



Queensland 2024 State Election Policy Platform

A decorative graphic consisting of several overlapping triangles in shades of orange, teal, and light blue, located in the bottom left corner of the teal banner.

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Mount Carbine tungsten mine, EQ Resources

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I. INTRODUCTION

AMEC’s Queensland Policy Platform 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 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 a public policy setting that aims to:

- 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 current 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 will suffer.

II. ABOUT AMEC

AMEC is the national industry body representing and advocating for more than 560 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, Vanadium, 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



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:

PROPOSAL	DESCRIPTION
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 “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 is necessary to reduce current and future conflicts and ensure certainty.
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.
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 in 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.

PROPOSAL	DESCRIPTION
<p>4. Define the rights of each party</p>	<p>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 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.</p>
<p>5. Set limitations on decision making timeframes</p>	<p>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.</p>
<p>6. Cap land access negotiation and compensation costs</p>	<p>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.</p>
<p>7. Embed shared mediation costs</p>	<p>Embedding within the framework that mediation costs are shared, would also facilitate 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.</p>
<p>8. Require title amendments, only when material change is determined</p>	<p>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 business and bottleneck that is not delivering any benefit to landholder or explorer.</p>



B. Reducing Red Tape

Attempting to solve new problems with old solutions will not serve industry or regions and 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:

PROPOSAL	DESCRIPTION
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.
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 consider what standard conditioning can occur to achieve greater administrative efficiency. 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 that 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. This could be piloted in the current Julia Creek-Richmond Critical Mineral Zone.
11. Critical mineral zones – economic development planning	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 discussion of environmental zonal work is 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.
12. Financial Provisioning Scheme reform – sharing the risk	AMEC’s members experience significant barriers in complying with the current Financial Provisioning Scheme by Queensland Treasury. There is no reward without risk, and currently both program and legal requirements are 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 both programs to enable more development and could include: a. Ensuring risk is fit for operation and increase risk tolerance within the schemes to support operators at the forefront of new mineral exploration and development. b. The State sharing, providing or even deferring (similar to the recently introduced critical mineral rent deferral mechanism) part of the surety to reduce the financial burden on the junior developer at a critical point of cash flow and development. c. Provision of a discount for operators contributing to sector diversification and supporting green growth opportunities that contribute to the resources and energy transition. d. Allowing surety to be paid in instalments to assist cash flow. This sort of approach would help provide flexibility for industry to operate in a way that benefits their unique situation, as well as contribute to delivering the government’s targets.

PROPOSAL	DESCRIPTION
	(It is noted that the scheme is merely implementing the recommendation from the Estimated Rehabilitation Cost Calculator, however there is no capacity based on engagements with Treasury to entertain any risk).
<p>13. Support for novel initiatives</p>	<p>Frameworks need to be able to support the changing face of the resources sector, including the ability for operators to be able to do toll processing under the hub and spoke model or similar. Currently there are regulations that prevent transporting ore from one site to another.</p> <p>Toll processing would support accelerated project development and increase State revenue. The existing operators are 'toll processing' ore if the location, price, and transport costs are economical. Other operators are finding the prices offered for processing too high and it's more economical to export concentrate for processing offshore. The model can work if the capital is in place and the price is right.</p> <p>The State could consider a funding model where a processing facility is constructed to toll process material for projects too small to justify building a smelter or refinery.</p>
<p>14. Freight and logistics management</p>	<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. Initiatives for consideration include:</p> <ol style="list-style-type: none"> Review 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. Review pricing structures for rail infrastructure to ensure that it is accessible, and that capacity is being maximised. Continue to work with industry, pipeline projects and local stakeholders to prioritise infrastructure investment through initiatives like the "Regional Freight Planning" process. Overcome the current obstacle of rail not being able to cross the Flinders Highway, as is the case for Julia Creek vanadium developers now.
<p>15. Water management</p>	<p>The current water management framework with an operational moratorium means that some instruments of the <i>Water Act 2000</i> are currently on hold. AMEC supports the re-implementation of a Water Licencing framework allowing the development of associated water infrastructure and take of waters from a watercourse. The following proposals could be considered by DRDMW to support the above intent:</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 as well as the 2018-2021 drought conditions as climate driving factors changing the nature of water resources and how it is managed. Publicly publish findings and advancement of the New Bradfield Project that was undertaken in 2021. Work with and fund common user infrastructure proposal for critical minerals development that deliver water certainty to critical mineral zones. Build more agility into water plans to allow for adaptive licensing in response to demand.
<p>16. Review and modernise the Native Title</p>	<p>The NTPCs have been rejected by the National Native Title Tribunal on multiple occasions as not being sufficient to mitigate potential impacts on cultural heritage within areas subject to applications for exploration permits. As a consequence, the</p>

