



AgForce Queensland Farmers Limited

ABN 57 611 736 700

Tenth Floor, 200 Mary St, Brisbane, Qld, 4000
PO Box 13186, North Bank Plaza, cnr Ann & George St, Brisbane Qld 4003

Ph: (07) 3236 3100 | Fax: (07) 3236 3077 | Email: agforce@agforceqld.org.au
Web: www.agforceqld.org.au

25 June 2026

Stephen Bennett MP (Chair)

Queensland Parliamentary Committee
Primary Industries and Resources Committee
Parliament House
George Street
Brisbane QLD 4000

By Email: pirc@parliament.qld.gov.au

Dear Mr Stephen Bennet MP

RE: Submission on the State Development and Public Works Organisation (Critical Minerals) and Other Legislation Amendment Bill 2026.

AgForce Queensland Farmers Ltd is the peak representative body for Queensland's cane, cattle, grain, and sheep, wool and goat producers. Together, these industries generated approximately \$11.2 billion in on-farm value of production in 2022-23. AgForce's purpose is to advance sustainable agribusiness and to support the long-term growth, viability, competitiveness and profitability of Queensland agriculture. More than 6,000 farmers, individuals and agribusinesses support AgForce through membership, collectively owning and managing approximately 55 million hectares—around one-third of Queensland's land area. Queensland producers supply high-quality food and fibre to domestic and international markets, contribute significantly to the social and economic fabric of regional, rural and remote communities, and play a central role in stewardship of the state's natural environment.

AgForce thanks the Primary Industries and Resource Committee for the opportunity to make this submission in response to *State Development and Public Works Organisation (Critical Minerals) and Other Legislation Amendment Bill 2026, (the Bill)*.

AgForce recognises the importance of Queensland's critical minerals sector and the benefits a responsible resource development can make to regional economies, sovereign capability, renewable energy technologies and future manufacturing opportunities.

However, the *State Development and Public Works Organisation (Critical Minerals) and Other Legislation Amendment Bill 2026 (the Bill)* significantly expands the role and powers of the Co-ordinator-General and Minister, while introducing new project facilitation mechanisms that have substantial material implications for agricultural landholders and businesses and regional, rural and remote communities that will negatively impact landholder property rights.

Further, the Bill prioritises project delivery and acceleration approvals without providing equivalent statutory protections for productive agricultural landholders, farming businesses and regional communities.

In AgForce's view, the Bill does not appropriately balance resource development with long term agricultural land use permissions and introduces a degree of legislative inconstancy. This legislation undermines integrational landholder investment and planning and puts the resources sector in direct competition with agriculture sector, threatening our core obligation as reliable producer of food and fibre for the nation and for our global trade partners.

With the global population projected to approach 10 billion by 2050, the preservation of our finite productive agricultural land is a matter of strategic importance. This is especially pertinent given the additional pressures of the *Environment Protection and Biodiversity Conservation (EPBC) Act* Reforms on the continuing use exemptions for agricultural land. Australia's ability to reliably supply food and fibre into the future, supports domestic needs, but also key international trade relationships and ensures regional stability. Legislative settings that diminish future agricultural production capacity risk undermining long-term food security outcomes, export competitiveness and broader geopolitical resilience.

The Bill's project facilitation mechanism should be considered through the lens of the landholder's right to produce food and fibre and determine the lawful land purpose use, as the primary function. While critical minerals and other forms of development are important to Queensland's future prosperity, legislative frameworks should exist as secondary land functions.

AgForce maintains any development must not come at the expense of private property rights, productive agricultural land, water security, procedural fairness or community confidence in the approvals system. Streamlining approvals should focus on reducing duplication and improving coordination between agencies, while maintaining appropriate safeguards, consultation requirements and landholder protections.

AgForce appreciates the intent that agricultural land and agricultural productivity is already recognised through the *State Planning Policy and Regional Planning Interests Act 2014* and considers these statutory planning instruments must be upheld and strengthened as matters of State significance. This recognition must extend beyond mapped Priority Agricultural Areas, as many AgForce members operate highly productive land that is not formally designated but is nonetheless critical to Queensland's economy and long-term food and fibre security. Stronger statutory safeguards are required to ensure these values and existing safeguards cannot be overridden by project-facilitation powers, and that landholder rights, independent assessment, fair compensation and long-term agricultural viability are not compromised.

