ENERGY ROADMAP AMENDMENT BILL 2025

Submission No: 25

Submitted by: Queensland Resources Council

Publication: Making the submission and your name public

Attachments: See attachment

Submitter Comments:

30 October 2025

Energy Roadmap Amendment Bill 2025 Inquiry Governance, Energy and Finance Committee Queensland Parliament

Via: Energy Roadmap Amendment Bill 2025 Inquiry | Submissions

Dear Committee Members

The Queensland Resources Council (QRC) is pleased to provide the Governance, Energy and Finance Committee with a submission to the Energy Roadmap Amendment Bill 2025 Inquiry.

The resources sector is proud of the important role we play for the Queensland economy through project investment, job creation, and support for local businesses and communities. In 2023-2024, the resources sector delivered an economic contribution of \$120.2 billion to Queensland. The sector also supported more than 554,000 direct and indirect jobs and spent a record \$35.8 billion supporting 17,028 business and 1,654 community organisations.

A strong resources and energy sector is essential for the long-term prosperity of the Queensland economy, especially as the state navigates economic challenges and the need for growth. It is more important than ever that Queensland has the right policy settings to attract new and continued investment across our resources and energy industries to guarantee Queensland's economic and energy security.

Queensland's resources sector is a significant energy user that requires affordable and reliable energy to remain globally competitive and financially sustainable. QRC's long term position is that Queensland needs a diverse energy mix that balances affordable, reliable, and sustainable energy supply for all users.

QRC welcomes this opportunity to provide the Committee with our submission to your inquiry for amendments to the Energy Act, including:

- Repealing current renewable energy targets under the Energy Act.
- Amendments to energy system planning, and strategic transmission investment frameworks.
- Revisions to renewable capacity estimates.
- Renaming of Renewable Energy Zones to 'Regional Energy Hubs'.
- Public ownership of existing operational generation assets.
- Delivery of the CopperString project.

The QRC concludes our submission requesting more clarity from the government on the interaction with the Energy Roadmap, and the Amendment Bill, with existing state and commonwealth policies.

Yours sincerely



Nicole Duquid

Acting Chief Executive Officer, Queensland Resources Council

Attachment: QRC Submission | Energy Roadmap Amendment Bill 2025



QRC Submission

Energy Roadmap Amendment Bill 2025

30 October 2025

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QRC Submission | 2025 Energy Roadmap

QUEENSLAND RESOURCES COUNCIL

The Queensland Resources Council (QRC) welcomes the opportunity to contribute to the Queensland Parliament's Governance, Energy and Finance Committee inquiry.

As the peak body representing Queensland's resources and energy sector, the QRC advocates for a competitive, sustainable, and investment-ready energy sector that underpins Australia's energy security and economic prosperity.

The QRC's membership encompasses minerals and energy exploration, production, and processing companies and associated service companies. The QRC works on behalf of members to ensure Queensland's resources are developed profitably and competitively, in a socially and environmentally sustainable way.

CONTEXT

Queensland's rich endowment of resource wealth has seen the state develop a world-class industry that contributes to Queensland's unique quality of life.

In financial year 2023-24, the resources sector delivered an economic contribution of \$120.2 billion to Queensland. The sector supported more than 554,000 direct and indirect jobs, or one in every six jobs in Queensland. The sector spent a record \$35.8 billion supporting 17,028 business and 1,654 community organisations in FY2023-24.

This economic benefit accrued as the result of previous investment decisions in projects across commodities including coal, metals, minerals, and gas that are essential for economic growth and ensuring a diverse energy mix for Queensland, Australia, and global energy markets.

Queensland is now at a critical juncture, with investment decisions urgent for new projects and the sustained investment in existing projects to protect the state's economic security, productivity, and jobs.

The cost of doing business has risen sharply, and this includes energy prices for large and energy intensive industries like mining and resources. Low margin mines and resources operations need affordable energy to remain financially viable, as do new projects attracting global capital.

This submission outlines the context, challenges, and practical reform priorities needed to sustain long-term, stable energy security, rebuild investment confidence, and maintain a resilient and competitive domestic resources and energy markets.

QRC SUBMISSIONS AND POLICY PRIORITIES

The QRC regularly makes submissions to state and federal government and parliamentary inquiries affecting competitiveness and sustainability of Queensland's resources and energy sector.



