



Queensland 2024 Budget Submission

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1 INTRODUCTION

AMEC's Queensland Policy Platform and Budget Considerations identifies key policy levers that the Queensland Government can pull to continue to create an environment that supports the resource sector's growth.

The support the Queensland Government has committed to through the QRIDP engagement, and the subsequent announcements has been extremely positive for the exploration sector. Particularly impactful in the short term has been the 5 year rent waiver for EPM's, rent deferral for Critical Minerals Projects, and the Queensland Resources Common User Facility (QRCUF). Most of our members are either direct beneficiaries or support companies who benefit from this support.

But no good deed goes unpunished. The positive sentiment in the Critical Minerals sector is driving increased demands in resource industry adjacent networks such as safety, approvals, multi land use, and the environment.

Budget considerations are summarised at the end of each policy priority section as the policy driver context is necessary for the budget request.

2 ABOUT AMEC

AMEC is the national industry body representing and advocating for more than 550 mining and mineral exploration 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 more than 70—explore, develop and produce minerals including Antimony, Bauxite, Coal, Cobalt, Copper, Gold, Graphite, Lead, Lithium, Mineral Sands, Molybdenum, Nickel, Phosphate, Rare Earths, Silica, Silver, Tungsten, Vanadium, Zinc.

3 OBJECTIVES

Resources is one of Queensland's oldest economic sectors, supporting consistent and sustained contributions to the State's royalty base, economy, and employment market. Queensland is also home to mature and emerging resource-related industries, such as METS, mineral beneficiation, research and development, battery production, gas (including hydrogen), and renewable energy.

Queensland's strong mining and mineral exploration sector is supporting the future growth and development of the State's economy. 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.

To achieve these objectives and create more jobs throughout the economy, AMEC has prepared some suggested policy recommendations with suggested budget priorities aligned with our members' needs and our organisations' priorities.

4 CURRENT POLICY ENVIRONMENT

AMEC is increasingly concerned by the consistent steps being taken by departments across the Queensland Government to continue tightening prescriptive controls on the resources sector. AMEC seeks 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.

AMEC advocates that to remedy this situation, the Queensland Government must work actively and quickly to achieve a whole of government alignment in its support for the resources sector.

The Queensland Government has committed to achieving zero net emissions by 2050, with an interim target to reduce emissions by 30% below 2005 levels by 2030. The government also has a target of achieving 70% renewable energy generation by 2032 and phasing out coal-fired generation by 2035. Critical to achieving both targets are the energy transition technologies and infrastructure that are resourced and fuelled by critical minerals, REE and steel-making coal.

Even with the Queensland Energy and Jobs and the Queensland Resources Industry Development Plan (QRIDP), there appears to be no centralised or coordinated and granular pathway that articulates transparently how the Queensland Government will deliver these targets. There is still a high level of opaqueness regarding how the state will transition to achieve the targets, in particular from high emitting aspects of the economy (namely energy generation, transport and agriculture), while still keeping on the lights, communities employed in sustainable and well-paid careers, and not crippling trade and supply chains.

Whole of government alignment and support for Queensland's critical minerals sector and facilitating its responsible development and diversification is one practical pathway to overcoming these challenges and articulating the pathways required to deliver targets. Further, investing in innovation and technology that supports the decarbonisation of coal and gas requires government support to ensure they are responsibly mined for decades to come.

5 THE ROLE OF GOVERNMENT AND THE ROLE OF INDUSTRY

AMEC does not expect the Queensland Government to go it alone; we see industry as a key partner in ensuring the future success of our members' and the sector broadly. As such we see our respective roles to be:

The role of the Queensland Government is to:

- Work transparently and collaboratively with industry, ensuring the time allowed for consultation is consistent with best practice and commensurate with the materiality of the proposed change.
- Achieve alignment in strategic objectives and key performance indicators across all Queensland Government departments involved in assessing, regulating and facilitating resources development.
- Build the capability and expertise of regulators to support delivery of strategic objectives and key performance indicators faster.
- Embed an agile and fit for purpose regulatory regime that addresses hazards and risks appropriately.
- Support industry leaders, innovation and new ideas by being responsive and receptive to new technology, ideas and processes, entertaining risk and participating and funding where appropriate in the de-risking process; be empowered to do things differently.
- Proudly and vocally support—at home and abroad—the Queensland resources sector and its long-term future, the benefits it provides to all Queenslanders, and its high ESG performance across all commodities.
- Continue to support and collaboratively fund exploration and pre-competitive geological data capture.
- Work across departments to achieve integration, consistency in best practice consultation, and consistency in best practice project management and implementation.

