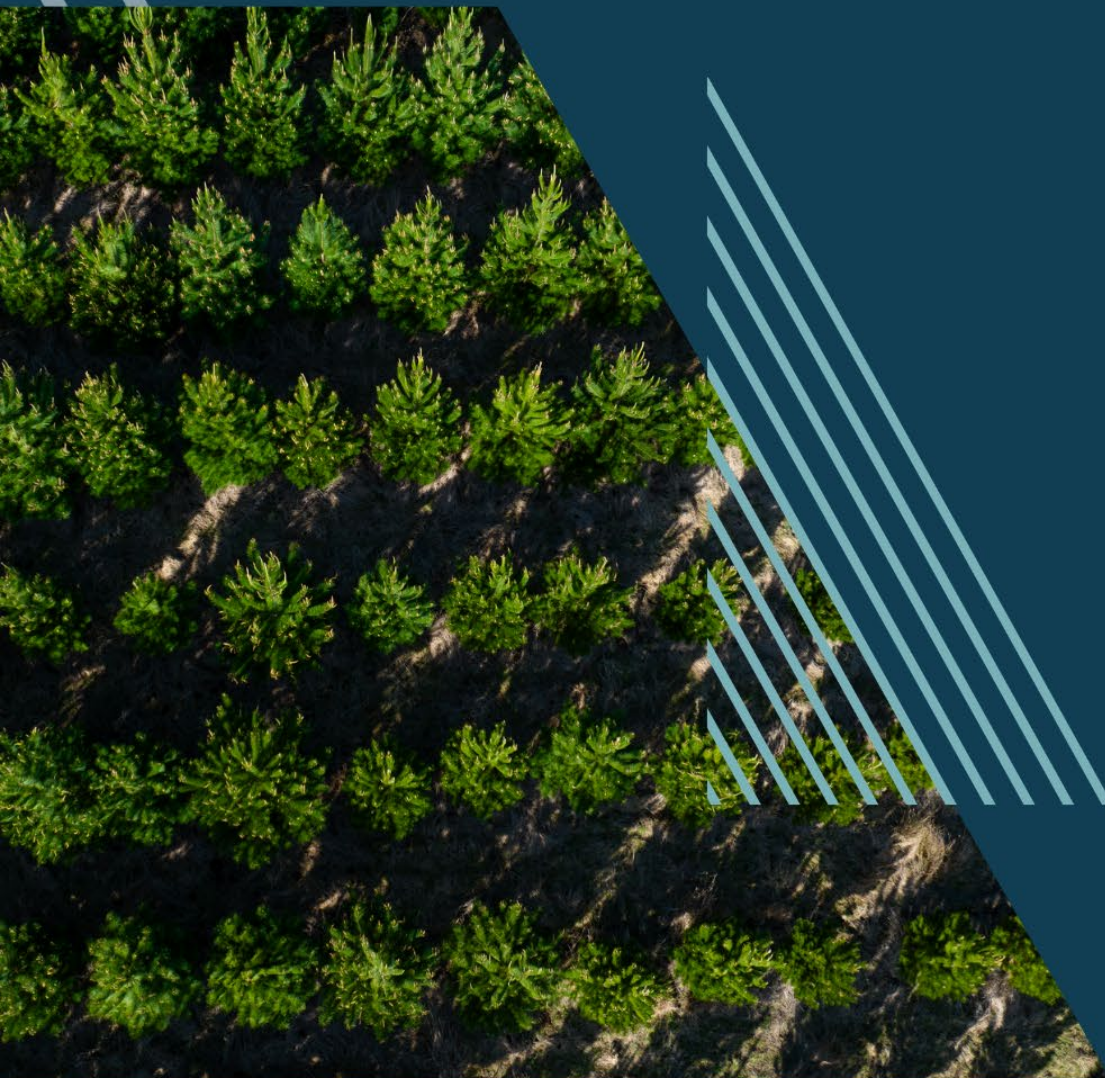




QUEENSLAND
FARMERS'
FEDERATION



A fresh start for Queensland's Environmental Offsets Framework **June 2026**

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Prepared for:

Department of Environment, Tourism, Science and Innovation
(DETSI)

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This submission is provided to:

Department of Environment, Tourism, Science and Innovation (DETSI)

Via email: offsetsreview@detsi.qld.gov.au

Our members

- Queensland Fruit & Vegetable Growers
- Cotton Australia
- Canegrowers
- Greenlife Industry QLD
- eastAUSmilk
- Australian Cane Farmers Association
- Queensland United Egg Producers
- Turf Queensland
- Pork Queensland
- Australian Chicken Meat Federation
- Bundaberg Regional Irrigators Group
- Burdekin River Irrigation Area
- Central Downs Irrigators Ltd
- Fairburn Irrigation Network
- Mallowa Irrigation
- Pioneer Valley Water Co-operative Ltd
- Theodore Water Pty Ltd
- Eton Irrigation
- Lockyer Valley Water Users

About the Queensland Farmers' Federation



The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland.

Our members are agricultural peak bodies who collectively represent more than 13,000 farmers who produce food, fibre and foliage across the state.

