



QUEENSLAND
FARMERS'
FEDERATION



Environmental Offsets Amendment Bill 2026

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Science and Innovation

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This submission is provided to:

Department of the Environment, Tourism, Science and Innovation

Submitted via email offsetsreview@detsi.qld.gov.au

Our members

- Queensland Fruit & Vegetable Growers
- Cotton Australia
- CANEGROWERS
- Greenlife Industry QLD
- eastAUSmilk
- Timber Queensland
- 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 comment on the exposure draft of the *Environmental Offsets Amendment Bill 2026*.

Queensland's farmers are fundamental to the long-term success of the Environmental Offsets Framework. As managers of more than half of Queensland's landmass, farmers play a critical role in maintaining biodiversity, managing natural resources and protecting the environmental values the Framework seeks to secure. They are also the landholders most likely to be directly affected where offsets are established on private agricultural land.

QFF therefore supports a Framework that delivers genuine and durable environmental outcomes while recognising the realities of managing productive agricultural enterprises. The success of offsets on private land depends on landholders having confidence that participation is voluntary, commercially viable and compatible with ongoing agricultural production; that long-term stewardship costs and obligations are properly recognised; and that farmers have access to clear, practical information to understand the consequences of participation before making decisions.

QFF also sees an important opportunity for the Framework to better recognise farmers as providers of environmental outcomes, rather than simply as landholders who may be affected by offset requirements. Where suitable agricultural land is used to deliver offsets, landholders should be appropriately rewarded for the environmental services they provide, including the ongoing management required to maintain those outcomes. The Offset Account should play a greater role in translating funds collected from proponents into timely, on-ground outcomes and appropriately remunerated landholder participation.

QFF made a submission to the discussion paper *A Fresh Start for Queensland's Environmental Offsets Framework*, supporting modernisation of the Framework while emphasising that its long-term success depends on more than administrative efficiency or increasing the supply of offsets. It depends on whether the Framework provides landholders with genuine confidence to participate through transparent processes, practical and commercially sustainable obligations, recognition of active land management, and appropriate protection for productive agricultural enterprises operating alongside offset sites.

Summary of recommendations

1. Apply the mitigation hierarchy so that offsets remain a genuine last resort and locate offset sites on degraded or lower-value land in preference to productive agricultural land wherever practicable.
2. Clarify the “repair” element (new section 6A(c)) to recognise landholders’ on-farm management history, including weed, erosion and pest control, so that active stewardship is credited rather than penalised.
3. Unlock the Offset Account by directing funds to timely on-ground delivery and ongoing active management, prioritising delivery in the region where the impact occurred, and reporting publicly on the collection and expenditure of funds.
4. Remove disincentives to landholder participation, including the land tax currently applied to land placed under a voluntary conservation covenant.
5. Ensure the financial settlement offset guideline reflects the true, full cost and opportunity cost of delivering and managing offsets over the long term.
6. Attach active, ongoing management obligations to offset sites as statutory duties (covering weeds, pest animals, biosecurity, fire and monitoring) with minimum standards, enforcement provisions and direct standing for affected neighbours.
7. Require the register to be publicly accessible and geospatial, and to record each site’s management obligations and delivery entity, with protection for commercially sensitive information.
8. Favour flexible, adaptive stewardship over unnecessary perpetual restrictions; provide for periodic review of long-term arrangements; and safeguard against retrospective or cumulative offset liability and against agricultural activities being drawn into scope without consultation.
9. Provide practical education and decision-support resources for agricultural landholders to navigate the reformed offsets system, including plain-English guidance on advanced offsets, legal security mechanisms, financial settlement arrangements, long-term management obligations, review rights, and interactions with biosecurity, planning and property law. These resources should be developed with agricultural peak bodies and made available before commencement of the reforms so farmers can make informed decisions about whether, and how, to participate.

Matters QFF supports

Several provisions respond directly to issues we raised in the initial consultation, and we support their retention through to the final Bill:

- QFF supports embedding the mitigation hierarchy as the principle for administering the Act (new section 3A) and defining it in the Act (new section 6A), including “repair” as a distinct step. Framing the avoidance, minimisation and repair standards as “reasonably practicable” is a workable and appropriate standard for landholders undertaking activities. As set out below, QFF’s support is conditional on avoidance and minimisation being applied rigorously so that offsets remain a genuine last resort.

