QREC
Queensland Renewable Energy Council

# Queensland Productivity Commission Inquiry

*into the Impact of the Australian Government's 2025 Environment Protection Reforms on Queensland*

**13 July 2026**

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# 1. Executive Summary

Queensland is at a critical point in the development of its future energy system. Renewable energy, storage, transmission and related infrastructure are already delivering measurable economic and social value across the State, while also supporting electricity affordability and reliability and long-term industrial competitiveness. Queensland also has a nationally significant pipeline of renewable energy projects that can support regional jobs, landholder income, local supply chains and private investment if regulatory settings enable timely delivery.

QREC supports strong environmental standards and better biodiversity outcomes. The key productivity issue for the Queensland Productivity Commission to consider throughout this Inquiry, is not whether environmental regulation should apply to renewable energy projects. It should. The question is whether the combined operation of Commonwealth and Queensland systems is transparent, proportionate, coordinated and efficient enough to deliver environmental protection while enabling the investment needed for Queensland's energy security, emissions reduction, regional development and industrial competitiveness objectives.

Recent Australian Energy Regulator and Queensland Competition Authority determinations show that electricity price reductions for South East Queensland and regional Queensland customers are being driven by lower wholesale, environmental and retail costs, with the AER expressly identifying increased wind and battery output during evening peaks as one contributor to easing wholesale costs. Major industrial announcements, including the Boyne aluminium smelter agreement and the Dugald River wind and battery proposal, also demonstrate that renewable energy is now central to the competitiveness of energy-intensive industry and critical minerals development in Queensland.

The Commonwealth's 2025 environment protection reforms create both risks and opportunities. New National Environmental Standards, net gain and restoration settings, bioregional guidance plans, data and information requirements, and revised accreditation and bilateral agreement provisions may improve decision-making if implemented well. However, if they are layered onto existing state processes without clear operational alignment, they may increase duplication, delay and uncertainty.

QREC therefore recommends that the Commission focus on practical reform opportunities: improving Commonwealth–Queensland accreditation and bilateral implementation; ensuring bioregional guidance plans are data-led and capable of supporting assessment efficiency; reducing duplication in information requests and offsets; reforming Queensland's SIA/CBA sequencing and functionality; publishing approval timeframes and performance measures; improving guidance and standardisation; addressing OSOM transport and enabling infrastructure constraints;

and developing a fit-for-purpose financial security framework for renewable energy projects.

Summary of QREC's proposed findings and recommendations

- The primary productivity problem is the combined approvals chain, not the Commonwealth reforms in isolation. Queensland should pursue a renewables-specific bilateral implementation agenda with the Commonwealth.
- Renewable project delivery should be treated as an electricity affordability, reliability and industrial competitiveness issue. Regulatory efficiency should be assessed through the lens of consumer and industrial outcomes.
- Bioregional planning could reduce duplication if final guidance plans remain practical, evidence-based and connected to assessment outcomes. Queensland should seek formal Commonwealth recognition or accreditation once consultation is complete.
- Queensland's SIA/CBA framework is currently positioned too early in the development pathway. Final CBA execution should be decoupled from DA lodgement.
- Project-by-project social impact and community benefit negotiation is inefficient in regions with multiple overlapping proposals, which places a particular strain on local governments. Queensland should develop a regional pathway for social impact and community benefit.
- The absence of published timeframes, performance measures and operational templates is itself a productivity problem. Queensland should publish renewable approval KPIs and clearer templates for SIA/CBA waiver and mediation pathways.
- The Commonwealth–Queensland information interface remains vulnerable to duplication and repeated RFIs. A discipline rule should apply so requests are necessary, justified and not duplicative of equivalent state information.
- Offsets and restoration settings are a major risk for duplicated compliance cost. Queensland should align its offsets framework with Commonwealth reforms while preserving credible state mechanisms.
- Technology-specific streamlining should be used where the risk profile supports it, including proportionate pathways for BESS and smaller or lower-complexity solar projects.
- OSOM transport, corridor readiness and enabling infrastructure are part of the approvals productivity problem for wind projects and should be addressed through a coordinated reform stream.
- Queensland needs a whole-of-lifecycle, risk-based financial security framework for renewable energy projects.
- The Commission should recognise renewable energy as a current and growing economic enabler and contributor, not only as a future opportunity.

# 2. About the Queensland Renewable Energy Council

The Queensland Renewable Energy Council (QREC) welcomes the opportunity to provide a submission to the Queensland Productivity Commission (QPC) on the Impact of the Australian Government's 2025 environment protection reforms on Queensland.

QREC is the only state-based industry association representing Queensland's renewable energy sector.