The role of industry is to:

- Work transparently and collaboratively with the Queensland Government, ensuring that all appropriate efforts are made to meet timeframes and participate in consultation.
- Lead innovation and ideas generation that will support responsible economic development.
- Engage proactively with departments across the resources assessment chain to provide feedback on what the Queensland Government should keep doing, improve, and stop doing.
- Advocate for a whole of government policy and regulatory setting that achieves responsible economic development by being fit for purpose, agile, efficient, and appropriate to the hazards and risks posed.
- Engage early and often in pre-lodgement conferencing to ensure development applications are complete.

6 AMEC'S TOP 5 POLICY PRIORITIES

Delivery on initiatives suggested against these top 5 policy priorities will deliver streamlined assessment and help drive down the current high costs of doing business in Queensland.

1. Safety
2. Whole of government alignment
3. Land access and co-existence
4. Critical Minerals Sandbox
5. Environmental regulation

Safety

AMEC believes that Queensland is well positioned to have a strong resources sector where safety continues to be priority #1. To achieve this, however, the safety frameworks and their administration need to be cognisant and adaptive to the changing and increasing diversification of the sector. As such, across the board as a principal, 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 and resourced as such to manage them—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 |
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| <p>1. Governance</p> | <p>Recognising that the current governance is determined by legislation, AMEC seeks to be included in some capacity as a key stakeholder in the governance of the Minerals Safety and Health Advisory Committee (MSHAC) to enable real time sharing of information as it relates to minerals explorers and developers. This includes being invited to each quarterly meeting or alternatively being aware of the agenda and being able to participate in relevant items at each quarterly meeting.</p> |
| <p>2. Clarity and communication</p> | <p>The approach of treating exploration in the same regard as mining operations causes confusion and unnecessary complexity for explorers trying to implement appropriate SHMS. Clarification of the requirements upon explorers, 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</p> |
| <p>3. Ensuring members are aware of the requirements upon them and have adequate support, guidance and tools</p> | <p>There are several actions that RSHQ could take to improve engagement with AMEC members and other junior and mid-tier operators.</p> <p>A targeted approach to engagement could be informed by analysing the current customer experience including for example (and not limited to) understanding:</p> <ul style="list-style-type: none"> • how they access information • their user experience with the website and RSHQ’s current notifications process, and <p>their confidence in their being able to seek guidance and support from RSHQ proactively and not only when there is an incident or issue.</p> |
| <p>4. Review the Minerals Exploration Safety Guidance Notice November 2004</p> | <p>AMEC seeks that the Minerals Exploration Safety Guidance Notice November 2004 is reviewed in collaboration and consultation with industry. As a part of this review improve the Senior Site Executive (SSE) framework for junior and mid-tier explorers, developers, and producers and its administration are fit for operations, hazard, and risk.</p> <p>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.</p> |
| <p>5. Building industry competency</p> | <p>Ensuring staff from policymakers, the inspectors, BoE, and the Commissioner are participating in professional development and industry placements to ensure they have a contemporary understanding of the resources sector and its increasing diversification.</p> |
| <p>6. BoE accepted training</p> | <p>A review of the CPD training be undertaken to ensure that it is a fulsome list that covers all acceptable and appropriate training.</p> <p>Develop partnerships with RSHQ, Industry professionals and peak representatives to develop a clear pathway for upskilling.</p> |

Budget Considerations for Safety

Allocate funding and resources to:

- Develop safety templates to improve reporting quality and quantity
- Improve communication of key messages with targeted information tailored to the audience
- Review the Minerals Exploration Safety Guidance Notice November 2004
- Provide ongoing professional development and industry placements of RSHQ staff
- Review training being undertaken to ensure it is acceptable and appropriate and adapt to include certification and recognition of prior learning
- Provide mapped pathways for training and skill analysis to take candidates from non-complaint to complaint SSE professionals

Whole of government alignment

The Queensland Government has committed to achieving net zero emissions by 2050, with an interim target to reduce emissions by 30% below 2005 levels by 2030. The government also has a target of achieving 70% renewable energy generation by 2032 and to phase out coal fired power generation by 2035. Critical to achieving these targets are the energy transition technologies and infrastructure that are resourced and fuelled by critical minerals, rare earths and steel-making coal.

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 these targets and the necessary transition of skills and communities in preparedness for the burgeoning green growth industries and opportunities. Further, investing in innovation and technology that supports the decarbonisation of coal and gas requires government support to ensure they are responsibly mined for decades to come.

Alignment of delivery commitments and priorities across departments would increase efficiency for all stakeholders and place Queensland as the top mining jurisdiction for Australia and could be an example for other jurisdictions to show what can happen when the State thinks about the big picture.

Building on the need for whole of government alignment, we need the State to making a coordinated effort to achieve policy certainty and royalty stability, or else Queensland will successfully continue to keep losing opportunities for the resource industry with flow on impacts to every business and opportunity along the supply and value chain.

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

| PROPOSAL | DESCRIPTION |
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| 7. Clear articulation of whole of government alignment and support for Queensland's resources sector | <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.</p> <p>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">• Clear articulation of support for the resources sector and facilitation of green and brownfield critical mineral 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.• From the top (Director-General) down, a clear commitment through articulation in strategic plans to operational business plans that facilitation of |

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| | responsible mining is a priority for Queensland. To be supported by capability uplift and cultural change where required. |
| 8. Queensland Energy and Jobs Plan | <p>The Department of Energy and Public Works will consider AMEC to be included as a key stakeholder in the implementation of the Queensland Energy and Jobs Plan.</p> <p>The Department of State Development, Infrastructure, Local Government and Planning must ensure that their battery strategy is aligned with the direction of the federal government and is developed in consultation and collaboration with the resources sector and has the full battery development supply chain in scope for minerals that are mined in Queensland. As a priority, immediate Queensland opportunities, e.g., vanadium, should be developed hard and fast to optimise investment attraction.</p> <p>Help create a value chain for the battery industry through initiatives like procurement targets, content requirements and co-funding manufacturing for downstream battery components.</p> |
| 9. 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 maintain and where appropriate, adjust to lower royalty rates for mineral commodities for the remainder of this term. |

Budget Considerations for whole of government alignment

Allocate funding and resources to:

- Improve the understanding of cross-government impacts to improve facilitation outcomes
- Maintain the focus of Energy and Jobs Plan and the contribution exploration and mining has as inputs to this
- Review royalty rates for developing commodities to incentivise investment and growth

Land access and co-existence

The ability for exploration companies to access their exploration permits throughout Queensland is inconsistent and 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 their tenements; this is more noticeable under 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 costs added by lengthy, costly and stressful legal processes.

Overlapping land uses and their consequences are being experienced, specifically with regards to renewable energy project occupiers (wind and solar proponents) overlapping with exploration leases. 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 pieces 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 that is in the interest of achieving coexistence of growth.

AMEC appreciates Resources efforts to assist with difficult cases, but often competing interests and legal processes are taking time and money from both landholders and exploration companies. The actions (23 and 24) in the QRIDP are a start but will not make a meaningful difference to the majority of problems currently being experienced.

