AMEC
ASSOCIATION OF MINING AND EXPLORATION COMPANIES

AMEC SUBMISSION

SA Productivity Commission: Red Tape Review

SOUTH AUSTRALIA

23 October 2026

Introduction

The Association of Mining and Exploration Companies (AMEC) welcomes the opportunity to provide input into the South Australian Productivity Commission Review of Red Tape.

The mining industry is a major contributor to South Australia's economy, supporting investment, exports, royalties, regional employment and future prosperity through the discovery and development of mineral resources.

About AMEC

The Association of Mining and Exploration Companies (AMEC) is a national industry association representing over 570 member companies across Australia. AMEC's member companies account for over $100 billion of the mineral exploration and mining sector's capital value. Our members are mineral explorers, emerging miners, producers, and a wide range of businesses working in and for the industry.

AMEC's membership base in South Australia comprises over 50 exploration and mining companies and 45 service providers working with industry to deliver projects.

Why this red tape review matters to the mining industry and the people of South Australia

The mining industry is a key economic sector for South Australia, with mineral exploration and mining companies investing and delivering the benefits to communities.

- Operating across 1778 licences[1]
- $239.6 million mineral exploration expenditure[2]
- $3.8 billion capital expenditure[3]
- $10.4 billion in mineral commodity sales from mines[4]
- $7 billion in mineral commodity exports
- $456.8 million in royalty payments to South Australians
- Over 45,000 direct and indirect jobs
- > 2800 local businesses supporting the industry

South Australia has world-class mineral resources and mining operations across a diverse range of commodities including copper, gold, uranium, zircon, magnetite, silver, graphite, cobalt and rare earth elements. These minerals are critical to the global energy transition, defence and space technologies, transport and infrastructure development, housing construction, health and medical industries and the technologies that underpin modern life.

Despite the State's strong resource base and significant development opportunities, companies continue to face avoidable regulatory and administrative barriers that delay exploration, investment and project development.

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[1] South Australia's Mineral Regulation Annual Report 2024-25
[2] Mineral and Petroleum Exploration, Australia, June 2026 | Australian Bureau of Statistics
[3] Private New Capital Expenditure and Expected Expenditure, Australia, June 2026 | Australian Bureau of Statistics
[4] Resource production statistics 2025-26 | Energy & Mining

[5] COVER PHOTO: Courtesy PTR Minerals, Aircore drilling at Muckanippie titanium project.

The Impact of Red Tape is Particularly Significant for Mineral Explorers

Exploration is the foundation of the mining industry and the starting point for future mines, jobs, exports and royalties. Every future mining project depends on successful exploration occurring today. However, the pathway from discovery to production is long, with projects taking 16 to 30 years to progress from discovery to an operating mine[6]. While much of this reflects the technical complexity of mineral development and commodity cycles, regulatory delays and administrative inefficiencies are increasingly adding further time and cost.

The impact is particularly significant for junior explorers responsible for more than 77% of all new mineral discoveries[7]. These companies undertake the highest risk stage of the mining lifecycle and often operate with limited staff and capital. Every dollar directed towards unnecessary administration is a dollar unavailable for drilling, geological studies, resource definition and feasibility work to reach financial investment decision.

Exploration productivity is also declining with increasing drilling costs and deeper exploration targets. Combined with growing expenditure for environmental assessments, cultural heritage surveys, native title processes, land access negotiations and compliance requirements meaning companies are spending more to achieve less. ABS data illustrates this trend, with 3.1 million metres drilled in the June 2026 quarter compared with 3.37 million metres in June 2021, despite exploration expenditure being 22 per cent higher[8].

Many of these costs are a necessary part of responsible exploration and are accepted by industry. However, delays, duplication and fragmented regulatory processes create additional productivity losses without necessarily improving environmental, heritage or community outcomes. The result is fewer exploration programs, delayed discoveries and slower progression of projects through the development pipeline.

South Australia also competes nationally and internationally for exploration investment. Exploration capital is mobile and investment decisions are increasingly influenced by regulatory certainty, approval timeframes, tenure security and ease of doing business. Explorers are increasingly drawn to other States when comparing South Australia's regulatory performance with competing jurisdictions.

Mining – South Australia's Key to Unlocking Productivity Growth

South Australia's productivity increased modestly in 2024-25, with mining a key contributor to improvement[9]. The State remains among the lowest performing jurisdictions nationally and has a significant opportunity to leverage its mineral endowment to improve productivity.

