05 October 2026

To: Department of Environment, Tourism, Science and Innovation (DETSI)

RE: Consultation on the draft ERA codes and draft ERA standards

Introduction

The Association of Mining and Exploration Companies (AMEC) appreciates the opportunity to provide feedback to the Queensland Government as it develops the draft ERA codes and refines the proposed list of significant environmental values under the broader legislative amendments introduced through the *Environmental Protection (Efficiency and Streamlining) and Other Legislation Amendment Act 2026* (the Amendment Act).

About AMEC

The Association of Mining and Exploration Companies (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 314,000 people. In 2025-26, the industry generated $383 billion in resource exports, invested $3.95 billion in exploration expenditure to discover future mines, and collectively paid over $59.4 billion in royalties and taxes.

AMEC represents more than 80 companies operating in Queensland, providing a united voice for junior and mid-tier explorers and miners who are key users of ERA codes and standards.

Recommendations

- **Establish a single, consistent definition framework for environmental values**

The Queensland Government should adopt one consolidated terminology set for environmental values, with SEVs defined exclusively through the SEV Guideline. All ERA Standards, regulations, and supporting materials must reference this single definition list. This removes duplication, prevents conflict with existing ESA terminology, and ensures alignment with both State significant residual impact criteria and national environmental significance matters.

- **Align buffers and spatial triggers with existing legislated mapping**

New buffer zones (e.g., 100 m wetland vegetation buffer, 10 m riparian rule) should not be introduced unless they are legislatively supported and spatially represented. All spatial triggers must align with existing statutory datasets such as Category R under the *Vegetation*

Management Act 1999. Remove arbitrary or non-legislated zones to avoid confusion, inconsistent interpretation, and regulatory overreach.

- **Ensure ERA Standards do not impose survey obligations beyond reasonable practice**

ERA Standards should be designed so operators, particularly SMEs, are not required to undertake habitat, wildlife, or vegetation surveys simply to demonstrate compliance. Where spatial datasets already exist, they must be used as the primary compliance tool. Survey requirements should apply only where risk is genuinely high and clear legislative authority exists.

Key Points

The draft ERA codes are intended to replace the existing prescribed conditions for small-scale miners and remove the requirement for operators to hold an environmental authority for certain lower-risk activities. AMEC acknowledges that the ERA codes will also replace the current Small-Scale Mining Code under the Mineral Resources Act 1989, creating a new regulatory framework that operators will be required to comply with once enacted.

While the introduction of ERA codes aims to streamline regulatory obligations for small-scale and exploration-related mining activities, the conditions must remain practical, proportionate to risk, and clearly articulated. Where operators cannot meet the conditions of an ERA code, the option to apply for an environmental authority remains appropriate; however, the criteria for determining when an EA is required must be transparent and applied consistently.

Alongside the ERA codes, DETSI has proposed amendments to the ERA Standards for mining activities undertaken under exploration permits, mineral development licences, prescribed mining claims, and mining leases. AMEC emphasises the importance of ensuring that the standards align with operational realities, minimise unnecessary regulatory burden, and support efficient, risk-based environmental management.

AMEC also notes the references within the draft ERA codes and ERA Standards to “significant environmental values” and welcomes the opportunity to provide feedback on the proposed list of values. AMEC seeks clarity on whether significant environmental values should include the environmental values of State forests and timber reserves, and how this definition will be applied in practice across different tenure types and mining activities.

AMEC has reviewed the legislative elements supporting risk assessment for environmentally relevant activities and the approval pathway, using its eligibility criteria assessment and supporting information sheets. The draft introduces significant legislative changes that expand control, protection, and prohibition of certain activities. However, these changes will not create a more transparent or streamlined process for many AMEC members operating under this framework. When reviewed with the draft ‘Significant Environmental Values’ expanded definition list, this approach broadens definitions across multiple acts for matters now classified as significant environmental values. It also establishes buffer zones, defined as areas where activities related to the nominated ERAs or their eligibility criteria are not permitted. This approach seems to exclude small-scale mining and exploration activities, rather than providing a transparent, streamlined framework for low-risk operators.

1. Environmentally Relevant Activity Codes – Comments and Review

Environmentally Relevant Activity Code for Small Scale Mining on an Exploration Permit

Environmentally Relevant Activity Code for Small Scale Mining on a Prescribed Mining Claim

General obligations are more explicit in the linkage to broader environmental duties and may be more pronounced than in earlier codes.

