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Property Rights Australia Inc submission to QPC inquiry - Impact of Australian Government's 2025 environment protection reforms on Queensland.

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The role of Property Rights Australia

Property Rights Australia Inc. (PRA) is a not-for-profit, apolitical organisation which formed in 2003, to protect the property rights of landowners adversely affected by the actions of government, private companies and others who negatively impact on their properties and their right to do business. Our members are small, medium, and large enterprises, mostly in Queensland and a few are from other states. PRA strives for ecologically and economically sustainable natural resource management, whilst protecting private property rights. PRA wants to ensure government policies and natural resource management decisions are based on sound science and responsible economic management.

Introduction

“From a rule of law perspective, vague laws of the kind that are increasingly popular in Canberra are worse than no law at all.

They harm the innocent by failing to provide adequate warning against conduct that can incur liability.

They open the door to arbitrary enforcement and they inhibit individual liberty by forcing people to conduct their affairs with a timidity that has no place in a free society.”¹

Rule of Law Institute of Australia² Vice-President, Chris Merritt referred specifically to mainstream legislation such as tax law, but he could have been writing about recent changes to the *EPBC Act*.

More than seven months on since EPBC Reform Bills were passed, there is still little clarity.

Property Rights Australia is intrinsically a landowner led organisation so will mostly confine our comments to effects on agricultural land and family businesses.

The effects, as observed by Property Rights Australia of the inability to use “continuation of use” provisions to manage regrowth legally after 15 years, and the inability to clear within 50 metres of a drainage line in the Great Barrier Reef GBR catchment, including unintended consequences, will be severe.

When a substantial pastoral company across Queensland and New South Wales, such as the Russell Pastoral Company which has access to first class ecological and legal services, put their land management plans on hold, it must be obvious that the legislation is lacking in much needed clarity.³

This is the kind of timidity referred to by Chris Merritt in the introductory quote.

It is a timidity that has spread rapidly through the rural community as they become aware of the hastily introduced legislation.

Messaging from the federal Environment Minister, Murray Watt is contradictory and also conflicts with messaging from the department.

The direct costs to industry of thickening woody vegetation and reduction in grass cover have been well documented over 30 years since vegetation management restrictions were first mooted.

Property Rights Australia made that point very thoroughly to the Australian Government Productivity Commission Inquiry into the effects of Impacts of Native Vegetation and Biodiversity Regulation in 2003. The inquiry’s final report on impacts, compliance burden and policy options is still valid today⁴ and should be utilised by QPC’s inquiry.

PRA’s submission to the inquiry is quoted from and referenced later in this document.

¹ <https://www.theaustralian.com.au/business/legal-affairs/why-camberras-vague-secrecy-rules-are-more-damaging-than-no-law-at-all/news-story/9f0e3cd9425160c8e663082e0d9f2789>

² Rule of Law Institute of Australia. <https://ruleoflawaustralia.com.au/>

³ <https://www.hancockagriculture.com.au/routine-farming-operations-criminalised-by-new-epbc-green-tape/>

⁴ <https://www.pc.gov.au/inquiries-and-research/native-vegetation/report/>

Loss of production, profitability and productivity

In the 2003 PRA submission (No 171)⁵ to the Productivity Commission's Inquiry into Impacts of Native Vegetation and Biodiversity Regulation, the authors of that report put forward a formula which affects productivity and profitability in livestock industries.

Four of five parameters involved grasscover and tree-grass relationship.
Neither the economics nor biology has changed.

Extract from 2003 submission

$$\text{Profit} = (\mathbf{P} \times \mathbf{p} - \text{DC} - \text{OC}) \times \mathbf{CC}$$

Where:-

p = Kg produced per animal

P = Price received per Kg

DC = Direct costs per animal

OC = Overhead costs per animal

CC = Carrying capacity

The strategic importance of vegetation management in Queensland is evidenced by the fact that vegetation management practices are capable of directly influencing four out of the five variables in the above equation. These four variables are those shown in bold type.

In the pastoral zone where profits represent only a very small proportion of total production a relatively large change in profitability can be obtained from a relatively small change in any of these four variables.

The interaction of the tree-grass relationship with this micro-economic sensitivity of the grazing business mean that vegetation management regulation has severe and widespread implications for families dependent upon the pastoral industries.

*Given their already economically and geographically disadvantaged status, it is unreasonable to expect farm families to shoulder this cost in isolation. If changing community expectations require the preservation of native vegetation on privately owned land, equity considerations require that the community meet the cost of preservation."*⁶

These comments were made in 2003, and the science and economics have not changed. What has changed is that the community and governments **expect** that the owners of privately owned land should meet the costs of environmental services.

