



POLICY SUBMISSION

Submission on the Draft Brigalow Belt North 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 Brigalow Belt North 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 proposed Plan is an important opportunity to improve the planning and assessment of renewable energy development within a region containing significant and, in some cases, irreplaceable environmental values.

EIANZ supports the overall intent of the Plan. However, the Plan should be strengthened to ensure that it is scientifically robust, consistently applied and capable of delivering measurable environmental outcomes.

2. Purpose and regulatory status of the Plan

The stated purpose of the Plan is to provide strategic guidance for the protection of Matters of National Environmental Significance and to improve the planning, assessment and approval of wind farm development within the Brigalow Belt North Bioregion.

The Plan is intended to assist proponents, regulators and environmental practitioners by identifying important environmental values, likely impact pathways, areas of potential conflict and regional priorities for avoidance, mitigation, restoration and offsets. It is also intended to improve consideration of cumulative impacts and support more efficient Commonwealth environmental assessment.

However, the Plan is expressly non-regulatory. It does not establish exclusion zones, alter statutory approval requirements or create binding development controls. The Plan has also not been designed for use in Queensland planning and environmental approval processes under the *Planning Act 2016*, *Environmental Offsets Act 2014* or *Environmental Protection Act 1994*. It does not change legislative requirements under the *Vegetation Management Act 1999*, *Native Title (Queensland) Act 1993*, *Aboriginal Cultural Heritage Act 2003*, *Torres Strait Islander Cultural Heritage Act 2003* or *Water Act 2000*.

EIANZ considers this to be a significant missed opportunity.

A non-regulatory plan may provide useful guidance, but it cannot ensure that important environmental areas are avoided, cumulative impact thresholds are observed, consistent survey and monitoring standards are applied, or environmental data are shared between projects.

The same landscape may continue to be assessed separately under Commonwealth, State and local government frameworks using different environmental matters, datasets, terminology, thresholds and decision-making processes. This fragmentation limits the ability of government, proponents and practitioners to assess and manage cumulative impacts consistently.

The practical influence of the Plan may nevertheless be substantial, particularly where decision-makers rely on its mapping, impact thresholds and recommendations. The final Plan should therefore clearly explain:

- the weight to be given to the Plan in Commonwealth environmental decision-making;
- how the Plan will be considered alongside Queensland planning and environmental approval processes;
- whether departures from the Plan will require justification;
- how inconsistencies between the Plan and site-specific evidence will be resolved;

- how inaccurate mapping, data or classifications may be reviewed and corrected; and
- how implementation of the Plan will be monitored and publicly reported.

EIANZ recommends that the Australian and Queensland governments use the final Plan as the first stage of a stronger and more integrated regulatory framework for the Brigalow Belt North Bioregion.

This should include a clear pathway towards a regulatory bioregional plan, strategic assessment or another statutory mechanism capable of:

- integrating Commonwealth, Queensland and local environmental requirements;
- identifying areas where impacts are unacceptable or require strict avoidance;
- establishing consistent cumulative impact thresholds;
- setting minimum survey, assessment, mitigation and monitoring standards;
- coordinating restoration and offset priorities;
- requiring the contribution and sharing of project data; and
- providing transparent compliance, reporting and review mechanisms.

A stronger regulatory framework would provide greater certainty for both industry and the community by identifying suitable development areas, establishing clear environmental limits and reducing the risk that cumulative impacts are identified only after multiple projects have been approved.

3. Public access to environmental data

A priority outcome of the Plan must be the establishment of an accessible, current and authoritative regional environmental information system.

The Plan appropriately recognises that cumulative impacts cannot be adequately managed through isolated project assessments. However, environmental consultants and other practitioners are often required to assess individual projects without access to the detailed ecological information collected for other developments within the same region.

Relevant information may be contained in unpublished technical reports, environmental approval documents, restricted government databases, consultant datasets or documents that are difficult to locate and compare.

Without access to this information, practitioners may be unable to accurately determine:

- whether threatened species have previously been recorded near a project;
- the location and condition of habitat identified during previous surveys;
- the survey methods, timing and effort previously applied;

- existing and approved habitat loss;
- bird and microbat collision or mortality records;
- cumulative disturbance from wind farms, transmission infrastructure, roads and mining;
- offset locations and management commitments;
- whether mitigation measures have been effective; and
- whether regional impact thresholds are being approached or exceeded.

This information gap creates a material risk that cumulative impact assessments will rely on incomplete datasets and underestimate the combined effects of development. It may also result in duplicated survey effort, inconsistent assessments and avoidable costs.