QREC advocates for responsible and sustainable development of renewable energy and transmission projects across the State, with a strong focus on regional and community engagement, collaboration, biodiversity protection, First Nations participation and practical regulatory reform. QREC fosters strong relationships across host communities and key stakeholders — including agriculture, local government, resources, biodiversity conservation and First Nations peoples as rights-holders — and brings together a diverse network of Australian and international companies invested in Queensland's renewable energy future.

QREC's members span the full spectrum of renewable energy technologies, including developers, investors, generators, distributors, supply-chain participants and service providers across wind, solar, battery storage, pumped hydro, transmission and distribution, and related infrastructure. QREC's leadership promotes leading practices that strengthen community partnerships and ensure meaningful regional involvement in the energy transition.

By championing innovation, transparency and inclusive growth, QREC plays a vital role in supporting regional economies, driving investment and delivering sustainable, reliable and affordable energy for all Queenslanders.

# 3. Introduction

The Queensland Renewable Energy Council (QREC) welcomes the opportunity to provide feedback on the Queensland Productivity Commission's (QPC) Inquiry *into the Impact of the Australian Government's 2025 Environment Protection Reforms on Queensland*.

This submission addresses both the practical effect of the Commonwealth's 2025 environment protection reform package, including amendments to the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), and the way those reforms interact with Queensland's own planning, assessment and community benefit frameworks.

From QREC's perspective, the central productivity issue is not environmental regulation itself. Environmental assessment is a necessary and important part of project development, and the purpose of the EPBC Act amendments—to improve environmental outcomes—should remain a central consideration throughout this review.

The issue is whether the combined operation of federal and state systems is enabling Queensland to convert strong investor interest and a nationally leading renewable energy pipeline into real projects, regional jobs, energy security and long-term economic value.

# 4. How this submission responds to the Inquiry Terms of Reference

The QPC inquiry page and Terms of Reference state that the inquiry will examine how the Australian Government's 2025 environment protection reforms affect Queensland in practice, with a focus on regulatory burden, economic impacts, implementation risks and operational arrangements. The Commission has also been asked, where relevant, to identify options to reduce unnecessary regulatory burden and improve regulatory efficiency.

QREC has framed this submission directly around that task. The submission does not simply restate concerns about delay. It identifies where the renewable project pathway is breaking down in practice and proposes concrete options for Queensland to improve regulatory efficiency, implementation readiness and project delivery outcomes.

The structure of this submission is intended to assist the Commission by separating background evidence from the findings and recommendations that follow:

- Sections 4 and 5 address the scale of the economic opportunity and why approvals efficiency now matters for electricity prices, reliability and industrial competitiveness in Queensland.

- Section 6 draws on recent EPBC referral data to identify emerging trends in Queensland's renewable project cohort and the continuing importance of lifecycle delay.
- Sections 7 to 10 address the main operational and implementation issues affecting renewable energy projects, including Commonwealth administration, Queensland planning processes, bioregional planning and the practical interaction of state and federal systems.
- Section 11 sets out findings and recommendations aimed at reducing unnecessary regulatory burden and improving regulatory efficiency.
- Section 12 draws those points together in a conclusion focused on Queensland's long-term economic and energy system interests.

# 5. What is currently at stake for Queensland

*Terms of Reference focus: Economic impacts; risk to jobs; impacts on major projects*

Queensland is leading Australia's clean energy transition. QREC published its Queensland Renewables Growth & Investment Strategy in August 2025, which stated that Queensland has almost 8GW of committed generation and storage projects valued at more than $10.7 billion, with a broader renewable energy project pipeline of more than 140GW — the largest in the country.

QREC has also publicly stated that the Strategy projects renewable energy could deliver $39 billion in new investment by 2035, $275 million in direct payments to landholders within five years, and more than 7,500 ongoing regional jobs if the right policy and regulatory settings are in place.

The ongoing expansion of renewables is central to the Queensland Government's Energy Roadmap and to the platform of a reliable, affordable and sustainable energy system.

QREC's inaugural Queensland Renewables Economic and Social Value Report 2024–25, released in December 2025, also shows the sector is already delivering material value, with around $1 billion contributed to Queensland's economy in a single year and around 3,252 jobs supported across the State.

For this reason, avoidable delays in approvals for renewable energy projects are not a procedural inconvenience. They affect regional investment, current and future jobs, local supplier activity, landholder income and broader state productivity.

# 6. Electricity affordability, reliability and industrial competitiveness

*Terms of Reference focus: Economic impacts; operational arrangements; broader productivity effects*

Electricity affordability and reliability are directly relevant to this inquiry. Recent formal determinations and public announcements by state, national and market entities indicate that renewable generation, storage and transmission are already associated with lower power price pressure, more reliable supply and stronger industrial competitiveness in Queensland.