Dr. Bill Burrows submission to the inquiry into the Vegetation Management (Reinstatement) Amendment Bill 2016 showed the exponential negative effects of tree thickening on pasture growth.⁷

The effect increasing woody plant cover exerts on potential pasture production has been widely studied in Queensland (Burrows 2002⁸ and references therein). The relationship between pasture yield and any expression of woody plant competition follows a negative exponential pattern. This means

⁵ <https://assets.pc.gov.au/inquiries/completed/native-vegetation/submissions/171/sub171.pdf>

⁶ <https://assets.pc.gov.au/inquiries/completed/native-vegetation/submissions/171/sub171.pdf> page 5 2003

⁷ <https://documents.parliament.qld.gov.au/committees/AEC/2016/rpt19-11-VegetationMangt/submissions/214.pdf>

⁸ Burrows W H. 2002. Seeing the wood(land) for the trees – An individual perspective of Queensland woodland studies (1965-2005). Tropical Grasslands. Vol 36. pp202-217. <https://era.dpi.qld.gov.au/id/eprint/10323>

that even small numbers of woody plants (excluding fodder trees with palatable leaves) present in a pasture can have a significant depressing effect on potential pasture production.

A comprehensive set of graphs shows negative exponential loss of pasture as stem density increases.”⁹

There is no shortage of scientific literature and landowner observation that without management, tree thickening will continue until it is not useful for any productive purpose. This is particularly the case in Queensland.

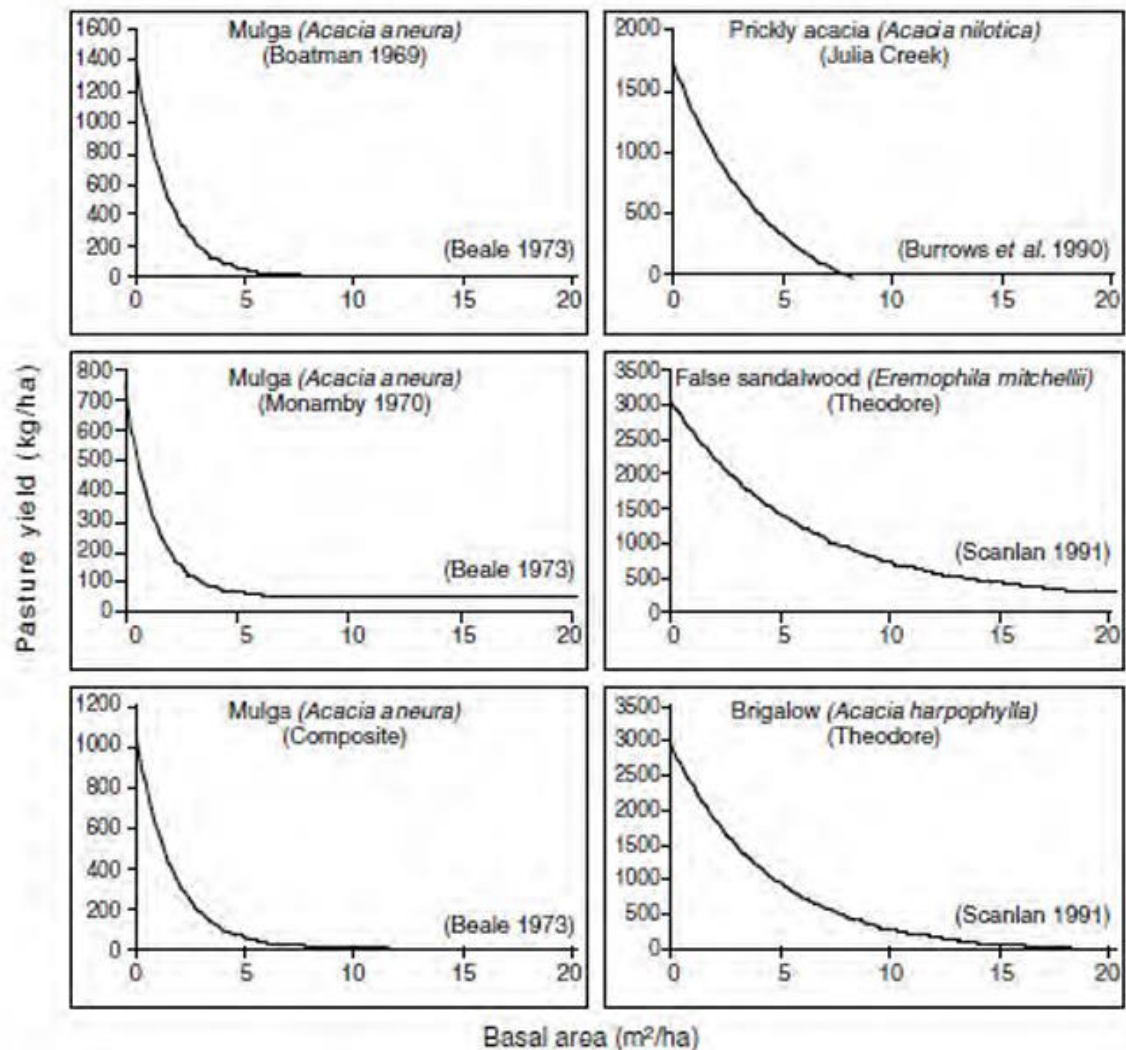


Figure 27 Woody plant competition effects on potential pasture yield – Burrows (2002) (continued on following page).