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

| PROPOSAL | DESCRIPTION |
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| <p>10. New policy to address overlapping tenure clarity and resolution of co-existence issues</p> | <p>AMEC identifies that with the release of the new Queensland Energy and Jobs Plan, delivering certainty in the regulatory framework for overlapping tenure between explorers and renewable energy developers will be key to the plan's success. Many of the minerals in the ground across Queensland, are critical to the infrastructure and battery demands that the plan seeks to deliver. While land access considerations for minerals are regulated by the Mineral Resources Act and MERCPC, renewable projects will be regulated under the Planning Act. Other than 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. Policy, legislative and process harmony is necessary for success.</p> |
| <p>11. Investigation of contemporary tenure solutions</p> | <p>Attempting to solve new problems with old solutions will not serve industry or regions and eventually lead to worse outcomes. It is suggested that Resources consider new tenure solutions to manage and address co-existence between resources, agriculture and renewable energy projects. This is not dissimilar to Western Australia's recently embedded diversification tenure solution.</p> |
| <p>12. Responsible person is at a minimum the landowner or the person who has day-to-day management of property, not the legal representative or land agent / advisor</p> | <p>Defining the responsible person for the negotiation is at a minimum the landowner or the person who has day-to-day management of property, not the legal representative or land agent / advisor. AMEC is in no way against having legal representatives or land agents / advisors involved but has traditionally found that when this entity is nominated as the responsible person this leads to situations as described in scenario three above. The role of the responsible person under the Land Access Code is responsible for communication and is required to have knowledge of the property and its operations. This role cannot be performed by a legal representative or land agent / advisor as they are not aware of the day-to-day operations on the relevant land.</p> |
| <p>13. Define the rights of each party to minimise the risk of conflict escalation</p> | <p>Clearly defining the rights of each party involve 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, such as the decisions referenced above.</p> |
| <p>14. Embed limitations on decision making timeframes</p> | <p>Setting clear guidance or embedding limitations on the timeframes to deliver clarity on when a decision will be made and consequently when equipment is required. Exploration, especially in Queensland, has seasonal limitations. As a result, having certainty on when access should be resolved delivers certainty as far as equipment and other sub-contracting requirements. Certainty delivers efficiency, which helps drive down costs and essentially makes Queensland a more attractive prospect for doing business.</p> |
| <p>15. Cap 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. The examples provided above from AMEC members, as well as the judicial decisions, show that there are some entities that are exploiting explorers for personal gain. Capping the compensation costs and providing guidance, would help to achieve a level playing field and deliver certainty.</p> |

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| 16. Share mediation costs | 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 in no way supports resolution, in particular under scenarios where the entity involved is being obstructive and seeking to gain personally and not in the spirit of the framework. |
| 17. Require title amendments, only when material change is determined | Currently once the CCA is executed this 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 benefit to landholder or explorer. |

Budget Considerations for land access and co-existence

Allocate funding and resources to:

- Consider the time, costs and stress impacts of Land Court and land access on all parties and develop frameworks to minimise these impacts

Critical Minerals Sandbox

AMEC's interpretation of action 43 in the QRIDP is that it is fundamentally designed to accelerate the administration of regulatory frameworks, or optimally design new alternative frameworks and pathways to ensure that they accelerate assessment of development by being fit to operations and risk based.

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| 43. New economy mineral regulatory sandbox | Lead: Government (Department of Resources) When: 2022–25 | The Queensland Government will collaborate and co-design with industry and other stakeholders a 'regulatory sandbox' process to ensure a streamlined approach for new economy mineral projects. The government understands a fit-for-purpose regulatory assessment is critical to accelerate development of these projects and ensure that Queensland is able to optimise the opportunity. The process will not reduce the opportunity for community to have a say or lessen environmental standards. Departments will also work together to develop a case management approach to support better coordinated and streamlined assessments across agencies. The government will consult further on the regulatory sandbox concept in late 2022. |
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AMEC advocates that if Queensland is to be a critical mineral leader, then we cannot do things how we have done them in the past. AMEC has engaged across the Queensland Government actively—with the Department of Resources, Department of Environment and Science (DES) and DSDILGP on how action 43 could be implemented as it is recognised that for there to be meaningful change, it must be an aligned and whole of government effort. AMEC is strongly of the view that the obstacles to efficient and risk-based assessment are not one departments problem alone but are a government problem. The sandbox and its principles of co-design are an elegant solution for coming up with government solutions to government problems.