2024 State Election Priorities

In the QRC's 2024 State Election Priorities paper¹, the QRC highlighted energy security, diversity, and transition as one of QRC's four state election policy priorities. QRC's position is that Queensland and Australia must have affordable and reliable energy security. The government must recognise the essential role Queensland's coal, gas, and critical minerals are playing in the state's energy transition to achieve 2050 goals.

This is important because Queensland's broad mix of commodities are essential to the global energy transition, priority must be given to providing affordable and reliable energy to households and industry, and Queensland's energy transition needs to be carefully managed to protect energy affordability and reliability while meeting emissions reductions goals.

Prior to the 2024 Queensland election, the QRC called on government to report annually to Queenslanders on the levels of energy affordability and reliability as key transition metrics, to increase public investment in common use infrastructure to drive energy production, distribution, and transition projects, to adopt a technology-neutral approach to the transition, with existing generators to remain online until fired replacement capacity is commissioned, and to continue to work in partnership with industry to support investment in emission reduction projects.

Following the release of the Queensland Energy Roadmap, **QRC welcomes the Queensland Government's adoption of QRC's resources and energy policy priorities** through this Roadmap to advance Queensland's energy security, supply diversity, and transition.

Submission to 2025-26 Queensland State Budget

In QRC's submission to Queensland Treasury on the 2025-26 State Budget², QRC set out five priorities for the resources and energy sector:

- Keep Queensland competitive.
- Fair returns for resources regions.
- Continue decarbonisation.
- Invest in skills.
- Meet existing funding commitments to the resources sector.

On behalf of Queensland's resources sector, QRC called for stability in the state's energy market through the government's Electricity Maintenance Guarantee and for an energy plan that considers all fuels and energy solutions, including coal and gas, to uphold basic energy principles of reliability, affordability, and stability of supply.

To maintain and improve the competitiveness of Queensland's resources and energy sector, QRC advocated for policies to attract and retain investment across all of Queensland's commodities, from gas as a transition fuel, steelmaking coal needed for lower emissions technology, to the critical minerals essential to the energy transition.



¹ 25 July 2024. 2024 State Election Priorities. Available at https://www.arc.org.au/arc-election-priorities-to-secure-a-strong-ald-resources-sector-that-will-protect-and-arow-jobs/.

² 3 February 2025. QRC 2025-26 pre-budget submission.

QRC called for investment in critical infrastructure that supports regional mining communities and the sector, including concluding the CopperString business case and identifying the common user infrastructure such as electricity, water, rail, and port infrastructure that is the backbone of competitive resources and energy operations.

QRC also called for continued investment in research and development for lowering emissions and decarbonising mining operations. QRC supports decarbonisation ambitions, energy diversity, and a technology neutral approach. Queensland's broad mix of commodities are essential to the global energy transition, and to ensuring affordable and reliable energy for households and industry.

QRC's view is that policies should balance emissions reduction goals with the importance of keeping our key economic sectors strong and competitive. Queensland's energy transition needs to be carefully managed to protect energy affordability and reliability while meeting emission reduction goals. The sector has invested significant capital into decarbonisation and supporting a lower emissions future.

Across the principles and policy approaches outlined above and in QRC's 2025-26 pre-Budget Submission, QRC welcomes the Queensland Government's adoption of QRC's resources and energy policy priorities through the Energy Roadmap.

ENERGY ROADMAP AMENDMENT BILL 2025

As set out in the Explanatory Notes, the Energy Roadmap Amendment Bill 2025 (the Bill) amends the Energy (Renewable Transformation and Jobs) Act 2024 (Energy Act) to deliver the Queensland Government's objectives for Queensland's energy system as outlined in their 2025 Energy Roadmap.

The QRC understand this Bill seeks to reflect government priorities to facilitate energy infrastructure and investment to deliver affordable, reliable, and sustainable energy for Queenslanders. Additionally, the Bill seeks to streamline and simplify the Energy Act by removing certain prescriptions and processes.

These key amendments include:

- Repealing current renewable energy targets under the Energy Act.
- Amending the energy system planning, and strategic transmission investment frameworks
- Revising provisions related to publicly owned coal-fired power stations and renewable capacity estimates
- Clarifying that the State Government will retain 100% public ownership of existing operational generation assets
- Repealing the Energy Industry Council, Queensland Energy System Advisory Board, and Queensland Renewable Energy Jobs Advocate
- Amending the Priority Transmission Investment (PTI) framework
- Renaming Renewable Energy Zones (REZ) to 'regional energy hubs' and streamlining associated processes, and
- Establishing mechanisms to support delivery of the CopperString project.