South Australia's published mining project pipeline currently includes 35 major projects being progressed by industry[10]. Many of these have the potential to create substantial regional investment, employment opportunities, exports and royalties. Several projects have been on the list for over a decade. While impacting commodity prices and global market conditions sit largely outside the control of Government, regulatory efficiency, policy settings, agency

[6] Manalo, P. 2026. From Discovery to Delay: Mine Permitting Stretches Project Timelines
[7] Schodde, R. 2025. Mineral Deposit Exploration—Discovery Trends: 1900–2023
[8] AFR. 31 August 2026. Minerals exploration boom slowed by productivity handbrake
[9] BDO Economic Landscape Report South Australia 2024-25
[10] energymining.sa.gov.au/industry/minerals-and-mining/mining/major-projects-and-mining-activities

coordination and infrastructure planning can directly influence the timing and viability of investment decisions and project progression to deliver the benefits for South Australians.

South Australia's future productivity will increasingly depend on its ability to accommodate multiple land uses across the State's one million square kilometres of land. A contemporary coexistence framework can support mining, agriculture, renewable energy, defence, infrastructure and biodiversity initiatives to operate alongside one another where practical, reducing conflict, improving investment certainty and maximising the productive use of land.

South Australia's mineral resources are owned by the Crown on behalf of all South Australians. These resources can only be developed where they occur and policy settings should support their timely and responsible exploration and development alongside other compatible land uses, delivering jobs, regional investment, exports, royalties and the minerals needed for modern industries and future economic growth.

General comments

AMEC supports effective regulation that protects environmental values, cultural heritage, landholder interests and community outcomes. Industry is not seeking deregulation or lower standards. The challenge is not regulation itself, but the cumulative effect of duplicated information requirements, inconsistent agency expectations, lengthy approval processes and inefficient digital systems and regulatory interfaces.

These issues rarely stop projects entirely. More commonly, they delay exploration expenditure, investment decisions, project development, operational improvements and mine life extensions. The result is increased costs, reduced productivity and deferred economic benefits for South Australians.

The efficiency of regulatory processes, the timeliness of decisions and the consistency of administration are areas where reforms can deliver measurable productivity improvements. Experience from other jurisdictions shows faster, more efficient approvals can be achieved without compromising environmental, heritage or community outcomes.

Improving regulatory productivity will benefit both Government and Industry by enabling resources to be directed towards outcomes rather than administration. A more efficient, coordinated and predictable regulatory framework will support investment, improve capital efficiency and accelerate the delivery of the next generation of South Australian mining projects. Advances in artificial intelligence also provide an opportunity to modernise regulation, reduce duplication and improve coordination across Government agencies.

2013 Australian Productivity Commission Findings Remain Relevant Today

AMEC provided a submission to the Australian Productivity Commission's 'Inquiry into Non-Financial Barriers to Mineral and Energy Resources Exploration' in 2013[11]. The core issues raised by industry remain largely unresolved, including land access, licencing, environmental approvals and EPBC Act processes. Together with the reforms proposed in this submission, AMEC encourages the Commission to consider the recommendations in the 2013 final report and AMEC's earlier submission (refer Attachment 1).

[11] https://www.pc.gov.au/inquiries-and-research/resource-exploration/

AMEC Recommendations: Thirteen mining industry priority reforms

AMEC has worked with members to identify 13 priority reforms. These are supported by 112 recommendations to reduce red tape, improve regulatory certainty and increase investment in exploration and mining to deliver a more productive economy. This document explains the need for reform and sets out detailed recommendations for each area.

A consolidated list of all recommendations for each reform area is provided in Appendix 1.

