

Planning (Social Impact and Community Benefit) and Other Legislation Amendment Bill 2025

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Submitted by: Association of Mining and Exploration Companies (AMEC)
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Submitter Comments:

To: State Development, Infrastructure and Works Committee

Attn: sdiwc@parliament.qld.gov.au

Re: Draft Renewables Regulatory Framework

Date submitted: 20 May 2025

Submission summary

With a coordinated and common-sense approach, we enhance our ability to coexist with community, mineral and renewable resources. By doing so, we can achieve outstanding outcomes for the state and our nation.

There are significant challenges and considerations in balancing landholder rights, mineral exploration, and renewable energy projects in Queensland. Landholders are experiencing fatigue from constant project proposals, necessitating improved support and compensation to maintain social license. If co-existence isn't feasible, compensation should be provided to exploration companies and the State of Queensland for sterilized assets and incurred expenses.

Key Points:

- The proposed changes will add even more consultation and generate more community fatigue. AMEC has been calling for “Levelling the Playing Field” meaning large-scale solar and wind projects should be subject to similar approvals frameworks as Mining Projects. The existing EIS process already includes community consultation and community benefit
- The proposed new approach significantly strays from the fundamental objective of land use planning, which is to establish a transparent and efficient framework at the local level. It remains unclear why a restructuring of the planning system is necessary, given that the current Environmental Impact Statement (EIS) process already provides a strategic and project-specific framework.
- The proposed approach does not establish a clear notification process and compensation mechanisms for mineral exploration companies.

Introduction

The Association of Mining and Exploration Companies (AMEC) appreciates the opportunity to provide feedback on the Planning (Social Impact and Community Benefit) and Other Legislation Amendment Bill 2025 issued by the State Development, Infrastructure and Works Committee.

AMEC members possess substantial experience in navigating regulatory frameworks, including land access, environmental approvals, mining leases, and rehabilitation. Many elements are shared as challenges and good governance for the renewable energy sector. AMEC Members also play a critical role in the renewable energy supply chain, acting as the explorers and producers of the raw minerals vital for developing renewable infrastructure. They are also end users by providing power generation in remote areas for camps and operations.

About AMEC

AMEC is a national peak industry body representing almost 600 mineral exploration and mining and related companies across Australia, with over 80 members having operations based primarily in Queensland. Our members are mineral explorers, emerging miners, producers, and a wide range of businesses working in and for the industry.

AMEC's members explore for, develop, and produce minerals including antimony, bauxite, coal, cobalt, copper, gold, graphite, lead, lithium, manganese, mineral sands (such as silica), molybdenum, nickel, phosphate, potash, rare earths, silver, tungsten, vanadium, and zinc.

Feedback Format

AMEC has a "Queensland 2025 Government Policy Brief" attached as an appendix to this document. The feedback will refer to this document and additional feedback on Planning (Social Impact and Community Benefit) and Other Legislation Amendment Bill 2025.

Level the Playing Field

AMEC's "Queensland 2025 Government Policy Brief" addresses solutions to Renewable energy projects via a Multi Land Use Policy and tenure solution (see Proposal 1 and Proposal 2 in the Appendix).

The layering of community consultation and land access processes is increasing stakeholder fatigue and friction. Projects between sectors share common stakeholders such as landowners, traditional owner groups and host communities. The number, frequency and nature of interactions with stakeholders will inform project approvals. What is missing is consultation with other rights-holders such as resource tenure holders (mineral exploration companies).

The renewable and mineral resource projects disproportionately affect regional Australia, which is already grappling with housing, workforce, and capacity challenges. Consultation fatigue and cumulative impacts are eroding social license and increasing public discontent. As project interactions intensify, friction escalates, leading to greater uncertainty in areas such as insurance, constructability, and financing.

The Planning (Social Impact and Community Benefit) and Other Legislation Amendment Bill 2025 requires a proponent to conduct a Social Impact Assessment (SIA) and enter into a Community Benefit Agreement (CBA) with the local government before lodging a development application, with both documents submitted to the assessment manager as part of a properly made application.