Disturbance Limits under the new code limits land disturbance to no more than 1,000 m² and prohibits adverse effects on significant environmental values.

Earlier codes may not have specified such strict quantitative limits or environmental value protections.

The *mandatory conditions* requiring drill pads and excavations to be rehabilitated within 3 months, and drill holes to be decommissioned or converted to water bores within 30 business days, impose very compressed timeframes for exploration operators. In practice, a 3-month rehabilitation window is often insufficient to complete all necessary works, particularly where multiple drill pads, access tracks, landholder negotiations, and seasonal constraints are involved. Likewise, converting drill holes to water bores and transferring them to landholders is not a quick process; it frequently requires coordination with landholders, bore contractors, and compliance checks that extend well beyond 30 business days.

A more realistic timeframe of 3–6 months would better reflect operational realities, allow for safe and orderly completion of works, and reduce the risk of non-compliance driven solely by administrative deadlines rather than environmental outcomes. These activities are already well-regulated under existing frameworks, and overly contracted timeframes do not align with the practical delivery of rehabilitation or bore transfer obligations.

Environmentally Relevant Activity Code for Hand Mining on a Mining Claim

The new code appropriately enables hand mining on mining claims (excluding prescribed claims) to be managed under a code rather than requiring a full environmental authority, provided all code conditions are met. Given the very low-risk nature of hand mining, this is a reasonable and proportionate regulatory approach. Compared to previous standards, the new code is more detailed, prescriptive, and activity-specific, particularly through the introduction of clear restrictions on the number of persons on site (maximum of 20) and limits on disturbed land area (maximum of 5,000 m² at a campsite). These refinements provide greater clarity for operators while ensuring that low-impact activities remain appropriately regulated.

2. Eligibility criteria - Comments and Review

Eligibility Criteria and Standard Conditions for Mining Lease Activities

The eligibility criteria in summary is below,

- Only certain types of mining (clay pit, opal, shallow pit, dimension stone, hard rock, alluvial) are eligible.
- Activities must occur on a mining lease for minerals (excluding coal, uranium, and mercury).
- Operations must not be in areas of significant environmental value or protected areas.
- Disturbance limits: no more than 10 hectares of land or 5 hectares of certain sensitive areas can be significantly disturbed at any one time

The terms *significant environmental value* (SEV) and protected area are used together in this section, but our understanding is that a protected area would already be considered a SEV. Using both terms in parallel is therefore confusing and suggests an unnecessary distinction. If the Department intends to adopt the full definition list set out in the draft SEV guideline, then only a cross-reference to that definition list is required. Including "protected area" separately implies an additional category, despite it already being captured within the SEV framework.

Eligibility Criteria and Standard Conditions for Prescribed Mining Claim Activities

The eligibility criteria in summary is below,

- Must be a mining activity on a prescribed mining claim.
- Only the following types of mining are eligible:
    - Opal mining
    - Shallow pit mining (open cut pits no more than 5 m deep)
    - Alluvial mining (excavating unconsolidated or waterborne/weathered materials and processing by gravity separation or chemical methods)

Eligibility Criteria and Standard Conditions for Exploration and Mineral Development Licence Activities

The eligibility criteria in summary is below,

- Must be a mining activity on an exploration permit or mineral development licence.
- The activity must be for exploration purposes

A new term is used in this ERA Standard for SEVs that does not appear in the other standards.

> *Activities must not be carried out in areas of significant environmental value (such as protected areas, marine parks, declared fish habitats, wetlands of high ecological significance, or strategic environmental areas)*

As previously noted, SEV terminology should be consistent and reference the single definition set contained in the draft SEV guideline. Introducing additional or slightly varied terms creates unnecessary nuance, reduces clarity, and increases the risk of inconsistent interpretation. A single, consolidated reference to the SEV guideline would avoid duplication and ensure definitional alignment across all ERA Standards.

The Assumptions drafted within the documents implies that activities are to avoid *Significant Environmental Value Areas*

- The criteria assume accurate identification and avoidance of all areas of significant environmental value. However, mapping errors, outdated databases, or ambiguous boundaries could result in unintentional encroachment.
- The gap in this documentation and material supporting this intent is there is no explicit process for verifying up-to-date mapping or independent validation before activity commencement.

If an operator is unable to determine the precise location of SEVs or cannot meet the definition requirements for SEVs as drafted, they will be required, at a minimum, to undertake field survey work. This represents a significant additional burden and cost for operators and is well beyond what is currently expected or occurring in practice. Requiring field verification for SEVs in circumstances where spatial datasets already exist undermines the intent of streamlining and introduces new regulatory obligations that are disproportionate to the scale and risk of the activities covered by this ERA.

