27 March 2026

To: Legislative Scrutiny Committee

Re: Mineral Titles Legislation Amendment Bill 2026

Introduction

The Association of Mining and Exploration Companies (AMEC) appreciates the opportunity to provide industry feedback and comments on the *Mineral Titles Legislation Amendment Bill 2026.*

Access to land is fundamental to the viability and competitiveness of the exploration industry. Without the ability to enter, survey, and test prospective areas, companies cannot identify new mineral resources, replenish reserves, or support long-term project pipelines.

About AMEC

AMEC is a national industry association representing over 550 member companies across Australia. Our members are mineral explorers, emerging miners, producers, and a wide range of businesses working in and for the industry. Collectively, AMEC's member companies account for over $100 billion of the mineral exploration and mining sector's capital value.

Mineral exploration and mining make a critical contribution to Australia's economy, directly employing over 274,000 people. In 2022-23, the industry generated a record-high $466 billion in resource exports, invested $4.27 billion in exploration expenditure to discover future mines (2023), and collectively paid over $63 billion in royalties and taxes.

General Remarks

AMEC welcomes these proposed amendments to the Mineral Titles Act 2010 (the Act) and the Regulations, which should resolve several administrative issues and improve the Act's functioning. These amendments follow the 2011 review of the Mining Act and the 2024 discussion paper released for public consultation. While it has taken 15 years to formulate, the proposed amendments will alleviate certain regulatory burdens and foster greater confidence among companies and investors.

Subsection 8 Geocentric Datum of Australia

The proposed amendment to the definition of 'GDA 94' under Section 8 changes it to 'Geocentric Datum of Australia (GDA)' to refer to the GDA used across Australia. It is a proactive issue that should be addressed by neighbouring jurisdictions. Industry has noted that the continent shifts northward by 7 cm each year and that GDA data used for placing tenements must be accurate.

Section 27

Specifically, Section 27(2)(c) requirement to lodge *a summary of the proposed technical work program for the following 4 operational years of the EL* shouldn't be a requirement. Company priorities will change year to year, and forward work programs also depend on the exploration findings and current reporting terms. This is simply not representative of the commercial realities faced by exploration companies.

Sections 29 and 30

AMEC supports the 'use it or lose it' philosophy, which is important for competitive exploration of the land and for preventing land banking. However, due to specific difficulties encountered while operating in the Northern Territory, AMEC supports the proposed amendments to reduce and renew the title area requirements for an exploration licence at the end of the initial grant period.

It is often an industry practice to drop ground regardless, as companies pinpoint where to focus their exploration and expenditure.

At the end of the first renewal period, the reduction in the title area may be made compulsory; however, the Minister's authority to waive the requirement should remain available in each subsequent renewal period. It has been noted that there could be many reasons why the titleholder still wants to retain the remaining licence. If they have already reduced the title to the point where the whole title area is prospective, this could be problematic. This will also discourage titleholders from hanging on to the ground until this compulsory reduction date.

Point (5) under Section 30 makes reference to the Minister not acting under subsection (3) in relation to an EL with an aggregate term that has reached 12 or more years. Does this mean titles older than 12 years will be able to waive the 50% renewal reduction requirement?

Section 67

Members expressed to AMEC that the inclusion of this amendment is expected to increase the overall regulatory burden by introducing additional compliance obligations and administrative processes. While the amendment aims to strengthen oversight, its practical effect will likely be a more complex regulatory environment that places added pressure on stakeholders to maintain compliance.

Regulation 80

Regulation 80(1) states, "*The holder of multiple ELs may apply to the Minister for approval of an exploration project area for the title areas of 3 or more of the ELs (the project area) if:*" Members' feedback has expressed to AMEC that this point should be changed from 3 to 2.

Regulation 81

AMEC supports the amendment to Regulation 81 to set the lodgement date of an expenditure report at 60 days after the end of each operational year, to coincide with the lodgement of the annual report.

Regulation 84

AMEC believes there should be a provision in the Act that does not require a holder that has not yet defined a resource to supply a Resource Report.

Section 100

The removal of 'retrospective variations' for the reporting year that has just ended is not supported. Companies do not always know if they will meet their expenditure 6 months into their reporting term. Delays in fieldwork or in receiving results may not be apparent within the first 6 months. It would be very difficult for explorers to know with certainty that they will fall short in many circumstances. This could lead to applications for an advanced waiver of expenditure, resulting in more work for both industry and the Department.

Companies will, unfortunately, fall short of their expenditure at the end of their reporting terms. This is especially true for companies whose anniversaries fall in the middle or at the end of their field season.

Final Remarks

AMEC appreciates the opportunity to provide feedback on the current Bill. In light of the previous consultation, refinement, and the many years of work that have brought these amendments to their current form, we fully support their progression. The proposed changes reflect a balanced and considered approach, and we believe they are ready to be adopted without further delay. Passing these amendments now honours the significant effort invested and ensures that the benefits of this long-awaited reform can finally be realised. We would welcome an opportunity to present our views.

For further information, contact:
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