This will add even more consultation and generate more community fatigue. AMEC has been calling for "Levelling the Playing Field" meaning we'd like for large-scale solar and wind projects to be subject to similar approvals frameworks as Mining Projects. The existing EIS process already includes community consultation and community benefit

The Draft Renewables Regulatory Framework for Queensland aims to streamline renewable energy project approvals while ensuring environmental protection, community engagement, and landholder rights. AMEC believes that the last 50 years of environmental assessment practices in Australia are being overlooked in favour of a new, inconsistent framework that does not align with established

environmental impact assessment standards. The title suggests a focus on environmental impacts, but the scope is much broader and fails to adequately address the regulatory goals. Currently, the environmental impact statement (EIS) process in Queensland effectively covers environmental, social, cumulative, and economic factors. There are two EIS processes in place: one under the *Environmental Protection Act 1994* and another under the *State Development and Public Works Organisation Act 1971*. Given this existing structure, AMEC questions the need for an additional tier of assessment under the *Planning Act 2016*.

The proposed new approach significantly strays from the fundamental objective of land use planning, which is to establish a transparent and efficient framework at the local level. It remains unclear why a restructuring of the planning system is necessary, given that the current Environmental Impact Statement (EIS) process already provides a strategic and project-specific framework. Additionally, AMEC questions whether the proposed changes can effectively address the five key areas outlined below, as local governments may lack the capacity or expertise needed to manage assessments of this scale, particularly given that entire specialised teams within State and Federal Departments are dedicated to this existing function.

- Enhanced environmental outcomes
- Effective community participation
- Accessible information
- Protections for landholders
- Streamlined industry facilitation

AMEC acknowledges the need for regulatory reform to address the growing challenges faced by regional communities and local governments. However, it appears that the host communities, as the net losers in this situation, would benefit more from enhancing the existing support frameworks established under state powers rather than creating an additional array of approvals and regulatory pathways for an already stressed sector.

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Queensland 2025 Government Policy Brief

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Mount Carbine tungsten mine, EQ Resources

Contents

I. INTRODUCTION	2
II. ABOUT AMEC	2
III. AMEC's POLICY PRIORITIES	3
A. Land access and co-existence	3
B. Reducing Red Tape	6
C. Environmental regulation	10
D. Whole of government alignment	13
E. Safety	14
IV. Other strategic matters	16
For further information contact:	18

I. INTRODUCTION

AMEC's Queensland 2025 Government Policy Brief identifies key policy levers that can be pulled to create an environment that supports the resource sector's growth.

Queensland's strong mining and mineral exploration sector is supporting a consistent and sustained contribution to the State's royalty base, economy and employment market. To improve Queensland's international competitiveness, create jobs and attract mining and mineral exploration investment, the Government needs to embed public policy settings that:

- Increase economic growth through increased mineral exploration and mining activity.
- Reduce the cost of doing business throughout the State, and
- Ensure Queensland is a partner of choice for sourcing and investing in responsibly sourced minerals for the future.

AMEC's proposals seek a regulatory framework that supports a safe, environmentally, socially and financially responsible and leading sector. The recent approach to the resources sector in Queensland, however, is generating an environment that will not attract strong investment in mineral exploration or support a modern Queensland economy with a diverse resources sector; consequently, regions and broad economic growth is suffering.

II. ABOUT AMEC

AMEC is the national industry body representing and advocating for more than 600 mineral exploration and mining companies across Australia. Our members are explorers, emerging miners, producers, and a wide range of businesses working in and for the industry. The AMEC Queensland membership base is dominated by companies looking for critical minerals, as well as associate companies working in and for the sector. Our members and associates in Queensland—of which there are about 80—explore, develop and produce minerals including Antimony, Bauxite, Coal, Cobalt, Copper, Gold, Graphite, Lead, Lithium, Mineral Sands, Molybdenum, Nickel, Phosphate, Rare Earths, Silver, Tungsten, Uranium, Vanadium and Zinc.

III. AMEC's POLICY PRIORITIES

Delivery on initiatives suggested against these policy priorities will deliver streamlined assessment and help drive down the current high costs of doing business in Queensland.

- Land access and co-existence
- Reducing Red Tape
- Environmental regulation
- Whole of Government alignment, and
- Safety.

This incoming government brief also identifies some further new strategic matters that AMEC recommends will require consideration and action, namely:

- Commitment to permanent funding for the Collaborative Exploration Initiative.
- Ceasing the current mining lease objections review process being carried out by the Queensland Law Reform Commission
- Overturning the current ban on uranium mining in Queensland
- Acid Supply Security, and
- Rationalise actions regarding emissions.



