



The Moreton Bay Foundation

Submission on *A fresh start for Queensland's Environmental Offsets Framework*

29 June 2026

Introduction

The Moreton Bay Foundation (TMBF) welcomes the opportunity to provide feedback on *A fresh start for Queensland's Environmental Offsets Framework – Discussion paper*.

As an independent, evidence-led environmental charity, TMBF is dedicated to protecting and restoring the environmental, cultural, social and economic values of Moreton Bay. Our organisation is guided by our academic members - Griffith University, University of the Sunshine Coast, University of Queensland and QUT - and collaborates with marine scientists, coastal engineers, environmental policy experts, government agencies and First Nations organisations to support evidence-based management and long-term stewardship of the Bay.

Moreton Bay is a wetland of international significance, a multiple-use marine park, an area of continuing cultural responsibility and connection for First Nations peoples, and a highly valued environmental, social and economic asset for South East Queensland. It supports marine plants, seagrass meadows, mangroves, saltmarsh, mudflats, shellfish reefs, coral and rocky reefs, fish habitat, shorebirds, turtles, dugong, marine mammals, and extensive recreational and commercial uses.

TMBF supports the principle that unavoidable significant residual impacts should be counterbalanced. However, offsets must remain a measure of last resort. They should not be used to justify avoidable impacts to high-value, difficult-to-replace or poorly understood coastal and marine habitats.

For Moreton Bay, this is particularly important because many ecological values are location-specific, hydrologically connected, slow to recover, and difficult or impossible to recreate once lost. Examples include mature mangrove and saltmarsh systems, seagrass meadows, intertidal flats used by migratory shorebirds, fish nursery habitat, and coastal wetlands connected to estuarine waterways.

TMBF's submission is focused on ensuring that any reforms to the offsets framework improve real environmental outcomes, particularly in marine and coastal systems.

Summary of recommendations

TMBF recommends that the Queensland Government:

1. Retain and strengthen the mitigation hierarchy so that offsets are only used after genuine avoidance and mitigation have been demonstrated.
2. Ensure the Offset Account is used to deliver timely, measurable and strategically prioritised conservation outcomes, rather than accumulating funds while environmental impacts proceed.
3. Prioritise coastal and marine offset projects that address known pressures on Moreton Bay, including habitat loss, water quality decline, fish passage barriers, marine plant loss, coastal wetland degradation and catchment-derived sediment and nutrient impacts.
4. Ensure financial settlement offsets reflect the full cost of delivering durable conservation outcomes, including landholder incentives, long-term management, monitoring, legal security, administration, climate risk and contingency.
5. Avoid weakening like-for-like requirements for high-value marine and coastal matters unless there is clear evidence that an alternative approach will produce an equal or better conservation outcome for the impacted matter.
6. Improve transparency by requiring public reporting on offset obligations, payments, offset locations, delivery status, ecological outcomes and adaptive management responses.
7. Improve regulation by clarifying offset triggers, cumulative impacts, staged developments, legal security, monitoring obligations and enforcement mechanisms.
8. Require field-verified assessment of marine and coastal habitats, rather than relying only on mapped layers.
9. Ensure First Nations participation in the design, delivery and governance of offsets affecting Sea Country, cultural landscapes, marine species, coastal wetlands and estuarine systems.
10. Ensure offsets are climate-resilient and do not rely on future habitat outcomes that are unlikely to persist under sea-level rise, marine heatwaves, increasing storm intensity or changing sediment dynamics.

General position: offsets must remain a last resort

TMBF supports the framework's continued emphasis on the mitigation hierarchy: avoid, minimise or mitigate, and only then offset significant residual impacts.

This principle should be made clearer and more enforceable. The framework should not allow proponents to move quickly to financial settlement where project redesign, relocation, alternative construction methods, revised footprints, or nature-based design could avoid or reduce harm.

For marine and coastal environments, the first question should always be: can the impact be avoided? This is particularly important where impacts involve:

- marine plants, including mangroves, seagrass, saltmarsh, samphire and saltcouch;
- declared Fish Habitat Areas;
- highly protected zones of the Moreton Bay Marine Park;
- high ecological significance wetlands;
- waterways providing for fish passage;
- shorebird feeding or roosting habitat;
- turtle, dugong or other protected species habitat;
- tidal wetlands, mudflats and estuarine creeks;
- habitats with cultural significance to First Nations peoples.

Offsets should not be treated as a standard cost of development. In many cases, the environmental value affected may be difficult to replace within any meaningful timeframe. A seagrass meadow, mature mangrove community, saltmarsh wetland or shorebird feeding flat is not simply an area on a map; it is part of a broader functioning system shaped by tidal exchange, hydrology, sediment dynamics, water quality, connectivity and species use.