As far as the 'sandbox' is concerned AMEC sees the following options as being key to considerations by the Queensland Government and looks forward to the opportunity to co-design their scope and implementation:

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| 18. Capability uplift | Capability uplift of assessment staff that are involved in the resource assessment—Resources, DES, DSDILGP, OCG and DRDMW—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. |

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| 19. Critical Minerals Assessment Hub | As part of the sandbox, the Critical Minerals Assessment Hub should focus on assessing and developing pathways fit for critical minerals operations, that have scalability to hazards and footprint embedded into them from the beginning. Preferably, it would bring together assessment, compliance and legislative specialists from each department—Resources, DES, OCG, DRDMW, Treasury—and centralise them in an agency such as DSDILGP to achieve push and influence. |
| 20. Critical mineral zones | <p>AMEC is supportive of the proposal to define critical mineral zones, especially if they are based on a successful model, e.g., State Development Areas which promote economic development. AMEC sees this model to be highly transferrable.</p> <p>AMEC also advocates that while a geographically agnostic approach would be preferable, it is understandable that to build the Queensland Government's comfort and capability in administering differently, starting with a single zone is a step in the right direction. AMEC believes a good starting point for the zones, would be vanadium development in the Julia Creek area, where there is one approved vanadium mine (St Elmo, held by Multicom Resources) and several emerging developers, such as QEM Ltd, Critical Minerals Group, Richmond Vanadium Technology and Velox Energy Materials.</p> <p>If this proposal was to be pursued, AMEC seeks to be included in the co-design to ensure that emerging mineral zones, not only the North West Minerals Province, but that of the North East Mineral Zone, Wide Bay-Burnett area and South West Queensland for example, were considered.</p> |
| 21. Standard conditions and geological risk profiling | <p>Development of 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.</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 as likely to be the same. As such, understanding geological risk profiles for one project could be applied or inform future development conditioning and as a result, accelerate assessment administration.</p> |

While AMEC advocates that we need to do things differently there are also mechanisms available to the Queensland Government that will deliver immediate and meaningful change to AMEC members that could be included as part of the sandboxing scope. The proposals presented below are the 'low hanging fruit' or early wins to support accelerated development.

An additional benefit if the Queensland Government were to implement the proposed improvements to freight and logistics and water management, is that it would contribute positively to investment attraction. Two key aspects of attracting investment to a project are whether you can move the ore or processed mineral to where it needs to go and whether it has accessible water. Securing these critical aspects of the development contribute significantly to securing investment.

| PROPOSAL | DESCRIPTION |
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| 22. ERC and FPS – shared risk | For the Queensland Government to achieve its aspirations regarding the growth of critical minerals development, there needs to be a thorough review and consideration of the barriers the current ERC managed by DES and the implementation of the 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. This makes it a terribly prohibitive environment for junior and mid-tier operators to be successful. |

| PROPOSAL | DESCRIPTION |
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| | It is recommended that options to share risk between the state and proponent, are embedded into both programs to enable more development. |
| 23. Support for novel initiatives | <p>In the vein of doing things differently, frameworks need to be able to support the changing face of the resources sector. This includes the ability for operators to be able to do toll processing under the hub and spoke model or similar. Now, there are regulations that get in the way of transporting ore from one site to another.</p> <p>Toll processing is the next step the Queensland Government could consider accelerating project development and increasing 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. 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. This facility could source electricity from renewable sources and go a long way to achieving "Action 19: Investigate innovative options to support junior and mid-level companies to decarbonise operations" in the draft QRIDP.</p> |
| 24. Rehabilitation | Currently, the ERC 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 contemporary use. |
| 25. Freight and logistics management | <p>There is a focus on finding resources, but a substantial hurdle for any potential project to overcome is the significant distances from the coast and accessing high efficiency and low-cost logistics infrastructure. This is often prohibitive for small, and emerging projects on a 'stand-alone' basis. The Bowen Basin Coal Infrastructure was developed with State Government assistance, the emerging minerals regions need this type of vision and planning also.</p> <p>There is significant effort underway to encourage development in the NWMP, especially to unlock to possibility for critical minerals. Freight costs and availability remain a key cost inhibitor for junior producers, however 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> <ul 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. • Deliver the Townsville to Mount Isa Logistics Trial to better utilise existing rail infrastructure and reduce/delay the need for new capital investment. • Overcome the current obstacle of rail not being able to cross the Flinders Highway, as is the case for Julia Creek vanadium developers now. |
| 26. Water management | The current water management framework with an operational moratorium means that some instruments of the <i>Water Act 2000</i> are currently on hold. For example, there is no clear process to make an application for a new Water Licence, as it will be rejected under the Water Plans, which uphold the moratorium. It would be of considerable benefit to industries |