QFF's peak body members come together to develop policy and lead projects on the key issues that are important to their farmer members and the Queensland agriculture sector.

Together, we form a strong, unified voice leveraging our effectiveness by working together to drive policy and initiatives that support a strong future for Queensland agriculture.

Submission

The Queensland Farmers' Federation (QFF) welcomes the opportunity to provide feedback on the discussion paper *A Fresh Start for Queensland's Environmental Offsets Framework*.

Queensland's farmers have a long history of managing productive agricultural landscapes while conserving the environmental values upon which those industries depend. As stewards of more than half of Queensland's landmass, farmers play a critical role in protecting biodiversity, managing natural resources and maintaining healthy ecosystems. QFF therefore supports reforms that improve environmental outcomes while recognising the importance of maintaining a productive, competitive and sustainable agricultural sector.

QFF supports the Queensland Government's commitment to modernising the Environmental Offsets Framework and addressing long-standing shortcomings in offset delivery, regulatory complexity and market performance. The reforms outlined in the discussion paper represent an important opportunity to improve both the effectiveness and credibility of Queensland's offsets system.

However, the long-term success of the Framework will depend on more than improving administrative processes or increasing offset supply. It will ultimately depend on whether the framework gives landholders the confidence to participate. A modern offsets system must deliver environmental outcomes while providing transparency, protecting property rights, recognising the value of active land management and ensuring offset obligations are practical, accountable and commercially sustainable.

Key recommendations

QFF recommends:

1. Establish a publicly accessible geospatial register of environmental offset sites that identifies the location of offset areas, the environmental matters being protected, the management obligations applying to each site and the responsible delivery entity, while appropriately protecting commercially sensitive information and landholder privacy.
2. Make active land management a mandatory requirement of all offset arrangements through documented management plans addressing weeds, pest animals, biosecurity, fire management and ecological monitoring, supported by enforceable minimum standards and mechanisms that allow neighbouring landholders to raise unresolved management issues directly.
3. Modernise the financial settlement offset calculator by updating cost assumptions and incentive payments that have remained unchanged since 2014, removing structural pricing distortions and improving transparency through regular public reporting on the collection and expenditure of Offset Account funds.
4. Strengthen landholder confidence by providing greater flexibility in offset delivery, avoiding unnecessary perpetual land-use restrictions, establishing clear liability protections and introducing mechanisms that allow long-term agreements to be periodically reviewed where circumstances materially change.

Part 1. Unlocking the Offsets account to deliver outcomes

Do you have views or suggestions about our ideas to unlock the Offset Account?

QFF supports the proposed direction of strengthening partnerships with the land sector, expanding delivery models and increasing flexibility in offset delivery. However, these reforms will only succeed if they also improve landholder confidence. The current Framework places significant long-term obligations on landholders while offering limited flexibility, transparency and recognition of active land management.

QFF recommends:

- Establish a public geospatial register of offset sites.
- Requiring active management plans for weeds, pests, fire and biosecurity, supported by enforceable standards;
- Recognising compatible agricultural activities where they do not compromise environmental outcomes.
- Retaining flexible legal mechanisms rather than defaulting to perpetual land-use restrictions.
- Ensure the future of food security and regional economies are not detrimentally impacted by offsets.

These changes must be implemented alongside improvements to the financial settlement offset calculator to address the underlying supply and funding constraints identified in the discussion paper.

What are some ways the challenges outlined could be addressed?

The discussion paper correctly identifies land availability, rising costs and long-term commitment as key barriers to delivering offsets. QFF considers these challenges are primarily driven by the level of risk and uncertainty placed on participating landholders.

Addressing these barriers requires more than stronger market engagement. The Framework must provide greater flexibility in legal security arrangements, recognise active land management as a conservation outcome, fairly allocate long-term risks and liabilities, and ensure financial settings adequately reflect the real cost of delivering offsets.

How could a flexible delivery model ensure conservation outcomes are secured?

QFF supports flexibility in principle, including departing from strict like-for-like requirements where suitable offsets cannot be found, but considers conservation outcomes, and landholder protections, can only be secured together if flexibility is paired with accountability.

Part 2. Financial settlements offset calculator

Are the current settings for the financial settlement offset calculator appropriate?

No. QFF supports a comprehensive review of the financial settlement offset calculator. The current settings no longer reflect the true cost of acquiring, securing and managing offset sites, with key cost assumptions and landholder incentive payments remaining unchanged since 2014.

How can Queensland ensure the calculator is robust for conservation and business?

QFF recommends the review correct the specific structural issues identified in the discussion paper. QFF considers robustness also depends on improved transparency over how Offset Account funds are allocated and spent. Periodic public reporting should be a standard requirement, detailing: funds received during the reporting period; offset projects funded (including location and environmental matter); conservation outcomes achieved against intended objectives; the geographic distribution of investment relative to areas of impact; and progress in addressing outstanding offset liabilities. This level of reporting would strengthen accountability and give communities and adjoining landholders confidence that settlements are delivering the outcomes they were collected for.

