



QUEENSLAND
FARMERS'
FEDERATION



A Fresh Start for Private Protected Areas (Discussion Paper). **September 2025**

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Prepared for

Andrew Powell MP
Minister for the Environment and Tourism,
Minister for Science and Innovation

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This submission is provided to:

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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
- 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 provide feedback on the "A Fresh Start for Private Protected Areas" Discussion Paper.

We provide this submission without prejudice to any additional submission from our members or individual farmers.

Overview

The Queensland Farmers' Federation (QFF) welcomes the opportunity to provide feedback on the "A Fresh Start for Private Protected Areas" Discussion Paper. QFF supports the expansion of Private Protected Areas (PPAs) as a cornerstone of Queensland's biodiversity conservation efforts, if done in a way that enables farmer participation that contributes to a viable future for agriculture. Properly designed, PPAs can play a pivotal role in safeguarding ecosystems, while at the same time strengthening the long-term resilience, productivity, and viability of Queensland's agriculture and regional communities.

For agriculture, the success of PPAs depends on ensuring they are practical, voluntary, and genuinely opportunity driven and worth farmer participation. Programs must recognise that farmers are frontline land stewards, already investing significantly in soil health, water management, vegetation, and biodiversity. To harness this stewardship at scale, PPAs must integrate seamlessly with farm business planning, provide safe and flexible entry pathways, and deliver clear financial and non-financial returns that make conservation a viable, attractive and meaningful land-use choice.

The greatest opportunity will lie in engaging commercial farmers who bring the land, expertise, and long-term commitment necessary to deliver enduring conservation outcomes. A system that incentivises the active participation of farmers, rather than one that primarily appeals to non-productive or peripheral participants, will ensure PPAs become a powerful mechanism to embed biodiversity outcomes directly within mainstream agriculture. This creates the potential for PPAs not only to expand conservation areas but also to deliver tangible ecological, economic, and community benefits.

With the right reforms, PPAs can evolve into a flagship program that positions Queensland as a national leader in not only successfully balancing production and protection but going the next step of achieving multiple outcomes that will benefit all Queenslanders now and into the future.

PPAs would enable farmers to enhance their business resilience, strengthen the sustainability of food and fibre production, and deliver measurable contributions to state and national biodiversity targets. QFF strongly believes that PPAs, if designed and resourced correctly, represent an opportunity to align agricultural productivity with environmental stewardship whilst supporting food security and viable regional communities in Queensland's future.

QFF's key points

a. Governance and longevity

QFF seeks a governance framework that is independent of political or individual organisation's board / leadership cycles, transparent and enduring, clearly aligned across jurisdictions. Landholders' willingness to participate is affected when initiatives are launched and abandoned, funding pools remain under-utilised due to narrow eligibility rules, or directions shift with changes in organisational boards or government policy. An appropriate and robust governance structure is needed to ensure clarity, and to reduce landholder fatigue through having to engage with a growing multitude of various intermediaries. Integrity, transparency, and maximising environmental and productive land-use outcomes must remain at the core. A governance structure that does not get caught up by inefficient bureaucratic operations but equally is not open to being dominated by individual environmental interest groups and intermediaries is also an important consideration.

b. Permanence and flexibility

QFF seeks tenure flexibility that balances the practical needs of landholders with the ecological value of eligible areas, promoting the opportunity for greater farmer participation which will still contribute to improved environmental outcomes. In-perpetuity covenants can deter landholders who need arrangements that align with succession planning, property transfers, or changes in farm enterprises. Farmers consistently express a preference for shorter- and medium-term agreements (ranging from 1 to 25 years) while still retaining the option for longer-term commitments. The system should also offer a "safe entry point" for landholders: low-risk, low-cost options that allow farmers to trial participation and build confidence before committing to longer-term arrangements.

c. Financial and non-financial incentives

For most landholders, financial incentives remain critical driver in enabling their participation. Programs must therefore provide sufficient, accessible, and well-structured income opportunities for farmers to make participation possible and attractive. Remuneration should reflect both the opportunity costs of lost production, the value of the land being considered, and the broader ecological services delivered. Farmers do not wish to be caught up in a world of bureaucratic funding cycles that often reflect a small financial investment but come with incredibly burdensome reporting requirements. Initiatives that are driven by one off, up front grant support are of little use for farmers who would benefit more from ongoing stewardship payments, that reflect the work done to preserve protected areas is not a set and forget scenario.