Agriculture is a long-term, land-based industry essential to Queensland's economy and regional communities. Agriculture contributes over \$20 billion annually to the State's economy¹, and forms the economic foundation of many regional, rural and remote communities, creating substantial multiplier effects that support local businesses, employment and investment. Unlike most sectors, agricultural production cannot be relocated if land is fragmented, sterilised or permanently impacted. AgForce supports responsible development but does not support development that results in unacceptable or irreversible impacts on agricultural productivity, biosecurity, water resources or the viability of farming enterprises.

The Bill materially shifts the balance toward project facilitation and streamlined approvals. Without stronger safeguards, there is a risk agricultural impacts will be secondary to project delivery objectives.

¹ Queensland Government 2026. [Department of Primary Industries, Queensland data sourced 19/06/2026](#)



Accordingly, AgForce **opposes** the Bill in its current form. The Bill requires substantial revision to ensure that agricultural land, agricultural productivity and the rights and obligations of landholders, communities are properly protected, and that project facilitation does not override the State's long-term economic interest in a viable and productive agricultural sector.

In addition, the Bill in its current form has several provisions that appear incompatible with the principles and protections contained in the *Human Rights (HR) Act 2019 (Qld)*².

AgForce believes that while existing human rights complaint mechanisms may remain available, the expansion of Ministerial and Co-ordinator-General powers, together with the reduction of established consultation, review and landholder protections, may adversely affect the rights and interests of individuals, landholders and regional communities.

For example:

- Removing rights or revising the right to lodge a complaint with the Commissioner (section 76, 77 78 and subdivision 4).
- The expanded compulsory acquisition powers of Co-ordinator General to take land for State strategic projects, under section 125, and or declared projects, under section 143, may adversely affect an individual's right to property under section 24 of *HR Act*.
- The proposed access authority provisions, including broad powers to undertake "enabling works" on private land, which arbitrarily deprive landholders of right to property; adversely affect landholders' rights to property, privacy and enjoyment of their home under sections 24 and 25 of the *HR Act*.
- The Bill places unnecessary limits on the right to freedom of expression, may adversely affect the rights of landholders and affected communities to participate in public decision making and access a fair hearing under sections 21, 23 and 31 of the *HR Act*.
- The Bill diminishes the ability of landholders, affected communities and third parties to seek judicial and administrative review of decisions, eroding individual rights to access justice, procedural fairness and practical enforcement of rights under section 23, 31 of the *HR Act*.

EXPANSION OF COORDINATOR-GENERAL'S POWERS

AgForce is concerned the Bill represents a substantive expansion of the Co-ordinator-General's role from a coordinator and assessor of projects to a central project facilitation and delivery authority. This shift reduces institutional separation between assessment, regulation and project delivery, increasing the risk that agricultural impacts will be subordinated to project-delivery imperatives.

Key changes include:

- Creation of State Strategic Projects with enhanced approval pathways
- Expanded authority over infrastructure coordination across agencies
- Greater influence over multiple approval systems and decision-makers
- Expanded land entry and acquisition powers for strategic projects
- Stronger capacity to direct, align or override government processes to project delivery outcomes

² Queensland Government 2023. Current [Human Rights Act 2019](#), Queensland



This consolidation of power reduces transparency, weakens checks and balances, and increases the likelihood that agricultural considerations will be diluted within broader economic facilitation objectives.

These changes materially increase risks for agricultural landholders, including:

- Reduced weight given to agricultural productivity in decision-making
- Increased likelihood of industrial development in productive farming regions and priority agricultural areas
- Fragmentation of agricultural enterprises and loss of operational efficiency
- Reduced certainty for long-term farm investment and planning
- Increased cumulative impacts from overlapping infrastructure corridors and projects and multiple concurrent projects.

AgForce is particularly concerned that agricultural impacts may be treated as one factor among many, rather than a mandatory and determinative consideration when projects affect valued agricultural land. Queensland already has a clearly articulated State interest in agriculture, expressed through the State Planning Policy and Regional Plans, which has been developed through proper democratic consultation and is intended to protect agricultural land as a matter of public interest. Allowing the Coordinator-General to circumvent these established planning instruments without consultation erodes transparency, weakens democratic accountability, and undermines the integrity of Queensland's planning framework. It risks reducing carefully constructed agricultural protections to discretionary considerations that can be overridden for project-delivery objectives.

