QUEENSLAND FARMERS' FEDERATION

Draft Gulf Plains Bioregional Guidance Plan

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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.

Introduction

The Queensland Farmers' Federation (QFF) welcomes the opportunity to comment on the Draft Gulf Plains Bioregional Guidance 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 Gulf Plains is one of Australia's most intact working landscapes. Agriculture, principally grazing, and increasingly cropping, is the dominant land use, occupying the overwhelming majority of the Plan area. Farmers therefore manage most of the landscape, alongside many of the environmental values the Plan seeks to protect. The Draft Plan itself recognises that effective land stewardship has contributed to positive outcomes for MNES and that approximately 99 per cent of the region remains remnant vegetation. These outcomes demonstrate that productive agriculture and biodiversity conservation are not mutually exclusive, but have evolved together across the landscape.

That shared history is precisely why the Plan's analytical balance matters. Environmental values are assessed systematically throughout the Plan, but productive agricultural land, its existing stewardship, and the cumulative effects of development on regional industries receive comparatively limited consideration. The result is a framework that guides development onto the agricultural landscape without transparently weighing the consequences for agriculture. Left unaddressed, this imbalance risks eroding sector confidence and undermining the Plan's effectiveness as a genuinely integrated planning instrument.

Detailed comments

1. The Draft Plan should adopt a more balanced landscape framework

The Plan seeks to integrate environmental, social, cultural and economic values, which is an objective QFF supports, but its framework remains weighted towards environmental values. It comprehensively assesses conservation priorities, restoration opportunities and cumulative environmental impacts, yet treats productive agricultural land largely as context rather than as a strategic landscape value. It does not systematically assess impacts on agricultural productivity, water availability, land fragmentation, biosecurity or the long-term resilience of regional industries, meaning restoration and offset activities may be directed toward productive land without transparent consideration of competing uses. Nor does it consider the siting of infrastructure and roads relating to a mine proposal in relation to existing agricultural activities. A genuinely landscape-scale framework should assess cumulative environmental, economic and social impacts together.

The Plan's view of agriculture is also inconsistent. It credits stewardship with positive MNES outcomes and 99 per cent remnant retention, yet separately casts agriculture as a "high intensity" pressure and cropping expansion as likely to compound mining impacts. These characterisations should be reconciled. Cropping warrants particular attention as the sector's principal growth pathway: the Plan frames it as "medium intensity" and as compounding pressure from mining, yet cropping covers only around 22,075 hectares across a Plan area exceeding 61,000 square kilometres, remains at an early stage, and is already governed by Queensland planning and vegetation management frameworks. Framing an emerging, tightly regulated industry primarily as a compounding pressure risks entrenching an unbalanced view before the evidence supports it. Where improved management is proposed, it should build on existing stewardship and be developed in partnership with industry, affording both grazing and cropping the treatment of *partner, not pressure*.

The Plan gives similarly limited attention to the pressures that development imposes *on* agriculture. Mining can spread weeds, pests and disease, and the Plan concedes it "may place strain on workforce participation in already low unemployment settings." Yet where the Plan encourages coordinated weed, pest and fire management, Advice 6 and Advice 7 each state this "is not intended to shift responsibility for other regional pressures to minerals mining proponents." As drafted, that qualification operates in one direction only: proponents are reassured, while the practical cost and effort of coordination fall to neighbouring landholders. QFF recommends this be balanced by an express statement that where a development is the source of, or materially intensifies, a weed, pest, disease or fire risk, the proponent bears primary responsibility for the cost of mitigating it.

QFF therefore recommends the final Plan recognise productive agricultural land as a strategic landscape value, consistently treat farmers as partners in delivering biodiversity outcomes, and assess cumulative impacts on agriculture alongside impacts on MNES. Advice 21 already invites "economic analysis of regional production and any impacts from projects including proposed offsets"; QFF supports this and recommends it be strengthened into a firm commitment to assess impacts on agricultural productivity, water, land fragmentation and workforce.