- The advanced offsets scheme (Part 8A) creates a supply-side pathway that allows landholders to register suitable land ahead of demand, offering a new income opportunity for well-placed agricultural landholders. QFF particularly welcomes the decision not to require the consent of every interested person before an advanced offset can be registered, and the retention of landholder discretion over whether to legally secure the site, both of which lower barriers to participation.
- Gathering landholder and interest-holder consent once during the offset approval and legal security process (new section 20D), rather than through a two-step process, reduces administrative burden while keeping landholders informed of changes.
- The rewritten section 90 requiring the chief executive to keep a register and make it available for inspection, with the safety and confidentiality carve-outs in section 90B, responds to QFF's call for greater transparency about the location of offset sites and the matters they protect.
- The introduction of internal review and external appeal rights (Part 11A) is a welcome improvement in procedural fairness for participants in the Framework.

Priority issues requiring resolution

Farmer education and decision-support

The reformed Framework will introduce new pathways, obligations and terminology that many agricultural landholders will be encountering for the first time. Participation will only be credible and well informed if farmers can access practical, plain-English education and decision-support resources explaining how the system works, what legal and financial commitments may attach to offset participation, and where to obtain independent advice before entering long-term arrangements.

Ensure Offset Account funding supports landholder-delivered outcomes

The Offset Account has the potential to provide a significant source of funding for environmental outcomes delivered on private land. QFF supports greater use of these funds for timely, on-ground delivery and ongoing management, including through appropriately remunerated arrangements with agricultural landholders.

Queensland farmers should be recognised not only as landholders who may be affected by offset requirements, but as potential providers of the environmental outcomes the Framework is seeking to purchase. Where agricultural land is suitable for offset delivery, participation should be voluntary, commercially viable and compatible with the continued operation of productive agricultural enterprises.

QFF recommends that the Government establish transparent arrangements for accessing Offset Account funding for landholder-delivered offsets, including clear eligibility criteria, transparent payment settings and recognition of the full cost and opportunity cost of long-term management. Funding should support active management and stewardship rather than simply the establishment of a legal restriction over land.

QFF also recommends that Offset Account reporting identify, to the extent practicable, the proportion of funds directed to on-ground offset delivery, ongoing management and landholder

payments, providing greater transparency about how funds collected from proponents are ultimately translated into environmental outcomes.

Remove disincentives to landholder participation

Increasing the supply of offsets on private land depends on making participation attractive to landholders. QFF notes that Queensland continues to apply land tax to land placed under a voluntary conservation covenant, which removes much of the incentive for landholders to restore and manage land under a covenant. QFF recommends this and comparable disincentives be reviewed as part of the reform, so that landholders willing to deliver durable conservation are not financially penalised for doing so.

The financial settlement offset guideline

QFF understands the methodology for calculating a financial settlement offset is to move to a standalone guideline made by the chief executive and approved by regulation (new section 13), and that the calculator, Regulation and Environmental Offsets Policy will be progressed separately. QFF accepts that relocating the methodology may improve accessibility but we emphasise that the calculator remains central both to landholder confidence and to whether offsets are actually delivered and managed. The current settings, based on 2014 data, are widely understood to understate the true cost of acquiring, securing and managing offset sites over the long term, including the ongoing weed, pest and fire management that most offsets require in perpetuity.

QFF recommends the guideline reflect the full, real cost of delivery and long-term management, include a mechanism for periodic review, and be developed in consultation with the agricultural sector. This should be supported by regular public reporting on the collection and expenditure of Offset Account funds.

Offsets should remain a genuine last resort

QFF supports the mitigation hierarchy being defined and made central to the Act. The strength of the avoidance and minimisation steps determines how much impact is passed down to offsetting, and therefore how much demand is placed on land, including agricultural land, to host offsets. QFF supports the “reasonably practicable” standard as workable for landholders’ undertaking activities but recommends that avoidance and minimisation be assessed rigorously in practice, so that offsets are reached only where impacts genuinely cannot be avoided or minimised and are not treated as a default pathway. Wherever an offset is required, the Framework should give preference to locating it on degraded or lower-value land rather than productive agricultural land, consistent with maintaining food security and the strength of regional economies.

The “repair” element should recognise on-farm management history

QFF welcomes the inclusion of “repair” as a distinct element of the mitigation hierarchy (new section 6A(c)). QFF recommends that “repair” be clarified to recognise a landholder’s on-farm management history, including weed, erosion and pest control, so that the step reflects the actual managed condition of the land rather than an assumed baseline of degradation. A repair standard applied without regard to that history would treat well-managed land as though it were degraded and place the greatest burden on the landholders who have managed their land most conscientiously, penalising the very stewardship the Framework depends on. This recognition

should be made explicit, whether on the face of the Act or in the supporting Environmental Offsets Policy.

