

Department of Environment, Tourism, Science and Innovation

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Submission on the Draft Brigalow Belt North Bioregional Guidance Plan and the associated Interactive Tool.

Environmental Advocacy in Central Queensland (**EnvA**) appreciates the opportunity to comment on the Draft Brigalow Belt North Bioregional Guidance Plan (**draft Plan**) and the Interactive Tool.

About Environmental Advocacy in Central Queensland

Environmental Advocacy in Central Queensland (EnvA) is a Central Queensland community organisation committed to ensuring that land use is environmentally sustainable and does not result in significant impacts on the environment. As many existing and proposed coal mining, coal seam gas and renewable energy developments occur within the Brigalow Belt North bioregion, EnvA has a strong interest in ensuring that regional planning appropriately identifies and protects areas of high environmental value while providing greater certainty for communities and proponents.

General comment of support

The EPBC Act currently includes a bioregional planning mechanism which has only been used in Commonwealth areas. The Independent Review of the EPBC Act (**Samuel Review**)¹ recommended that the Act should be amended to replace the bioregional planning mechanism with ecologically sustainable development (**ESD**) plans.

The Samuel Review considered that ESD plans should:

- be spatial plans that address environment, economic, Indigenous and social priorities,
- support more integrated management of the environment by accommodating the respective interests of the Commonwealth, and States and Territories,
- set clear rules to manage competing land uses and identify future long-term development aspirations,
- identify areas where impacts on the environment should be avoided or minimised, where development may be of lower or higher risk to the environment, and where development assessment and approval is not required, and
- the Commonwealth Environment Minister (or an accredited party) should make decisions on development approvals in a way that is consistent with the provisions of the ESD plan.

¹ [Professor Graeme Samuel AC \(2020\). Independent Review of the EPBC Act – final report](#)



EnvA is supportive of the development of this Plan in line with the recommendations of the Samuel Review.

The draft Plan and Implementation tool provides a pre-mapped framework that identifies which areas in a region carry higher or lower environmental values which provides proponents, communities and decision-makers with an important strategic planning resource that enables potential environmental constraints to be identified early in project design.

This upfront information will save significant time and money for Proponents as it will allow smarter decisions at the design stage - avoiding sensitive areas rather than discovering conflicts once an application is lodged. It also has the potential to reduce duplication in the environmental assessment approach at federal, state and territory levels.

Development of the 'enforceable' Bioregional Plan

EnvA reiterates general support for the guidance provided in the draft Plan, but it remains unclear on how this guidance will be used to create conservation and development zones and enforceable conditions.

Proposed zones

Under the Nature Positive Plan², the Government embraced the recommendation for the development of regional plans and proposed that regional plans would adopt a three-level spatial system:

- Areas of High Environmental Value: where development would largely be prohibited.
- Areas of Moderate Environmental Value: where development would be allowed, subject to an approval process and any agreed rules.
- Development Priority Areas: where the planning process has determined that development can proceed without a separate federal environmental approval.

On the DCCEEW bioregional planning website, it is suggested that there will be two designated zones:

- Conservation zones: areas of high ecological importance where some developments are not allowed.
- Development zones: areas where priority actions like renewable energy projects, critical mineral projects and housing can occur without the requirement of a project-level approval.³

The Bioregional Plan, if it is progressed, is not likely to be developed and for many months or years. To provide greater certainty for proponents, communities and decision-makers EnvA considers that it is important for additional guidance on the assessment-level decisions required within the draft Plan.

Without greater clarity, there is a risk that proponents and the communities will have different expectations regarding the legal effect of the guidance document and how it will influence future approval decisions.

Therefore, EnvA recommends that the draft Plan is amended to include further detail on when projects can access the fast-tracked process or when further assessment and information will be required. Without this detail, the assessment and approval process will not really be any different to the current system.

² [Australian Government \(December 2022\) Nature Positive Plan: better for the environment, better for business](#)

³ [DCCEEW \(April 2026\) Bioregional planning](#)

Data used in the draft Plan

As noted in the draft Plan, the biodiversity information has been largely sourced from state or national databases which limits the specificity of geographic or fine-scale detail required for project assessment.

EnvA retains concerns that some priority projects may be exempted from a detailed assessment based on limited, and sometimes 'dated' information sources. Aside from detailed assessments for proposed developments, the North Brigalow region biodiversity has not been well surveyed and documented.

While progressively sourcing higher confidence datasets is essential, the draft Plan must identify that where uncertainty exists regarding environmental values or likely impacts, the precautionary principle should apply, and project proponents must be required to undertake additional site-based investigations before approval pathways are determined.

It would also be useful to provide detail on how and when datasets will be updated. Reliance on the current dataset is not appropriate for future development proposals.