Priority Reform		Productivity Outcome
1.	Restore exploration licence certainty of tenure beyond 18 years	*Grow exploration investment, future mines, jobs, exports, royalties and the economy*
2.	Reform Native Title and cultural heritage land access processes.	*Speeds up land access for mineral exploration and increases productivity of Industry and Native Title groups*
3.	Address Mining and Exploration Regulatory System (MERS) inefficiencies	*Reduced administrative compliance burden on Industry to bring forward investment in on ground activities*
4.	Improve productivity across the exploration and mining approvals pathway	*Faster assessment and approvals bring forward the economic and social benefits for South Australians*
5.	Streamline interagency referrals and national approvals under the EPBC Act	*Reduced duplicative administration for more productive Government assessment and faster approvals for Industry*
6.	Streamline groundwater approvals and plan for future water security	*Reduced Industry and Government administration, streamline activities to only necessary for environmental outcomes*
7.	Improve regulatory certainty and efficiency in environmental approvals	*Streamlined assessment and approvals*
8.	Exploration and mine closure and rehabilitation	*Reduced compliance burden and faster return of land for other productive uses*
9.	Implement a more flexible financial assurance framework for Industry	*Improves capital efficiency by aligning financial assurance with actual risk*
10.	Develop a contemporary multiple land use and coexistence framework	*Improved statewide industry coexistence and productivity to support regional growth*
11.	Strategic infrastructure planning to support resource sector growth	*Enhances investment certainty and reduces bottlenecks and lowers development costs*
12.	Streamline Government websites and regulatory information services	*Improves efficiency by reducing time navigating regulatory requirements*
13.	Other mineral exploration and mining productivity enablers	*Accelerate investment & Industry decision making, social acceptance, grows economy*

Recommendations in detail

1. Restore exploration licence certainty of tenure beyond 18 years

The 18-Year Exploration Licence Barrier

Changes in 2020 to the *Mining Act 1971*, introduced a maximum exploration licence tenure of 18 years. Approximately 113 exploration licences held by 58 companies will begin reaching their maximum tenure between 2027 and 2030. This includes numerous advanced exploration and feasibility stage projects with no legal pathway to retain tenure and developing future mines.

South Australia is the only state with maximum tenure and no legal option to apply for renewal. Other states generally rely on expenditure commitments, relinquishment requirements and compliance mechanisms rather than a hard statutory tenure limit.

The issue is further complicated because tenure does not reset when a licence changes ownership. New investors acquiring existing projects can inherit licences with only a limited period of tenure remaining despite committing substantial new exploration expenditure.

The current framework creates:

- Loss of hundreds of millions of dollars of sunk costs in exploration investment.
- Companies forced to leave the State who will invest in other jurisdictions.
- No incentive to invest above minimum spend in the final years of a tenement.
- Less incentive for farm-in and joint venture investment, particularly in old tenements.
- Unnecessary duplicative approval processes when licences expire and new or existing explorers obtain a new licence in the same area.
    - New land access agreements, Native Title Mining Agreements, heritage clearances and environmental approvals, will all be required.
- Delays to future mines, jobs, exports and royalty revenue.
- Reduced investor confidence in long term exploration projects.
- Increased sovereign and regulatory risk perceptions.
- Reduced attractiveness of South Australia relative to competing jurisdictions.

Importantly, the South Australian Government has already recognised this issue and has proposed a legislative solution through the *Statutes Amendment (Energy and Mining Reforms) Bill 2026*. The Bill would allow qualifying projects to apply for five year Special Circumstances Extensions beyond the 18-year tenure limit.

The Bill was reintroduced to Parliament in 2026 following untenable amendments proposed to these amendments in 2025[12,13]. Uncertainty regarding the Bill's progression through Parliament continues to create uncertainty for affected explorers and investors. Without reform, the current framework is likely to become one of the most significant impediments to exploration and mining investment, undermining the states competitiveness and productivity, regional development and economic growth across South Australia.

[12] Hansard 25 November 2025. Statutes Amendment (Mining and Energy) Reforms Bill
[13] https://amec.org.au/wp-content/uploads/2025/11/49.-South-Australian-investment-certainty-sabotaged-by-Liberals.pdf#new_tab

Recommendations:

1.1 Progress passage of Mining Act amendments that provide a clear pathway for Special Circumstances Extensions beyond the 18-year tenure limit.

1.2 Investigate tenure mechanisms to reset the clock, where appropriate, following unrelated acquisitions.

1.3 Government must provide early guidance regarding alternative licencing options should the Bill not pass before tenements begin expiring in May 2027.

1.4 Commit resources to DEM to debottleneck administration of Special Circumstances Extensions or alternative licences to ensure exploration continuity.