Similarly, programs should enable the "stacking" of multiple projects, such as soil carbon initiatives, habitat restoration, and river system rehabilitation, so landholders can build layers of value over time. Complementary non-financial incentives, including recognition programs, technical support and reduced regulatory burden, can likewise strengthen uptake and long-term commitment. Education and awareness must be an important consideration.

Agricultural peak bodies (eg. CANEGROWERS, Cotton Australia, Queensland Fruit and Vegetable Growers etc) are best placed to assist farmers when it comes to assisting their farmer members make informed decisions on a range of matters relevant to their enterprises. Whilst most farmers are aware that there are both opportunities and risks in the environmental space, it is a crowded marketplace with multiple intermediaries, changing policy frameworks etc, and proving difficult for farmers to navigate.

QFF strongly encourages the Queensland government to consider providing funding support to key agricultural peak bodies so that they can employ environmental officers who can work directly with their farmer membership to raise awareness and make more informed decisions when it comes to PPA's but also in relation to environmental opportunities more broadly. Education and awareness are critical if we are to achieve successful farmer engagement in PPA's and other environmental programs. In relation to structuring effective financial incentives for farmer participation, QFF would encourage a flexible approach that includes a number of different options so that farmers are able to choose the approach that will best fit their enterprise.

d. Productivity, farm viability, food security and conservation must be complimentary

The success of PPAs should not be measured by transactional funding alone but by the delivery of tangible land improvement and whole of ecosystem outcomes. Productivity and conservation can, and should, be mutually reinforcing. Anecdotal evidence from jurisdictional initiatives such as the NSW Biodiversity Scheme demonstrates that ecosystem services markets can be profitable for landholders who adopt regenerative practices and an environmental stewardship mindset.

Participation is more attractive where funding supports practical, on-ground improvements, such as fencing, pasture management, or riparian rehabilitation. Protecting waterways is a priority for many landholders, especially where unmanaged access by livestock and wildlife continues to degrade sensitive areas. QFF encourages the Queensland government to strongly consider how this initiative can result in the genuine desire for Queensland's leading agricultural businesses to participate. Rather than continuing the path of environmental groups becoming "hobby farmers", we should aspire to leading agricultural enterprises becoming "hobby environmentalist". This is where the real opportunity lies.

e. Federal legislation alignment

QFF points to the need to consider overlaps and inconsistencies between state-based PPA frameworks and the federal system and the potential risk in creating duplication, additional compliance costs, and uncertainty for participating landholders, many of whom fear being subject to a dual approval process. QFF therefore seeks greater clarity on the imposition and interaction between state and federal frameworks and calls for explicit recognition of state-led PPAs within the EPBC Act in a way that respects state-based oversight and avoids imposing unnecessary federal triggers.

Discussion paper responses

1. Protected Area Landscape

1.1 What factors have held Queensland back from expanding its private protected area system?

The limited growth of Queensland's PPA system reflects weaknesses in program design, not reluctance from landholders. Many productive and non-productive landholders recognise the

ecological and stewardship value of protecting biodiversity on their land, but participation is constrained by structural barriers that reduce the attractiveness of entering into binding agreements.

QFF notes the following factors:

- Program design limitations and effectiveness concerns. Current programs prioritise quantity over quality, relying on opportunistic protections instead of strategic, landscape-scale planning. Without systematic monitoring and adaptive management, promised ecological benefits have not materialised.
- Permanence and enforceability concerns. Landholders are reluctant to commit land indefinitely due to financial and management uncertainties as well as shifting policy goal posts.
- Financial and resourcing constraints. The current model remains predominantly driven by a one off, upfront grant model which does not support the long term or ongoing participation of farmers. High entry costs and reliance on grants favour larger NGOs over smaller local entities, limiting diversity and participation and excluding the opportunity for farmers themselves to build skills and capacity to manage their environmental assets.
- Shifting the participation model. Rather than framing farmers as “hobby environmentalists” reliant on environmental groups and intermediaries, who often compete for limited funding, there is an opportunity to foster genuine partnerships. This approach encourages collaboration and capacity building, rather than creating an expectation that farmers must participate.
- Limited scale of public investment. Queensland has underinvested in resourcing, incentives, ongoing maintenance, education, awareness and recruitment, restricting the ability of PPAs to deliver outcomes at scale.
- Lack of clear communication and awareness. Misperceptions that PPAs exclude productive use limit uptake. Programs must clearly demonstrate integration with agriculture and benefits for production and landscapes, using trusted networks to build confidence. Farmers who have had negative experiences with an intermediary or the environment department in the past, are understandably cautious when it comes to future endeavours.
- Targeted engagement. Thoughtful consideration is needed regarding which organisations are best suited to deliver specific aspects of the initiative: “it matters who does what.” Trust between the Department of Environment and industry must be rebuilt, which can only be achieved through tangible action rather than ongoing unproductive meetings or discussions.
- Lessons from international experience. In New Zealand, poorly calibrated emissions trading incentives have driven more than 200,000 hectares of productive sheep and beef land into carbon forestry in just five years, undermining food production and hollowing out rural communities. This risk is playing out across the world and Australia – this is not what we want for Queensland and our future generations.