⁹ <https://documents.parliament.qld.gov.au/committees/AEC/2016/rpt19-11-VegetationMangt/submissions/214.pdf>

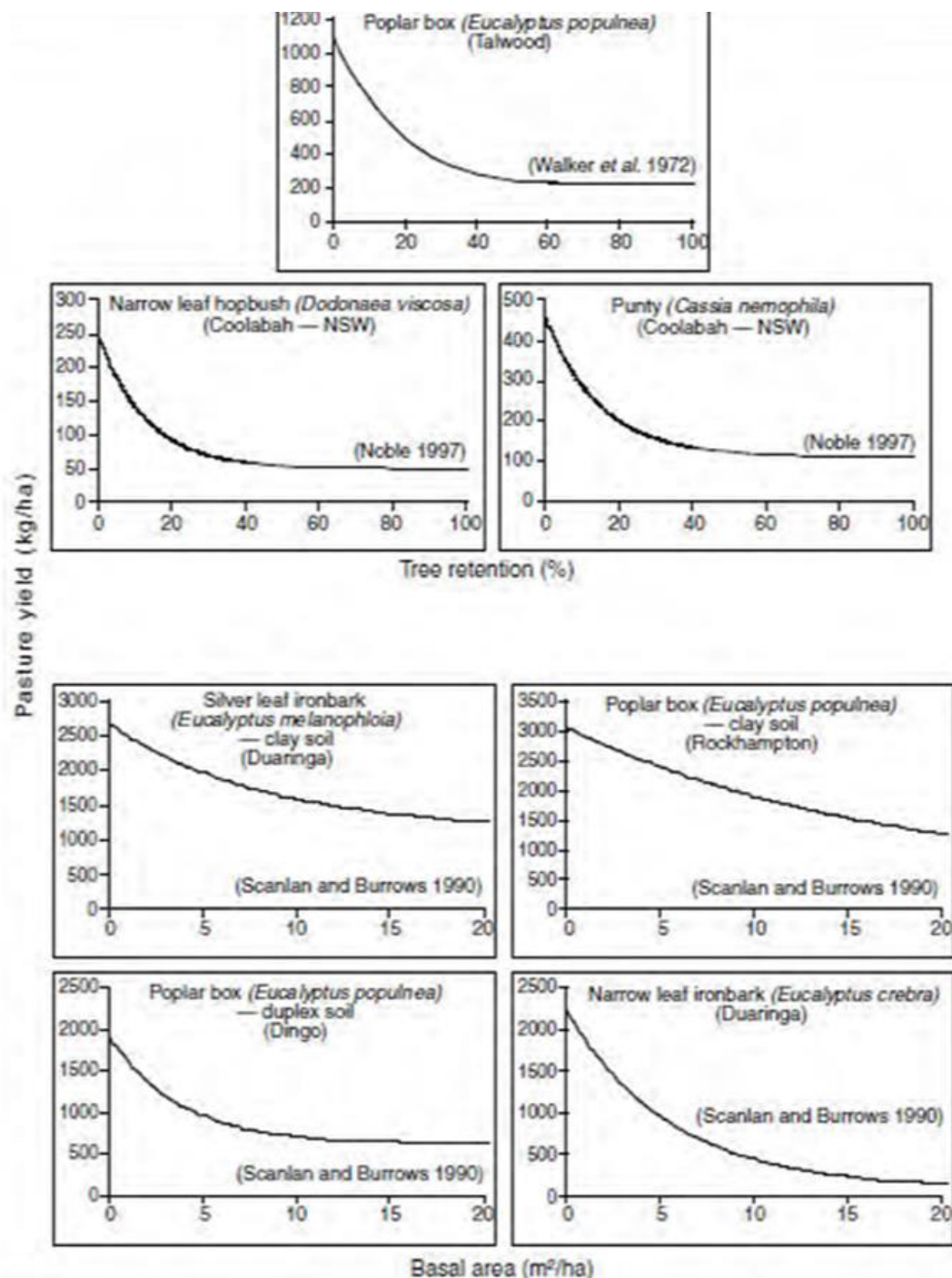


Figure 27 (Cont'd) Woody plant competition effects on potential pasture yield.

