Draft Brigalow Belt North Bioregional Guidance Plan

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This submission is provided to:

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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 comment on the Draft Brigalow Belt North Bioregional Guidance Plan (the Plan), and supports the development of a non-regulatory guidance document that helps proponents better avoid, mitigate and manage impacts on Matters of National Environmental Significance (MNES).

The Brigalow Belt North is a nationally significant agricultural landscape. Grazing is the dominant land use across roughly 80 per cent of the Plan area; the southern Fitzroy basin is Australia's leading cattle production region, with the highest cattle numbers of any region in the country; and cropping occupies a further nine per cent, concentrated around Bowen and Gumlu in Great Barrier Reef catchment. Agricultural landholders therefore manage most of the country the Plan seeks to guide.

QFF supports Queensland's renewable energy transition and recognises the region's strong wind resource. Well-sited wind development can coexist with agriculture and deliver benefits to farmers and rural communities, diversified and stable income for host landholders, dual-use grazing around turbine infrastructure, on-farm energy resilience, and new economic activity in regional towns. QFF has consistently advocated for these opportunities to be realised, including the distributed and on-farm energy options too often overlooked in transmission-scale planning. Our equally consistent position is that these benefits are only durable where development is delivered without disrupting agricultural production or rural livelihoods; an outcome that depends on getting the framework right.

That is why the Plan's analytical balance will matter. Environmental values are assessed systematically throughout the Plan, but productive agricultural land, existing stewardship, and the cumulative effects of development on regional industries receive comparatively limited consideration. This imbalance is heightened here by two features specific to this bioregion. First, the Plan's wind farm development focus is itself rated only low-to-medium risk, while the dominant regional pressures it must sit alongside are coal and resource extraction (high intensity) and grazing.

The Plan therefore guides one emerging land use onto a landscape already under intense pressure from another, without transparently weighing the consequences for the agricultural enterprises caught between them. Second, the Plan expressly identifies agricultural landholders as "positioned to provide offsets"; a framing that, without safeguards, risks treating productive farmland as the region's offset reserve. Our recommendations below are directed at closing these gaps, and are offered in support of a Plan we want to see succeed.

QFF is providing a concurrent submission on the Draft Gulf Plains Bioregional Guidance Plan. A number of our positions apply consistently across both pilot plans; where we have set those out in detail in the Gulf Plains submission, we summarise them briefly here (see section 6) and ask that the two be read together.

Detailed comments

Consistent with QFF's Gulf Plains submission

QFF has set out detailed reasoning on the following matters in its concurrent submission on the Draft Gulf Plains Bioregional Guidance Plan. Our position is consistent across both pilot plans, and we summarise it briefly here.

- *Certainty about the Plan's role and application:*
  - QFF supports the Plan's non-regulatory status but seeks, before finalisation: an explicit statement of the limits of the "must have regard to" effect; confirmation that application beyond wind ("relevant regardless of industry") is voluntary for agriculture and creates no obligation or assessment trigger; and a firm commitment that any move to build the Plan upon into a regulatory instrument or strategic assessment, or any use of broader conservation targets such as the '30 by 30' target invoked in Advice 11, will be preceded by separate, dedicated consultation with the sector. This is reinforced by the reform's shift from "no net loss" to a "net gain" test, which would raise the compensatory burden of any future application to agriculture.
- *Limits of the data:*
  - The Plan's information is, on its own terms, "appropriate for landscape-scale consideration, not for property-level analysis," and is presented at a 6-kilometre hexagon resolution. QFF recommends clear, prominent guardrails that its spatial products must not be interpreted as zoning, must not substitute for on-ground assessment, and must not be applied to individual properties, leasehold or freehold, without ground-truthing, together with incorporation of current Queensland land-use and vegetation information.
- *Governance and the Interactive Tool:*
  - Much of the Plan's operative content lives in the Interactive Tool, which may be updated outside the five-year MERI cycle. QFF recommends structured agricultural representation in the MERI framework, and that any Tool, threshold or spatial-analysis update materially affecting the Plan's application to agriculture be subject to the same commitment to prior, dedicated consultation, recorded and reported transparently.
- *Resourcing the stewardship the Plan relies on:*
  - The Plan leans heavily on land managers to deliver coordinated fire, weed, pest and erosion outcomes for MNES, yet commits no funding. QFF recommends this

be supported by dedicated, ongoing investment and stewardship arrangements that reward landholders, including through carbon and natural capital markets, rather than adding uncompensated obligations, and notes the opportunity for low-cost or “new power” arrangements to form part of the benefit wind development delivers to host agricultural communities.