3. Significant Environmental Values

Key environmental considerations are currently managed under the definition of *Environmentally Sensitive Areas* (ESAs) in accordance with *Schedule 19* of the *Environmental Protection Regulation 2019*. The EPSOLA Bill introduced the new term *significant environmental value (SEV)* without clear explanation or definition, although it was indicated that further changes would follow to support the transition to this terminology.

AMEC have consistently expressed concern that this shift may create challenges, conflict with the State's significant residual impact designation, and fail to align with national matters of environmental significance. Given the limited detail available during EPSOLA Bill consultation on the SEV definition, AMEC went to considerable lengths to explain why consistent, non-conflicting terminology is essential for matters so intricately related. Despite this strong feedback, the SEV guideline and definition list continue to raise concerns.

Although AMEC has already provided extensive feedback on terminology, transparency, and the effectiveness of legislative tools, we consider it necessary to restate these concerns more clearly, considering the ERA Standards now released. The conflicts and practical challenges we anticipated are now evident.

To demonstrate this, *Schedule 19* of the *Environmental Protection Regulation 2019* (as currently drafted) is set out below, followed by the Significant Environmental Values definition list and guideline, and a comparison table with detailed commentary. This material illustrates how the reform approach will impact our member base and why alignment, clarity, and consistency are critical to achieving workable regulatory outcomes.

Environmentally Sensitive Areas (ESA's) are divided into two categories:

***Category A* Environmentally Sensitive Areas**

A category A environmentally sensitive area means any of the following—

(a) any of the following under the Nature Conservation Act 1992—

(i) a national park (scientific);
(ii) a national park;
(iii) a national park (Aboriginal land);
(iv) a national park (Torres Strait Islander land);
(v) a national park (Cape York Peninsula Aboriginal land);
(vi) a conservation park; (vii) a special wildlife reserve;

(b) the wet tropics area under the Wet Tropics World Heritage Protection and Management Act 1993;

(c) the Great Barrier Reef Region under the Great Barrier Reef Marine Park Act 1975 (Cwlth);

(d) a marine park under the Marine Parks Act 2004, other than a part of the park that is a general use zone under that Act.

AND

***Category B* Environmentally Sensitive Areas**

A category B environmentally sensitive area means any of the following—

(a) any of the following areas under the Nature Conservation Act 1992—

(i) a coordinated conservation area;

(ii) an area of critical habitat or major interest identified under a conservation plan;

(iii) an area subject to an interim conservation order;

(b) an area subject to the following conventions to which Australia is a signatory—

(i) the 'Convention on the Conservation of Migratory Species of Wild Animals' (Bonn, 23 June 1979);

(ii) the 'Convention on Wetlands of International Importance, especially as Waterfowl Habitat' (Ramsar, Iran, 2 February 1971);

(iii) the 'Convention Concerning the Protection of the World Cultural and Natural Heritage' (Paris, 23 November 1972);

(c) a zone of a marine park under the Marine Parks Act 2004 that is within a general use zone of the marine park under that Act;

(d) an area to the seaward side of the highest astronomical tide;

(e) the following under the Queensland Heritage Act 1992—

(i) a place of cultural heritage significance;

(ii) a Queensland heritage place, unless there is an exemption certificate issued under that Act;

(f) an area recorded in the Aboriginal Cultural Heritage Register established under the Aboriginal Cultural Heritage Act 2003, section 46, other than the area known as the 'Stanbroke Pastoral Development Holding', leased under the Land Act 1994 by lease number PH 13/5398;

(g) a feature protection area, State forest park or scientific area under the Forestry Act 1959;

(h) a declared fish habitat area under the Fisheries Act 1994;

(i) a place in which a marine plant under the Fisheries Act 1994 is situated;

(j) an endangered regional ecosystem identified in the database known as the 'Regional ecosystem description database' published on the department's website.

Note— The Regional ecosystem description database is also available for inspection during office hours, at the Queensland Herbarium and each regional office of the department.

ESA's areas are currently defined in the Queensland spatial system and are linked to supporting legislation the intent is to help regulatory bodies set operational conditions, constraints, or clearing limits for standard and site-specific environmental authorities in Queensland. These definitions are not meant to alter or undermine enabling legislation or expand its scope by adding buffer zones. However, the new standards appear to do so, creating a clear conflict with this purpose.