Unintended consequences- loss of pasture and groundcover

These graphs show by tree species how quickly pasture production decreases with relatively small areas of thickening, reaching zero in many cases.

Reduced groundcover increases potential for erosion.

One of the requirements of Queensland's Reef Protection Standards for beef cattle grazing requires at least 50% groundcover at the end of September, the dry season, every year¹⁰. If the grazier does not reach that Standard, he must put forward an action plan for remediation.

The inability to manage trees and implement "measures" outlined in the Standard, severely limits those options to almost zero.

If the cause of lack of groundcover is tree thickening or invasive weeds, options for increasing groundcover and reducing erosion, are almost non-existent under the EPBC reform rules.

It is obvious from the graphs that loss of pasture can be due solely to tree thickening, with the only variable being the season.

Decreasing stocking rates, or destocking, will not solve the problem.

Twenty-three years ago, the writers of the PRA submission to the Productivity Commission warned how a simplistic approach to management would be disastrous.

*"The importance of this issue to regulation is that it is only well understood by frontline rangeland managers and scientists, and is not well understood by regulators, who tend to have a simplistic view of trees and grasses and the relationships between them. In essence what woodland thickening means is that if grazing is to continue in Queensland's rangelands, vegetation must be able to be managed, as any regulatory regime which removes the ability to maintain the tree-grass balance will ultimately result in the eventual loss of all grazing utility and a reduction in biodiversity through the excessive proliferation of woody species."*¹¹

Unintended Consequences- variation to clearing cycle

Too much of the hastily conceived legislation has unintended consequences, and these can only be exacerbated when Australian Government decides to use a one size fits all approach over a very large, variable area and a very intricate system.

With a fifteen-year restriction on managing regrowth vegetation without a EPBC referral, landowners will be forced into clearing at shorter intervals which are neither desirable nor necessary, meaning more fuel use, more clearing and more expense. PRA would call this counterproductive.

In order to ensure getting within the fifteen-year period, planning will start ten years out with the hope that seasons and finances allow the clearing to be done before the fifteen-year mark. Seasons both wet and dry, and finances all dictate when management can be addressed. In practical terms this will mean that clearing will happen at 10 to 15 year intervals instead of 16, 20 or even 25 or 30 year intervals in some bioregions.

¹⁰ https://www.qld.gov.au/data/assets/pdf_file/0014/113144/grazing-agricultural-era-standard.pdf

¹¹ <https://assets.pc.gov.au/inquiries/completed/native-vegetation/submissions/171/sub171.pdf> page 12

SLATS monitoring tool for land clearing in Qld, if used by national EPA

Clearing intervals below 15 years will read as an observable increase in clearing in the Statewide Landcover and Trees Study SLATS reports and the environmental groups will use this as yet another club to beat farmers with, even if it was one designed and fashioned by them. They never present a clear picture to their willing audiences, just cherry-picked data.

We have already experienced, with the change in government methodology as to how satellite images are interpreted, how environmental non-government organisations ENGOs, use inflated data to opportunistically argue that increases in clearing have occurred.

Those of us who live in the regions are usually aware that thickening on a major scale has occurred.

In 2018 when the SLATS methodology had changed, it gave the appearance that clearing had more than doubled or tripled overnight. Environmental NGOs were told that 2018-19 figures were not comparable to previous figures but that did not stop them using the increased figures to beat the agricultural sector with.

Not only do they use such statistics to raise money for their own organisations, but they influence listed companies, including banks and supermarkets to discriminate against clients and suppliers, based on one-sided use of statistics and an incorrect interpretation of the law, where most farmers do not yet realise there is a battle to be fought.

One big four bank actually carried out investigations of its own customers for illegal clearing based largely on flawed information, both legally and environmentally, supplied by environmental NGOs. According to its annual report, there were 37 such investigations. PRA contend that they have neither the environmental nor legal expertise to do such investigations, particularly when the information has been supplied by environmental NGOs. This is dangerous-ground.

Not only are listed companies bullied into investigating customers and suppliers but the same cohort of ENGOs get themselves heavily embedded into negotiations of national significance such as trade negotiations with the European Union and are undoubtedly intimately involved with UNESCO World Heritage Committee negotiations on the Great Barrier Reef this year and influencing the Australian Government with the current EPBC reform package.

Agricultural organisations do not gain opportunity for input or as many representative seats at the UNESCO table as the green cohort get.

The change in SLATS methodology was nothing more than a government gift to environmental groups at the expense of the reputation of agriculture. PRA is concerned what evidence-based monitoring will be used by the national EPA to assess compliance with the revised *EPBC Act* and how ENGO's will interpret and manipulate the publicly accessible land use clearing data for their own market transformation agendas.