2. Reform Native Title and cultural heritage land access processes

Native Title Mining Agreements and Land Access

Relationships with Traditional Owners and Native Title Mining Agreements (NTMA) are fundamental to responsible exploration and mining in South Australia. Industry strongly supports meaningful engagement and long-term partnerships with Native Title holders and Aboriginal communities. However, the time and costs required to negotiate land access and progress NTMAs has become one of the most significant productivity constraints affecting exploration activity.

Members report exploration licences remaining inaccessible for extended periods, while negotiations progress. In some areas, five or six years can pass and cost hundreds of thousands to get an NTMA in place before exploration activities such as fundamental drilling programs can commence. This reduces productive exploration tenure, delays investment and postpones economic benefits for Aboriginal communities and regional South Australia.

Increasing demand from renewable energy, transmission infrastructure, Government projects and other developments is expected to further increase pressure on existing systems. Importantly, industry believes there are substantial opportunities to improve efficiency without necessarily requiring immediate legislative change.

Certain exploration and mining rights that affect native title land can only be granted where the ‘right to negotiate’ (RTN) process in the *Commonwealth Native Title Act 1993* is followed. This means exploration and mining rights can only be granted by Government where there is an agreement between the Government party, the exploration or mining company and the native title party (registered native title claimants or native title holders) or where the National Native Title Tribunal (NNTT) has determined the grant may be made. This framework is used in every State and Territory, where land is subject to Native Title, except for South Australia.

In 1996, the South Australian Mining Act established an alternative scheme under Part 9B and section 58 that is recognised by the Commonwealth as having effect instead of the RTN scheme in the Native Title Act. South Australia is the only state or territory with an alternative RTN scheme of this nature.

The scheme does not involve the State as a Parth to the Agreement, nor does the NNTT or any other statutory body play a role in the progress of the agreement making process. This leaves the proponent and the Native Title Party in a negotiation landscape with no boundaries and no ‘independent’ third party to monitor and keep momentum during negotiations.

To support the process of land use agreements, South Australia developed Indigenous Land Use Agreements (ILUAs) with four Native Title Groups using the Minerals Exploration ILUA template, with the goal of streamlining negotiations and reducing administrative burden for all parties. These set out provisions for long-term benefits to the traditional owners, including the preservation of Aboriginal heritage, access payments and a commitment to use all possible endeavours to develop work, training and educational opportunities around the resources industry.

Across the four ILUAs that were active for periods of time between 2004- 2017, explorers signed on to more than 200 Exploration Licences. ILUAs are voluntarily used by Native Title groups and were considered fairly successful for the decade they were in use. However, they are no longer used in SA as they were terminated, or not being actively used with some groups preferring NTMAs via the Part 9B provisions of the Mining Act. The Department for Energy and Mining (DEM) website[14] states that 'the department is currently running a project to explore ILUAs in negotiating land access for mineral exploration', but Industry have not heard progress for several years.

In recognition of the practical challenges faced by both mineral industry and native title holders, DEM consulted on a review of Part 9B of the Mining Act, as part of a package of reforms to the Mining Act[15], to consider the potential benefits of adopting the RTN scheme under the Commonwealth Native Title Act.

This consultation represents an important opportunity to resolve longstanding regulatory inefficiencies that have imposed unnecessary cost, delay and uncertainty on both industry and native title holders. Implementing practical improvements and longer-term reforms without delay will support earlier investment decisions, increase exploration activity and improve the productivity and competitiveness of South Australia's resources sector.

Recommendations:

2.1 Government should commit to a clear reform pathway and implementation timeframes over the next 12 months.

2.2 Introduce statutory response timeframes for Industry to meet with Native Title holders to negotiate agreements.

2.3 Facilitate early engagement between proponents and Traditional Owners where relationships and meeting timeframes are difficult to establish.

2.4 State Government to work with Native Title holders and Industry to develop standard NTMA templates such as ILUA's with agreed standard clauses.

2.5 Publish process maps and data informed indicative timeframes.

2.6 Appoint a dedicated DEM liaison officer to provide improved guidance and support for Industry and Native Title holders.

2.7 Establish a dedicated Government support function to assist agreement making.

2.8 Continue consultation on longer term reforms to the Mining Act.

[14] https://energymining.sa.gov.au/industry/minerals-and-mining/communities-and-land-access/native-title-and-aboriginal-land#land-use

[15] https://www.energymining.sa.gov.au/__data/assets/pdf_file/0006/1146687/Mining-Act-revies-issues-paper.pdf

Aboriginal Cultural Heritage Surveys

Aboriginal cultural heritage surveys are increasingly becoming one of the clearest examples of a process where costs and delays are increasing faster than industry can absorb them.