2. Provide greater certainty about the role and application of the Plan

The Plan states that it is non-regulatory, does not establish "go / no-go" zones, does not change Queensland legislative requirements, and does not increase regulatory burden. QFF strongly supports these statements and the accompanying "use by a landholder" factsheet, and considers them fundamental to our support. Several features of the Plan nonetheless create genuine uncertainty that should be resolved before finalisation:

EPBC Act decision-makers "must have regard to" the Plan. While framed as guidance, advice that decision-makers are legally required to consider can, in practice, function as a de-facto standard against which projects are judged. The Plan should be explicit about the limits of this effect.

- “Must have regard to.” Advice that EPBC Act decision-makers are legally required to consider can, in practice, function as a de-facto standard against which projects are judged. The Plan should be explicit about the limits of this effect.
- Application beyond minerals mining. The Plan repeatedly states its thresholds and spatial analyses are “relevant regardless of industry” and encourages proponents of “other development”, expressly including grazing and cropping, to apply its guidance. QFF seeks an unambiguous statement that this application is voluntary for agriculture and creates no expectation, obligation or assessment trigger.
- A “pilot” that may be “built on.” The Plan states it “could be built upon to support future strategic planning exercises, such as a regulatory bioregional plan or strategic assessment,” including “measures that change assessment and approval requirements.” This is the sector’s single greatest source of uncertainty. Compounding it, the reforms replace the “no net loss” standard with a “net gain” test, which would materially raise the compensatory burden of any impact should the Plan’s guidance ever be applied to agriculture.
- Broader conservation targets. The Plan already invokes the ‘30 by 30’ target to justify avoiding development in representative protection areas. As this target is not confined to mining, the Plan should confirm it will not be used to constrain agricultural land use without dedicated consultation. There is also no recognition that agricultural land can also be providing refuges for native plants and insects where buffers are maintained[1], as well as playing a role in connectivity across the landscape.

QFF recommends the final Plan include a clear, prominent statement of what it does and does not do for agriculture, and a firm commitment that any transition toward a regulatory instrument or strategic assessment, or any measure that would change assessment or approval requirements affecting agriculture, including through broader conservation targets, will be preceded by separate, dedicated consultation with the sector.

3. Protect the Great Artesian Basin and resolve groundwater uncertainty first

QFF supports the cumulative impact assessment and agrees that understanding landscape-scale impacts is essential. However, the Plan identifies altered groundwater hydrology as a high residual risk for several MNES while acknowledging significant uncertainty about groundwater connectivity and the effects of below-water-table mining. Given the Basin’s importance to agriculture, regional communities and groundwater-dependent ecosystems, this is one of the Plan’s most significant implementation risks.

The Plan already identifies the coordinated, government-led work needed to resolve it: the Geoscience Australia Georgetown-Julia Creek Deep Dive scheduled for 2027, and CSIRO’s sampling of GAB spring water quality and flow. QFF recommends these initiatives be expressly prioritised and adequately resourced, that Plan area-scale hydrological modelling be completed and used to inform planning *before* groundwater-affecting development proceeds, and that the outcomes be made available to landholders and the sector.

1. Integrated pest management (IPM) is an environmentally sensitive way of managing pests and a tool widely used by agriculture and includes strategies to encourage ‘beneficial’ insects that predate on pests. More at: https://www.epa.nsw.gov.au/Your-environment/Pesticides/integrated-pest-management

4. Offsets must not displace productive agricultural land

The Plan directs proponents and governments toward large "high restoration potential" and "representative protection" areas for offsets and restoration, much of it productive grazing and cropping land held under lease or freehold. QFF is concerned that, over time, offset and net-gain demand generated by mining could compete for, encumber or displace productive land, or place restrictive covenants on title.

QFF draws particular attention to the geographic convergence between the Plan's conservation priorities and the sector's principal expansion frontier. Advice 10 directs proponents to avoid impacts along the Flinders River, and the high restoration potential and representative protection layers cluster on the same riparian and alluvial country, which are the very areas the Plan identifies as "rapidly expanding" cropping land, with Agricultural A and B land flagged for expansion. The Plan's conservation-priority mapping therefore sits directly over the region's identified cropping frontier, and even as guidance that decision-makers "must have regard to," this overlap could constrain expansion on some of the region's most productive land. QFF recommends the final Plan expressly acknowledge this overlap, confirm that identifying an area as important for conservation, restoration or representative protection does not of itself constrain agricultural land use and its ability to provide connectivity in the landscape, and commit to reconciling the spatial conservation analyses against current agricultural land-use and land-suitability mapping before finalisation.