Adopt a more balanced landscape framework

Integrating environmental, social, cultural and economic values is an objective QFF supports, but the current framework remains weighted towards environmental considerations. It ultimately treats productive agricultural land largely as context rather than as a strategic landscape value. It does not systematically assess impacts on agricultural productivity, land fragmentation, biosecurity, transport networks or the long-term resilience of regional industries, meaning wind development, restoration and offset activities may be directed onto productive land without transparent consideration of competing uses.

This matters most in the way the Plan handles cumulative pressure *on* agriculture. Wind and the region’s substantial coal pipeline together bring land clearing, heavy-vehicle traffic, workforce demand and biosecurity risk to the same landholders, pressures the Plan’s own social analysis acknowledges may compete with agriculture and challenge “long-established rural character and identity.” Yet where the Plan encourages coordinated weed, pest, fire and erosion management, it states three separate times that this “is not intended to shift responsibility… to wind farm developments proponents.” As drafted, that qualification runs one way: proponents are reassured, while the practical cost and effort of coordination default to neighbouring farmers. QFF recommends the Plan expressly state that where a development is the source of, or materially intensifies, a weed, pest, disease, fire or erosion risk, the proponent bears primary responsibility for the cost of mitigating it.

The Plan’s view of agriculture is also internally inconsistent as it relies on grazing landholders to deliver coordinated fire, weed, pest and erosion outcomes and to host offsets, while separately characterising grazing as a “high intensity” regional pressure. These framings should be reconciled, with improved management built on existing stewardship and developed in partnership with industry, treating farmers as partners, not pressures. This should be reflected by recognising productive agricultural land as a strategic landscape value and assess cumulative impacts on agriculture alongside impacts on MNES. Advice N already invites “economic analysis of regional production and any impacts from projects including proposed offsets”; QFF supports this and recommends it be made a firm commitment.

Assess cumulative impacts regionally, not project by project

The Plan’s cumulative impact assessment is a welcome step, but it assesses cumulative pressures on MNES rather than on the communities and industries hosting development. QFF recommends the Plan’s cumulative-impact approach be explicitly coordinated with regional-scale assessment of social and economic impacts, ideally aligned with existing planning frameworks, so the combined footprint of wind, coal and other development on agriculture, roads, workforce and community is planned for together, rather than devolving to a series of duplicative project-level processes. Advice E already recognises that complementarity “should be applied across all major developments in the Plan area, including wind farm developments and mines”; this principle should extend to social and economic impacts on agriculture, not only to environmental mitigation.

Efficiency must not erode consultation rights. QFF supports more efficient assessment, but faster wind approvals can compress the very project-level processes through which affected farmers raise concerns. QFF recommends the Plan make clear that efficiency gains are not to come at the expense of host and neighbouring landholders' rights to be consulted and heard in project assessment.

Address the risks unique to wind

Transmission and enabling infrastructure. Transmission easements are among the most contentious land-access issues the sector faces; they fragment properties, constrain future operations, sit on title in perpetuity, and are frequently delivered by a network entity separate from the wind proponent whose project drives the need for them. The Plan should recognise transmission and its easements as a distinct source of cumulative impact on agricultural land, not merely an ancillary component because the current agricultural use can be providing for some MNES connectivity through the landscape. The Plan should also make clear that the associated land-access, fragmentation and compensation considerations rest with the proponents and network entities responsible, rather than defaulting to the affected landholder.

Decommissioning and financial assurance. This is a critical gap. The Plan treats decommissioning as an ecological impact pathway but is effectively silent on financial security. As QFF has consistently submitted in other renewables planning contexts, end-of-life and decommissioning risk must not sit with the host landholder. Wind infrastructure has a finite life, and contractual removal obligations offer little protection if a proponent becomes insolvent. Consistent with the 'polluter pays' principle applied in the resources sector, QFF recommends the Plan acknowledge that durable landholder and MNES outcomes depend on decommissioning being financially secured, for example through bonds or equivalent assurance, so that restoration is delivered even where the responsible entity fails, and that this risk rests with the developer and the state rather than the landholder.

Landholder negotiation protections. The Plan relies on access, easement and offset arrangements being "voluntary" and "fairly negotiated," but provides nothing to make negotiation fair in practice. The bargaining-power gap between an individual landholder and a wind proponent or network entity is the mechanism by which "voluntary" arrangements become coerced.