Legislative Amendments Sought – Coordinator-General Powers

AgForce seeks amendments requiring that:

- Agricultural land, agricultural productivity, food and fibre production, water resources, animal welfare, landholder WHS duties, and biosecurity obligations are mandatory considerations in all Coordinator-General decisions
- The Co-ordinator-General publish clear reasons demonstrating how agricultural impacts, WHS risks and landholder statutory duties have been assessed and addressed
- Independent merits review is available for decisions affecting agricultural land, ensuring accountability and procedural fairness
- Land acquisition and entry powers are exercised only where negotiated access has failed, an independent agricultural assessment has been undertaken, and the public benefit clearly outweighs permanent agricultural loss
- Cumulative agricultural impacts are explicitly assessed and transparently reported before any project facilitation decisions are made

PROTECTION OF AGRICULTURAL LAND

Agricultural land is a finite and strategic resource. Once degraded, fragmented, or converted to non-agricultural use, its productive capacity is often permanently reduced. These losses may not be able to be reversed within a human timescale and directly affect Queensland's long-term food and fibre security.

AgForce considers that agricultural land must be treated as a Matter of State Significance within the legislative framework. This aligns with the existing State interest in agriculture under the State Planning Policy, which recognises agricultural land as essential to Queensland's economy, regional communities and food security.



Legislative settings that allow agricultural land to be overridden without transparent justification undermine this established State Interest and weaken the integrity of Queensland's planning system.

Legislative Amendments Sought

AgForce seeks insertion of a statutory objective requiring:

- Recognition of agricultural land and productivity as matters of State Significance
- Avoidance of impacts on strategic agricultural land wherever feasible
- Prohibition on projects that cause unacceptable or irreversible agricultural loss
- Demonstration that public benefit outweighs agricultural productivity impacts before approval

INDEPENDENT ASSESSMENT AND LANDHOLDER RIGHTS

AgForce supports independent assessment of agricultural impacts by a body with genuine agricultural expertise. Decisions affecting valued agricultural land must be informed by evidence that is technically robust, transparent and free from proponent influence.

Landholders should not be required to fund their own technical evidence to have legitimate concerns considered. This creates an inequitable system in which those with the least resources bear the greatest burden, and it undermines procedural fairness, transparency and confidence in the assessment process. Independent assessment is essential to ensure that agricultural impacts are properly identified, accurately characterised and given appropriate weight in decision-making.

Legislative Amendments Sought

AgForce seeks:

- Mandatory independent agricultural impact assessments for all relevant projects, undertaken by assessors with suitable agricultural expertise
- Independent expert reports funded by proponents
- Public release of all assessment material prior to decisions
- Inclusion of agricultural expertise in assessment processes
- Recognition of cumulative regional impacts on farming systems

ACCESS, COMPENSATION AND BUSINESS IMPACTS

Access To Land

No access should occur until negotiation and compensation arrangements are agreed or determined, and landholders have access to funded legal and technical advice. Landholders carry non-delegable statutory duties that cannot be met where third-party activities occur without clear agreements, defined controls and independent expert support. Allowing access before these protections are in place exposes landholders to legal, financial and operational risks they cannot control.

Compensation

Compensation must reflect the full impact on agricultural businesses, including:

- Loss of productivity and land value
- Crop and livestock losses
- Natural capital impacts
- Business disruption and inefficiency
- Biosecurity impacts and contamination risks
- Insurance, liability and financial risk exposure



- Loss of amenity and landholder time at commercial rates
- Cumulative and neighbouring property impacts
- Psychosocial harm arising from uncertainty, conflict and prolonged operational disruption
- Landholder compensation streams, i.e., Royalties, lease or rental options, generational considerations.

Legislative Amendments Sought

AgForce seeks amendments ensuring:

- No access without prior agreement or determination of compensation, including clear biosecurity and WHS controls
- Full funding of landholder legal and technical advice by proponents
- Compensation includes direct, indirect and cumulative impacts
- Rights to review or renegotiate compensation where impacts change, escalate or emerge over time

AgForce seeks explicit legislative recognition that landholders carry non-delegable duties under the *Work Health and Safety (WHS) Act 2011 (Qld)*, the *Biosecurity Act 2014 (Qld)*, and the *Animal Care and Protection Act 2001 (Qld)*.