A. Land access and co-existence

The ability for exploration companies to access their exploration permits throughout Queensland is becoming increasingly difficult. Uncertainty of access has the perverse outcome of driving exploration away from Queensland and into areas where there is more certainty regarding the timing and cost to access tenements; this is more noticeable during times when markets are unstable or unfavorable. A clear and consistent minerals land access framework would benefit explorers and landholders and would reduce time and cost added by lengthy, costly and stressful legal processes.

In addition to fundamental land access, increasingly overlapping land uses, and their consequences are being experienced; specifically with regards to renewable energy project occupiers (wind and solar proponents) overlapping with exploration tenements. Land access under these conditions is becoming complicated for exploration companies and competing land occupiers. Agreements need to be arranged with multiple stakeholders for the same areas of land. There is no better time than now to have a fresh look at Land Access in Queensland due to these increasing complexities and embed policy and mechanisms that are in the interest of achieving the coexistence of growth.

As such, AMEC seeks to work with Government on the following policy recommendations:

PRIORITY	PROPOSAL	DESCRIPTION	MECHANISM FOR CHANGE	RESPONSIBLE DEPARTMENT
HIGH	1. Establish a NEW Multi-Land Use Policy	Many of Queensland's minerals are critical to the infrastructure and battery demands that will underpin the delivery of the renewable energy transition. While land access considerations for minerals are regulated by the Mineral Resources Act and MERCPC, renewable energy projects are regulated under the Planning Act. Despite an overarching policy objective of	Through consultation with industry, agriculture and renewables companies, establish an integrated multi-land use policy to support the co-existence and development of land for multiple uses. This also, needs to take the subsurface resources into consideration.	Dept of Natural Resources and Mines, Manufacturing, Rural and Regional Development (DNRMMRRD)

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		"co-existence", the current framework introduces significant project risk to all parties, and potentially costs if they play out through the Land Court. A NEW Multi-Land Use Policy, legislation and process harmony (specifically notification parity between resource and renewable energy companies) is necessary to reduce current and future conflicts and ensure certainty.		
MED	2. Establish a NEW tenure solution to support the NEW Multi-Land Use Policy	It is suggested that a new tenure solution to manage and address co-existence between resources, agriculture and renewable energy projects is established. This is not dissimilar to Western Australia's diversification tenure solution.	If consultation on the policy demonstrates the need for a supporting tenure to operationalise the policy, then trigger a process to do such.	DNRMMRRD
HIGH	3. Responsible person is at a minimum the landowner or the person who has day-to-day management of property	Defining the 'responsible person' under the Land Access Code to be the landowner or the person who has day-to-day management of the property, not the legal representative or land agent / advisor. AMEC is not against having legal representatives or land agents / advisors. The role of the responsible person under the Land Access Code is to be responsible for communication and is required to have knowledge of the property and its operations. This role cannot be performed efficiently by a legal representative or land agent / advisor as they are not aware of the day-to-day operations on the relevant land.	Amend the Land Access Code.	DNRMMRRD
HIGH	4. Define the rights of each party	Clearly defining the rights of each party involved will help to minimise the risk of conflict escalation. This could be done in a way that builds	Amend the Land Access Code	DNRMMRRD

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		capability, for example, clearly showing in guidance what “good” looks like and also sharing what “bad” looks like and the possible repercussions of the behavior.		
HIGH	5. Set limitations on decision making timeframes	Setting limitations on the timeframes for decisions in the negotiations will help deliver certainty on when access should be resolved. Certainty delivers efficiency, which helps drive down costs and essentially makes Queensland a more attractive prospect for doing business.	Amend the Land Access Code	DNRMMRRD
High	6. Cap land access negotiation and compensation costs	Similar to the New South Wales model , capping the costs involved in the land access negotiations, as well as guidance on compensation costs to deal with material impacts and rehabilitation appropriately. Capping the compensation costs and providing guidance would help to achieve a level playing field and deliver certainty.	Amend the Land Access Code	DNRMMRRD
HIGH	7. Embed shared mediation costs	Embedding within the framework that mediation costs are shared would also facilitate the expedited resolution of access. The current framework, where all costs sit with the explorer until the matter is referred to the Land Court, does not support resolution.	Amend the Land Access Code	DNRMMRRD
LOW	8. Require title amendments only when a material change is determined	Currently, once the CCA is executed, it needs to be registered on title. AMEC suggests that this is only necessary under scenarios where the outcome of the exploration has material or ongoing (e.g. more than 2 years) impacts. Otherwise, the requirement to register on title is another cost to businesses and a bottleneck	Amend the Land Access Code	DNRMMRRD

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		that is not delivering any benefit to landholders or explorers.		



