Environment Institute of Australia and New Zealand Inc.

Submission on the Draft Gulf Plains Bioregional Guidance Plan

17 July 2026

1.1 About EIANZ

The Environment Institute of Australia and New Zealand (EIANZ) is the not-for-profit, multidisciplinary association of environmental practitioners across Australia and New Zealand. Our members include scientists, ecologists, planners, engineers, lawyers, economists, and policy specialists, many with direct experience in designing, assessing, approving, delivering, monitoring, and enforcing environmental offsets under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

This submission reflects practitioner experience and draws on consultation across EIANZ specialist groups, including biodiversity offsets, heritage, ecology and impact assessment.

1.2 Introduction

EIANZ welcomes the opportunity to comment on the Draft Gulf Plains Bioregional Guidance Plan.

EIANZ supports strategic, landscape-scale planning that improves biodiversity protection, strengthens cumulative impact assessment and provides clearer expectations for environmental assessment and project design.

The Gulf Plains contain significant ecological, hydrological and cultural values, including extensive river and wetland systems, groundwater-dependent ecosystems and habitat for threatened species. EIANZ supports the overall intent of the Plan but considers that it should be strengthened to deliver clearer, more consistent and enforceable environmental outcomes.

2. Purpose and regulatory status

The Plan is intended to guide the assessment of minerals mining impacts on Matters of National Environmental Significance and improve consideration of cumulative impacts across the bioregion.

However, the Plan is expressly non-regulatory and has not been designed for use under Queensland legislation, including the Mineral Resources Act 1989, Planning Act 2016, Environmental Protection Act 1994 or Environmental Offsets Act 2014.

EIANZ considers this a missed opportunity.

Mining impacts are currently assessed through separate Commonwealth and Queensland processes that may use different datasets, terminology, thresholds and assessment requirements. A non-regulatory Plan cannot ensure that important environmental values are avoided, cumulative impact thresholds are observed, consistent survey and monitoring standards are applied, or regional environmental data are shared.

The final Plan should clearly explain:

- the weight given to its mapping, thresholds and recommendations;
- how it will interact with Queensland approval processes;
- when departures from the Plan must be justified;
- how mapping or classification errors may be corrected; and
- how implementation will be monitored and reported.

EIANZ recommends that the Plan be treated as the first stage of a stronger regulatory framework, including a future statutory bioregional plan, strategic assessment or other enforceable mechanism.

3. Public access to environmental data

A priority outcome of the Plan must be the establishment of an accessible and current regional environmental database.

Environmental practitioners are often required to assess individual projects without access to ecological and hydrological information collected for other developments. This limits the accuracy of cumulative impact assessment and may lead to duplicated surveys, inconsistent conclusions and underestimation of regional impacts.

Subject to appropriate protection of sensitive information, the database should include:

- ecological survey reports and spatial data;
- threatened species records;

- vegetation, habitat, wetland and watercourse mapping;
- groundwater and surface-water monitoring data;
- groundwater models and assumptions;
- project footprints and approved clearing;
- offsets, rehabilitation and restoration areas;
- approval conditions and monitoring results; and
- information on existing, approved and foreseeable developments.

Data should be supplied in consistent, machine-readable and spatial formats with clear metadata and version control.

Proponents should be required to provide relevant survey, impact and monitoring data within a specified timeframe. Without accessible regional data, practitioners and regulators cannot reliably assess cumulative impacts.

4. Site-specific assessment and mapping

EIANZ supports the use of the Bioregional Planning Interactive Tool for preliminary constraints analysis and strategic planning.

However, regional mapping and species distribution modelling must remain screening tools only. They should not be treated as confirmation of the presence or absence of a protected matter and must not replace appropriately designed field investigations.

The final Plan should require:

- surveys by suitably qualified and experienced practitioners;
- appropriate seasonal and temporal survey effort;
- clear documentation of data gaps and uncertainty;
- field validation of mapped habitat;
- assessment of habitat function, not only vegetation type; and
- integration of ecological and hydrological assessment.