REVIEW OF KEY AMENDMENTS AND ENERGY ROADMAP

Overall, the QRC views the Energy Roadmap as a step in the right direction to ensuring an energy mix that is fit-for-purpose in Queensland and addressing some of the challenges faced by the state to provide reliable, affordable, and sustainable energy.

The resources sector is a large and energy intensive industry that requires a reliable and affordable energy system based on prudent, pragmatic, and responsible decision-making. The Energy Roadmap is viewed as meeting these needs; however, clarity on the reduction of energy costs for mining and resources providers remains outstanding.

When implementing the Energy Roadmap, more consideration for the resources sector's role in the energy supply chain is required. This includes streamlined approvals, incentives for exploration, and expedition of common user infrastructure to bring coal and natural gas supply online sooner.

REPEALING CURRENT RENEWABLE ENERGY TARGETS UNDER THE ENERGY ACT

- The QRC welcomes the Energy Roadmap's focus on a more flexible, market-driven approach to investment in Queensland's energy system.
- There is an expectation that Queensland will increasingly utilise energy generated from renewable sources as part of the net zero transition.
- However, the QRC notes that the changed trajectory for renewables could require
 further planning and changes to investment decisions. Some resources companies in
 Queensland have built renewable energy utilisation into their decarbonisation strategies,
 or through renewable energy power purchase agreements.
- The QRC also queries the interaction between the Energy Roadmap, this Bill, and the Clean Economy Jobs Act 2024 which legislates emissions reduction plans for economic sectors be prepared by the responsible Minister.

SYSTEM PLANNING AND STRATEGIC TRANSMISSION INVESTMENT FRAMEWORKS

Support for a pragmatic, balanced approach

The QRC supports a pragmatic and technically grounded approach to system planning.
 This includes the use of technical and investor-guided scenarios to inform generation and capacity decisions, ensuring that planning reflects both engineering realities and market signals.

Endorsing reliability through extended use of existing assets

- The QRC supports keeping state-owned coal assets operational 'as long as needed', extending their technical lifetimes to maintain affordability and system reliability by providing firming for intermittent power supply.
- The phase-out of coal fired power stations as part of a pragmatic decision-making framework can provide continued grid stability needed by the mining and resources sector, along with Queensland energy consumers.



Reframing gas as a critical reliability technology

- The QRC supports reframing gas as a critical reliability technology. We note the Government's forecast of an additional of 6.1 GW of new capacity by 2030.
- A balanced generation mix using coal-fired electricity, gas for firming, and loweremissions technologies, that is supported by storage can ensure sufficient baseload capacity is available as renewable energy sources are scaled up.

QRC recommendations for strengthening the Energy Roadmap Increase transparency in gas modelling

With the Government signalling growth in gas-powered generation (GPG), stakeholders
would benefit from a transparent summary of modelling assumptions. This transparency
will enhance the credibility of the Energy Roadmap, support informed stakeholder
feedback, and align with the legislation's flexibility requirement to revisit the Energy
System Outlook as conditions evolve.

Clarify gas reservation principles

The QRC recommends the Government clarify the principles it applies when assessing gasreservation models, including how it will influence the National Gas Market Review.

Enable resource development to support system needs

- The extension of thermal coal and natural gas in the system necessitates increased investment in exploration and new projects to ensure adequate supply.
- The QRC will continue to work with the Resources Cabinet Committee and the Queensland Government to streamline project approvals and bring more coal and gas supply to market by 2030.
- Land access considerations, including the Land Access Framework Review and the Land Release process, should be integrated into project identification to support future coal and gas reserves.

Strategic Transmission Investment Frameworks

- The resources sector requires significant and reliable energy in regional locations, including those highlighted as Priority Investment for critical infrastructure: Gladstone, CopperString Western link, North West Power System.
- The prioritisation of transmission assets largely supports resources regions, including in North and Central Queensland. This includes replacement lines and additional network augmentations in Northern Bowen Basin, along with the priority projects outlined above.
- If the 'system outlook' and Regional Energy Hub planning do not prioritise transmission to major resource sites, companies face compliance risks or higher costs when it comes to decarbonisation.
- Public and private investment frameworks, including the QIC Investor Gateway, must be
 underpinned by principles of affordability and reliability, ensuring the resources sector is
 not forced into commercial arrangements that are uncompetitive.
- Future resources areas, like the North West Minerals Province, require urgent attention and infrastructure that provides affordable and reliable supply.