B. Reducing Red Tape

Attempting to solve new problems with old solutions will not serve industry or regions and will eventually lead to worse outcomes. AMEC is strongly of the view that the obstacles to efficient and risk-based assessment are not one department's problem alone but are a government problem and, as such, need to be solved by departments working cooperatively together in the State's interest.

As such, AMEC seeks to work with Government on the following policy recommendations:

PRIORITY	PROPOSAL	DESCRIPTION	MECHANISM FOR CHANGE	RESPONSIBLE DEPARTMENT
LOW	9. Set statutory timeframes	The current assessment by the administering authority of the <i>Minerals Resources Act 1989</i> , <i>Mineral and Energy Resources (Common Provisions) Act 2014</i> and <i>Mineral and Energy Resources (Financial Provisioning Scheme)</i> does not set statutory timeframes. The setting of statutory timeframes supports delivering certainty and predictability to proponents, which generates cost savings. If you know how long your assessment will take, you can better plan, which saves money.	Amend the Resources Acts to include statutory timeframes	DNRMMRRD
MOD	10. Standard conditions for critical minerals	In response to growing coal development, departments developed a suite of standard conditions for coal assessment to improve assessment efficiency and achieve multiple benefits in streamlining these developments. As critical minerals emerge as the next wave of development in Queensland's resources sector, it seems logical to	Using the Julia Creek-Richmond Critical Mineral Zone as a pilot, establish standard conditions. Some low-hanging fruit for this could include conditions for light and noise. This could, however, be extended and include other matters, where the risks and geological profiling are known to be similar.	DNRMMRRD Department of Environment, Tourism, Science and Innovation (DETSI)

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		<p>consider what standard conditioning can occur to achieve greater administrative efficiency.</p> <p>As a part of this, the Queensland Government could consider the use of geological risk profiling to inform standard conditions. As such, where the geology is the same, the hazards and risks involved in the development are likely to be the same. Understanding geological risk profiles for one project could be applied or inform future development conditioning and, as a result, accelerate assessment administration.</p>	<p>Broadly, there could be efficiency gained for standard conditions that are developed across all EA and ERA Holders, e.g., Duty of Care and Reporting standards. The development of eligibility criteria and stand conditions or codes, for low risk profile operations is sensible and provides a pathway for guidance and policy to be achieved, leaving room to focus on the critical nuances of each project.</p>	
LOW	11. Critical mineral zones – economic development planning	<p>The critical mineral zones require urgent economic development planning to be included within their scope. AMEC is supportive of the current critical mineral zone work, but is aware that there is a lens of coordinated economic planning and development missing. The current focus areas of social, housing and First Nations, as well as discussion of environmental zonal work, are positive. However, these are putting the cart before the horse without sound economic planning to identify where critical infrastructure is required, how utilities can be accessed and optimised, and the best models for funding.</p>	<p>Undertake an assessment of the common infrastructure—workforce, accommodation, roads, energy, water, port, freight, acid—that will be required and identify an overarching plan for sequencing and development of ancillary but critical infrastructure needs for the critical mineral zones.</p>	<p>DNRMMRRD</p> <p>Economic Development Qld (EDQ)</p>
HIGH	12. Financial Provisioning Scheme reform	<p>AMEC's members experience significant barriers in complying with the current Financial Provisioning Scheme by Queensland Treasury,</p>	<p>Undertake a review with the intent to reform consistent with these principles:</p> <ol style="list-style-type: none"> Ensuring risk is fit for operation and increase 	<p>Queensland Treasury</p> <p>DETSI</p> <p>DNRMMRRD</p>