Project layouts should not be fixed before sufficient environmental investigations have been completed.

5. Groundwater and surface-water impacts

Hydrological change is one of the most significant risks associated with minerals mining in the Gulf Plains.

The final Plan should establish stronger expectations for:

- assessment of aquifer connectivity;
- identification of recharge and discharge areas;
- protection of springs, wetlands, rivers and groundwater-dependent ecosystems;
- cumulative groundwater drawdown modelling;
- consideration of delayed and post-closure impacts;
- uncertainty and sensitivity analysis;
- independent technical review for high-risk projects;
- long-term monitoring; and
- clear early-warning and intervention triggers.

Where impacts may affect Great Artesian Basin springs or other irreplaceable ecosystems, uncertainty should not be used to justify development. Avoidance and the precautionary principle should apply.

6. Cumulative impacts

EIANZ strongly supports the Plan's focus on cumulative impacts.

Cumulative assessment should consider the combined effects of:

- existing, approved and proposed mines;
- roads, rail, pipelines and utilities;
- groundwater extraction and mine dewatering;
- vegetation clearing and fragmentation;
- surface-water diversion and discharge;
- grazing, fire and invasive species;
- rehabilitation performance;
- mine closure and legacy impacts; and
- climate change.

The final Plan should establish a consistent methodology with defined spatial and temporal boundaries, shared datasets and clear limits of acceptable change.

Cumulative assessment must extend across the full project life cycle, including construction, operation, closure, rehabilitation and post-closure.

7. Avoidance, rehabilitation and offsets

EIANZ supports the Plan's emphasis on the mitigation hierarchy.

Avoidance must be the primary response for irreplaceable habitat, Great Artesian Basin springs, critical threatened species habitat, important wetlands and areas of high hydrological sensitivity.

The final Plan should clarify that:

- offsets must not justify avoidable impacts;
- rehabilitation potential must not be treated as a guaranteed outcome;
- time lags, uncertainty and failure risks must be addressed;
- offsets must directly benefit the affected environmental value;
- rehabilitation criteria must be measurable and ecologically relevant; and
- long-term monitoring and financial assurance must be required.

Where ecosystems cannot be reliably restored or recreated, strict avoidance is required.

8. First Nations participation and professional standards

EIANZ supports early and meaningful participation by First Nations peoples in regional planning, project siting, assessment, monitoring and rehabilitation.

Traditional ecological knowledge should only be incorporated with free, prior and informed consent and appropriate protection of culturally sensitive information.

Environmental and hydrological assessments should be undertaken or supervised by suitably qualified and experienced professionals. Independent peer review should be required for projects involving Great Artesian Basin springs, major groundwater impacts, irreplaceable habitat, near-zero impact matters or substantial scientific uncertainty.

9. Monitoring and review

The Plan should be supported by a transparent monitoring, evaluation, reporting and improvement framework.

This should include measurable ecological and hydrological indicators, regular public reporting, independent scientific review, version control for mapping and models, and clear triggers for management intervention.

A five-year formal review should not prevent earlier updates where new evidence identifies significant environmental risk.

10. Conclusion

EIANZ supports the development of the Gulf Plains Bioregional Guidance Plan as an important step towards stronger strategic planning, cumulative impact assessment and protection of Matters of National Environmental Significance.

However, the Plan's non-regulatory status limits its ability to deliver consistent and enforceable environmental outcomes. This is a missed opportunity to create an integrated framework for managing mining impacts across a region where ecological and hydrological systems extend beyond individual project boundaries.

The final Plan should establish a clear pathway towards stronger statutory implementation and integration with Queensland mining, planning and environmental approval processes.

Priority should be given to protecting groundwater and surface-water systems, groundwater-dependent ecosystems, Great Artesian Basin springs and threatened species habitat. The establishment of a publicly accessible regional environmental database is also essential to support accurate cumulative impact assessment.

Strong science, early avoidance, transparent data, qualified professional assessment and enforceable long-term monitoring will be fundamental to protecting the Gulf Plains while providing greater certainty for responsible development.

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