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| | <p>and the greater economic framework built around industries if this were re-considered in a contemporary context.</p> <p>The main challenge for the mining industry and other parts of the economy, is that the extreme events from 2011 and again recently in 2022 mean that there is significant additional flood peak water that could be removed from the systems and catchments prior to reaching destructive and life-threatening levels. Mitigation of the waters that are (in many cases) outside of acceptable water quality objectives, could be captured and stored.</p> <p>A potential solution is the re-implementation of a Water Licencing framework allowing the development of associated water infrastructure and take of waters from a watercourse. This would allow private investors, landowners, and tenure holders the opportunity through a range of existing frameworks, to apply for a Water License, and associated infrastructure to harvest and store water during excessive flood peaks; this water could then be stored and utilised for actions such as mineral processing, blending, dust suppression, construction, and development.</p> <p>This would reduce the impact industry currently has on the water resource system as a competitive user to all other industries. It would also reduce the impact of waters as they move through the catchment, accumulating sediment, debris, and chemicals during critically high flood events, assisting in part to mitigate and dissipate the impact from these events in the future and building some degree of resilience as well as offering opportunity for development. The following proposals could be considered by DRDMW to support the above intent:</p> <ul 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. |

Budget Considerations for critical minerals sandbox

Allocate funding and resources to:

- progress the Queensland Critical Minerals Strategy
- Set up the Critical Minerals Assessment Hub with adequately trained staff whilst maintaining resources in existing departments

Environmental regulation

AMEC will continue to engage proactively and be involved in consultation with Government, in particular DES and Resources to ensure there is transparency in their consultation and the materiality of any changes as they directly relate to policy impact on our members.

AMEC and the experience of its members is that environmental regulation for resource projects continues to incrementally and materially increase. AMEC supports robust and outcomes focussed environmental regulation that is focussed on protecting natural values and managing pollution. While DES continues to state that the amendments they make through various vehicles in the parliament are achieving regulatory efficiency, AMEC largely disagrees with these assessments and submits that the direction is one that continues to make it harder to develop minerals and broadly, do business in Queensland. This outcome generates an environment that does not attract strong investment in mineral exploration or support a modern Queensland economy that facilitates development of a diverse resources sector that consequently supports regional and broad economic growth.

There needs to be a strong focus on stability of the policy reforms and policy direction. The past two years have produced necessary reform, but a great deal of uncertainty and unpredictability in what the framework looks like for developers. This instability creates uncertainty around project investment and pathway capacity, some projects will transpire over many years which surpasses Government's current policy cycle and direction.

Implementation of assessment and regulatory frameworks that are fit-for-purpose and correspond to an operations footprint, disturbance and risks, are critical to achieving the government's vision of a resilient, responsible and sustainable Queensland resources industry that grows as it transforms. In taking this vision forward, there needs to be capability built within government that disturbance will be required, however the footprint will typically be less. This disturbance may also be geographically broader, as data and new information is gathered around the presence of critical minerals across Queensland, through efforts made by the Geological Survey of Queensland as well as private explorers. It is worth noting that as it stands, less than 1% of Queensland's land mass is currently disturbed by mining.