On 26 May 2026, the Australian Energy Regulator (AER) released its final Default Market Offer (DMO) determination for 2026–27. Overall, DMO prices decreased for most residential and all small business customers in the regions where the DMO applies. For South East Queensland, the AER's final determination will see flat-rate residential DMO prices decrease by 7.2 per cent and small business prices decrease by 10.4 per cent. The AER stated that the reductions reflect easing costs across most components of the DMO, particularly wholesale energy, where it had seen lower electricity contract prices, reduced spot price volatility and increased output from wind and battery generation during evening peaks.

On 5 June 2026, the Queensland Competition Authority (QCA) released its 2026–27 regional electricity price determination, which confirmed lower power prices for regional households and small businesses from 1 July 2026. The QCA determined that typical residential bills on flat-rate tariff 11 could decrease by 6.9 per cent and typical small business bills on flat-rate tariff 20 could decrease by 8.1 per cent. The QCA stated that these bill decreases were largely due to lower default market offers for South East Queensland set by the AER, reflecting the operation of Queensland's uniform tariff policy.

These formal determinations matter to the QPC inquiry because they show that approvals and delivery of renewable generation, storage and enabling infrastructure are not just sector-specific development issues. They are increasingly linked to the prices faced by households and small businesses and to the broader efficiency of Queensland's energy system.

There is also an important industrial dimension. On 25 March 2026, Rio Tinto announced a partnership with the Queensland and Commonwealth Governments to secure the long-term future of the Boyne aluminium smelter at Gladstone.

The agreement supports a long-term future for aluminium smelting in Queensland and builds on power purchase agreements signed by Rio Tinto to underwrite A$7.5 billion in new renewable energy and storage in the State. Rio Tinto also stated that the partnership will ensure Boyne continues aluminium production beyond the completion of its current power contract in 2029 through to at least 2040, and positions Boyne to be among the world's first aluminium smelters underpinned by solar and wind power.

More recently, on 1 July 2026, the Queensland Government announced that the $200 million North West Energy Fund had secured progress for a new battery storage and wind farm project to power MMG's Dugald River Mine along the CopperString corridor. The Government described the project as a two-stage development consisting of up to 24 wind turbines producing up to 144MW backed by a battery energy storage system, with the potential to power the mine and feed energy into the broader North West Power System.

Taken together, these developments show that the efficient delivery of renewable energy projects is now intertwined with cost-of-living outcomes, regional reliability, energy-intensive manufacturing and the long-term competitiveness of Queensland's heavy industry and resources sectors. In other words, environmental regulatory processes are also an economic and productivity issue for the State as a whole.

# 7. Evidence from recent EPBC referral data

*Terms of Reference focus: Regulatory burden; implementation risks; operational arrangements*

The June 2026 EPBC Act dataset[1] for referrals in the Energy Generation and Supply (renewable) category indicates that Queensland had nine referrals in 2023, 28 in 2024, 16 in 2025, with four 2026 referrals recorded so far. It also indicates eight Queensland controlled actions in 2023, 16 in 2024 and 6 in 2025, with zero so far in 2026 (one decision pending).

QREC considers the most notable and concerning shift is that 2026 has the lowest number of referrals since 2018, despite (or because of) the dataset suggesting a materially faster validation gateway and a cohort of Queensland solar, BESS and transmission-related referrals that were assessed as not-controlled actions within shorter decision windows than the historic median. This suggests that pathway design and project characteristics matter greatly.

The average time between referral and valid date improved from 91 days in 2023 to 11 days in 2026 (so far), while the average time between referral and controlled action decision further improved to around 53 days in 2026 (so far) – it was 145 days in 2023. At the same time, the broader EPBC lifecycle for controlled actions remains long, with none of the 2024 and onwards applications receiving final approval. This continues to mean there is around 800 days from referral to final approval. This should be read with the important caveat that lifecycle figures include time taken by proponents to prepare assessment material and respond to information requests.

[1] EPBC Act Public Portal

It is far too early to tell what impact the EPBC Act reforms will have on these numbers, but QREC considers these trends important for the QPC inquiry for two reasons. First, they suggest some elements of Commonwealth administration have improved. Second, they also suggest that the renewable approvals productivity question has become more differentiated by technology and project type. Part of the reform challenge therefore is not only about the average EPBC process; it must also be about ensuring Queensland's own systems do not negate efficiency gains that may already be emerging for some project cohorts.

# 8. Why the combined approvals chain remains the core productivity issue

*Terms of Reference focus: Regulatory burden; operational arrangements; implementation risks*

Renewable energy projects experience the approvals system as a sequential chain rather than a single integrated assessment and decision-making process. That chain includes Commonwealth referral and assessment, state planning assessment, nested environmental approvals, grid and transport coordination, social impact requirements, community benefit obligations, offsets design and post-approval conditions.