The Plan should also account for tenure. 87 per cent of the Plan area is held under term lease, yet the Plan does not distinguish leasehold from freehold 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.

QFF strongly believe that offset, restoration and net-gain arrangements affecting agricultural land must be voluntary, incentive-based, and negotiated fairly with the landholder. We welcome the Plan's recognition that existing land uses and "negotiations with landholders and other interests on title" will refine offset opportunities, and that stewardship incentives can allow benefits for protected matters to be achieved "while maintaining agricultural production in the landscape". This principle should be strengthened and made explicit: the Plan should state that it does not prioritise offsets over continued agricultural production, and that participation is a matter of landholder choice supported by fair reward, trusted partners and clear information. Well-designed stewardship and natural capital opportunities can complement farm income and deliver genuine co-benefits where these conditions are met.

5. Be clear about the limits of the data

QFF welcomes the Plan's transparency about its own limitations: that its information is "appropriate for landscape-scale consideration, not for property-level analysis," that on-ground ecological and cultural heritage surveys were not undertaken, that most biodiversity data is drawn from statewide or national datasets, and that the spatial analyses are "tenure-blind."

These are significant caveats, and the sector's broader experience is that landscape-scale layers are too often applied by regulators, proponents or third parties as though they were property-level determinations. This produces unfair or inaccurate outcomes for individual landholders, particularly where mapping is dated or ignores how land is actually managed; a risk heightened on leasehold land, where tenure-blind mapping could be read across into lease-renewal conditions.

QFF recommends the final Plan include clear, prominent guardrails stating that its spatial products must not be interpreted as zoning, must not be used as a substitute for on-ground assessment, and must not be applied to individual properties, whether held under lease or freehold, without ground-truthing. We also encourage the incorporation of current Queensland land-use and vegetation information so that planning better reflects on-ground reality.

6. MERI and governance

The Plan will be accompanied by a MERI framework on a five-year cycle, while supporting materials may be updated more frequently. Because these updates can materially affect how the Plan is interpreted and applied to agricultural land, QFF considers it essential that the sector has a formal, standing role in the Plan's governance, review and improvement, and engaged when updates are *scoped*, not only once drafted.

This matters most for the Interactive Tool. Much of the Plan's operative content, impact thresholds, residual risk ratings, mitigation effectiveness ratings and the spatial conservation analyses, lives in the Tool, which the Plan says may be updated outside the five-year cycle. Changes made this way could alter the Plan's practical effect on producers without triggering review or consultation. QFF recommends that any update to the Tool, the impact thresholds or the spatial analyses that materially affects the Plan's application to agricultural land be subject to the same commitment to prior, dedicated consultation QFF seeks for the Plan itself, and that such changes be recorded and reported transparently through the MERI framework.

7. Resource the stewardship the Plan will rely on

The Plan rates coordinated fire management as its most effective landscape-scale measure and directs land managers to expand it, alongside coordinated weed and pest control, yet commits no funding to any of it. For many producers these are already significant, largely unfunded responsibilities. Where the Plan relies on land managers to deliver fire, weed and pest outcomes for the benefit of MNES, this should be supported by dedicated, ongoing investment and by savanna fire and stewardship arrangements that reward all landholders, including through carbon and natural capital markets, rather than adding uncompensated obligations to the sector.

Conclusion

As one of the inaugural pilots under the reformed EPBC Act, the Gulf Plains Bioregional Guidance Plan carries national significance well beyond its boundaries. It will help set the precedent for whether landscape-scale planning in Australia can protect biodiversity while keeping productive farmland in operation and treating farmers as the trusted stewardship partners they have already proven to be.

The Plan can meet that test, but doing so depends on the balance we have set out above: recognising agricultural land as a strategic value, holding the line against the regulatory creep of "guidance," resolving Great Artesian Basin water security before development proceeds, keeping stewardship voluntary and fairly rewarded, and securing a formal agricultural voice in ongoing governance.

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

Kind regards,

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