

PIRC - Submission - Resources Safety and Health Queensland and Other Legislation Amendment Bill 2026

Submission No: 005

Submission By: Australian Energy Producers

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16 March 2026

Primary Industries and Resource Committee
PIRC@parliament.qld.gov.au

Dear Committee,

RE: *Resources Safety and Health Queensland and Other Legislative Amendment Bill 2026*

Australian Energy Producers (AEP) welcomes the opportunity to provide a submission on the *Resources Safety and Health Queensland and Other Legislation Amendment Bill 2026* (the Bill).

AEP is the peak national body representing Australia's upstream oil and gas exploration and production industry. The health and safety of workers and the community is the petroleum industry's highest priority. Alongside the regulatory framework provided by Resources Safety and Health Queensland (RSHQ), the sector contributes to Queensland's safety ecosystem through initiatives such as *Safer Together*, a member-led program which since 2013 has worked across the natural gas supply chain to simplify, standardise and share safety practices. The industry ethos is that safety is a shared responsibility and not an area of competition.

Consultation and process

AEP notes that the Bill was introduced on 3 March 2026 without prior industry consultation and that submissions to the parliamentary inquiry are due nine business days later. This limited timeframe has constrained stakeholders' ability to fully consider the implications of the proposed reforms.

The Bill follows the independent review of RSHQ conducted by Professor Susan Johnston, tabled in Parliament in November 2025. That review proposed a staged implementation of reforms over an 18-month period. By contrast, the legislative approach now before the Committee proposes significant institutional changes within a much shorter timeframe and without a formal Government response to the recommendations. Given the complexity of the Bill additional consultation would help ensure the reforms strengthen RSHQ while maintaining clarity and stability in the regulatory framework.

Governance reforms

AEP supports the objective of strengthening governance arrangements for RSHQ and recognises the intent to establish a new statutory Board to provide clearer oversight and accountability.

The Bill proposes that the RSHQ Board comprise no more than five members while collectively holding a broad range of expertise, including governance, safety and risk management, stakeholder engagement, organisational performance and regulatory effectiveness. Given the

Brisbane Office

PO Box 12052 George Street QLD 4003
+61 2 6247 0960 | brisbane@energyproducers.au

Australian Energy Producers Limited

energyproducers.au

ABN 44 000 292 713

breadth of industries regulated by RSHQ (including petroleum and gas) the Committee may wish to consider whether the proposed Board size provides sufficient flexibility to ensure an appropriate balance of expertise. AEP would support allowing the Board to include additional members if required to ensure balanced representation of relevant industry knowledge and regulatory experience.

The Bill also provides that the Governor in Council may remove Board members or the CEO “for any reason or none.” While such decisions are unlikely to be taken lightly, this drafting appears inconsistent with the stability and independence normally associated with statutory governance boards. Providing clearer grounds for removal would strengthen confidence in the governance framework.

Land Access Ombudsman arrangements

AEP welcomes the Government’s decision to directly fund the operations of the Land Access Ombudsman (LAO). Given the historically small number of referrals, AEP did not consider an industry levy to be appropriate.

The proposal to locate the LAO’s investigation and mediation functions within Coexistence Queensland (CQ) may provide a clearer single interface for companies and landholders seeking information or dispute resolution on land access matters. As the new arrangements are implemented, clear communication of the respective roles of CQ and the LAO will be important to ensure stakeholders understand how to engage with the system.

Complexity of the Bill

The Bill represents a significant omnibus legislative package, amending seven Acts and introducing multiple commencement dates. Elements of the Bill also amend provisions in earlier omnibus legislation that have not yet commenced. At the time submissions were due, stakeholders had not had the benefit of departmental briefings on the proposed reforms.

Given the importance of workplace safety in Queensland’s resources sector, legislative changes should ensure that RSHQ is equipped with the experience, skills, resources and governance structures necessary to deliver effective safety outcomes.

Recommendations

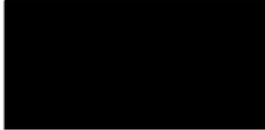
AEP recommends that the Committee:

1. amend the Bill to ensure that the skill set is considered for the RSHQ Board as a whole, to include demonstrable petroleum and gas expertise – both operational and regulator.
2. amend the Bill to allow more than five Board members if necessary to maintain a full cross section of the necessary skills and experience on the RSHQ Board; and
3. amend the Bill’s ability to remove Board members “for any reason or for none” as inconsistent with a statutory skills-based advisory Board established to improve governance.

Conclusion

AEP supports the Government's objective of strengthening transparency, coordination and confidence in RSHQ. With appropriate consultation and careful implementation, the proposed reforms have the potential to enhance governance and improve the effectiveness of Queensland's resources safety framework.

Yours sincerely,



Keld Knudsen

General Manager States & Territories, Director Queensland,
Australian Energy Producers