Under the pre-2018 SLATS methodology, the calculation was done at a pixel scale, so with a relatively small grid. Those pixels which showed tree disturbance were counted. Those which showed no disturbance were not. Considering that 83% of clearing occurs in SLATS categories "sparse" and "very sparse", this is entirely reasonable.

Under the post-2018 methodology, the counting was done at what is called "a landscape scale", so no counting of pixels. If an area was in the frame it was counted in its entirety. In spite of looking, it has been impossible to find an exact definition of "landscape scale". Whether it is a paddock, a series

of paddocks or something larger has been difficult to ascertain. PRA regards this as an inflation of clearing rates where most cleared vegetation is in the category of “sparse” or “very sparse”.

PRA would like to point out, a significant portion of clearing would be woody weed such as *Lantana camara*, also known as the Curse of India. This weed is particularly prevalent on government land in South-East Queensland.

“*Lantana (Lantana camara)* is one of the 32 Weeds of National Significance (WoNS) in Australia¹². It is regarded as a significant environmental weed in Queensland, New South Wales, and on Norfolk Island, and as a potentially significant environmental weed in Western Australia and the Northern Territory. This species is actively managed by community groups in Queensland and New South Wales, and was recently ranked as the most serious environmental weed in south-eastern Queensland. It is also listed in the Global Invasive Species Database (GISD) and is regarded to be in the top 100 of the world's worst invasive alien species.”¹³

It is unfortunate that too many landowners have been reported, investigated, harassed, stressed, fined and threatened with fines for clearing this Weed of National Significance¹⁴.

With this in mind, PRA would respectfully ask the Queensland Government to return to the old methodology unless they can explain, in detail, why the newer methodology is superior. This is particularly relevant as a very large proportion of cleared land is in the “sparse” or “very sparse” vegetation category under SLATS.

It is also a feature of the new methodology that if only partial clearing occurs it is added to the clearing figures at a landscape scale but is also eligible to be recounted when another pass is made over it, rather than being added to the “cleared” baseline.

The SLATS methodology has no category for assessing land clearing attributed to renewable energy development sites, only for associated linear infrastructure such as powerline corridors and roads¹⁵. This clearing must not be attributed to the grazing host property as “clearing to pasture”. These anomalies need to be rectified, before SLATS data becomes part of the national Environmental Protection Agency and used for regulation.

Part of the reasoning for this hasty addition to the amendments to *EPBC Act* was because of ENGOs claims that a million hectares have been cleared between 2018 and 2023. Queensland has about 96 million hectares of forest which is expanding and/or thickening. That is about 0.2% of the forested area per year using what landowners regard as flawed and inflated methodology and we have seen nothing to convince us of its usefulness.

With this straight jacket of unintended consequences that landowners are being beaten into by this legislation as it is presenting at the moment, this can only increase.

Loss of groundcover and erosion from thickening is well documented in scientific literature and is observable by those who manage our rangelands and forests. It should be listed as an EPBC Key Threatening Process, rather than the current EPBC reforms posing further restrictions on vegetation clearing.

¹² <https://weeds.org.au/profiles/lantana-common-kamara/>

¹³ <https://weeds.brisbane.qld.gov.au/weeds/lantana>

¹⁴ <https://www.beefcentral.com/news/84-year-old-graziers-lantana-clearing-ordeal-highlights-chaotic-regulatory-environment/>

¹⁵ https://www.qld.gov.au/data/assets/pdf_file/0022/613507/slats-methodology-overview.pdf . Tables 4 and 5. pp22-24.

Unintended consequences - direct costs

AgForce estimates that the new laws will cost agriculture \$3.5 billion per year in regulatory costs and that there will be a permanent reduction in land value of \$6 billion¹⁶.

PRA would like to add that there will be a lot of indirect costs which will not be accounted for.

Questioning in Senate Estimates by Senator Matthew Canavan has revealed that no modelling was done on impacts, costs, nor environmental outcomes. If they had done serious modelling they would have found negative outcomes in every area.

This flawed legislation and its “one size fits all” across numerous different bioregions, states and across the entire continent, has not been tailored for best environmental outcomes.

Thickening causes erosion.

Thickening increases fire hazard.

Thickening causes economic loss.

Thickening deprives grass dwelling native fauna and flora of their habitat.

Not all woody vegetation matures at the same rate and this regulation will result in pre-emptive clearing rather than judgement of necessity.

Unclear regulation and delay causes loss.

Auxiliary industries such as dozer operators have already suffered loss of seven months of work.

The presence of this sort of machinery in the regions is a necessity in preparation for, and during, an active fire event.