EIANZ recommends that the final Plan require the establishment and ongoing maintenance of a publicly accessible regional environmental database. Subject to appropriate protections for sensitive ecological records, cultural information, privacy and legitimate commercial confidentiality, the database should include:

- ecological survey reports and spatial survey data;
- validated threatened species records;
- vegetation and habitat mapping;
- survey dates, methods, effort and limitations;
- project footprints and supporting infrastructure;
- approved and proposed vegetation clearing;
- direct and indirect impact areas;
- bird and microbat monitoring and mortality data;
- offset areas, restoration areas and secured conservation land;
- approval conditions and environmental commitments;
- compliance and monitoring results;
- regional fire, weed, pest and habitat-condition information; and
- current, approved and reasonably foreseeable development.

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

The database should clearly distinguish between verified field records, modelled habitat, expert interpretation and unverified observations.

Proponents should be required, through approval conditions or another enforceable mechanism, to provide relevant ecological survey, impact and monitoring data within a specified timeframe.

Public access to this information is essential to improve the accuracy and consistency of impact assessments, support early identification of environmental constraints, reduce duplication, improve cumulative impact assessment and strengthen public confidence in the approval process.

Without comprehensive and accessible data, the Plan's cumulative impact objectives are unlikely to be achieved.

4. Spatial information and site-specific ecological assessment

EIANZ supports the use of the Bioregional Planning Interactive Tool for preliminary constraints analysis, strategic site selection and identification of potential conservation and restoration priorities.

However, regional mapping and species distribution modelling inevitably contain uncertainty and may include errors of both omission and commission.

The final Plan should clearly state that mapped information is a screening tool only and must not be treated as confirmation of the presence or absence of a protected matter.

Regional mapping must not replace appropriately designed site-specific ecological assessment.

Field investigations should remain necessary where a protected matter may occur, and survey scope should be determined by:

- the ecology and detectability of the relevant species;
- habitat condition and connectivity;
- seasonal and climatic variability;
- potential impact pathways;
- project scale and infrastructure layout; and
- the limitations of available desktop information.

The final Plan should require that:

- surveys are undertaken by suitably qualified and experienced practitioners;

- relevant Commonwealth survey guidance is applied or any departure is scientifically justified;
- survey limitations and uncertainty are clearly documented;
- sufficient seasonal and temporal survey coverage is provided;
- important habitat functions are assessed separately where required; and
- expert interpretation is used to assess breeding, roosting, denning, foraging, dispersal and movement habitat.

Project layouts should not be commercially or technically fixed before sufficient ecological assessment has been completed.

5. Impact thresholds and scientific transparency

EIANZ supports the use of differentiated impact thresholds and the recognition that impacts on some protected matters should be near zero.

The recognition that some habitat or species impacts may be irreplaceable or incapable of being effectively offset is an important strength of the Plan.

However, the scientific basis for each impact threshold should be transparent and subject to review.

The final Plan should clearly explain:

- the evidence supporting each threshold;
- the meaning of terms such as “near zero” and “as low as possible”;
- the treatment of uncertainty and data-deficient species;
- how thresholds relate to species recovery objectives and population viability;
- how local impacts will be considered in a regional cumulative context;
- the level of confidence associated with each classification;
- the process for independent scientific review; and
- how thresholds will be revised as new information becomes available.

Where quantitative evidence is unavailable, the basis for expert judgement should be clearly documented.

Thresholds should not be applied as rigid substitutes for site-specific evidence, but neither should uncertainty be used to justify avoidable impacts on highly sensitive or irreplaceable values.

6. Cumulative impacts

The cumulative impact focus of the Plan is strongly supported.

Individual projects should not be assessed in isolation where multiple developments and regional pressures affect the same species, habitats and ecological processes.

Cumulative assessment should include more than the direct footprint of proposed wind farms. It should consider existing, approved, proposed and reasonably foreseeable impacts associated with:

- mining and resource activities;
- transmission lines and substations;
- roads and access tracks;
- vegetation clearing and habitat fragmentation;
- grazing and altered land management;
- changed fire regimes;
- invasive plants and animals;
- hydrological change;
- climate change; and
- previous and legacy disturbance.

The final Plan should establish a consistent and reproducible cumulative impact assessment methodology, including:

- appropriate spatial and temporal boundaries;
- agreed regional datasets;
- treatment of existing and future development;
- assessment of interaction and compounding effects;
- consideration of habitat condition and ecological connectivity;
- defined thresholds or limits of acceptable change; and
- clear responsibility for maintaining regional development and environmental data.

Cumulative impact assessment must also consider operational impacts, not only vegetation clearing and construction footprints.

7. Birds, microbats and operational impacts

EIANZ supports the recognition of aerial collision and entanglement as significant impact pathways for birds and microbats.

These impacts require a stronger and more consistent regional framework for pre-construction assessment, operational monitoring and adaptive management.

The final Plan should establish, or require the development of, consistent standards for:

- pre-construction bird and microbat surveys;
- seasonal and multi-year survey coverage;
- assessment of flight height, flight paths and movement corridors;
- assessment of migratory, dispersal and weather-related movement;
- turbine-risk modelling;
- post-construction mortality monitoring;
- carcass-search frequency and duration;
- scavenger-removal and observer-detection trials;
- transparent reporting of mortality;
- operational curtailment and shutdown triggers; and
- adaptive management where unacceptable impacts are detected.