In that combined chain, the key risks for Queensland are not only the new Commonwealth legal tests. They are also duplication, sequencing failure, inconsistent guidance, uncertain implementation and Queensland process settings that sit at points in the pathway that can delay or fragment formal assessment.

QREC's view is that this is the most important lens through which the QPC should assess the impact of the recent Commonwealth reforms. A reform package can be directionally sensible at the federal level, but still produce poor productivity outcomes for Queensland if it is layered onto state systems that duplicate effort or front-load requirements in a way that delays project entry into assessment.

# 9. Specific issues the Commission should address

*Terms of Reference focus: Implementation risks; operational arrangements; regulatory burden*

## 9.1. Commonwealth issues

- The transition from legislative reform to operational practice remains incomplete. While the proposed reforms are intended to provide greater certainty, their practical effect will depend heavily on how the Commonwealth finalises and applies the National Environmental Standards, including standards relating to offsets, net gain and restoration. Further clarity is also required on administrative guidance, decision-making thresholds, interaction with existing State assessment processes, and transitional treatment for projects already in the system.
- QREC remains concerned that new data and information requirements should not operate as a rigid technical compliance layer or as an exclusionary evidence rule. Information requirements should support better decision-making, not become an end in themselves. They should be proportionate to the nature, scale and risk profile of the project, enable appropriate reuse of existing data, protect sensitive ecological and cultural information, and avoid unnecessary re-survey work where adequate information is already available.
- Members are particularly concerned that compliance, monitoring and reporting obligations are increasingly being applied in a way that is disproportionate to project risk. These requirements can appear to be driven by a highly conservative interpretation of uncertainty, rather than by a practical assessment of whether the condition will materially improve environmental outcomes. Where conditions are overly prescriptive or duplicative, they can substantially increase project costs, extend delivery timeframes and affect overall feasibility, particularly for renewable energy projects already operating within complex State and Commonwealth assessment frameworks.
- QREC considers that compliance and monitoring frameworks should be designed to achieve clear environmental outcomes while remaining practical to implement. Approval conditions should be risk-based, targeted, measurable and capable of being delivered within project timeframes. They should also recognise existing State requirements and avoid imposing parallel obligations that do not materially improve environmental protection. A more outcomes-focused approach would better support both environmental integrity and efficient project delivery.

- The Commonwealth gateway, referral and request-for-information process continues to present a major productivity risk. This risk is heightened where information is requested repeatedly, duplicated across Commonwealth and State processes, or not clearly tied to the relevant controlling provisions. Requests for information should be disciplined, transparent and directly connected to statutory decision-making requirements, with clear regard to the information already provided through State assessment pathways.
- The value of the revised bilateral and accreditation architecture will depend on whether Queensland renewable energy assessment pathways are recognised in a way that genuinely reduces double handling in practice, not merely in principle. Accreditation should provide proponents and regulators with a clear pathway for relying on existing State assessment, consultation, conditioning and compliance processes where those processes meet agreed environmental standards.
- Offsets interaction remains a practical barrier where Commonwealth and State requirements operate in parallel without clear substitution, recognition or strategic alignment. Offsets are a valuable opportunity for Commonwealth–State accreditation, particularly where aligned frameworks could support more strategic environmental outcomes, reduce duplication and provide clearer pathways for restoration, net gain and landscape-scale investment. Without this alignment, offsets risk remaining a source of uncertainty, delay and cumulative project burden rather than a mechanism for delivering coherent environmental benefit.

## 9.2. Queensland issues

*Terms of Reference focus: Operational arrangements; implementation risks; land use and process design*

QREC considers it entirely appropriate for the Commission to examine where Queensland processes may be compounding, rather than alleviating, the impacts of the recent federal changes. The real-world project experience is shaped by the combined approvals chain, not by Commonwealth reform in isolation. For renewable energy projects, productivity impacts often arise from the way Commonwealth, State and local processes interact, sequence and compound across the project development pathway.

One of QREC's central concerns remains the timing of Queensland's new social impact assessment (SIA) and community benefit framework, incorporating Community Benefit Agreements (CBAs), in the development assessment process. In practice, the current position of these requirements in the framework inserts a major negotiation point before a development application is lodged; risks delaying the commencement of formal assessment processes; reduces flexibility to respond to assessment outcomes and project design refinement; and risks turning community benefit into a gateway issue rather than one element of an integrated project and regional development framework.

This concern is exacerbated by the extensive range of technical assessments required to adequately inform a meaningful SIA. In practice, proponents may need to substantially progress project design, construction methodology, traffic and transport, workforce and accommodation planning, land-use, visual amenity, environmental, cultural heritage, infrastructure and stakeholder engagement work before the likely social impacts of a project can be properly understood. Many of these inputs are also core components of the development application package itself.