RENEWABLE CAPACITY ESTIMATES

Closure dates for coal-fired power stations

- The QRC supports the plan to reset state-owned units to their technical life, with potential extension.
- Keeping state-owned assets operational 'as long as needed' underpins affordability and system reliability, which is critical for industrial users and regional communities.
- A pragmatic phase-out of coal-fired power stations provides the time and investment needed for the energy transition to occur in a smooth, more pragmatic way that is led by the market and allows for baseload capacity while renewables are connected to the National Electricity Market (NEM).
- The decision-making framework set by government, which is based on system need, economic viability, and asset integrity, is supported by the QRC for its prudency and pragmatic approach to the transition.

PUBLIC OWNERSHIP OF EXISTING OPERATIONAL GENERATION ASSETS

- The QRC supports the investment of \$1.6 billion for the Electricity Maintenance Guarantee for existing generation assets owned by Government Owned Corporations (GOC).
- The QRC notes the Connections Guarantee proposed by the government to ensure Powerlink and Energy Queensland can adequately respond and provide certainty for new resources projects or operational expansions in a timely and coordinated way.
- Clarification of provisions to confirm the State Government will retain 100 per cent public ownership of its existing operational generation assets provides the Queensland energy market with additional policy certainty in respect to future development of Queensland's energy market.

GOVERNANCE

- The QRC notes the government's intention to repeal the Energy Industry Council, Queensland Energy System Advisory Board, and Queensland Renewable Energy Jobs Advocate.
- Given the role the resources sector plays in the value chain for coal and gas supply, as
 well as being an energy-intensive sector, the QRC recommends the mining and
 resources sector is represented on any future forums, councils, or advisory groups being
 established by the government. Active representation will ensure the value chain is
 engaged in system planning and generation, including any barriers for supply or forecast
 shortfalls.
- The QRC calls on the government to ensure Queensland's resources sector, and other relevant stakeholders, are properly consulted in the implementation of the Energy Roadmap.



REGIONAL ENERGY HUBS

The QRC would like to ensure any changes proposed to Renewable Energy Zones (REZ) through the amendment to Regional Energy Hubs (REH) consider existing provisions in the Mineral Resources Act 1989 and the Minerals and Energy Resources (Common Provisions) Act 2014 that encourages coexistence and coordination between sectors to minimise the occurrence of overlapping tenures.

SUPPORTING DELIVERY OF COPPERSTRING PROJECT

- CopperString could unlock \$500 billion for North West Queensland through minerals projects and resources development. The proposed North West Power System and CopperString Western Link provide the fundamentals for the emerging North West Minerals Province.
- The QRC supports the intent of the North West Power System to drive down energy prices
 and ensure the system design has biggest impact on existing supply arrangements.
 However, sequencing of the Western Link and undisclosed pricing and delivery
 timeframes could present issues for resources operators or for future investors.
- Future projects require certainty on pricing and delivery timeframes to take Final Investment Decisions. The sequencing of the North West Power System followed by the Western Link could prolong decisions and create more uncertainty for project.
- In addition, major resources operators need long-term plans for operations that could run 20-30 years. These operators rely on pricing and delivery certainty to make investment decisions.
- The North West Energy Fund is largely seen as a starting point for investment at \$200
 million and does not provide the level of investment adequate for a resilient and reliable
 system in a remote area.
- The QIC and Treasury must work with the resources sector to ensure North West Energy Fund is equitably distributed and achieves balanced outcomes for companies, communities, and other users.

COORDINATION WITH EXISTING CLIMATE POLICIES

- The Government's previous energy plan, the Queensland Energy and Jobs Plan (QEJP), was implemented through the Energy (Renewable Transformation and Jobs) Act 2024 and Clean Economy Jobs Act 2024.
- Together, the legislation outlined how the QEJP would meet ambitious targets set by the Commonwealth to achieve the Paris Agreement and the state's contribution to the Nationally Determined Contribution (NDC).
- Given the scope and extent of work required by the resources sector to deliver Sector Plans, more clarity is sought on how the Energy Roadmap will interact with the Clean Economy Jobs Act 2024.
- QRC understands 2035 emissions reductions targets have not been repealed, however targets and a mechanism for reductions have not been confirmed by the Energy Roadmap. Any policy changes that could follow the Energy Roadmap Amendment Bill 2025 should be provided for consultation to those sectors, including resources, facing significant investment in decarbonisation.





