



Submission on the Environmental Standards **January 2026**

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Contents page

Contents page.....	1
About the Queensland Farmers' Federation.....	2
Introduction.....	2
Submission.....	2
MNES Standard.....	2
Environmental Offsets.....	3
Conclusion	4

This submission is provided to:

Department of Climate Change, Energy, the Environment and Water

Submitted via website at consult.dcceew.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
- Mallawa 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.

Introduction

The Queensland Farmers' Federation (QFF) welcomes the opportunity to provide this submission on the Draft National Environmental Standards for Matters of National Environmental Significance (MNES) and Environmental Offsets. Our members are the stewards of vast tracts of land that host many of the nation's most significant environmental values. However, they are also at the frontline of global food security and regional economic stability.

While QFF supports the broad objective of moving toward an environmentally positive framework, the current drafting of the National Environmental Standards for MNES and Environmental Offsets presents material risks to the ongoing viability of agricultural production. In particular, the Standards lack sufficient balance to enable the sustainable use of natural resources and risk imposing disproportionate, long-term regulatory and financial liabilities on individual landholders. Without refinement, these instruments may undermine both environmental and economic outcomes.

Submission

MNES Standard

The erosion of Ecologically Sustainable Development (ESD)

Ecologically Sustainable Development (ESD) is a central object of the EPBC Act, yet it is inadequately reflected in the MNES Standard. The principle of ESD must be elevated from a peripheral reference to a core operational requirement. Decision-making under the Standard should explicitly require regulators to weigh the legitimate social and economic benefits of primary production alongside conservation outcomes. Without this balance, the Standard risks privileging environmental considerations in isolation, contrary to the intent of the Act and to the realities of land management in working agricultural landscapes. This significantly increases the risk of decisions being made that will lead to detrimental unintended consequences in the future.

Clarify the scale of outcomes: individual vs landscape

The MNES Standard does not clearly specify whether environmental outcomes are expected to be delivered at the individual project level or across broader landscapes. This ambiguity creates significant risk for proponents. QFF strongly submits that individual landholders should only be held accountable for the direct, project-level impacts of their actions. Broader recovery objectives and landscape-scale outcomes should be achieved through coordinated, government-led bioregional planning and investment. Requiring individual proponents to deliver regional or ecosystem-wide outcomes would impose unrealistic and inequitable restoration burdens on single enterprises.

Environmental Offsets

Legal certainty on “measurable improvement”

The Offsets Standard links the statutory requirement for “net gain” to the concept of “measurable improvement.” It is essential that the policy explicitly confirm that a demonstrable, quantified improvement in environmental condition relative to an agreed baseline satisfies the legislative net-gain test. Clear legal certainty is required to prevent subjective interpretation by regulators, which could otherwise result in approvals being withheld despite the delivery of genuine and measurable environmental benefits.

Protect productive farmland (Principle 7)

Offset design must avoid the permanent loss of high-value agricultural land. QFF recommends the application of an explicit “agricultural lens” within Principle 7, requiring offset site selection to prioritise lower-capability land (e.g. Land Classes V–VIII) and avoid the use of prime arable soils (Classes I–III). In addition, a clear hierarchy should be established that prioritises offsets on public land, including conservation reserves and Defence land, before placing pressure on privately owned productive farmland that will potentially erode the sector, future food security, economies and the future of regional communities.

Make offsets operationally feasible

As currently drafted, the operational requirements of the Offsets Standard threaten the feasibility of farm-level improvements and critical regional infrastructure. In particular:

Timing of offsets: Requiring offsets to be fully secured prior to impact risks multi-year project delays. A staged-securing approach should be adopted, allowing essential works to proceed while offsets are progressively implemented and verified.

Duration of obligations: One-hundred-year maintenance requirements are unbankable and unworkable for family-owned farming businesses. These should be replaced with a realistic intensive-management period (for example, 20–25 years), followed by transition to long-term stewardship arrangements or transfer to an appropriate public conservation mechanism.

Transparency: the current lack of transparency relating to how an offset requirement is calculated and subsequently met, needs to urgently be addressed. It is imperative that the changing land use that is taking place as a result of offsets can be easily identified, measured and tracked at a regional, state and national level.

Conclusion

QFF and its members are committed to the long-term health and resilience of Queensland's environment. However, in their current form, the draft National Environmental Standards risk creating a regulatory framework that is "Nature Positive" in name but "Agriculture Negative" and potentially "Regional Community Negative" in practice.

There is an urgent need to increase transparency of how offsets are calculated and then applied so that the impacts can be accurately tracked and measured to inform sound land use planning and enable any developing risks to be identified and mitigated.

Agriculture is fundamental to Australia's economic resilience, food security, and regional communities. The National Environmental Standards must be refined to ensure they genuinely support environmental protection while enabling a productive, sustainable, and internationally competitive farming sector and a viable future for regional communities.

Yours sincerely



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