1.2 What role can all levels of government play in supporting its growth?

Programs succeed when governments act as catalysts and facilitators, not managers. The most effective role for all levels of government is to create the enabling conditions for participation, by reducing risk, providing stability, and ensuring programs retain integrity across political cycles, while leaving landholders with control and flexibility in how ecological outcomes are achieved.

- Bipartisan stability across political cycles is critical to provide landholders with the confidence needed to commit to long-term stewardship.
- The Commonwealth Government must take the lead in aligning private conservation programs with national legislation, particularly the EPBC Act, to remove duplication and compliance burdens. Federal reforms must ensure that obligations are matched with appropriate incentives. It is critical that the States are at the table when it comes to EPBC.
- The Commonwealth has a role in funding support, expanding stewardship and biodiversity market programs, and working with State governments to ensure funds can be flexibly applied to activities such as training, pest and weed management, or farm business planning.
- The State Government has a clear role in developing and administering policy for Private Protected Areas. This includes undertaking targeted ecological assessments, providing baseline biodiversity data, and streamlining approvals through low-cost entry assessments. The State Government can also play an important role in supporting the agricultural industry to be able to provide information, raise awareness and help their farmer members make informed business decisions when it comes to PPA's and other environmental opportunities.
- The State Government should also establish safe entry pathways for landholders, such as pilot agreements and shorter-term stewardship contracts, to build confidence and encourage participation. While responsible for policy and standards, delivery of on-ground support is better channelled through trusted networks such as regional NRM organisations, but QFF strongly submits that strong involvement from agricultural peak industry bodies who actually represent farmers is absolutely critical.
- Local Governments are well placed to provide direct incentives and promotional support. Options including rate relief for landholders participating in PPAs, recognising the public good environmental services these properties provide have been suggested. QFF acknowledges that Local Governments would need to be financially supported by the State should this occur and cautions the program going down the path where the delivery of financial incentives becomes so clunky that it expends more resources through the administration of the financial incentives than it actually delivers to farmers.
- All levels of government must support active land management within conservation areas to address fire, pest, and invasive species risks. Coordinated technical guidance, adequate funding, and practical support are essential to avoid conservation areas becoming liabilities for landholders and communities.

1.3 How could other land uses, such as stock routes, be better integrated into Private Protected Areas?

PPAs should formally recognise the co-existence of multiple land uses, allowing compatible agricultural activities, including grazing, seasonal cropping, horticulture, agroforestry, fire management, and water catchment management, to continue alongside conservation objectives:

- Ecological corridors
- Stock route and travelling reserves
- Riparian buffers
- Shelterbelts and windbreaks
- Agroforestry and silvopastoral systems
- On-farm water storage (farm dams)
- Productive agricultural areas unrelated to forestry

Importantly, strategically targeting land parcels to increase connectivity, regardless of whether they hold high existing values, will strengthen landscape-scale outcomes. Governments must work with landholders to improve land and vegetation condition and forest cover where compatible with existing land use and provide targeted support to leverage existing and emerging markets that reward biodiversity, connectivity, and sustainable production. QFF welcomes continued engagement with the Department to identify and promote land uses that support both productive agriculture and biodiversity outcomes within PPAs.

Queensland continues to face a challenge with land designated for environmental purposes that is not being adequately managed, resulting in negative impacts on neighbouring landholders and broader communities. Addressing this issue is essential if landholders and communities are to support the further expansion of environmental landscapes. It is important to carefully consider the stakeholder ecosystem, distinguishing between actual stakeholders (e.g., farmers, local councils) and broader interest groups. While QFF recognises that everyone has a role to play, we emphasise that it truly matters 'who does what'.