Unintended costs- fire

General Manager of the Queensland Rural Fire Brigades Association, Justin Choveaux has long maintained that Queensland’s *Vegetation Management Act 1999* meant that firebreaks and fire management lines were often inadequate.

Although the legislation allows for ten metres on each side of a boundary fence, a landowner can only do his own side. If your neighbour is a national park or other government land for example, you are unlikely to have a firebreak on the government owned land side. In addition, it will not have been managed for fuel loads which is a known risk.¹⁷

PRA submits that if you adjoin government land which has not constructed the maximum fire break, you should be able to do it on your side, at government expense.

In some bioregions and regional ecosystems, even the 20 metre firebreak has often proved inadequate and it is widely believed that it should be wider.

A hugely underestimated consequence, and we really do mean hugely, of the quest for woody vegetation, any woody vegetation, is fire.

¹⁶ <https://www.agforceqld.org.au/knowledgebase/article/AGF-03071>

¹⁷ <https://www.abc.net.au/news/rural/2023-11-26/red-tape-unmanaged-national-parks-blamed-for-qld-bushfires/103142334>

Queensland suffered catastrophic fires in 2018-19. Some areas suffered again in 2019-20 when all of Australia's East Coast was burnt.

There was, at that time houses, sheds infrastructure burnt in addition to large areas of bushland including the Eungella National Park, which is largely rainforest and was considered un-burnable.

Of course, climate change was blamed but the overgrown, and unmanaged state of national parks, is ignored at the peril of the people who live anywhere in their vicinity.

Those who fought those fires, report the loss of great numbers of wildlife, including koalas on public and private land.

The threat to community safety, workplace health and safety, farm livestock safety of uncontrolled bushfires is immense. Few people have any concept of the magnitude of the losses. Not only are there infrastructure flora and fauna losses, loss of edible pasture, but many landowners report significant cattle losses, particularly where a fire has burned through an unmanaged national park and gained in intensity.

This risk will be increased with any increase in unmanaged vegetation, including from these legislative changes.

The timidity referred to in the introduction has extended to firebreaks and fencelines. This is not only because it will often involve the removal of trees beyond 15 years old but they must often run through creeks and gullies, some of which will be mapped as drainage lines in a Great Barrier Reef catchment.

Government needs to clarify that there will be no penalty for clearing vegetation for 50 m either side of a drainage line if it is for the purposes of a firebreak. All firebreaks and fire management lines should be exempt from the EPBC reform legislation and National Environmental Standards.

Unintended Consequences-costs to at least one important auxiliary industry

One of the often forgotten groups in rural areas is heavy machinery operators.

By the time this submission is lodged, it will have been thirty-two weeks since amendments to the EPBC Act were assented to with a ban on clearing regrowth that was greater than fifteen years old.

For many bulldozer drivers that has meant a halt to large portions of their businesses.

With assumptions that a bulldozer would be operated for ten hours a day, seven days a week (these dozer drivers only stop for bad weather and breakdowns) that equates to a loss of slightly more or less than \$1 million per machine depending on horsepower. Many operators will have three machines on a job. This calculation is based on a cost of \$600 per hour for a large machine down to \$215 per hour for a small machine.

Most have very large machinery debts to pay.

These are losses already incurred and will not be made up when there is more clarity.

Regulatory burden and compliance impacts including costs

The creation of Category X under Queensland's Property Map of Assessable Vegetation (PMAV) was an acknowledgment that the applicable vegetation had already been legally cleared under a permit

and has regrowth. Various vegetation communities valued for environmental qualities were excised at the time.

It was one of the rare occasions when an effort was made by government to reduce green tape.

Property Rights Australia believes that acknowledgment of regrowth clearing should stand.

The blanket assumption that any regrowth left uncleared for fifteen years or longer meant land use change, regardless of bioregion, was an error and will lead to unintended consequences, one of which will be increased lobbying efforts by environmental organisations who seek to disrupt our trade negotiations, particularly, but not exclusively, in the EU.

It could also lead to increased clearing.

Compliance with the amended *EPBC Act* will mean that approval for clearing native and non-native woody vegetation and grasslands which have not been cleared for fifteen years and is not “degraded”, will require federal approval.

Environment Minister Murray Watt has stated in various media that an application for an approval will be simple.

This is at odds with the Department of Climate Change, Energy, the Environment and Water of Australia which advises that if a farmer does not have the skill to do an application, it should hire someone who does. This will be a costly exercise for a family run business.

AgForce have received estimates of \$80,000 for an ecological survey for an EPBC assessment. Depending on complexity, a simple self-assessment may cost \$10,000 to \$15,000 (Steve Cupitt, *pers.comm.*) These costs hardly fall into any category of simple or affordable, everytime a landowner wants to conduct an EPBC assessable activity on their property (e.g. vegetation clearing, weed management, fence building, etc). This cost cannot be imposed onto the sale of their food and fibre and will ultimately be borne by the landowner.