The result is a practical sequencing problem. SIA and community benefit requirements are positioned early in the process, yet the information needed to complete them in a robust and credible way may not be available until a substantial portion of the development application material has already been prepared. This can impose significant time and cost burdens at the front end of project development, before proponents have the benefit of formal assessment feedback or sufficient certainty about the project's approval pathway.

QREC considers that SIA requirements should be proportionate, staged and capable of refinement as project design and technical studies mature. Early-stage assessment should focus on identifying likely social risks, affected communities, engagement priorities and matters requiring further investigation, with more detailed assessment and mitigation refined alongside the broader development application material. This would better reflect how renewable energy projects are developed and would help ensure the framework supports informed engagement and practical mitigation, rather than operating as a premature gateway or duplicative compliance burden.

Members have also noted that CBAs are often being negotiated on the basis of preliminary project designs. In practice, the detailed design and value engineering process frequently occurs after approvals are obtained because progressing those activities earlier can involve substantial additional cost and effort. It is therefore common for approval applications to assess and disclose a conservative or worst-case impact scenario, while subsequent detailed design and value engineering work seeks to reduce, avoid or better mitigate those impacts. Requiring finalised social impact and community benefit commitments too early in the development process may not reflect the eventual project design and can reduce the flexibility needed to respond to assessment outcomes, technical refinements and opportunities to improve environmental, social and community outcomes.

QREC fundamentally considers that broader state-level issues interact with the federal reforms in ways that matter for productivity — including the absence of published timeframes and performance reporting for renewable project pathways, the continuing burden of nested approvals and post-approval management plans, and the lack of sufficiently coordinated planning for transport, mapping and enabling infrastructure.

These issues reinforce the need for Queensland processes to reduce duplication, support staged decision-making and avoid adding further front-end uncertainty to projects already navigating complex Commonwealth reforms.

### 9.2.1. *Community benefit system guidance and process certainty*

Queensland's own planning material now makes clear that proponents for prescribed development must generally submit an SIA report and an executed CBA with their development application, unless they obtain a notice from the Chief Executive stating that a SIA report and/or a CBA is not required.

The SIA and CBA must be negotiated with the relevant local government. While QREC supports the intent behind a formal CBA process with local governments, in this initial introductory phase, there appears to have been minimal guidance, coordination or support provided to local governments in implementing the new framework. This has led to increased administrative burden for local governments and approval bottlenecks, particularly in regions negotiating with multiple renewable energy and storage proponents.

Local governments are also approaching SIA/CBA requirements differently, resulting in inconsistent processes, fees and charges, and outcomes for proponents. This is more complex where a project overlays several local government areas, requiring a social impact assessment and separate CBA negotiations with each relevant local government.

Where a proponent and the relevant local government cannot reach agreement on a CBA, and all reasonable steps have been taken, the regulatory framework enables the parties to make a written request to the department's Director-General for mediation. In exceptional circumstances, a proponent may also request the Director-General to waive the requirement for a SIA and/or CBA prior to lodging a development application and must provide the relevant information required under the Planning Regulation.

QREC considers there is a strong case for more operational clarity on these pathways — including a standardised template or minimum content list for waiver requests, particularly for low impact eg BESS projects and a more transparent mediation process — because without that clarity the system risks reproducing uncertainty and transaction cost at exactly the point where the State says it is trying to provide consistency.

# 10. Bioregional planning, Queensland coordination and accreditation opportunities

*Terms of Reference focus: Operational arrangements; implementation risks; Commonwealth–Queensland interaction*

Bioregional planning is one of the major parts of the reform package that could reduce duplication if it is implemented as a practical guidance tool and then linked to accreditation or bilateral outcomes.

The Commonwealth reform package provides for more emphasis on bioregional plans, albeit that it will take time to achieve any broad roll out of the plans, including guidance plans, and also updates the accreditation and bilateral agreement architecture. In parallel, the Queensland Department of the Environment, Tourism, Science and Innovation (DETSI) has been working on bioregional planning with the aim of providing greater certainty for industry and better environmental outcomes through improved information and guidance to support assessment under the EPBC Act.

QREC understands that the intent is for the Commonwealth Government to recognise Queensland's bioregional plans as guidance plans under the EPBC Act. The draft bioregional guidance plans for the Brigalow Belt North (wind farms focus) and Gulf Plains (mining focus) regions were released for public consultation in May 2026, with submissions closing on 17 July 2026. QREC recommends that the QPC review both draft plans to understand their potential impacts on Queensland's economy as it relates to this inquiry.

