply not doing the work of government which is at the very least, to secure the best outcomes for all of Nature by applying the EPBC Act, as it stands, to its full extent.

It would appear the conservation sector has waited patiently during the last term of the federal government to see strong new Nature Laws; ones which realised the promise of No Net Loss and Nature Positive Outcomes. Perhaps because the incumbent government is sitting comfortably back in office with a majority, it feels entitled to do as it always intended; suit industry demands and accept a monumental breach of trust. Inevitably, not only in Queensland but throughout Australia, these morbid statistic will worsen:

19 animals and plants added or uplisted on the Federal Government's ballooning list of thousands of [threatened species and ecosystems](#).

The changes were quietly made last week without ceremony, and then publicised by the Australian Conservation Foundation (ACF) today. Its national nature campaigner, Jess Abrahams, has been keeping a tally of new additions, which he puts at 2,287, comprising 685 animals, 1,490 plants, and 107 ecological communities.

These key findings attributed to Rainforest Reserves Australia:

1. **Scientific Rigor:** The Act's rigorous assessment process ensures that any development projects are evaluated against the best available ecological data.
2. **Social License:** Australians expect their government to prioritize environmental stewardship over short-term industrial gains. Weakening the Act would jeopardize that trust.
3. **Long-Term Economic Value:** Healthy ecosystems underpin sectors such as tourism, agriculture, and fisheries; protecting them is an investment in our future prosperity.
4. **International Obligations:** The Act aligns with Australia's commitments under global biodiversity conventions. Any rollback could damage our international reputation.

Furthermore to Australia's International obligations, we are signatories to The Kunming-Montreal Global Biodiversity Framework which sets out four global goals to 2050 and 23 global targets to 2030 which work toward a vision of living in harmony with nature by 2050.

Following four years of negotiations, the Kunming-Montreal Global Biodiversity Framework was adopted by Parties on 19 December 2022 at the 15th meeting of the Conference of the Parties to the CBD, held in Montreal, Canada under the presidency of the People's Republic of China.

- [More information on the Kunming-Montreal Global Biodiversity Framework](#)

<https://www.dcceew.gov.au/environment/biodiversity/international/un-convention-biological-diversity>

Summary Given these considerations, we believe any proposal that places industry interests ahead of long term consideration for the welfare of our natural landscapes is unacceptable.

Queensland's LNP Government has placed a significant financial investment in eco-tourism in preparation for the 2032 Olympic Games. Many question the relevance in modern times, when circa 1% of Australia's GDP is committed to the welfare of country and nature. Australians spend more on domestic animals than government spends on protecting unique and much adored, iconic native species. Both people and landscape would benefit from an equal investment in exercise out in Nature; a land army to repair degraded systems before they are beyond repair.

The reality that feral cats remain 'uncontrolled'; humans disturb severely threatened migratory shorebirds by permitting their dogs exercise 'off leash' on beaches; more trees are cleared in urban areas than in state forests; confirms implementation of the EPBC Act is a dismal failure.

The ongoing decline of plants and animals, our precious biodiversity, is unacceptable. If there is genuine intent to reform the EPBC Act, it should be done with the sole purpose of safeguarding the functioning of our natural landscapes. The EPBC Act 1999 remains one of Australia's most robust frameworks for safeguarding threatened and endangered species and the habitats that sustain them. Its strong protections are essential for preserving our nation's unique biodiversity. Diluting these safeguards would undermine decades of scientific endeavour and weaken its protective provisions.

We respectfully ask that you **oppose any amendment that weakens the EPBC Act** and instead legislate measures that reinforce its provisions. This has been a longstanding promise which we hope will be upheld. We thank the Committee for the opportunity to contribute. It is time to demand integrity in the discourse around policymaking in the EPBC Act processes. This is essential to restore public confidence that government will protect the core values of humanity; we care for other sentient beings, on which all life depends.

We wish the Committee well in its deliberations.

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Chairperson Protect the Bush Alliance
Convenor of BirdLife Southern Queensland

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