Bushfire, biosecurity and transport. Wind construction and operation carry bushfire, biosecurity and heavy-haulage risks that fall directly on adjacent agricultural land. QFF recommends the Plan cross-reference these as matters requiring proponent-funded management plans, consistent with the expectations in State code 23 and Queensland biosecurity requirements, rather than leaving them to be absorbed by neighbouring farmers.

Offsets must not displace productive agricultural land

The Plan states that "agricultural landholders are positioned to provide offsets," and directs proponents toward large "high restoration potential" and "representative protection" areas, much of it productive grazing and cropping land, for offsets and restoration. QFF is concerned that offset and net-gain demand generated by wind *and* the region's coal pipeline could, over time, compete for, encumber or displace productive land, or place restrictive covenants on title that constrain future farming.

QFF holds that offset, restoration and net-gain arrangements affecting agricultural land must be voluntary, incentive-based and fairly negotiated. We welcome the Plan's recognition that stewardship incentives can deliver benefits for protected matters "while maintaining agricultural production in the landscape," and that "negotiations with landholders and other interests on title" will refine opportunities. This principle should be strengthened and made explicit: the Plan should state that it does not prioritise offsets over continued agricultural production, that identifying land as suitable for offsets or restoration does not of itself constrain agricultural use, and that participation is a matter of landholder choice supported by fair reward, trusted partners and clear information.

The Plan should also account for tenure. Half the Plan area is held under term lease and a further 43 per cent freehold, yet the Plan does not distinguish between them when discussing offsets, covenants and legal security. Offset arrangements on leasehold land raise distinct questions of lease conditions, renewal rights and operational needs that should be addressed explicitly. Where these conditions are met, well-designed stewardship and natural capital opportunities, several of which, including grazing-based carbon projects, already operate in the Plan area, can complement farm income and deliver genuine co-benefits, an outcome QFF actively supports.

Protect Great Barrier Reef water quality and shared water security

The Brigalow Belt North adjoins the Great Barrier Reef Marine Park, and its northern cropping around Bowen and Gumlu sits within Reef catchment. Advice C rightly flags that wind developments could affect the Reef through land-based run-off and, where adjacent to the Marine Park, artificial light. QFF notes that poorly managed construction run-off, erosion and sedimentation from development can undermine the objectives of the Reef 2050 Water Quality Improvement Plan. QFF recommends the Plan make explicit that erosion and sediment controls for wind (and associated infrastructure) in Reef catchment must meet Reef water-quality expectations, and that the cost of managing development-generated run-off rests with the proponent, not with downstream agricultural landholders who are themselves working to meet Reef targets.

Water security is a related cumulative impact that requires greater attention throughout the Plan. While the Draft Plan identifies altered groundwater hydrology, groundwater extraction and bore fields as potential impact pathways, it does not adequately consider the cumulative implications for agricultural water security. This includes impacts on landholder access to reliable surface and groundwater resources, existing water entitlements, stock and domestic supplies, irrigation infrastructure, and the groundwater-dependent ecosystems that support the long-term health and sustainability of these resources.

QFF recommends the Plan recognise surface and groundwater availability as strategic landscape values that underpin agricultural production. Construction dewatering, foundation works and groundwater drawdown that may affect stock, domestic or irrigation bores should be assessed, monitored and managed at the proponent's cost. The Plan should also ensure that cumulative water demand from mining, urban development and renewable energy projects does not erode the reliability of water resources for agriculture. Where there is potential for groundwater drawdown, the expertise and assessment frameworks of the Office of Groundwater Impact Assessment (OGIA) should be utilised to identify risks and inform appropriate mitigation and management measures.

Conclusion

As one of the inaugural pilots under the reformed EPBC Act, and the first focused on wind, the Brigalow Belt North Bioregional Guidance Plan carries national significance well beyond its boundaries. It will help set the precedent for whether landscape-scale planning can enable Queensland's renewable energy transition while keeping productive farmland in operation and treating farmers as the trusted stewardship partners they have already proven to be.

The Guidance Plan can meet that test, but doing so depends on the balance we have set out above: recognising agricultural land as a strategic value on a landscape already carrying coal, solar and now wind; assessing cumulative impacts regionally rather than project by project; ensuring the risks unique to wind never fall to the host landholder; keeping offsets voluntary and productive farmland out of the region's offset reserve; and protecting Reef water quality and shared water security.

QFF looks forward to working closely with DETSI and DCCEEW to refine and finalise this instrument.

Kind regards,

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Queensland Farmers' Federation

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