QREC supports the general government position that bioregional guidance plans are not intended to be "go" or "no-go" zoning instruments. However, members have raised concerns with the contents of the plans as currently drafted, including the potential for practical restrictions on development in significant parts of plan areas. This is particularly important because the Collinsville area is not presently an operating wind farm landscape. Publicly available information identifies a limited number of named proposals in or near the area.

The distinction matters because the broader plan area already contains established and intensive land uses, including grazing and resource extraction. The draft Plan identifies grazing as a dominant, widespread and intensive land use across the Plan area, and resource extraction as high intensity, particularly in the lowland areas of the Northern Bowen Basin.

In the Brigalow Belt North, QREC will recommend that DETSI provide a more precise account of current and proposed wind farm development activity in the final plan. The current use of broad references such as "several" wind farm developments being in planning is not sufficiently precise for a government guidance document intended to inform cumulative impact assessment, project siting, regulatory decision-making and investment certainty.

QREC considers the final plans significant. If they remain practical, data-led and clearly connected to approvals outcomes, they may operate in a quasi-bilateral way by creating shared regional information, cumulative impact guidance and clearer expectations that reduce project-by-project rework across both jurisdictions. However, that opportunity will only be realised if the final plans have data integrity, realistic expectations and can actually be relied upon in assessment practice.

In this context, QREC supports formal recognition through accreditation or related bilateral arrangements only where Queensland has sufficient certainty that Commonwealth decision-makers will use the plans appropriately in assessment processes and not treat guidance as de facto zoning or a substitute for site-specific evidence.

# 11. Findings and recommendations

*Terms of Reference focus: Actionable options to reduce unnecessary regulatory burden and improve regulatory efficiency*

QREC suggests the Commission can do more than identify burden at a high level. It can make findings about how the renewable project pathway is functioning in practice, and then make targeted recommendations to the Queensland Government on what should change at both a state and national level.

## Finding 1 — The primary productivity problem for renewables is the combined approvals chain, not the Commonwealth reforms in isolation.

Renewable energy projects experience the approvals system as a chain of interdependent Commonwealth and Queensland decisions.

Even if some Commonwealth steps are improving, the productivity outcome will remain poor if Queensland processes are inserted at the wrong point, require repeated information, or do not align with Commonwealth implementation settings.

### *Recommendation 1 — Prioritise a bilateral implementation agenda*

The Commission should recommend that Queensland actively pursue a bilateral implementation work program with the Commonwealth.

That work program should identify which Queensland assessment pathways are suitable for accreditation or practical recognition under bilateral arrangements; what state process, documentation or guidance changes are required to support that recognition; and which state approvals should be relied on to reduce duplication in Commonwealth assessment. A focus on offsets and bioregional guidance plans may be a practical starting point.

## Finding 2 — Renewable project delivery should be treated as an electricity affordability, reliability and industrial competitiveness issue for Queensland.

Recent formal determinations and public announcements indicate that renewable generation, storage and transmission are already associated with lower power price pressure, more reliable supply and stronger industrial outcomes in Queensland.

Approvals inefficiency therefore has consequences beyond project proponents. It can affect households, regional businesses and energy-intensive industry.

### *Recommendation 2 — Assess regulatory efficiency through the lens of consumer and industrial outcomes*

The Commission should recommend that Queensland assess regulatory reform not only by reference to environmental process burden, but also by reference to the cost to consumers and industry of delaying new renewable generation, storage and transmission.

In practical terms, the QPC should ask whether Queensland's own planning, transport, SIA/CBA and post-approval systems are delaying the very projects that are now being recognised as contributing to lower power prices, firmer supply and industrial competitiveness.

## Finding 3 — Bioregional planning is a key part of the reform package that could reduce duplication if implemented as practical guidance and linked to accreditation or bilateral outcomes.

The Commonwealth reforms provide for bioregional plans and updated accreditation and bilateral agreement settings.

Queensland's pilot work led by DETSI could be valuable if it produces shared biodiversity and cumulative impact information that proponents, communities and both jurisdictions can rely upon.

### *Recommendation 3 — Support DETSI's bioregional planning work and seek formal recognition once consultation is complete*

The Commission should recommend that Queensland continue to support the development of bioregional guidance plans led by DETSI, but make clear that the value of these plans depends on them remaining practical, data-led and clearly connected to approvals outcomes.

The Commission should recommend that Queensland pursue formal Commonwealth recognition or accreditation of the plans as formal EPBC Act guidance or planning instruments only after consultation on the draft plans has been completed and the plans have been finalised. If formal accreditation is not immediately available, the plans should be expressly incorporated into bilateral or assessment arrangements between Queensland and the Commonwealth so they operate as upstream assessment tools that reduce duplication, improve consistency and provide greater certainty across both jurisdictions.