The draft broadens the scope of matters that ERA users and proponents must address. It incorporates multiple Acts, wetland and water quality protections, vegetation categories, and explicit buffers. The table below provides a detailed comparison and highlights the expanded considerations. Industry is concerned that the original framework required assessment of impacts on Category A or B matters only if they were likely to occur, rather than being avoided or approved through offset mechanisms. The new assessment of impact for specific matters, still encourages an avoidance, of specific matters, but also now creates new stand of areas for sterilisation of activities. AMEC is concerned this further restricts operators and over complicates the mapping which operators and proponents rely heavily on to understand a projects constraints and planning.

Without legislative reform to the Offsets and Bioregional Planning and Adaptation Environmental Standards, this guideline creates confusion about the nature and scale of impacts by introducing new buffer zones not supported by legislation and how operates or proponent working within the ERA standards are to addresses impacts in a transparent and streamlined manner.

Key inclusions in the draft standard

- Protected areas under the Nature Conservation Act 1992 (excluding coordinated conservation areas)
- Marine park zones (conservation park, buffer, scientific research, marine national park, preservation) under the Marine Parks Act 2004
- Declared fish habitat areas (Fisheries Act 1994)
- Legally secured offset areas (Environmental Offsets Act 2014)
- Strategic environmental areas' designated precinct environmental attributes (RPI Act 2014, s11)

- Wetlands: GBR wetland protection areas; wetlands of high ecological significance (Qld wetland EVs)
- High ecological value waters: wetlands/watercourses within EPP (Water and Wetland Biodiversity) 2019
- Buffers: native vegetation within 100 m of listed wetlands (items above)
- Threatened wildlife and multiple forms of threatened wildlife habitat (incl. koala habitat areas)
- Marine plants (Fisheries Act 1994)
- Waterways providing for fish passage (regulated under Fisheries Act 1994)
- Regional ecosystems: endangered or of concern, with canopy structure thresholds (coverage >50%, height >70%, characteristic species)
- High value regrowth vegetation within endangered/of concern regional ecosystems
- Vegetation in category R areas (Vegetation Management Act 1999)
- Riparian vegetation: native vegetation within 10 m of a defining bank of mapped watercourses (where not category R)

Comparison matrix (draft vs. original ESA)

Specific Environmental Values as described in the Draft SEV	Area of significant environmental values (ASEV)	Significant environmental value (SEV)	Environmentally sensitive area (ESA)
NCA protected areas (excl. coordinated conservation areas)	Yes		Category B
Marine park conservation/scientific/national/preservation zones	Yes		Category A
Declared fish habitat areas	Yes		Category B
Legally secured offset areas		Yes	NEW – offsets are a private agreement in many case on freehold lands, this would create conflict with landholders, offset security and exploration entities.

RPI Act strategic environmental areas (designated precinct attributes)	Yes		NEW

The RPI Act restricts the carrying out of resource and regulated activities in SEAs where the activity is not exempt under the provisions of the Act or a regional interests development approval (RIDA) has not been granted. Resource activities include any activity for which a resource authority is required. Resource activities do not include the following:

- a prospecting permit under the Mineral Resources Act 1989
- a petroleum survey licence,
- a data acquisition authority, or
- a water monitoring authority under the Petroleum and Gas (Production and Safety) Act 2004.

https://dilgpprd.blob.core.windows.net/general/rpi-guideline-05-14-carrying-out-activities-in-sea.pdf

This legislation also regulates a broad range of other activities, including broadacre cropping and water storage dams, which further constrain development opportunities. In particular, the increasing restriction of water storage dams is in direct conflict with the work undertaken over the past two years by the Department of Regional Development, Manufacturing and Water (RDMW) to review major catchment plans and develop long-term catchment strategies to support Queensland's future water security. This misalignment between environmental regulation and water-security planning underscores the need for a more integrated, whole-of-government approach to legislative reform.

Can the Department demonstrate how it has considered the relationship between this new provision and the existing requirements of the *Water Act 2000*, particularly the Water Plans and their associated Operational Plans? AMEC can see the potential for varying standards and expectations depending on activity and legislative expectation.

GBR wetland protection areas	Yes		NEW

Wetlands are already protected, along with waterways connected to the Reef, under Category R of the *Vegetation Management Act 1999*, as well as through Endangered Regional Ecosystem protections and internationally recognised Ramsar Wetlands. It is therefore unclear why the draft ERA codes introduce a third, separate definition for wetlands as a new consideration, particularly given the limited detail provided and the absence of any clear legislative linkage.