Timeframes are important in farming. Farms and their operations are dictated by weather and finances. Managing regrowth is also dictated by these factors. Lengthy timeframes for surveys for applications, for preparation of applications and approval of applications, all risk putting the applicant into a timeframe where conditions are no longer optimal, returns are too low, fuel is unavailable or expensive, or appropriate machinery and operators are not available.

Minister Watt is being disingenuous when he says the law is, “simply requiring farmers to follow the same process that miners, renewables and property developers have followed for years”.

The Minister has repudiated the “*continuation of use*” exemption and thrown family farmers into a framework intended for corporates who just call in the experts and pay the bill. None of these groups could ever claim “continuation of use” so it is definitely not the same.

Landowners’ observations of renewables environmental practices certainly do not accord with what they know is expected of them.

The necessity for an approvals process at all has a huge effect on family run operations both in terms of cost and stress.

At the time of writing, National Environmental Standards have not been finalised. Even when they are, they can be readily changed.

Ever since the EPBC reform legislation was passed in December 2025, landowners have been looking for clarity and have found none.

In all probability, there is a very significant cohort who are unaware that any new rules are in play.

Legislation which does not come with standards attached, as with this legislation, always causes uncertainty and timidity as outlined by Chris Merritt and quoted in the introduction.

Conflicts with Qld Govt Reef Protection regulations and management actions

Using the new regulations to impress UNESCO in Great Barrier Reef catchments is disingenuous. Thickening will result in loss of groundcover and increases erosion potential.

The 2022 Reef Scientific Consensus Statement has rebutted unsubstantiated claims that land clearing is the main cause of sediment runoff to the GBR. Multiple sources of anthropogenic sediment and nutrient include overgrazing, land clearing, tillage, cattle trampling, feral animals, historical surface mining, unsealed roads and construction earthworks. Half of the sediment comes from gullies and 24 per cent from streambank and only 22 percent from hillslopes¹⁸.

Large scale remediation of gullies can reduce sediment exports by more than 90 per cent in restored gullies within 1 to 2 years¹⁹. An unintended consequence of the new EPBC reforms will restrict these Reef actions by preventing or impeding activities within 50 metres of a Reef watercourse. This includes impeding the \$12.4 million Streambank Remediation Program recently announced by the Queensland and Australian Governments²⁰.

As for sedimentation itself, it definitely does not smother coral, and such claims by some environmental NGOs are not correct. The 2022 Reef Scientific Consensus Statement confirms sediment runoff is constrained to the inner shelf and deposited within river mouths²¹. Sediment flocculates out at salinity units above 10, therefore sediments rarely impact on the mid and outer reefs where most coral ecosystems occur.

In his submission to the Senate Inquiry into “Identification of leading practices in ensuring evidence-based regulation of farm practices that impact water quality outcomes in the Great Barrier Reef”, Dr. Piers Larcombe said, “There are no examples published in any international specialist sedimentary journal of GBR coral reefs having been smothered by river-borne sediments, no substantial tested body of case examples, and no examples demonstrating such impacts being of long-term significance to the marine ecosystem. Changes in sediment volumes delivered by rivers cannot effect changes in marine habitats of ecological relevance.”²²

¹⁸ <https://reefwqconsensus.com.au/question/3-3/>

¹⁹ <https://reefwqconsensus.com.au/question/3-6/>

²⁰ <https://www.qld.gov.au/environment/agriculture/sustainable-farming/reef/streambank>

²¹ <https://reefwqconsensus.com.au/question/3-1/>

²² Submission to Senate Inquiry -- “Identification of leading practices in ensuring evidence-based regulation of farm practices that impact water quality outcomes in the Great Barrier Reef” -- Piers Larcombe. 31/10/2019 Sub 46 page 2

No vegetation clearing within 50 metres of a Great Barrier Reef drainage line-increased flooding

The most stunning existing example of this is North Queensland which has suffered multiple floods across wide tracts of productive country during the 2025-26 wet season in the southern Gulf, and previous flood events.

Long before these flood events, North Queensland residents have warned about the unintended consequences and impacts of the Wild Rivers Legislation, which, in spite of being repealed, seems to have been enforced in other guises which are often unclear. The constant oversight is a threat in any ability to tackle the invasive weed species, which are now completely out of control, and which are creating enormous fire risk. Underfunded Catchment groups and Aboriginal Ranger programs are having limited success in controlling the infestations.