## Finding 4 — The current position of the SIA/CBA framework is likely to compound delay with flow-on effects to project delivery and electricity affordability.

The requirement to complete a SIA and execute a CBA before lodging a development application inserts a major negotiation stage before formal assessment begins.

That sequencing creates an additional gating point in the pathway and risks turning community benefit into an early-stage transaction rather than part of an integrated regional development model.

### *Recommendation 4 — Decouple final CBA execution from DA lodgement*

The Commission should recommend that Queensland amend or refine the operation of the community benefit framework so that a finalised CBA is not a precondition to lodging a development application.

A more workable model would allow lodgement once the proponent has completed the required social impact work and demonstrated genuine engagement on community benefit, with the final CBA to be settled later in the process. This would better align the CBA with other analogous agreements, such as conduct and compensation agreements in the resources sector, which generally occur post-approval when there is greater certainty around project design and impact.

## Finding 5 — Project-by-project social impact and benefit negotiation is inefficient in regions experiencing multiple overlapping renewable proposals.

In high-development areas, cumulative issues are regional rather than project-specific.

Requiring each proponent to separately develop regional context, local benefit concepts and baseline social analysis creates duplication and inconsistent outcomes.

### *Recommendation 5 — Create a regional pathway for social impact and community benefit*

The Commission should recommend that Queensland develop a regionally coordinated pathway for social impact and community benefit in high-development areas.

This could include recognition of former REZ readiness assessments or other regional readiness work as satisfying part of the project-level SIA requirement; standardised CBA models; and consideration of options for pooled or regionally governed community benefit funds.

## Finding 6 — Lack of published timeframes, visible performance measures and clear process guidance is itself a productivity problem.

A key source of uncertainty for proponents is not only whether approvals will be delayed, but where delay is occurring and whether it reflects the proponent or government.

Without public timeframes or operational guidance, inefficiency is harder to diagnose and fix.

### *Recommendation 6 — Publish renewable approvals timeframes, performance KPIs and process templates*

The Commission should recommend that Queensland publish assessment timeframes and performance indicators for the renewable project pathway, including SARA assessment, relevant environmental approvals, key nested approvals and post-approval management plan approvals.

The Commission should also recommend more explicit operational guidance on the community benefit Chief Executive reserve powers, including a standard template or minimum content list for a request to waive the requirement for a SIA and/or CBA, and clearer process guidance for requesting mediation where CBA negotiations stall.

## Finding 7 — The Commonwealth–Queensland information interface remains too vulnerable to duplication, repeated RFIs and unnecessary data rework.

The transition from legal reform to administrative practice remains incomplete.

If the same information is prepared multiple times for related purposes, or if RFIs are not clearly linked to relevant controlling provisions, compliance burden escalates quickly.

### *Recommendation 7 — Apply an RFI and data reuse discipline rule across the Queensland–Commonwealth interface*

The Commission should recommend a formal discipline that requests for information must be necessary, clearly justified and not duplicative of material already provided through a relevant state process unless there is a stated reason why that material is inadequate for the Commonwealth purpose.

Queensland should make reuse of equivalent material a default objective in any bilateral implementation discussions, including in relation to environmental data standards, survey requirements and information lodged through Queensland planning or environmental assessment processes.

## Finding 8 — Offsets and restoration settings are a major risk for duplicated compliance cost unless Queensland adopts a clear response.

The Commonwealth reforms introduce new net gain and restoration concepts, while Queensland already operates its own environmental and planning frameworks.

Without clear interaction settings, proponents risk double handling, double offsetting or uncertain treatment of equivalent contributions.

Queensland's current Environmental Offsets Framework review provides an important opportunity to improve alignment with Commonwealth offsets reforms, including calculator, accreditation and duplication issues.

### *Recommendation 8 — Develop a specific Queensland response to the new Commonwealth offsets and restoration regime*

The Commission should confirm and support Queensland's commitment to developing a formal policy position on interaction between state offset mechanisms and the new Commonwealth offsets and restoration regime.

Queensland should seek recognition of credible state offset or financial contribution mechanisms where they can avoid duplicated obligations and still meet environmental objectives. The bioregional guidance plans should also be consistent with the outcomes of Queensland's offsets review.

## Finding 9 — Technology-specific streamlining opportunities are not yet being used consistently where the risk profile justifies it.

Different renewable technologies have different approval profiles, community interfaces and operational risks.

A uniform pathway does not necessarily produce proportionate regulation.

### *Recommendation 9 — Use proportionate, technology-specific streamlining where justified*

The Commission should recommend that Queensland progress technology-specific streamlining measures where the risk profile supports it — for example, more proportionate pathways for grid-scale BESS where appropriate, standard conditioning and tailored guidance for smaller or lower-complexity solar projects.