Wetlands are already captured through existing spatial analysis and regulatory triggers, so the addition of another wetlands category appears duplicative and unnecessary. This duplication is further compounded by the continued separate listing of wetlands and the Marine Park in the draft materials. Without alignment across legislation, introducing another wetlands trigger risks creating overlap, confusion, and inconsistent regulatory interpretation.

Wetlands are also highly static features with well-defined spatial boundaries, making their identification straightforward under existing regulatory tools. This makes the inclusion of an additional wetlands consideration even more confusing, as it does not appear to add regulatory clarity or environmental benefit.

Wetlands of high ecological significance (Qld wetland EVs)		Yes	Category B
High ecological value waters (wetlands/watercourses)		Yes	Category A and Category B (Ramsar and Endangered

			Regional Ecosystem)
100 m wetland vegetation buffer	No	No	NEW – refers to comments about duplication, is neither an area or a specific matter it is an arbitrary measurement.
Threatened wildlife		Yes	NEW – not clear how this is the be addressed as part of the Eligibility criteria which will require survey work
Threatened wildlife habitat (incl. koala habitat areas)		Yes	Category B
Marine plants		Yes	NEW
Fish passage waterways		Yes	Category B
Endangered/of concern regional ecosystems (+ canopy thresholds)		Yes	Category B – with added canopy threshold which will require survey work
High value regrowth in endangered/of concern REs		Yes	Category B
Category R vegetation		Yes	Category B – is already covered but include the specific vegetation code for reef watercourse.
Riparian 10 m native vegetation (non-category R)	Yes		NEW - introducing a new arbitrary measurement.

The draft ERA codes introduce a **new additional buffer zone for wetlands**, despite Reef catchment watercourses already being mapped and regulated as buffer zones under **Category R of the *Vegetation Management Act 1999***. This represents legislative creep and is not reflective of the source legislation for Category R. Reef connected waterways and wetlands are already subject to strict spatial protections, and adding another buffer requirement through the ERA codes creates

duplication, inconsistency, and unnecessary regulatory burden. The Department should clearly demonstrate how this new provision aligns with existing Category R obligations and why an additional buffer is required when the current statutory mapping already provides defined, enforceable protection.

Key changes

AMEC considers the key changes relative to the previously consistent approach to protecting State Significant Environmental Matters

Buffer definitions

The draft introduces an explicit 100 m wetland vegetation buffer and a 10 m riparian vegetation rule. Both represent new areas that are not currently recognised in existing spatial datasets, because they are not linked to any underlying legislation.

For example, the footprint for Category R riparian vegetation is a known polygon defined by the centreline of the watercourse and the 50 m setback prescribed under the Vegetation Management Act 1999. The new buffer provisions introduce an additional arbitrary zone outside this legislated polygon, which is neither spatially represented nor supported under the Vegetation Management Act. This creates duplication, inconsistency, and uncertainty for operators attempting to interpret their obligations.

Threatened wildlife habitat scope

The draft expands the scope to include koala habitat areas and essential habitat map references. The wording suggests that operators may need to undertake habitat and wildlife survey work to demonstrate whether they do or do not intersect these matters, and whether they have sufficient evidence to support their assessment. This is a substantial and excessive requirement for low-impact activities, and it is unclear whether the original ESA relied on the same triggers.

Regional ecosystem criteria

The draft introduces explicit structural thresholds for regional ecosystems, including coverage, height, and characteristic species. There is no doubt this will require operators and proponents to undertake vegetation survey work, which is often economically unviable in remote exploration locations. This represents a significant shift from previous practice and imposes new burdens not present in the original ESA.

Riparian 10 m native vegetation (non-Category R)

The introduction of a 10 m riparian vegetation requirement outside Category R creates a new, non-legislated buffer that does not align with existing mapping or statutory definitions. This adds another layer of complexity and duplication.

Inclusion of legally secured offsets and RPI Act areas

The draft appears to include legally secured offsets and RPI Act areas as additional considerations. It is unclear whether these categories were present in the original ESA or whether they represent new additions. If they are new inclusions, they further expand the scope of matters operators must assess, again without clear legislative linkage.

The briefing session delivered by the Department on 24 September provided some clarity; however, the pace at which the presentation was delivered would not be considered genuine engagement with relevant stakeholders. Although a PowerPoint presentation was provided and the ERA Standards were outlined, the key operational elements and practical implications of these Standards were not communicated in a way that enabled meaningful understanding. It is highly unlikely that this session facilitated true comprehension or effective dissemination of the proposed changes across industry.