Focus Area 1: Unlocking the Offset Account to deliver outcomes

TMBF supports reforms that ensure funds held in the Offset Account are converted into timely, measurable conservation outcomes.

The current reliance on financial settlement offsets is a significant concern. The Government's consultation material indicates that a large majority of offsets have been settled via financial settlement, with substantial funds received but a much smaller proportion contracted to projects.

This creates a risk that environmental impacts are occurring now, while the corresponding conservation outcomes are delayed, uncertain or not clearly linked to the affected environmental matter.

Recommendation 1.1: Prioritise timely delivery of offset outcomes

The framework should include clearer expectations for the timing of offset delivery. Wherever possible, offsets should be secured and commenced before, or at least concurrently with, the impact. This is especially important for coastal and marine systems where habitat loss can have immediate consequences for fish, shorebirds, marine plants and water quality.

Where financial settlement offsets are used, the administering agency should publicly report:

- the impact that triggered the offset;
- the prescribed environmental matter affected;
- the amount paid;
- the intended conservation outcome;
- the offset project or projects funded;
- the timeframe for delivery;
- monitoring results;
- any adaptive management action required.

Recommendation 1.2: Use the Offset Account strategically, but not generically

TMBF supports strategic delivery of offset funds where this improves ecological outcomes. For Moreton Bay, this could include projects that deliver landscape-scale or seascape-scale benefits, such as:

- restoring or protecting coastal wetlands;
- improving fish passage in estuarine and coastal waterways;
- restoring riparian and floodplain vegetation that reduces sediment and nutrient loads entering the Bay;
- protecting or restoring marine plant communities;

- supporting shellfish reef, seagrass or saltmarsh recovery where technically feasible and scientifically justified;
- improving management of shorebird roosting and feeding habitat;
- reducing catchment-derived pollutants affecting Moreton Bay's marine habitats.

However, strategic delivery must not become a justification for weakening ecological equivalence. If a development impacts saltmarsh, seagrass, mangroves, Fish Habitat Area values or shorebird habitat, the offset should be designed to benefit the same or closely related environmental matter wherever possible.

Recommendation 1.3: Support partnerships, but require accountability

TMBF supports partnerships with natural resource management bodies, First Nations organisations, research institutions, local governments and environmental organisations to deliver offset outcomes.

For Moreton Bay, partnerships could help deliver projects at an appropriate ecological scale. However, any partnership model should include:

- clear governance;
- transparent project selection;
- public reporting;
- scientific oversight;
- Traditional Owner participation where Sea Country or cultural values are affected;
- long-term monitoring and management obligations;
- clear responsibility if the offset does not achieve the intended conservation outcome.

Recommendation 1.4: Be cautious with flexible offset delivery

TMBF understands the need to improve delivery and unlock funds. However, flexibility should not reduce environmental standards.

Flexible delivery may be appropriate where it delivers a clearly superior conservation outcome for the impacted matter. It should not allow impacts to a specific marine or coastal value to be offset through unrelated, easier-to-deliver actions elsewhere.

For example, impacts to seagrass, saltmarsh, mangroves, tidal wetlands or shorebird feeding habitat should not be offset through generic terrestrial vegetation protection unless there is a clear and evidence-based link to an equal or better outcome for the impacted matter.

Focus Area 2: How financial offsets are calculated

TMBF supports a review of the financial settlement offset calculator. The current calculator should be updated to ensure that financial settlements reflect the true cost of delivering durable, measurable conservation outcomes.

The Government's consultation material identifies concerns with outdated costs, sliding-scale discounts, distinct matter area discounts, fixed multipliers and lack of contingency margins.

These issues are environmentally significant. If the payment is too low, the framework may approve a real impact while collecting insufficient funds to deliver a real offset.

Recommendation 2.1: Update costs and index them regularly

The calculator should be updated to reflect current costs, including:

- land acquisition or access;
- landholder incentives;
- legal security;
- ecological assessment;
- restoration works;
- long-term management;
- monitoring;
- administration;
- adaptive management;
- climate risk;
- contingency.

Costs should be indexed regularly so that payments do not fall behind market conditions.

This is particularly important in South East Queensland, where land values, construction costs, restoration costs and competition for environmental markets are all likely to affect offset delivery.

Recommendation 2.2: Remove or reconsider discounts that undermine delivery

TMBF is concerned by any calculator settings that reduce offset payments below the actual cost of delivery.

Sliding-scale discounts may be appropriate only where there is strong evidence of genuine economies of scale. The consultation material indicates that large discounts have not proven accurate in practice and may have reduced funds available for offset delivery, delayed offset delivery and reduced conservation outcomes.

The calculator should not assume that large or complex offsets are cheaper to deliver unless this is supported by evidence.