PRIORITY	PROPOSAL	DESCRIPTION	MECHANISM FOR CHANGE	RESPONSIBLE DEPARTMENT
		<p>namely the raising of cash funds to meet surety requirements at a time when cash flow is at its lowest in the development cycle.</p> <p>There is no reward without risk, and currently the FPS is managed to ensure there is zero risk to the State. It is recommended that options to share risk between the State and proponent are embedded into the FPS to help enable and support resource development.</p>	<p>risk tolerance within the scheme to support operators at the forefront of new mineral exploration and development.</p> <p>b. Bring back the discount for operators who are performing well.</p> <p>c. The State sharing, providing or even deferring (similar to the critical mineral rent deferral mechanism) part of the surety to reduce the financial burden on the developer at a critical point of cash flow and development.</p> <p>d. Allowing surety to be paid in instalments to assist cash flow.</p>	
MOD	13. Freight and logistics management	<p>Freight costs and availability remain a key cost inhibitor for junior producers. Government intervention in the following could help support efficiency. Proposals such as the ones below are not of benefit to the resources sector only, good roads and rails benefit the whole economy (e.g., agriculture and tourism) as well as improve safety of the community and workers who commute, DIDO.</p> <p>Reviews of some corridors, e.g. the rail between Townsville and Mount Isa have been done exhaustively with no useful action or change from the previous government.</p>	<p>Options for action include:</p> <p>a. Review and reform access conditions for export infrastructure to ensure new and smaller projects can be offered equitable access to infrastructure on reasonable terms. For example, a dedicated or scheduled berth at the Port of Townsville that services junior operators only like that in Western Australia.</p> <p>b. Review pricing structures for rail infrastructure to ensure that it is accessible, and that capacity is being maximised.</p> <p>c. Continue to work with industry, pipeline projects and local stakeholders to prioritise infrastructure investment through initiatives like the “Regional Freight Planning” process.</p>	<p>Department of Transport and Main Road</p> <p>Queensland Rail</p>

PRIORITY	PROPOSAL	DESCRIPTION	MECHANISM FOR CHANGE	RESPONSIBLE DEPARTMENT
HIGH	14. Water management	<p>Implementation of the current water management framework means that some instruments of the <i>Water Act 2000</i> are currently not operationalised.</p> <p>AMEC supports the re-implementation of a Water Licencing framework allowing the development of associated water infrastructure and take of waters from a watercourse.</p>	<p>The following proposals could be considered by DLGWV to support development:</p> <ol style="list-style-type: none"> Establish a water storage infrastructure licence specifically for harvesting water from a watercourse during above peak flood events. Complete catchment wide hydrological study upgrades considering the 2011 and 2022 drought conditions as well as the 2018-2021 drought conditions as climate driving factors changing the nature of water resources and how it is managed. Work with and fund a common user infrastructure proposal for critical minerals development that delivers water certainty to critical mineral zones. Build more agility into water plans to allow for adaptive licensing in response to demand. Allow for a development application to develop infrastructure under water plans. Currently, there are no mechanisms for the development of infrastructure unless it is tied directly to an EIS and or Strategic Development. This limits the ability to develop key operational infrastructure that heavily influences whether it is the make or break of a project. 	Department of Local Government, Water and Volunteers (DLGWV)
LOW	15. Harmonise Cultural Heritage Regulation for explorers	Regulation of impacts to cultural heritage is overseen by three agencies; each agency's regulations conflict and confuse explorers, and in	Collaboration between the agencies must be directed with an outcome to harmonise these regulations, particularly as they apply to exploration tenure and	<p>DNRMMRRD</p> <p>DETSI</p> <p>Department of Women,</p>

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		many cases, make it impossible to comply with one agency's regulations without breaching the other's. Currently, each agency interprets the other's regulations differently, and inter-agency engagement on this topic is effectively non-existent.	permits, due to their limited impact.	Aboriginal and Torres Strait Islander Partnerships and Multiculturalism (DWATSIPM)
HIGH	16. Capability uplift	Across the government, companies are feeling the impacts of staff turnover and capability gaps in assessment and compliance staff. This being felt more acutely in some areas than others. The high turnover means time (and hence money) lost in regularly rebuilding relationships and re-educating staff on projects and their objectives.	Capability uplift of assessment staff involved in the resource assessment to better understand critical minerals projects, their footprint, operations, hazards and risks. The Western Australian government achieved significant improvement in assessment timeframes by purely focusing on capability and creating regulatory specialists.	DNRMMRRD DETSI OCG DLGWV



C. Environmental regulation

AMEC advocates that environmental regulation would benefit from having a strong focus on stability of the policy reforms and policy direction, as well as implementation of assessment and regulatory frameworks that are fit-for-purpose and correspond to an operation's footprint, disturbance, and risks.

