

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

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Submission By: Idemitsu Australia Pty Ltd

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SUBMISSION TO THE QUEENSLAND PARLIAMENT
PRIMARY INDUSTRIES AND RESOURCES COMMITTEE

Inquiry into the Resources Safety and Health Queensland and Other Legislation
Amendment Bill 2026

Submission by

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Executive Summary

Idemitsu Australia Pty Ltd (Idemitsu Australia) welcomes the opportunity to make this submission to the Queensland Parliament's Primary Industries and Resources Committee inquiry into the Resources Safety and Health Queensland and Other Legislation Amendment Bill 2026.

Idemitsu Australia is the Australian subsidiary of Idemitsu Kosan Co., Ltd., a Japanese energy company listed on the Tokyo Stock Exchange.

With more than 45 years of continuous operations in Australia, Idemitsu has built an extensive footprint across Queensland, New South Wales and Western Australia, encompassing coal mining, energy transition investments and a rapidly expanding portfolio of critical minerals mining and processing company projects.

In Queensland, Idemitsu has acquired a portfolio of holdings in critical minerals investments with a current focus on vanadium and graphite.

Idemitsu's current and historical operations across Queensland and New South Wales mean that the company is able to share a wealth of experience with the Committee from 45 years working in hazardous environments in the Australian resources sector.

1. About Idemitsu Australia

Idemitsu Australia is a wholly-owned subsidiary of Idemitsu Kosan Co., Ltd. (Idemitsu Kosan), one of Japan's leading energy companies with operations spanning petroleum refining, renewable energy, functional materials and resource development.

Idemitsu Australia's operations have centred in Queensland on thermal coal mining, at the Ensham Mine, near Emerald in Central Queensland. Ensham was divested by the company in 2023.

Mine safety in Queensland remains a critical issue for our company with a majority investment in Vecco Group, and substantial shareholdings in Graphinex and Critical Minerals Group (CMG).

Vecco is well advanced with their bankable feasibility study for their Critical Minerals Project near Julia Creek, planning to produce vanadium, high-purity alumina and molybdenum. The company already manufactures vanadium electrolyte at its small commercial scale plant in Townsville. In partnership with Sumitomo and Vecco, Idemitsu Australia is exploring vanadium flow battery manufacturing in Queensland.

Graphinex has identified extensive resources at its flagship Esmeralda Graphite Project and has opened a fully integrated, demonstration-scale plant for processing graphite into active anode material in Townsville. The company has received a Letter of Interest from the Export-Import Bank of the United States (EXIM), for US\$860 million (A\$1.32 billion) in funding and is being supported by the Queensland Critical Minerals and Battery Technology Fund.

Critical Minerals Group is exploring for vanadium at their Lindfield Project near Julia Creek.

In NSW, the company operates the Boggabri Coal Mine in the Gunnedah Basin. The Muswellbrook Coal Company site in the Upper Hunter Valley ceased mining in 2022 after 115 years of continuous production.

Idemitsu Australia's operations have provided the company with deep expertise in Australian mining regulation from a health and safety perspective.

Since 2022, Idemitsu Australia has been executing a deliberate strategic pivot toward critical minerals and clean energy. In Queensland, this involves major investments in vanadium and graphite extraction and processing, so that the issues under consideration by the Committee continue to be of great interest and importance to the Idemitsu Australia.

Idemitsu Australia's submission will be confined to the provisions of the Bill which have greatest relevance to the company. These are:

- Amendments to the governance of RSHQ.
- Reforming the Mining Safety and Health Advisory Committee by reinstating their function to review the effectiveness of legislation, standards and guidelines.
- Implementing reforms to the Land Access Ombudsman.

2. Amendments to the governance of RSHQ

The Amendments propose to establish an RSHQ board.

Idemitsu Australia considers these amendments to be an important step forward in the maturity and development of the governance of the organisation.

RSHQ remains an independent regulator for the safety of resources workers in Queensland. A well qualified board will provide an opportunity for senior and experienced resources sector professionals from all backgrounds to support the work of the organisation and ensure its policies and practices are contemporary, fit for purpose, and protect Queensland mine workers.

A function of the board according to the legislation is "ensuring RSHQ performs its functions and exercises its powers in a proper, effective and efficient way." The board will also manage performance and set key performance expectations. This kind of oversight is critical for such an important body, and a board structure will ensure that RSHQ remains on track and delivering on its purpose.

We note that the functions of the Commissioner for Resources Safety and Health are also being incorporated into the responsibilities of the RSHQ board.

Idemitsu Australia has made previous submissions on amendments to mine safety legislation. We have noted that in the past that our organisation came to the view that some changes made in safety and health legislation, appeared to be done to achieve an industrial outcome. Were this the case, certainty and reliability for mine operators would be dented and the credibility of mines safety regulation damaged. We consider that board oversight will help to mitigate any such potential impact in future.

3. Reforming the Mining Safety and Health Advisory Committee by reinstating their function to review the effectiveness of legislation, standards and guidelines

A key function of the Mining Safety and Health Advisory Committee (MSHAC) is to set the required competencies for statutory positions in mines. This is a highly technical and involved field which is well understood by the members of the Committee. The technical experience and expertise of this committee therefore makes the MSHAC membership very well placed to undertake oversight of the broader regulatory framework around mine health and safety.

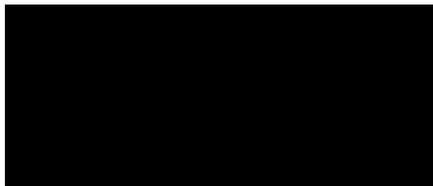
For example, the root causes and key factors leading to mine incidents are often complex, and are often best understood by those with direct experience in running mining operations or as mine workers. Given the make up of the MSHAC is predominantly of people with this experience, then it makes sense that they would play a role in reviewing the regulatory settings for mine safety to ensure they are effective.

4. Implementing reforms to the Land Access Ombudsman

According to the explanatory note, amendments in the Bill, “...support the continued operation and expansion of the LAO as an independent coexistence institution, while repealing the industry levy and cost recovery funding model.”

Idemitsu supports these amendments in principle. As a responsible land holder, Idemitsu Australia has always sought to maintain positive and fair engagement with our neighbours. The Bill enables an expansion of non-court mechanisms which can be used by the LAO to resolve disputes, including voluntary dispute resolution during the negotiation and renegotiation of agreements.

Maximising the opportunities to resolve matters without the need to resort to costly and time-consuming court processes, is likely to see matters resolved sooner, with balanced outcomes and in a way that enables the parties to maintain or improve a neighbourly relationship.



Mr Steve Kovac
Chief Executive Officer
Idemitsu Australia Pty Ltd
March 2026