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| <p>27. Environmental Approvals and Assessment Framework</p> | <p>AMEC will maintain active engagement across all proposed environmental reforms as they emerge to understand the possible impacts on members and advocate in the interest of the broad membership, this includes but is not limited to:</p> <ul style="list-style-type: none"> • Approval pathway and increasing complexity of approvals in QLD (ERC ,PRCP, Site Specific ERAs and EA.), tenure overlap and land access, and • Complex compliance conditions, lack of clarity and effectiveness that is intended to protect the environment. • Continue to engage on the mine rehabilitation and financial assurance reforms to ensure the practical and effective implementation as well as the appropriate outcomes sought are delivered for the resource sector. <p>Development of new requirements, such as decarbonisation needs, as they emerge.</p> |
| <p>28. Re-commercialising abandoned and historic mines</p> | <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. The current administration, legislation and costs however, are a deterrent to companies keen to work on these sites and tailings, member experience identifies DES as the handbrake in achieving success in this space. A fresh approach is required collectively by the Queensland Government in seeing 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> <ul style="list-style-type: none"> • Implement action 8 of the QRIDP in consultation with industry to ensure that the principles catalyse interest, investment, and development of critical minerals in already disturbed areas achieving economic, social and net environmental benefits. • Incentivise companies proposing to reprocess tailings or work on abandoned/ historic mines sites by not imposing excessive and prohibitive environmental liabilities. |
| <p>29. Decarbonisation policy and plans</p> | <p>Implement action 22 of the QRIDP in consultation with industry in a transparent and collaborative way. To ensure any policy or required plan is fit for operations and scalable, as well as supported by appropriate education and communication. Of key importance is that DES work with industry to tailor education in this space to ensure all operators have their capability needs addressed.</p> |

| PROPOSAL | DESCRIPTION |
|---|--|
| <p>30. End of waste framework review</p> | <p>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.</p> <p>The codes are currently inhibiting achieving a circular economy and they are limited to innovation and technology. There should be incentives to put forward for new EOW Codes that allow for Re-processing and innovation in wastewater and tailings.</p> |
| <p>31. Environmental mapping</p> | <p>There are many areas in the state where exploration is severely restricted on erroneous environmental grounds. Examples include:</p> <ul style="list-style-type: none"> • The 'repealed' Wild Rivers areas, where the areas are now designated 'Strategic Environmental Areas'. • Often cattle are grazing in the 'sensitive ecosystem/wetland' as part of a pastoral lease, but lower impact exploration activity is not permitted within the overlying exploration permit area. • Explorers are not seeing or encountering the mapped vegetation in environmentally significant areas when they go to these sites. <p>A large part of the Herbarium mapping is based on satellite images and remote sensing. AMEC understands that the Queensland Government Herbarium is working to cross reference this information. According to DES, <i>"Regional ecosystem mapping is based on field survey, analysis of aerial photographs and satellite imagery, and assessment of other data such as geology and soil mapping and historical survey plans."</i>¹</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. There is a dis-incentive for companies to report potentially incorrectly mapped 'clear' areas that might have sensitive vegetation.</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. |
| <p>32. Government Relationships</p> | <p>AMEC witnesses disharmony between departments in their own engagements with each other. As such AMEC seeks that departments start to consider issues as government problems and not one department's responsibility exclusively. AMEC expects that is successful the critical minerals sandbox may help resolve some of these issues.</p> <ul style="list-style-type: none"> • Regular consultation that is targeted at Specific Departments and achieves the outcome of informing policy at a practical and effective level. • Engagement with Government and improve the culture. Where there is conflict between Departments and within Departments this resonate to industry at all levels. The disharmony at the approvals and compliance (day to day) in comparison to the top down assessment approach need to be approved |

¹ [Survey and mapping ecosystems](#)

Budget Considerations for environmental regulation

Allocate funding and resources to:

- progress the Queensland Critical Minerals Strategy from a Department of Environment and Science (DES) perspective. All 4 objectives of the Queensland Critical Minerals Strategy (Move faster and smarter, Maximise investment, Build value chains, Foster research and ESG excellence) can't be done without the support of DES.

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