PROPOSAL	DESCRIPTION
Protection Conditions (NTPCs)	expedited procedure is becoming an unreliable pathway for securing exploration tenure in parts of the state, but increasingly throughout the entire state. The NTPCs should be amended to reflect the feedback from the NNTT and to provide reassurance to the exploration sector that the expedited procedure remains an available pathway to securing exploration tenements in Qld.
17. Harmonise Cultural Heritage Regulation for explorers	Regulation of impacts to cultural heritage is overseen by three agencies (DoR, DESI and DTATSIP) each agency's regulations conflict and confuse explorers, and in 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. AMEC calls for the harmonisation of these regulations particularly as they apply to exploration and mining tenure and permits.
18. Capability uplift	Capability uplift of assessment staff that are 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.





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 implementation of assessment and regulatory frameworks that are fit-for-purpose and correspond to an operations’ footprint, disturbance, and risks.

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

PROPOSAL	DESCRIPTION
19. Embedding the State Interest in decision making	AMEC’s members persistently experience decision making under the act administered by DESI that is not in the State’s interest. Delivering outcomes that are in the State’s interest must be embedded in the <i>Environmental Protection Act 1994</i> , with thresholds or guidance on how to do this to be independently developed.
20. Re-commercialising mines reform	<p>Historic mine sites and tailings storage facilities are becoming increasingly popular to investigate to 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 DESI 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>AMEC recommends that the framework governing these sites is reformed to allow for exploration and analysis of historic and abandoned mines, under a modern, shared risk scenario. 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>
21. Post mine land use tenure solution	<p>In addition to the reforms above, 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 such as energy production.</p> <p>Currently the ERC Calculator is managed to return a disturbed area back to its original use or another economic use such as grazing. Under the current energy transition paradigm however, this is an outdated view and disturbed areas should be considered through more innovative lenses and alternative ongoing economic opportunity considered. The Mount Rawdon and Kidston Gold Mines are great examples of using a disturbed landform for a contemporary use.</p>
22. Waste framework reform	Consistent with circular economy principles, re-define 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.
23. 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.

PROPOSAL	DESCRIPTION
<p>24. Environmental mapping</p>	<p>Currently there is a significant delay in the Queensland Herbarium's identification of errors in 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:</p> <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 are reported.





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:

PROPOSAL	DESCRIPTION
<p>25. Clear articulation of whole of government alignment and support for Queensland’s resources sector</p>	<p>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. This includes:</p> <ul style="list-style-type: none"> a. Clear articulation of support for the resources sector and facilitation of green and brownfield critical minerals and metals 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. b. 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>26. Local procurement and content targets</p>	<p>Through the energy transition infrastructure, create a local market for local minerals through initiatives like procurement targets, mineral content requirements in technology and co-funding manufacturing for downstream battery components.</p>
<p>27. Royalty stability</p>	<p>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.</p>
<p>28. Whole of Government pre-lodgment</p>	<p>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.</p>



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:

PROPOSAL	DESCRIPTION
29. AMEC to be a member of the Minerals Safety and Health Advisory Committee (MSHAC)	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.
30. Complete the review of the Minerals Exploration Safety Guidance Notice November 2004	AMEC seeks that the Minerals Exploration Safety Guidance Notice November 2004 is reviewed 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 operators to build capability, ensure compliance and work towards continuous improvement.
31. 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 driller for example, including clear instructions and resources would improve the current framework. This could include RSHQ working closer with AMEC to develop safety templates that make it easier for smaller companies to implement changes and ensure compliance
32. BoE accepted training	A review of the CPD training be undertaken to ensure that it is a fulsome list that covers all acceptable and appropriate training.

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