2. Existing Programs

2.1 What are the key barriers preventing private landholders from entering or expanding agreements?

Similar to our response in 1.1, while many landholders value conservation, participation is limited by barriers directly experienced on the ground:

- Inadequate financial incentives. Payments rarely match opportunity costs or the value of environmental services, relying too much on altruism. Scaled, reliable incentives are needed to attract both commercial and conservation-minded landholders. Grant programs strangled by excessive reporting and red tape and tied to small investments are unattractive to farmers. One off, up front grants do nothing to incentives longevity in these types of programs and do not reflect the ongoing investment and work required to manage landscapes over time.
- High costs, complexity, and insufficient resourcing. Entry and management require ecological assessments, monitoring, and threat control, but are underfunded. Bureaucratic processes that see hopeful participants bogged down in departmental dealings to the extent that their hope quickly turns to despair and a resolve to avoid this

process again in the future. Lack of expertise, time, and support limits outcomes, requiring the need for flexible assessments and stronger resourcing.

- Inflexible tenure arrangements and property exclusions. Long-term (50+ year) agreements deter participation and exclude smaller, ecologically important areas such as riparian corridors or koala habitat. Flexible options are required. Landholders that are informed can often be deterred from this type of agreement given its binding nature, impact on the title, and administrative effort.
- Policy inconsistency and weak engagement: Programs suffer from fragmented rules, land tax disincentives, and poor continuity. Many landholders lack awareness of biodiversity and environmental activities that can actually strengthen their farming enterprises, if done correctly. Collectively, we must support farmers to make informed decisions for their enterprises, and we need to recognise the depth and diversity of agriculture acknowledging that one size does not necessarily fit all.

2.2 Have you considered establishing a nature refuge or special wildlife reserve on your property? If not, what has influenced that decision?

No comment.

2.3 How could current programs be improved to better support private landholders in protecting high-conservation-value land?

Programs to support PPAs and on-farm conservation will be most effective when they provide landholders with practical support, long-term certainty, and clear financial incentives that actually make it worthwhile. While many farmers are motivated by stewardship values, the reality is that participation is strongly shaped by whether programs are workable, fair, and rewarding.

- Integrated approaches. Conservation must tackle weeds, ferals, fire, and other threats in a holistic way, not rely on “single pillar” fixes like fencing or carbon credits. Programs should support stewardship that benefits both biodiversity and farm productivity and profitability.
- Practical on-ground support. Landholders need affordable assessments and clear biodiversity information. Dedicated, trusted advisors, such as funded officers within agricultural peak bodies, can provide independent, place-based guidance. It matters who does what.
- Sustained funding. Incentives must be adequate, accessible, and ongoing. One-off grants are quickly exhausted; long-term funding for monitoring, planning, and management is essential for durable, lasting outcomes.
- Remove perverse disincentives. Barriers such as land tax on refuges or cumbersome covenants reduce participation. Clearer, fairer policy settings would improve confidence and integrity.
- Encourage regenerative stewardship. Incentivising practices that integrate biodiversity with production, through markets, branding, or natural capital rewards, can turn conservation into a productive asset for some farming enterprises.

2.4 What incentives or support would make it more viable for you or others to commit land to long-term conservation?

Landholders entering private land conservation agreements face three main costs: the opportunity cost of foregone productive uses of the land, transactions costs in establishing an agreement (e.g., environmental and valuation assessments), and ongoing conservation management costs (with higher expenditures usually occurring in the earlier establishment years and potentially less thereafter as a result of unforeseen events). To make long-term conservation more viable, landholders require a flexible package of incentives that are both financial and non-financial:

- **Market participation opportunities.** Governments should enable landholder participation in carbon, biodiversity, and stewardship markets, encouraging project stacking (e.g., soil carbon, koala conservation, river rehabilitation) to build layered value. It is important to understand that different market opportunities will suit different farming enterprises and market opportunities do not necessarily suit all farming enterprise types.
- **Flexible tenure.** Options from short- to long-term (1–25 years) are needed to encourage broader farmer participation, accommodate succession planning and enterprise changes, rather than rigid, perpetual agreements which do not appeal to all farmers.
- **Ongoing management funding.** Long-term stewardship needs continuous support for weeds, pests, fencing, and habitat care. Programs must fund monitoring and adaptive management beyond one-off grants.
- **Tailored advisory networks.** Landholders need visible, trusted, place-based advisory services through agricultural peak bodies, councils, NRM groups, and regenerative agriculture advisors, such as highly regarded organisations such as RCS etc.
- **Independent reporting.** External monitoring and transparent reporting would strengthen program integrity, demonstrate ecological gains, and recognise landholder contributions.