AMEC also highlights that there are inconsistencies in terminology between "*Area of Significant Environmental Values (ASEV)"* and *"Significant Environmental Values (SEV)"*, which are used interchangeably across the draft materials. Our understanding is that ASEV refers to a theoretical polygon or regional spatial layer identified through mapping, whereas SEV refers to a known environmental matter or feature (for example, a protected species habitat, wetland, or cultural heritage site).

Using these terms interchangeably creates confusion and undermines clarity. If the Department intends to rely on the definitions contained in the draft SEV guideline, then all ERA Standards should reference that single definition set rather than introducing additional terminology. Consistent use of SEV terminology is essential to avoid misinterpretation, duplication, and inconsistent regulatory application across ERA codes and standards.

The introduction of the new 100m buffer that is neither an area nor a specific environmental matter; rather, it appears to be an arbitrary measurement. As noted above, the draft materials already contain established terminology for SEVs and ASEVs, each with defined meaning and spatial context. Introducing an additional term that does not align with either concept creates confusion, adds unnecessary complexity, and risks inconsistent regulatory interpretation. If the intent is to rely on the SEV definition set in the draft guideline, then a single cross-reference is sufficient and preferable to introducing new terminology.

Conclusion

As Queensland develops the draft ERA codes and refines the definition of significant environmental values under the Environmental Protection (Efficiency and Streamlining) and Other Legislation Amendment Act 2026, AMEC stresses the need for these reforms to align with national environmental modernisation efforts as well as aiming to ensure consistent use of SEV terminology is essential to avoid misinterpretation, duplication, and inconsistent regulatory application across ERA codes and standards. The introduction of net-gain requirements, updated MNES triggers, bioregional planning, and the Commonwealth's new financial offset calculator marks a significant change in how environmental impacts and offsets are assessed across Australia. These national reforms highlight the need for Queensland to modernise its offsets framework to reduce duplication, harmonise MNES and MSES triggers, and ensure consistent, transparent assessment processes.

Integrating new concepts such as "significant environmental values" into ERA codes and Standards should be part of a comprehensive legislative review to prevent conflicts between State and Commonwealth triggers. Without clear alignment, proponents will continue to encounter duplicate offset obligations, inconsistent ratios, and uncertainty about the equivalence of MNES and MSES outcomes. AMEC is particularly interested in how

significant environmental values will be defined, including whether State forests and timber reserves will be included, and the potential impact on exploration access and small-scale mining.

The list cites several pieces of legislation and specific mapping tools, requiring users to be familiar with legal and technical terminology. Many values rely on spatial data, such as proximity to wetlands, specific zones, or mapped habitats. Users must access and interpret official maps and databases. Some criteria involve detailed ecological definitions, such as canopy coverage, species composition, or regrowth status, which may require expert knowledge or field assessment.

Including various Acts, such as Nature Conservation, Marine Parks, Fisheries, Environmental Offsets, and Vegetation Management, requires users to cross-reference multiple regulatory frameworks. Accessing certain databases, such as the Regional Ecosystem Description Database, may require in-person visits or navigating government websites.

In summary, while the list is comprehensive, non-experts may find it difficult to interpret and apply without guidance or support tools. AMEC has consistently raised concerns, through multiple forums and formal submissions, about the significant impact of numerous concurrent legislative amendments. The interrelated issues of environmental status, significance, and definitional inconsistency further highlight the disconnect between emerging national standards and state-based reforms. The parties most affected by these changes are the end users of the guidelines and legislation — operators, proponents, and small to medium businesses. For many of these operators, navigating complex environmental definitions, significance thresholds, and multi-layered approval pathways is often beyond their operational scope, experience, and capacity.

Guidelines must therefore operate in a manner that genuinely supports operators and proponents to understand how their activities may interact with environmental values, how to plan and prepare for activities (for example, through avoidance), and how to navigate approval pathways where avoidance is not achievable. Without clear, practical, and accessible guidance, the cumulative effect of overlapping reforms risks creating confusion, compliance fatigue, and barriers to lawful and responsible development.

Modernising Queensland's approach to environmental assessment, management, and mitigation must not compromise transparency or clarity for those navigating development in the State.

AMEC is committed to working with government to deliver a nationally aligned, scientifically robust, and operationally practical system that reflects contemporary ecological science and the realities of on-ground implementation in Queensland.

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