Residents claim that the inability/unwillingness as a result of regulatory risk to clear weeds such as rubbervine, prickly acacia, lantana, bellyache bush, Siam weed and others in the clogged watercourses has resulted in up to four weeks extra for floods to dissipate. Floods also impact on native biodiversity and their habitats.

This is four weeks more of cattle standing in water, starving and generally suffering ill health. Stations have their houses, sheds, communications and roads cut off for four weeks longer than necessary. Townships face expensive evacuations particularly in the coastal Gulf regions where 26% of Australia's annual rainfall filters into the Gulf of Carpentaria. Local Government Councils, Aboriginal Community Councils with limited rate bases are constantly operating at a loss in the face of recovery operations.

The costs of loss of business are enormous and impacts on our ability to calculate the costs of losses and the ability to continue to operate. Impacts include stock losses, fauna losses and an increase in invasive pest animals especially feral pig populations.

This situation will only be exacerbated by the ban on clearing any vegetation within fifty metres of a drainage line to the GBR. This measure needs urgent excision in some areas and is a clear illustration of how regulation from a distance is unlikely to work.

North Queensland flood areas have been denied recovery funding in the budget. They need to be consulted and exempted from these regulatory imposts and be allowed to clear waterways and country from the choking weeds and vegetation.

In concert with this, whatever the barriers to clearing in the past have been at any level of government, they must be reviewed and abolished. There will be other areas where this is also applicable from time to time and communities need to be shown leniency.

Environmental Groups- how they will use the legislation

Australian Conservation Foundation ACF has been accusing Australian producers of "deforestation" and illegal clearing long before the November 28th 2025 EPBC reform legislation.

They are still implying in this week's Land newspaper that managing of regrowth that occurred before the 1st December 2025, was illegal.

They use unviable and insignificant statistics to convince those who do not know what a viable comparison is, that clearing is massive and illegal, neither of which is correct.

Both accusations were refutable because they were untrue. That was part of the reason why Australia gained an evaluation of “low risk” for deforestation from the EU.

ALL definitions of deforestation, and yes definitions do matter, both Australian and international, require “land use change” to occur to be called deforestation. When a landholding could demonstrate “continuation of use” and there was no land use change, there was no deforestation.

This matters for our international trade negotiations. Now their outcome will hinge on whether our government can just legislate away even genuine continuation of use or whether international rules will apply. Landowners need to be given the opportunity to demonstrate there has not been land use change, regrowth only was being managed, and that no “deforestation” has occurred.

The next question is why the government would not only stab Australian primary producers in the back, but risk future trade negotiations based on a lie.

Organisations have long wanted to know exactly which properties, by lot and plan number and name, have had clearing on them.

That knowledge will be easily available from records required to be kept under the EPBC searchable public portal where minute details of referrals and approvals will be kept.

Family farms need to not be harassed claiming illegality or demonstrating against them doing their jobs.

Quotes from ACF’s Nathaniel Pell in this week’s Land Newspaper, 8th July, 2026, give an indication of what they are planning on using data for.

"Australia provides UK exporters with information about traceability, biosecurity, whether the meat is hormone-free, but they don't offer to verify that the product is deforestation-free," Mr Pelle said.

"The big supermarkets struggle to implement their commitments to deforestation because they can't properly trace back."²³.

There will lot of unintended consequences of this legislation which will not be obvious until they happen

Summary of key points

- Queensland will be most affected by this legislation because of its climatic conditions and bioregions
- Forests are not static. They are always in a state of flux
- Left without disturbance, even open forests thicken to up to 100% canopy cover
- Thickened vegetation becomes unproductive
- Thickened vegetation becomes a fire risk
- Thickened vegetation becomes weed infested which is a biosecurity threat
- Thickened vegetation becomes a breeding ground for feral animals which can become a biosecurity risk
- Feral pigs will become a disease vector if any of a number of diseases hit our shores
- Fire and feral pigs are a community safety risk and a workplace health and safety risk
- Floods are a community safety risk and a workplace health and safety risk
- The new legislation may impact trade negotiations

²³ <https://www.theland.com.au/story/9306234/australian-beef-uk-market-demand-grows-amid-deforestation-rules/>

- The highest risk of sedimentation is when avulsion occurs due to blockages either from sediment or weeds (Larcombe)
- Costs to our productive communities will be huge
- Cost of compliance for any workable result will be beyond the ability of most family farmers to pay
- Thickening of vegetation does not benefit the environment
- Grass living, and open forest living flora and fauna lose habitat
- All of the information registers and information portals open up family farmers to the risk of harassment, vigilantism and discrimination
- Australia should lift the moratorium on nuclear power

Further information

If you require further information or clarification on any points raised in the submission, please contact Joanne Rea at PRA by email on pra1@bigpond.net.au or phone 0493 667 561.