Cumulative impacts

The assessment of cumulative impacts remains very unclear, despite the intent to address and manage these in the draft Plan.

The draft Plan identifies activities at a range of intensities including:

Major projects and land use change

- Resource extraction – high intensity,
- Energy and industrial development – medium intensity,
- Infrastructure – medium intensity,
- Urban and commercial development – low intensity.

Ongoing land use and diffuse human activity

- Grazing – high intensity,
- Cropping – medium intensity,
- Forestry – medium intensity, and
- Recreation and tourism – low intensity.

It is EnvA's view that assessment of cumulative impacts, irrespective of the project must be enhanced in the draft Plan and the Interactive Tool to provide guidance on the assessment of cumulative impacts. Clearing of threatened species habitat is often reported as a percentage of the available habitat which does not take into account the many other projects also removing and fragmenting habitat. There needs to be a clear guidance on this assessment, particularly on limits to clearing habitat of threatened species and communities.

Figure 9 in the draft Plan depicts the overview of sources and their impact on threatened species, migratory species and threatened ecological communities. EnvA considers that Figure 9 underestimates the risks associated with major resource developments. The Northern Brigalow Belt has experienced extensive coal mining and increasing coal seam gas development, both of which have resulted in significant impacts on threatened species, ecological communities, migratory species and water resources. Accordingly, these activities should not be characterised as presenting a low cumulative risk. The Interactive Tool provides little guidance on assessing cumulative impacts for proponents or decision-makers.

The cumulative impact assessment must assess each project's contribution to ongoing habitat loss across the Northern Bowen Basin bioregion. Given the already extensive clearing in the

region, any additional loss or disturbance of native vegetation and habitat should be assessed in the context of the existing extent of habitat loss, fragmentation and degradation across the Northern Bowen Basin. Even relatively small additional losses may contribute to significant cumulative impacts on threatened species and ecological communities.

Interactive Tool

EnvA commends the integration of the Interactive Tool to complement the draft Plan. However, it does need to be integrated into a more usable tool to accurately locate a specific location. At present, it is challenging to locate a proposed project without the ability to search, and without basic details such as townships, roads or land descriptions.

The Interactive Tool should also allow users to overlay multiple environmental datasets simultaneously and generate downloadable reports to improve transparency for proponents, regulators and the community.

We note that the final version of this draft Plan ‘may use’ a different platform⁴ with enhanced features for identifying locations. While this is encouraging, it is important to ensure that this platform is easily accessible to the public and does not require specific software.

Community consultation

EnvA is concerned that this draft Plan, when finalised, will be used as the interim guidance and interpreted as a Bioregional Plan by proponents and decision-makers. The ability for the community to have input on proposed developments may also be reduced if this occurs.

It is our view that this draft Plan should not limit the consultation requirements as it is only a guidance document. Again, EnvA reiterates that this guidance document, while useful, should not negate the opportunity for consultation on any project that may have impacts on MNES.

We further note that the draft Plan recognises the importance of First Nations peoples, but it does not provide the opportunity to participate through a genuine consultation process before the plans are finalised.

Focus on wind farms

While the draft Plan has been developed with a strong focus on wind energy development in the Collinsville area, the guidance is intended to apply across the broader Brigalow Belt North bioregion. It should therefore provide equivalent guidance for all significant development sectors, including mining, coal seam gas, transmission infrastructure, critical minerals, housing and other renewable energy developments.

The current government has identified wind farms as a priority development, critical minerals and housing are also priorities. Hence, we question why the draft Plan is focussed on one type of development in a relatively small area of the bioregion.

Conclusion

EnvA supports the development of bioregional planning as an important reform that has the potential to improve environmental outcomes while providing greater certainty for proponents, governments and the community. However, the draft Plan requires further refinement to ensure that it provides clear guidance, appropriately addresses cumulative impacts, applies the precautionary principle where information is uncertain, and maintains opportunities for meaningful community participation.

⁴ [Australian and Queensland Government \(May 2026\) How to Use the Draft Bioregional Planning Interactive Tool guide](#)

As detailed above, EnvA recommends that the draft Plan:

- be amended to include further detail on when projects can access the fast-tracked process or when further assessment and information will be required,
- provide detail on how and when datasets will be updated,
- Improve guidance on the assessment of cumulative impacts in the bioregion,
- provide a user-friendly platform for the Interactive Tool to access project specific environmental values,
- does not provide for decreased consultation opportunities, and
- is expanded to include other renewable energy projects, critical minerals, housing and other potential projects that may or will impact on MNES.

Thank you again for the opportunity to comment on the Draft Brigalow Belt North Bioregional Guidance Plan and the associated Interactive Tool.

Kind regards



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