As such AMEC seeks to work with Government on the following policy recommendations:

PRIORITY	PROPOSAL	DESCRIPTION	MECHANISM FOR CHANGE	RESPONSIBLE DEPARTMENT
LOW	17. Embedding the State Interest in decision making	AMEC's members persistently experience decision making under the acts and provisions administered by DETSI that is not in the State's interest.	Establish the state interest as a key consideration in making decisions under the <i>Environmental Protection Act 1994</i> . Support state interest with guidance to assessors and companies on what this looks like and how to assess it independently.	DETSI
HIGH	18. Re-commercialising mines reform	Historic mine sites and tailings storage facilities are	AMEC recommends that the framework governing these	DETSI

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		<p>lower impact way to recover resources from already disturbed land. With innovative technology, it is becoming increasingly popular to investigate and understand their commercial viability for a range of critical minerals; millions are invested in researching this each year.</p> <p>The current administration, legislation and costs, however, are a deterrent to companies keen to work on these sites and tailings. Member experience identifies DETSI as the handbrake in achieving success in this space.</p> <p>A fresh approach is required to classify these sites as opportunities to further develop our resources, as well as an opportunity to reduce the government's environmental liability. Proposals to re-process mine tailings and re-visit abandoned mine sites offer obvious potential. Previously disturbed sites are given the same environmental scrutiny as a greenfield site and therefore have the same rehabilitation cost requirement, even when the reprocessing process has a rehabilitation component.</p>	<p>sites be reformed to allow for exploration and analysis of historic and abandoned mines under a modern, shared risk scenario.</p> <p>The ERC Calculator should also be reviewed to correspond with the reforms and allow for more fit-for-operations calculations.</p> <p>This is the definition of economic rehabilitation, enabling net positive outcomes for the environment, economy and community.</p>	DNRMMRRD
MOD	19. Post mine land use tenure solution	<p>Currently, the ERC Calculator is managed to return a disturbed area back to its original use or another economic use, such as grazing.</p> <p>This is not keeping pace with infrastructure needs, e.g. renewable energy development, or technology, e.g. exploring tailings /</p>	<p>Establish a post mine land use tenure solution that allows mines to be re-mined, or economically rehabilitated (second prospectivity—be it pit or tailings) or used for another higher use (than grazing), such as energy production.</p> <p>Reduce the scrutiny around post-mining land use outcomes. There are circumstances where a</p>	<p>DETSI</p> <p>DNRMMRRD</p> <p>Qld Mine Rehabilitation Commissioner</p>

PRIORITY	PROPOSAL	DESCRIPTION	MECHANISM FOR CHANGE	RESPONSIBLE DEPARTMENT
		historic or abandoned mines.	PMLU outcome is re-processing and reshaping, but it may never have a community purpose. The current solution is to heavily cost rates at these sites	
MOD	20. Waste framework reform	Tailings and other waste rocks on mine sites are increasingly being explored for minerals (critical) that were not previously sought. This is seeing the definition of possible resources in what were traditionally waste sources. Due to their waste classification, this makes it very challenging to explore and commercialise these resources. The End of Waste Code and overarching circular economy policy needs reform to take advantage of this opportunity.	Consistent with circular economy principles, reform the end of waste code and redefine the definition of waste, noting that what was a waste once is now a highly valuable resource, and that this paradigm will only gain momentum as innovation grows. Specifically, this relates to traditional mine waste products such as rock and tailings.	DETSI
LOW	21. Decarbonisation policy and plans	Any actions to impact the resources sector must be co-designed with industry to tailor education in this space to ensure all operators have their capability needs addressed.	Similar to recent action in NT and WA, make the decision to leave the emissions policy and requirements to the federal government only	DETSI
LOW	22. Environmental mapping	Currently, there is a significant delay in the Queensland Herbarium's identification of errors in the existing mapping of regional ecosystems. Further, the updating of the maps only occurs every two years. If companies find vegetation incorrectly mapped, it is difficult and costly for the company to get it corrected.	The following initiatives would help improve the data available: <ul style="list-style-type: none"> • Update digitally published vegetation maps more regularly and notify publicly when amendments are made. • Make it simpler to report potentially incorrectly mapped areas to the appropriate agency for follow up. • Remove the cost and time burden of incorrect mapping from the explorer by enabling Herbarium staff to make field visits when errors 	DETSI / Qld Herbarium

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			are reported and amendments are made.	