Monitoring methods should be sufficiently standardised to allow comparison between projects and regional analysis of cumulative mortality.

Operational data should be made available through the regional environmental database, subject to appropriate controls for sensitive species information.

Adaptive management should not be relied upon where there is a material risk of irreversible harm. Clear performance thresholds and enforceable corrective actions should be established before operations commence.

8. Mitigation hierarchy, restoration and offsets

EIANZ strongly supports the Plan's emphasis on early avoidance and its recognition that offsets are unlikely to compensate for some impacts.

Avoidance must remain the first and most important step in the mitigation hierarchy.

The final Plan should make clear that:

- offsets must not be used to justify avoidable impacts;
- project boundaries and turbine layouts should not be fixed before ecological constraints are understood;
- restoration potential must not be treated as a guaranteed ecological outcome;
- offsets must be additional, measurable, enforceable and appropriately secured;
- time lags, uncertainty and risk of failure must be explicitly addressed;
- offsets must benefit the specific protected matter affected;
- direct mortality impacts may require different responses from habitat-loss impacts; and
- long-term monitoring and adaptive management must be required.

Areas mapped as having high restoration potential should be treated as preliminary investigation areas only.

Their suitability must be confirmed through field assessment, tenure investigations, landholder engagement, cultural heritage considerations and protected-matter-specific analysis.

Net gain claims should not be made where ecological benefits are uncertain, delayed or unrelated to the value affected.

9. First Nations participation and regional collaboration

EIANZ supports early and meaningful participation by First Nations peoples and local communities.

Engagement should occur during regional planning and site selection, not only after preferred project layouts have been developed.

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

The final Plan should also encourage collaboration between:

- Commonwealth, State and local governments;
- First Nations organisations;
- proponents;
- environmental practitioners;
- landholders;
- natural resource management organisations;

- researchers; and
- conservation and community groups.

Regional coordination is particularly important for ecological monitoring, habitat connectivity, fire management, invasive species control, restoration and offsets.

10. Monitoring, review and continuous improvement

The Plan should be supported by a transparent Monitoring, Evaluation, Reporting and Improvement framework before it is finalised.

The framework should include:

- measurable ecological and administrative performance indicators;
- baseline environmental conditions;
- regular public reporting;
- independent scientific review;
- version control and change logs for mapping and datasets;
- a transparent process for correcting errors;
- clear triggers for management intervention; and
- provision for early review where new evidence identifies a significant risk.

A five-year formal review should not prevent more frequent updates to mapping, species information, impact thresholds, survey requirements or operational guidance.

The effectiveness of the Plan should be assessed against measurable environmental outcomes, not only the number or speed of project approvals.

11. Professional standards

The effectiveness of the Plan will depend substantially on the quality of ecological assessment, interpretation and implementation.

The final Plan should require work to be undertaken or supervised by suitably qualified and experienced environmental practitioners.

Reports should clearly identify:

- practitioner qualifications and relevant experience;
- survey methods and effort;
- assumptions;

- methodological limitations;
- data gaps;
- areas of uncertainty; and
- the basis for professional conclusions.

Independent peer review should be required for projects involving:

- near-zero impact matters;
- irreplaceable habitat;
- high-risk collision pathways;
- substantial uncertainty;
- major cumulative impacts; or
- significant departures from the Plan.

12. Conclusion

EIANZ supports the development of the Brigalow Belt North Bioregional Guidance Plan as an important step towards better strategic planning, stronger cumulative impact assessment and improved protection of Matters of National Environmental Significance.

However, the non-regulatory nature of the Plan limits its ability to deliver consistent and enforceable environmental outcomes. This represents a missed opportunity to establish a more integrated and effective regulatory framework for the Brigalow Belt North Bioregion.

The final Plan should establish a clear pathway towards stronger statutory implementation, improved integration with Queensland planning and environmental approval processes, consistent scientific standards and transparent regional governance.

A central priority must also be the creation of an accessible regional environmental database. Environmental practitioners cannot provide reliable cumulative impact assessments where relevant ecological, project, monitoring and offset information is unavailable or fragmented.

The transition to renewable energy is essential, but it should not result in avoidable impacts on threatened species, ecological communities or irreplaceable habitat.

Strong science, early avoidance, transparent decision-making, accessible data, qualified professional assessment and enforceable long-term monitoring will be fundamental to achieving both renewable energy and biodiversity conservation objectives.



Kelly Matthews

Chair of the Ecology SIS



Geraldine Squire

President of SEQ Division

Contact Details

For further information, please contact:

Environment Institute of Australia and New Zealand

Email: office@eianz.org

Phone: +61 3 8593 4140

Web: www.eianz.org