Are there any matters related to financial calculation of offsets which need to be considered?

In addition to the issues identified in the discussion paper, QFF recommends the review consider:

- Removing or reforming Distinct Matter Area discounts where they reduce the practical delivery of offsets across multiple environmental matters.

- Reviewing offset area multipliers to ensure they adequately compensate for impacts to high-value environmental matters.
- Incorporating appropriate contingency allowances to account for events such as natural disasters and project delivery risks.
- Establishing a regular review mechanism so the calculator remains aligned with changes in land values, management costs and market conditions.

To what extent do you support alignment of the Queensland financial settlement offset calculator and the proposed Commonwealth Government financial offset calculator?

QFF supports alignment in principle where it reduces duplication, streamlines approvals and avoids proponents paying twice for equivalent offset outcomes. However, alignment should not diminish Queensland's environmental standards or create additional complexity for landholders. Any harmonisation should preserve Queensland-specific ecological requirements, recognise equivalent State outcomes where appropriate and be subject to further stakeholder consultation once the Commonwealth calculator has been developed.

Part 3. Improving regulation

Do you support the proposed amendments and policy changes? Why or why not?

Broad support for defining the mitigation hierarchy in the Act, streamlining legal security to a single consent step, enabling EOPAs and advanced offsets for Commonwealth use, expanding indirect offsets to include threat mitigation, removing the non-remnant restriction on connectivity offsets, and growing the protected area estate through offset delivery, provided three safeguards are met: avoidance should require action "to the extent reasonably practicable," not an absolute "extent possible" standard; "repair" should recognise on-farm management history (weed/erosion/pest control); and streamlining must not reduce landholder engagement or the rigour of avoidance/mitigation assessment. Strengthened, enforceable active management obligations should accompany this package, since unmanaged offset sites currently impose real costs on neighbouring farms.

What issues require further consideration within the context of the Framework?

The package of amendments is largely focused on reducing regulatory friction for proponents and government before and during offset establishment. QFF considers the most significant gap is what happens to agricultural landholders once an offset site exists nearby, which is not addressed by the current proposals at all. Specifically:

- There is no requirement in the current proposals for offset sites to maintain documented, ongoing management plans addressing biosecurity, invasive species, fire prevention and monitoring.
- There are no clear minimum management standards, nor compliance and enforcement provisions to act on persistent failures to meet them and no mechanism for an affected neighbour to trigger action directly rather than relying on the regulator to do so.

- The real costs that unmanaged offset sites impose on neighbouring agricultural land are not currently factored into the regulatory design at all, despite being a lived experience reported by farmers across regional Queensland, and there is no mechanism for an affected landholder to recover the control costs they incur as a result.

QFF recommends these obligations be framed as active, ongoing responsibilities attached to the offset site, rather than passive conditions attached to a land-use designation, with regulators empowered to act where a site is creating measurable harm to neighbouring enterprises, and with landholders given direct standing to raise that harm rather than only an indirect path through the regulator.

What else would you suggest to improve the Framework? Please state what and why?

Beyond the matters raised against the specific proposals above, QFF suggests the following additions:

- A publicly accessible geospatial register of offset sites: there is currently no simple way for landholders, neighbours, local governments or emergency services to know whether land is subject to an offset arrangement or what its management obligations are. This creates real uncertainty for fire management planning, biosecurity responses and property transactions, and undermines public confidence that offset commitments are being delivered.
- Mandatory active management plans for all offset sites, with compliance and enforcement mechanisms: poorly managed offset sites become reservoirs for weeds, pests and fuel loads that affect both biodiversity outcomes and neighbouring agricultural enterprises; active management consistently delivers better long-term outcomes than passive exclusion.
- A framework designed around Ecologically Sustainable Development principles, balancing environmental, social and economic consideration: a framework that prioritises conservation outcomes without due regard to sustainable land-use and production risks skewing regulatory outcomes against productive agriculture, and reducing the pool of willing, capable landholders able to deliver durable conservation outcomes.
- Avoiding unnecessary long-term land lock-up in favour of active stewardship as the default model: long-term legal security mechanisms extending for decades or in perpetuity discourage adaptive land management and reduce participation by commercial farmers who are otherwise well placed to deliver durable biodiversity outcomes.

Conclusion

Queensland's Environmental Offsets Framework will only deliver enduring conservation outcomes if it also earns the confidence of the landholders expected to implement it. Achieving this requires a framework that is transparent, actively managed, financially credible and founded on genuine partnership with the agricultural sector.

The reforms proposed in the discussion paper represent an important opportunity to improve the operation of Queensland's offsets system. However, they should be complemented by measures that increase transparency through a public offsets register, strengthen active stewardship obligations, modernise the financial settlement calculator and provide appropriate safeguards for landholders participating in offset delivery.

Together, these reforms would create a framework that not only delivers better biodiversity outcomes but also encourages greater participation from the agricultural sector, ensuring conservation and productive land use continue to coexist across Queensland's landscapes. QFF welcomes the opportunity to continue working with the Queensland Government as these reforms are developed and implemented.

Yours sincerely

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