This should be considered alongside Queensland's post-2025 planning reforms, the relevant state codes and the State's broader objective of maintaining a secure long-term energy system as ageing coal-fired generation retires over time.

## Finding 10 — OSOM transport and enabling-infrastructure constraints are part of the productivity problem, not peripheral to it.

For wind projects in particular, transport approvals, corridor readiness, Traffic Management Plan timing, bridge and road constraints, and agency coordination can be as material to delivery as the environmental pathway itself.

If these enabling issues remain fragmented, the benefit of any federal approvals reform is significantly reduced.

### *Recommendation 10 — Establish a coordinated transport and enabling-infrastructure reform stream for renewables*

The Commission should recommend that Queensland treat wind transport, OSOM corridor planning, road and bridge readiness and project mapping as part of the productivity response to the federal reforms, rather than as separate ancillary issues.

This should include progressing the Queensland Wind Farm Transportation Group concept, OSOM corridor mapping, clearer TMP timing expectations and better public visibility of infrastructure constraints and planned upgrades.

## Finding 11 — Queensland still lacks a fit-for-purpose whole-of-lifecycle financial security framework for renewable energy projects.

Decommissioning and financial assurance expectations are evolving, but current settings risk being piecemeal, unclear or disproportionate if they are not anchored in an explicit state framework.

### *Recommendation 11 — Develop a fit-for-purpose decommissioning and financial security framework*

The Commission should recommend that Queensland develop a whole-of-lifecycle decommissioning and financial security framework for renewables, led by Queensland Treasury and informed by environmental and resources-sector experience.

The framework should be risk-based, technology-sensitive and designed so the amount and timing of security reflect actual risk rather than imposing blunt up-front burdens that unnecessarily damage project viability.

QREC does not support returning the financial assurance/security framework and scheme to the Department of Natural Resources and Mines, Manufacturing and Regional and Rural Development. Such a move would reduce the opportunity for a more holistic approach to industrial development financial security and closure arrangements.

### Finding 12 — Renewable energy should be treated as a current and growing economic enabler and contributor, not only as a future opportunity.

The renewable sector is already making a measurable contribution to Queensland's economy, supply chains and regional communities.

Its role as a key economic enabler is also clear from renewable energy underpinning the future of an internationally competitive Boyne smelter in Gladstone and powering mine sites such as MMG's Dugald River.

*Recommendation 12 — Recognise the current contribution of renewables in the final report*

QREC proposes that the Commission recognise in its report that renewable energy is already delivering material economic and social value in Queensland and that the productivity consequences of regulatory delay should be evaluated against that current contribution, not only against projected future benefits.

## 12. Conclusion

Queensland has a nationally leading renewable energy pipeline and a significant opportunity to attract private capital, strengthen regional economies and support an affordable, reliable and sustainable future energy system.

The question is whether the approvals framework is capable of converting that opportunity into delivery.

QREC's view is that the Commonwealth's 2025 reforms should be assessed not only against their policy intent, but also against their practical operation in Queensland, noting that many of the most important productivity gains still depend on implementation, guidance, administrative practice and stronger Commonwealth–State coordination.

Equally important is ensuring that Queensland's own processes are not inadvertently adding to the problem. The QPC inquiry provides an important opportunity to examine the full approval chain, including the way new Queensland requirements — such as the SIA and CBA framework — interact with federal environmental reforms.

The recent electricity pricing and affordability signals reinforce that this is not only an approvals discussion. If Queensland wants lower-cost, reliable and competitive electricity — including for heavy industry and regional communities — then the renewable generation, storage, transmission and enabling infrastructure pipeline must be able to move through approvals with less duplication and more certainty.

# 13. Follow up

We look forward to further engagement with the QPC as the inquiry progresses, particularly the opportunity to review the draft report in November 2026.

If you have any questions about any of the points and recommendations raised in this submission, please contact Frances Hayter, QREC's Director, Sustainability and First Nations, who has carriage of QREC's response to this Inquiry, on 0417 782 884 or at fhayter@qrec.org.au.

# 14. References


- Queensland Renewable Energy Council, Queensland Renewables Growth & Investment Strategy, August 2025.
- Queensland Renewable Energy Council, Queensland Renewables Economic and Social Value Report 2024–25, December 2025.
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- Queensland Government, A fresh start for Queensland's Environmental Offsets Framework, May 2026.

**QREC collaborates with industry, communities, and all levels of government to drive the growth of Queensland's renewable energy sector.**

As Queensland's only renewable peak industry body, we represent stakeholders across solar, wind, pumped hydro, electricity transmission and battery storage.

Our leadership in policy development promotes leading practices and fosters positive community relationships. Through this focus, we aim to power regional growth, support Queensland's economic future, and provide access to clean, reliable and affordable energy for all.

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