2.5 How could the recognition of OECMs help support landholders who are already delivering conservation outcomes but are not part of a formal protected area agreement?

Recognition of OECMs could support broader participation and allow for conservation outcomes to be achieved alongside agricultural production, rather than limiting farm operations. It also offers opportunities to align with new federal initiatives such as the Nature Repair Market, creating potential financial benefits for farmers while respecting property rights and farm viability.

There are, however, risks that must be managed. If recognition shifts towards coercion or “pseudo regulation,” landholders could lose trust in the framework. Similarly, poorly supported OECMs risk becoming unmanaged “locked up” areas that harbour pests, weeds, or fire hazards, undermining biodiversity outcomes and neighbouring land use. Unclear eligibility rules, rigid long-term commitments, and inequities in how consent is applied would also discourage participation.

To remain competitive alongside the growing range of financial market mechanisms that already support landholders in delivering conservation outcomes with financial returns (such as carbon, natural capital, energy developments, and offset markets), OECMs must offer the right

mix of incentives, financial, technical, and advisory, that reward stewardship while upholding property rights and farm viability.

3. Existing Support

3.1 Do you feel you have the tools and information you need to support decisions to improve environmental outcomes for your land?

See 3.2 and 3.3 below.

3.2 How can existing landholder tools and advisory networks be better coordinated and promoted?

The environmental space is crowded, noisy and generally confusing for many farmers. There is not a coordinated approach to supporting farmers to be aware of the opportunities and make informed decisions. Landholder tools and advisory networks could be improved through centralised, accessible information that clearly explains opportunities, eligibility, and benefits:

- Education and information campaigns through existing and trusted networks can raise awareness, promoting financial incentives, ecosystem service markets, and stacked projects.
- Trusted partnerships should be facilitated to develop the capacity to ensure those working closely with landholders have access to the resources and support they need to inform and discuss with land managers information about PPAs.
- Linking tools with farm business planning, valuations, and succession ensures conservation is value-adding. Farmers are already participating in a range of best management practice vehicles. Rather than reinventing the wheel, QFF strongly suggests that these existing vehicles are enhanced and utilised to deliver support to farmers regarding PPA opportunities, as part of their wholistic farm management best practice and planning.
- Simplified, indicative assessments and case studies reduce barriers and build confidence.
- Ongoing monitoring, feedback, and adaptive support reinforce participation, helping landholders achieve both ecological and productive outcomes across property types.
- Consider carefully which organisations are best placed to deliver specific resources or services. It truly matters who does what.

3.3 Are the current tools available fit for purpose?

Some existing tools offer a useful starting point for recognising conservation efforts on private land, but they are not yet fit-for-purpose if the goal is to achieve broad participation across the farming sector. As interest in environmental opportunities grows, the market has seen a proliferation of products, tools, and service providers, each competing for attention. Independent, practical tools are needed to help farmers make informed decisions.

A useful precedent can be found in the energy sector, where QFF developed a Landholder Toolkit to support farmers considering hosting renewable energy infrastructure. The toolkit helps farmers understand key considerations and make informed decisions. To improve uptake in the environmental space, tools must be practical, accessible, scalable, and delivered by the

appropriate organisation. Technology also has an important role; for example, LiDAR could enhance carbon measurement, biodiversity mapping, and property-level planning.

Key priorities for effective tools include:

- Independent outcome reporting. Transparent, external reporting, using frameworks like Accounting for Nature (AFN), is needed to track conservation and land improvement, and recognise landholder stewardship.
- Independent, accessible, practical tools. Low-cost, user-friendly assessments and property-specific biodiversity data should be provided to make tools practical and widely usable.
- Integration with farm business planning. Conservation planning must link to finance, valuations, and succession planning so agreements are understood as value-adding, not restrictive. The existing MY BMP programs are an obvious existing vehicle that could be enhanced to play a role here.

Conclusion

Queensland can develop a successful PPA that transforms from a niche program into a mainstream mechanism for sustainable land management, one where farmers are empowered to be productive custodians of the land, biodiversity outcomes are delivered at scale, and conservation becomes a value-adding part of agricultural enterprise.

The success of PPAs will be measured not just by hectares protected, but by the enduring ecological and economic benefits created for Queensland's landscapes and communities and our ability to realise important outcomes in relation to farmer profitability, food security, strong regional communities and environmental outcomes. Farmers must be at the centre of these discussions and of the program that is developed.

QFF and our peak body members appreciate the opportunity to provide input into this important initiative.

Yours sincerely

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Chief Executive Officer



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