

Timber Queensland Limited
30 Boothby Street
Kedron QLD 4031

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Timber Queensland submission on the draft National Environmental Standard (Matters of National Environmental Significance) 2025

Background

Timber Queensland is the peak state body representing the interests of the forest and timber industry supply chain: from forest growers and managers, harvesters and haulers through to processors, manufacturers and fabricators, timber wholesalers and traders. We have a strong objective to pursue research and development, promote the use of renewable timber products in the built environment and work with educators and regulators to maximise the benefits from sustainable forest management including the provision of timber and related ecosystem services such as carbon.

The Queensland forest and timber industry makes a significant contribution to the state economy, supporting 25,000 direct and indirect jobs as well as contributing \$3.8 billion to the state economy. Many of these jobs are located in rural and regional areas across the state.

Timber Queensland (TQ) welcomes the opportunity to provide feedback on the draft National Environmental Standard (Matters of National Environmental Significance) 2025 or 'MNES'.

Key points

- Timber Queensland supports the broad intent of the draft MNES if implemented in accordance with key principles, including to ensure:
 - reduced regulatory duplication;
 - more streamlined and effective regulatory processes;
 - greater certainty for plantation and native forestry managers and owners;
 - reduced cost shifting from regulators to producers;

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- minimising adverse socio-economic impacts on sustainable and renewable industries such as forestry and downstream processors (e.g. sawmills); and
 - adequate recognition of existing state government environmental laws and regulatory processes surrounding forestry and wood production activities.
 - Within Queensland, there is already a robust environmental management and regulatory framework in place for meeting the environmental safeguards for forestry and wood production activities. These include, but are not limited to:
 - *Forestry Act 1959*;
 - *Vegetation Management Act 1999*;
 - *Nature Conservation Act 1992*;
 - *Environmental Protection Act 1994*;
 - *Waste Reduction and Recycling Act 2011*; and
 - associated codes of forest practice on public and private land; operational harvesting plans; other management plans and conditions such as for protected plants and listed species; and environmentally relevant activities (e.g. sawmills).
 - Future interpretation and application of the MNES must take into account these existing state arrangements and the relevance of scale and impact in terms of local versus national impacts in the MNES.
 - There is merit in exploring bilateral agreements, bioregional plans or regional assessments as to their best fit for forestry activities which will require industry input together with the Queensland Government.
 - It is worth noting that the Queensland Future Timber Plan (see: [Queensland Future Timber Plan - Dataset - Publications | Queensland Government](#)) is being developed and implemented by the Queensland Government to provide greater resource security and meaningful environmental safeguards for forestry over the next 25 years as part of the plan. The potential impacts and intersection of these safeguards (such as modernising the codes of forest practice) with the MNES should be addressed in accordance with the key principles identified above.
 - The new *Environment Protection and Biodiversity Protection* (EPBC) legislation and MNES introduces an 'unacceptable impacts' test that needs to be better defined with measurable criteria that provides clarity and certainty for proponents and regulators.

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- While acknowledging that Queensland's environmental laws and safeguards supporting sustainable forestry and wood production activities aligned with the EPBC prior to the new legislation and MNES, the draft framework does not adequately address how accreditation and bilateral processes and decisions will be made.
 - The cumulative effect of MNES self-assessment, when applied to routine forestry activities across a landscape, represents a marked shift in regulatory burden and requires clarification and meaningful interpretation.
 - As currently proposed, the MNES applies a development style, project based regulatory model, suited more to large development and site specific activities which contrasts markedly with forestry activities within a landscape. This approach does not reflect the periodic, adaptive and perpetual footprint of forestry activities in a landscape by many producers operating in a range of forest types that is often integrated with agricultural production (e.g. beef grazing in selectively harvested and managed private forests).
 - Timber Queensland, being a member of the Australian Forest Products Association (AFPA), also endorses the broad comments and submission made by AFPA on the MNES.