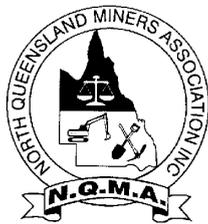


Environmental Protection (Efficiency and Streamlining) and Other Legislation Amendment Bill 2025

Submission No: 001
Submission By: North Queensland Miners Association
Publication: Making the submission and your name public



NORTH QUEENSLAND MINERS' ASSOCIATION

ABN 76 525 585 093

2nd December 2025

To: Health, Environment and Innovation Committee

Environmental Protection Efficiency and Streamlining – and other Legislation Amendment Bill 2025

NQMA (North Queensland Miners Association) Submission:-

Dear Sir,

The Section of the Proposed Bill that NQMA would like to comment on is Clause 126, Division 3-110. Small scale mining activities will transition to code managed ERA and prescribed conditions.

The proposal is to remove the need for a Surety under the MERFP Act and return the Surety to the Tenure holders. NQMA agrees totally with this proposal. However, Small Scale mining activity only applies at present to Mining Claims. This excludes all our members who hold and work on mining leases. The holding of Surety is a substantial burden on the lease holder.

NQMA is not aware of one example in North Queensland where lease holder's Surety has had to be used by Government to rehabilitate a mining lease after surrender or cancellation. This does not include ASX listed companies.

As our Membership does not qualify as small scale miners NQMA is at a loss as to where our members actually fit on the scale between small and large mining operations. We have always been labelled as small scale miners but we do not fit the Act's description.

NQMA would welcome the removal of Surety from our Leases and Projects, as we have proven over time to be low risk as to environmental issues. The definition of "small miner" could be altered to include activities currently allowed on a Mining Lease but capped at 20 persons at any one time as per claims.

Another definition that NQMA would agree to is that a "small miner" is a person or group that operates under a standard Environmental Authority.

We welcome the opportunity to discuss these ideas before the Act goes to Parliament.

Yours sincerely,

Graham Byrne (President)

Email : [REDACTED]