D. Whole of government alignment

The Queensland Government has a range of commitments that relate to resources, critical minerals, energy transition, decarbonisation targets, workforce and skills, communities and First Nations people that are implemented by departments in silos.

Whole of government alignment and support for Queensland's resources sector and facilitating its responsible development—both greenfield and brownfield—is a practical pathway to achieving the various targets and the necessary transition of skills and communities in preparedness for the burgeoning green growth industries and opportunities.

As such, AMEC seeks to work with the Queensland Government on the following policy recommendations:

PRIORITY	PROPOSAL	DESCRIPTION	MECHANISM FOR CHANGE	RESPONSIBLE DEPARTMENT
MOD	23. Clear articulation of whole of government alignment and support for Queensland's resources sector	The Queensland Government must align their efforts with those of the Federal Government to ensure that duplication is minimised and, instead, effective integration is achieved. The Queensland Government needs to recognise the criticality of responsibly facilitating and accelerating the development of critical minerals by achieving alignment in strategic objectives and key performance indicators across all Queensland Government departments involved in assessing, regulating and facilitating resources development.	<p>Clear articulation of support for the resources sector and facilitation of green and brownfield minerals projects in the Ministerial Charter letters for those ministers responsible for administering the Environmental Protection Act 1994, Minerals Resources Acts, Water Act 2000 and other legislation and regulations that are associated with the resource development.</p> <p>From the top (Director-General) down, a clear commitment through articulation in strategic plans to operational business plans that facilitation of responsible mining is a priority for Queensland. To be supported by capability uplift and cultural change where required.</p>	<p>DNRMMRRD</p> <p>DETSI</p> <p>OCG</p> <p>DLGWV</p>
LOW	24. Local procurement and content targets	Through the energy transition infrastructure, create a local market for local minerals	Where practical, establish procurement targets for local minerals in products	Department of Housing and

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		through initiatives like procurement targets, mineral content requirements in technology and co-funding manufacturing for downstream battery components.	required to support the energy transition.	Public Works (DHPW)
HIGH	25. Royalty stability	The change to coal royalties in June 2022 was a destabilising act that has had far reaching investment consequences. This decision was interpreted as policy instability and, based on member experience across Australia, has greatly impacted Queensland as a preferred destination of investor choice. AMEC seeks that the Queensland Government commits to competitive royalty rates for all mineral commodities.	Commit to royalty stability for the term of government	Queensland Treasury
MOD	26. Whole of Government pre-lodgment	For minerals projects, re-establish whole of government (resources, water, environment, etc) pre-lodgment or scoping meetings with proponents. This puts the assessing officers from each line department in the room with the proponent early to understand how the process integrates, what the obstacles may be and pathways forward.	The Resources Cabinet Sub-Committee will assist in enabling this process at a high level. Translation of this process into departments will further support its success.	DNRMMRRD DETSI OCG DLGWV Queensland Treasury



E. Safety

AMEC advocates that safety proposals must be scalable and fit for operations, its hazards and corresponding risks. Continuing to regulate the industry in a homogenous way—capturing juniors and mid-tiers as though they are tier 1 companies and correspondingly presenting the same risks—is not sustainable, will lead to perverse outcomes (e.g., under reporting) and consequently not facilitate achieving Resources Safety and Health Queensland's (RSHQ) zero serious harm vision.

As such, AMEC seeks to work with the Queensland Government on the following policy recommendations:

PRIORITY	PROPOSAL	DESCRIPTION	MECHANISM FOR CHANGE	RESPONSIBLE DEPARTMENT
HIGH	27. AMEC to be a member of the Minerals Safety and Health Advisory Committee (MSHAC)	Currently, AMEC is not a member of MSHAC; as such, the exploration industry does not have adequate representation in the meetings that set the priorities for the sector. Explorers, therefore, have limited, if any, influence on safety and health policy and how it should be implemented and legislated.	AMEC seeks that legislation is amended to include AMEC as a member of the MSHAC. This will enable junior explorers and miners to be better represented in important decision making. Until such time as legislation can be amended to include AMEC as a member, AMEC should be allowed to have an observer role in some capacity.	Resources Safety and Health Qld (RSHQ)
MOD	28. Complete the review of the Minerals Exploration Safety Guidance Notice November 2004	Over the last two years, AMEC has had RSHQ commit to review the Minerals Exploration Safety Guidance Notice, November 2004, which has not been done since its release. AMEC seeks that the Minerals Exploration Safety Guidance Notice, November 2004, be reviewed in 2025 in collaboration and consultation with industry.	The review will include updated guidance for explorers in relation to dust management, respirable disease and psychosocial safety. As part of the Guidance Note review and improving communication and engagement with junior and mid-tier explorers and operators, work with industry to develop safety templates that make it easier for junior and mid-tier operators to build capability, ensure compliance and work towards continuous improvement.	RSHQ
MOD	29. Clarity and communication	The approach of treating exploration in the same manner as mining operations causes confusion and unnecessary complexity for explorers trying to implement appropriate SHMS. Clarification of the requirements upon explorers as opposed to drillers, for example, including clear instructions and resources, would improve the current framework. This could include RSHQ working closer with AMEC to develop safety	Review of the Minerals Exploration Safety Guidance Notice November 2004	RSHQ