Avoid unnecessary perpetual lock-up of agricultural land

The Bill broadens the categories of legal security available for offsets (section 29) but does not establish active, adaptive stewardship as the default in preference to long-term or perpetual restriction. Long-term security mechanisms that extend for decades or in perpetuity discourage adaptive land management and reduce participation by commercial farmers who are otherwise well placed to deliver durable outcomes. The new review rights (Part 11A) attach to specified agency decisions and do not allow a landholder to seek review of an existing offset obligation where circumstances materially change.

QFF recommends the Framework favour flexible, adaptive management over unnecessary perpetual restriction, and provide a mechanism for periodic review of long-term arrangements where circumstances materially change.

Guard against expanded scope and retrospective liability

The Bill expands the activities dealt with under the Act to include prescribed accepted development (clause 9): activities that do not require a development approval under the Planning Act. This has the potential to bring activities that previously attracted no offset obligation within scope once prescribed. QFF seeks clarity on what development is intended to be captured and asks to be consulted before any agricultural activities are prescribed.

The Bill also clarifies that significant residual impact includes the cumulative impact of a project, including impacts that have already occurred, and provides that an offset may be approved where an impact has occurred or is occurring (clauses 8, 16 and 21). QFF supports considering the total impact of a project in principle but recommends clear assessment methodology and explicit safeguards against retrospective application, double-counting, and offset obligations attaching to historical impacts. QFF further notes that the new deemed conditions (new sections 17A and 17B) require payment of a financial settlement amount, or an agreed delivery arrangement, before an activity may start or continue under an amended or replaced authority. QFF recommends practical timing arrangements to avoid unnecessary disruption to staged agricultural works.

The impact on neighbouring agricultural land is not addressed

The Bill is focused on the establishment of offsets by proponents and government. It does not address what happens to an agricultural landholder once an offset site exists nearby, which is an issue of practical concern to QFF. The Bill contains no enforceable, ongoing obligation for offset sites to be actively managed for weeds, pest animals, fire fuel loads and biosecurity risk; no minimum management standards; no mechanism for an affected neighbour to trigger compliance action directly; and no pathway to recover control costs incurred because of an unmanaged offset site. The terms “neighbour”, “adjoining” and “weed” do not appear in the Bill.

The single reference to biosecurity (the example to clause 19) operates to exclude a landholder’s existing *Biosecurity Act 2014* duty from what an offset delivers; it does not impose any biosecurity-management obligation on the offset site. Poorly managed offset sites can become reservoirs for weeds, pests and fuel loads that affect both biodiversity outcomes and neighbouring agricultural enterprises.

QFF recommends that active, ongoing management be established as a statutory obligation attached to the offset site, with minimum standards, compliance and enforcement provisions, and direct standing for an affected neighbour to raise unresolved management issues.

The register should be geospatial and record management obligations

While QFF supports the mandatory register, its form is left to the chief executive's discretion, and it is not required to be a public geospatial map. Critically, each site's ongoing management obligations, the very information neighbours and emergency services need for fire and biosecurity planning, are not within the mandatory content, and the responsible delivery entity is not clearly a public field. The Bill also establishes a separate local-government register (new section 90A), which should not require landholders to search two sources to establish whether nearby land carries an offset.

QFF recommends the regulation-making power in section 90 be used to require a single, publicly accessible, geospatial register that records the management obligations and delivery entity for each site, and that protection extend to commercially sensitive information as well as personal safety.

Land-use security and change of circumstances

The Bill broadens the categories of legal security (clause 29) but does not establish active stewardship as the default in preference to long-term or perpetual lock-up, and the new review rights attach to specified agency decisions rather than allowing a landholder to seek review of an existing offset obligation where circumstances materially change. QFF recommends the Framework favour flexible, adaptive management over unnecessary perpetual restrictions, and provide a mechanism for periodic review of long-term arrangements.

Conclusion

QFF supports the direction of the Bill and the improvements it makes to the operation of Queensland's offsets system. The Framework will deliver enduring conservation outcomes only if it safeguards productive agricultural land, keeps offsets to a genuine last resort, earns the confidence of the landholders expected to implement it, and ensures the funds already collected are translated into real, well-managed outcomes on the ground. QFF welcomes the opportunity to continue working with the Department as the Bill and its supporting instruments are finalised.

Yours sincerely

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