Recommendation 2.3: Avoid bundling matters where ecological requirements differ

The calculator should be cautious about rolling multiple environmental matters into one payment or one offset solution where those matters have different ecological needs.

This is particularly relevant in marine and coastal environments. A single site may not be able to properly offset impacts to multiple distinct matters such as mangroves, saltmarsh, seagrass, fish passage, shorebird feeding habitat and wetland hydrology.

Where multiple matters are impacted, each matter should be assessed separately, and any proposed combined offset should demonstrate that it can meet the ecological requirements of each impacted matter.

Recommendation 2.4: Include contingency margins for uncertainty and climate risk

Financial settlement offsets should include contingency margins for uncertainty, failure risk and climate change.

This is essential for Moreton Bay's coastal and marine environments, where offset success may be affected by:

- sea-level rise;
- coastal erosion;
- marine heatwaves;
- increased storm intensity;
- extreme rainfall and flooding;
- changes in sediment and nutrient loads;
- invasive species;
- poor water quality;
- delayed ecological recovery.

Offsets that rely on coastal habitat restoration must be assessed against future conditions, not only current conditions.

Recommendation 2.5: Ensure the calculator reflects ecological function, not just area

For marine and coastal habitats, offset calculations should not rely only on area. They should also account for ecological condition and function.

For example, intertidal habitat may be valuable because it supports migratory shorebird feeding; mangroves and saltmarsh may provide fish nursery habitat and shoreline protection; seagrass may support dugong, turtle and fish habitat; and wetlands may filter water, store carbon and regulate flows.

The calculator should be able to recognise that a small area of high-functioning, strategically located habitat may be more valuable than a larger area of lower-quality or poorly connected habitat.

Focus Area 3: Improving regulation

TMBF supports reforms to improve clarity, consistency and enforceability in the offsets framework. Regulatory complexity can delay offset delivery, increase uncertainty for proponents, and weaken environmental outcomes.

However, streamlining should not mean lowering environmental standards. The goal should be clearer, faster and more accountable delivery of genuine conservation outcomes.

Recommendation 3.1: Put the mitigation hierarchy clearly in the Act

TMBF supports clarifying the mitigation hierarchy in the Act.

The Act should clearly require proponents to demonstrate avoidance and mitigation before offsets are considered. This should include evidence that alternatives have been assessed, including alternative sites, designs, construction methods, footprints, timing and nature-based design options.

For marine and coastal developments, this could include avoiding marine plants, reducing dredging footprints, relocating infrastructure away from tidal wetlands, using bridge or boardwalk structures to maintain fish passage and tidal exchange, and adopting living shoreline or hybrid infrastructure where appropriate.

Recommendation 3.2: Clarify cumulative impacts and staged developments

TMBF supports clearer provisions for cumulative impacts and staged offsets.

This is especially important for Moreton Bay. The Bay is affected by many individual decisions across catchments, coastlines and waterways. Each impact may appear small in isolation, but together they can contribute to:

- loss and fragmentation of coastal habitat;
- reduced fish passage;
- increasing sediment and nutrient loads;
- declining water quality;
- disturbance to shorebirds and marine fauna;
- reduced resilience to climate change.

The framework should require cumulative impacts to be considered where multiple stages, related developments or repeated activities affect the same environmental matter, waterway, coastal system or receiving environment.

Recommendation 3.3: Require field-verified marine and coastal habitat assessment

The framework should make clear that offset assessments cannot rely solely on mapped layers.

In marine and coastal areas, the presence, extent and function of habitats can be missed or underestimated if assessment relies only on desktop mapping. TMBF recommends requiring field-verified assessment of relevant habitats, including:

- marine plants;
- intertidal flats;
- seagrass;
- saltmarsh;
- mangroves;
- tidal wetlands;
- fish habitat;
- fish passage;
- shorebird roosting and feeding areas;
- turtle, dugong and marine mammal habitat;
- culturally significant coastal and marine values.

This is important because unmapped or poorly mapped habitat may still perform significant ecological functions.

Recommendation 3.4: Strengthen monitoring, reporting and enforcement

Offset conditions should be enforceable and outcome-focused.

A proponent should not be regarded as having satisfied an offset obligation merely by making a payment or preparing a plan. The framework should require clear performance indicators, monitoring, public reporting and adaptive management.

For proponent-driven offsets, approval conditions should specify:

- the impacted matter;
- the offset matter;
- baseline condition;
- expected conservation outcome;
- delivery timeframe;
- legal security mechanism;
- monitoring method;
- performance thresholds;
- reporting frequency;
- corrective actions if the offset fails.

For financial settlement offsets, the Government should report equivalent information once a project is selected and delivered.

Recommendation 3.5: Ensure legal security is durable and appropriate

TMBF supports improvements to legal security processes where these reduce delays without reducing environmental protection.

