

1 June 2026



QUEENSLAND
FARMERS'
FEDERATION

Senator the Hon Murray Watt
Minister for the Environment and Water
Senate
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CANBERRA ACT 2600

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Via email: minister.watt@dcceew.gov.au

Dear Minister

Re: Consultation on the proposed *National Environmental Standard for Matters of National Environmental Significance* (MNES)

The Queensland Farmers' Federation (QFF) welcomes the opportunity to provide feedback to the *Department of Climate Change, Energy, the Environment and Water* on the proposed *National Environmental Standard for Matters of National Environmental Significance* (MNES). QFF supports the submission made by the *National Farmers' Federation* (NFF) and endorse the concerns and recommendations raised.

QFF do not support the MNES Standard that has been presented as it does not provide a clear, practical, or viable pathway for agriculture to assess our obligations or determine whether routine farming activities have a Significant Impact on a MNES. It is unfit-for-purpose and cannot be progressed in its current form.

The regulatory burden that has now been placed upon farmers post-legislative reform is significant and is creating major concern and distress. The lack of clarifying guidance to exempt or mitigate what is clearly low-risk and routine agricultural activities from assessment, and/or commitment (or understanding for that matter) toward the urgent updating of outdated guidance materials for agriculture (i.e., 2013 *Significant Impact Guidelines* for MNES) despite provisions in the Budget to support compliance and extension, has meant reforms have increased uncertainty and worsened what was already a challenging task for farmers seeking to understand their obligations under Federal law.

Should the Commonwealth proceed with finalising the MNES Standard through the current process, significant amendments are required to make it workable and fit-for-purpose for agriculture.

This includes in summary:

- Better integrating *Ecologically Sustainable Development* (ESD) including through a dedicated Principle so that the Principles-led approach to implementation actually reflects and gives practical effect to the Objectives and Outcomes of the Standard, let alone requirements under the Objects of the EPBC Act (Section 3A);

- Duplication against future Standards are removed and deferred to those separate dedicated processes (in relation to *Environmental Offsets, Data and Information, Community Consultation, and First Nations Engagement*);
- Refine legislative drafting to ensure matter-specific Objectives do not introduce broader obligations than those already required under existing international agreements and frameworks;
- Use clearer and more consistent drafting as it relates to the multiple differently framed Significant Impact concepts so that proponents can better understand their Self-Assessment and referral obligations; and
- A commitment to exempt routine and continuing-use agricultural activities from the assessment process and urgently prioritise development in real partnership with industry of clear, useful, and fit-for-purpose guidance for farmers including:
 - Plain English definitions;
 - Clearly outline what is and is not an acceptable practice (i.e., examples that are grounded in the reality of production systems and reflective of what is a legitimate practice);
 - Improved guidance documentation;
 - Better mapping; and
 - Increased resourcing to support extension and communication.
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QFF supports improved environmental outcomes and greater regulatory certainty. However, the proposed MNES Standard does not provide the clarity, practicality, or guidance needed for farmers to understand and meet their obligations. Significant amendments are required to ensure the Standard is workable for agriculture, reduces uncertainty, and supports both environmental stewardship and productive farming operations.

Yours sincerely

Jo Sheppard
Chief Executive Officer