To give effect to this recognition, legislation must provide clear tools and mechanisms ensuring that proponents:

- must identify, consider and accommodate landholder WHS, biosecurity and animal-welfare duties at every stage of project planning, assessment, construction and operation;
- cannot undertake access or works that would place landholders in automatic non-compliance with their statutory duties;
- must consult, cooperate and coordinate with landholders as PCBUs, consistent with *WHS Act* requirements for overlapping workplaces;
- must demonstrate how proposed activities will avoid or minimise risks to landholders' legal obligations before any approval or access is granted.

COMPLIANCE, REHABILITATION AND BIOSECURITY

Compliance

AgForce seeks stronger, more transparent compliance mechanisms to ensure that conditions intended to protect agricultural land are actually delivered in practice. This requires:

- Mandatory inspections at least every six months
- Immediate reporting of non-compliance to landholders
- Stop-work powers for serious breaches
- Public reporting of compliance outcomes

These measures are essential to maintain confidence that approval conditions are being monitored, enforced and corrected in a timely manner.

Rehabilitation

Agricultural land must be restored to pre-existing productive capacity or better, supported by adequate financial assurance. Rehabilitation must reflect the realities of agricultural production, including soil structure,



drainage, erosion control, water management and long-term land function. Restoration must be independently verified to ensure outcomes are achieved, not merely attempted.

Biosecurity

Proponents must comply with landholder biosecurity plans and prevent introduction, proliferation or spread of pests, weeds and disease. Biosecurity failures impose long-term costs on farming systems and regional landscapes.

Legislative Amendments Sought

AgForce seeks:

- Progressive rehabilitation and independent verification
- Adequate financial assurance for full agricultural restoration
- Mandatory compliance with landholder biosecurity plans
- Enforceable penalties for breaches, proportionate to the agricultural and regional consequences

TRANSPARENCY, PARTICIPATION AND REVIEW

Meaningful participation is essential to maintain trust in project assessment processes, and it is also a mandatory requirement under the *WHS Act*, which obliges PCBUs to consult, cooperate and coordinate where their activities overlap. Landholders cannot be placed in a position of automatic non-compliance with WHS, biosecurity or animal-welfare duties because of imposed project(s) and their timelines. State Significance cannot override the fundamental right to a safe and healthy workplace, nor can it displace the statutory duties landholders must meet.

Legislative Amendments Sought

AgForce seeks:

- Public release of all agricultural impact assessments and expert reports
- Publication of reasons for decisions, including how agricultural impacts, landholder WHS risks and landholder evidence were considered
- Accessible merits review through an independent tribunal or court with flexible evidentiary requirements appropriate for landholders
- Reduced financial barriers for landholder participation in decision-making and review processes, including access to funded legal, technical and WHS expertise



CONCLUSION

AgForce opposes the Bill in its current form, as it undermines the State Interest in Agriculture and significantly expands project facilitation powers without providing commensurate statutory protections for agricultural landholders, farming businesses, productive agricultural land and regional, rural and remote communities.

AgForce supports responsible critical minerals and resource development and recognises the important contribution these industries make to Queensland's economy, regional employment and future prosperity.

In its current form the Bill risks shifting Queensland's major project framework toward delivery-focused decision-making at the expense of agricultural productivity, landholder property rights and the sustainability of regional, rural and remote communities. The Bill erodes the State's need for core triple bottom line outcomes and may compromise Queensland's contribution to long term obligations of global food and fibre production and food security.

Therefore, AgForce recommends the Bill should not proceed in its current form which omits these essential safeguards. We urge the committee to recommend amendments, developed in consultation with agricultural stakeholders, that ensure appropriate balance between project facilitation and protection of valued and finite Queensland agricultural lands, and that recognise these lands operate both as workplaces and as essential production systems.

AgForce, again thanks the Committee for the opportunity to provide feedback to the Bill and looks forward to continued engagement on the subject matter.

Should you have any questions or require further information please contact Anna Fiskbek, Policy Advisor by email fiskbeka@agforceqld.org.au or mobile 0407 813 470.

Yours Sincerely,

Niki Ford
Chief Executive Officer

Reference Sources:

AgForce 2025. [Third Party Access to Farming and Grazing Lands Across Queensland – Principles](#)

AgForce 2020. [AgForce Land Use Protection Principles-AgForce · Advancing Rural Queensland](#)

AgForce 2023. [Submission: Land Access and Co-Existence. AgForce · Advancing Rural Queensland](#)