Legal security should be sufficient to protect the offset for at least the duration of the impact. For impacts that are permanent, offset protection should also be long-term or permanent.

Legal security should not be treated as an administrative formality. It is central to whether the offset is real, durable and enforceable.

Recommendation 3.6: Treat indirect offsets carefully

TMBF recognises that some conservation outcomes may be delivered through actions that are not strictly land-based, such as threat mitigation, fire management, research, monitoring, biosecurity, stewardship or Traditional Owner-led management.

However, indirect offsets should be used carefully. They should be accepted only where:

- the action is directly relevant to the impacted matter;
- the conservation benefit is measurable;
- the outcome is additional to existing obligations;
- the action is likely to deliver an equal or better outcome than a direct offset;
- there is transparent monitoring and reporting;
- the benefit is durable.

For Moreton Bay, indirect offsets may be appropriate in limited circumstances, such as targeted threat reduction for shorebirds, improving fish passage, reducing sediment loads affecting seagrass and coral habitats, or supporting Traditional Owner-led monitoring and management of Sea Country. However, indirect offsets should not replace direct protection or restoration of habitat where direct habitat loss is the primary impact.

Recommendation 3.7: Improve integration with Commonwealth offsets without weakening State standards

TMBF supports improved alignment between State and Commonwealth offset systems where this reduces duplication and improves delivery.

However, alignment should not weaken Queensland's requirements. Moreton Bay includes matters that may be relevant under both State and Commonwealth frameworks, including Ramsar wetlands, migratory species, threatened species, marine park values, fish habitat and marine plants.

Integrated offsets should meet the highest applicable ecological standard, not the lowest.

Recommendation 3.8: Embed First Nations participation

Offsets affecting Sea Country, culturally significant species, coastal wetlands, marine plants, shorelines, islands, tidal areas and estuarine waterways should be designed and delivered with appropriate First Nations participation.

This should include early engagement, respect for cultural authority, opportunities for Traditional Owner-led monitoring and management, and recognition that environmental and cultural values are often inseparable in coastal and marine systems.

Moreton Bay-specific matters requiring particular care

The offsets framework should recognise that some marine and coastal values are especially difficult to offset. In the Moreton Bay context, these include:

Seagrass meadows

Seagrass provides habitat and food resources for marine species and contributes to the ecological function of Moreton Bay. Impacts to seagrass may be difficult to offset because recovery depends on water quality, light availability, sediment conditions, hydrodynamics and ongoing disturbance.

Mangroves and saltmarsh

Mangroves and saltmarsh provide habitat, shoreline protection, carbon storage, fish nursery function and water quality benefits. Mature systems can be difficult to replace, and their future extent may be constrained by sea-level rise and coastal squeeze.

Intertidal flats and shorebird habitat

Mudflats, sandflats and roosting areas can be critical for migratory shorebirds. These habitats are highly location-specific and may not be readily replaced elsewhere. Disturbance, reclamation, changed hydrology or altered sediment dynamics may reduce their value even if the area is not fully removed.

Fish habitat and fish passage

Moreton Bay's fisheries and ecological productivity depend on connected habitats across freshwater, estuarine and marine systems. Barriers to fish passage, loss of tidal wetlands, marine plant damage and changes to nursery habitat can have broader system impacts.

Coastal wetlands and water quality

Coastal wetlands and connected catchments influence water quality entering the Bay. Offsets should support actions that reduce sediment, nutrients and toxicants where these pressures affect marine habitats and biodiversity.

Shellfish reefs and reef habitats

Shellfish reefs, coral communities and other reef habitats provide ecological functions that may not be captured neatly by simple area-based offset calculations. Where these habitats are affected, assessment should consider ecological function, connectivity, recovery timeframes and water quality requirements.

Conclusion

TMBF supports reform of Queensland's Environmental Offsets Framework to improve clarity, transparency and delivery. The current review is an important opportunity to ensure offsets deliver genuine conservation outcomes rather than simply providing an administrative pathway for approving residual environmental harm.

For Moreton Bay, the key issue is that many marine and coastal values are complex, connected and difficult to replace. Offsets must not be used to justify avoidable impacts to these values.

The reformed framework should ensure that offsets remain a last resort, financial settlements reflect the true cost of delivery, the Offset Account is used transparently and strategically, and regulation is clear, enforceable and outcome-focused.

TMBF would welcome the opportunity to contribute further to the review, particularly in relation to marine and coastal offsets, Moreton Bay Marine Park values, fish habitat, marine plants, coastal wetlands, shorebird habitat and catchment-scale actions that improve the long-term health and resilience of Moreton Bay.

Sincerely,



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References and Source Material

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Matters relating to International Treaties

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Peer-Reviewed Literature, Technical Reports and Briefings

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