PRIORITY	PROPOSAL	DESCRIPTION	MECHANISM FOR CHANGE	RESPONSIBLE DEPARTMENT
		templates that make it easier for smaller companies to implement changes and ensure compliance		
LOW	30. BoE accepted training	Member feedback indicates the accepted training is not fulsome.	A review of the CPD training will be undertaken to ensure that it is a full list that covers all acceptable and appropriate training.	RSHQ

IV. Other strategic matters

Below are key further strategic priorities AMEC would like to see the new Queensland Government progress.

PRIORITY	PROPOSAL	DESCRIPTION	MECHANISM FOR CHANGE	RESPONSIBLE DEPARTMENT
HIGH	31. Commitment to rolling funding of the Collaborative Explorative Initiative	There are no new mines without exploration. The CEI is currently funded until 2027 with the program receiving \$17.5M total to that date. In the 24-25 budget, the CEI was not extended in the same way as it has been previously, i.e. a further year of funding.	There needs to be a commitment to ongoing funding of the CEI to provide certainty that the state will support exploration.	DNRMMRRD
HIGH	32. Cease the current Mining Lease Objections Review Process STATUS: COMPLETED	The Qld Law Reform Commission is currently undertaking a review of the mining lease objections process. AMEC has been consulted in the review process. Based on the current consultation paper, AMEC is highly concerned that the review is likely to recommend a suite of proposals that duplicate the current notification and objections processes, as well as do not address the core matter of issues, e.g. assessing officer not being skilled to do their jobs effectively and efficiently.	The Minister to request that the Attorney General seeks for the review process to be stopped.	DNRMMRRD Department of Justice and the Attorney General
HIGH	33. Overturn the moratorium on uranium development	There is currently a moratorium on U development. Queensland has some of the most globally	Overturn the moratorium on U development to allow for investment to flow to Qld readily and build the	DNRMMRRD

PRIORITY	PROPOSAL	DESCRIPTION	MECHANISM FOR CHANGE	RESPONSIBLE DEPARTMENT
		significant U deposits in north west Qld. Despite the moratorium exploration has continued.	opportunity to not only revitalise the Qld economy and regional NW economy but contribute to the development of new and expanded supply chains. Previous guidance: 5413T3427.pdf	
High	34. Emissions action rationalisation	Stop the work currently being undertaken on a Resources Sector Emissions Reduction Plan	This plan is being progressed to support the previous government's legislative commitment to deliver the plan by the end of 2025. The plan is intended to support the federal plan, which has not yet started development or consultation. AMEC believes better effort would be spent by amending legislation to allow for renewable energy to be exported off mining leases to support the development of on lease renewable energy infrastructure, than another plan for a plan.	DNRMMRRD
HIGH	35. Emissions action rationalisation	There is significant duplication between the federal and state requirements for emissions. This is not effective nor efficient regulation. The resources sector is significantly overregulated in this space.	Similar to recent action in NT and WA, make the decision to leave emissions policy and requirements to the federal government only	DETSI
MOD	36. Acid Supply	The supply of acid in Qld for mineral processing has been show as not being sufficient to support the growth of minerals, in particular critical minerals in Qld. To date the government has run a process that has not been transparent, inclusive or efficient.	It is recommended that the process going forward to identify effective actions to support the supply of acid in Qld is expedited and that recommendations from industry—not only Glencore, IPL and Evolution—are included in the scope of work.	Department of State Development, Infrastructure and Planning (DSDIP)

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