In South Australia members report:

- Long wait times to secure surveys.
- Escalating survey costs.
- Delays receiving final reports.
- Limited survey capacity.
- Growing competition for heritage services from other sectors.
- Annual reviews of a proponents work program at the end of the program with the full survey team – a survey of the survey.
- Issues regarding the currency of clearances – clauses in NTMAs which state that a clearance can be invalidated should "new information" come to hand at any time.

AMEC's 2025 Member Survey for Western Australia[16] reported that heritage clearance surveys average $23,000 per day and can total well in the hundreds of thousands depending on the clearance area required. South Australian explorers have indicated that this is generally on par with averages in South Australia, but some companies have paid almost double this per day. In some circumstances, survey costs now exceed the cost of the exploration activity itself.

Activities that may only require days to complete can spend months or years progressing through survey scheduling, survey completion and report delivery. These delays have direct consequences for exploration productivity and investment decisions. Industry has also identified circumstances where exploration areas may be re-surveyed because there is no effective mechanism to identify previous survey work while protecting cultural information.

Recommendations:

2.9 Support Native Title groups to build capacity for the required survey services.

2.10 Provide greater transparency on survey costs and expected delivery timeframes.

2.11 Review processes by which anthropologists and archaeologists are engaged.

2.12 Consider support for strategic regional heritage survey programs.

2.13 Investigate introduction of confidential heritage survey registers to reduce duplicating surveys.

2.14 Improve transparency regarding survey scheduling and report delivery timeframes.

2.15 Consider establishing a body to coordinate heritage surveys and sacred sites independently, outside of Native Title agreements. Similar to the Aboriginal Areas Protection Authority[17] under the Northern Territory ALRA legislation.

2.16 Consider reforms to the Aboriginal Heritage Act 1988

[16] The-Cost-of-Complying-with-Aboriginal-Cultural-Heritage-Requirements_AMEC-Member-Survey-FinalReport_Revised1058132.1.pdf

[17] Aboriginal Areas Protection Authority: aapant.org.au

3. Address Mining and Exploration Regulatory Systems (MERS) inefficiencies

Industry supports the objective of an integrated digital regulatory platform. However, members report that MERS has increased administrative burden rather than reduced it. More than a year after its release in July 2025, many transactions require greater effort than under previous systems, with companies required to provide information in formats that do not align with standard business practices. This increases compliance costs and diverts resources from on ground exploration activities, while the efficiency benefits appear to have accrued primarily to the public sector.

Industry seeks to ensure that future development improves productivity rather than transferring administrative workload from Government to Industry.

Issues raised include:

- Extensive manual data entry into multiple fields by one company person at a time, where previously one document worked on by all in parallel was submitted.
- Significant issues with user logins not able to access the required tenement information.
- Multiple workflow steps and inability to navigate around these effectively.
- Multiple requests for information (RFI) to industry where MERS fails to capture data
- Poor integration with Government datasets including mapping software to markup licence and program areas.
- User interface challenges with multiple logins required for separate licences.
- Joint Venture Agreements for productive land use are supported by DEM to accelerate discoveries but are not considered in MERS for data entry points.
- Approval delays and bottlenecks.
- Companies being locked out of the system for several weeks when trying to progress urgent EPEPR approvals for field work programs.

Overall, industry support the continued development of MERS and recognise its potential to deliver substantial productivity gains. However, the initial rollout highlighted the risks of implementing complex digital systems without adequate end-user testing.

Future releases must be extensively tested with industry users to ensure functionality, minimise disruption and deliver the productivity efficiencies intended by the system.

Recommendations:

3.1 Undertake a ‘lessons learned’ review of MERS Stage 1 implementation, ahead of Stage 2 implementation.

3.2 Resolve MERS Stage 1 functionality issues before further expansion.

3.3 Continue the MERS Industry reference group and call for additional participants.

3.4 Review Industry logins to streamline personnel permissions to ensure they can access appropriate tenement information.

3.5 Improve interoperability with existing systems including spatial data.

3.6 Publish performance metrics including the number of tickets raised by industry and RFIs issued to Industry where MERS fails to capture required data

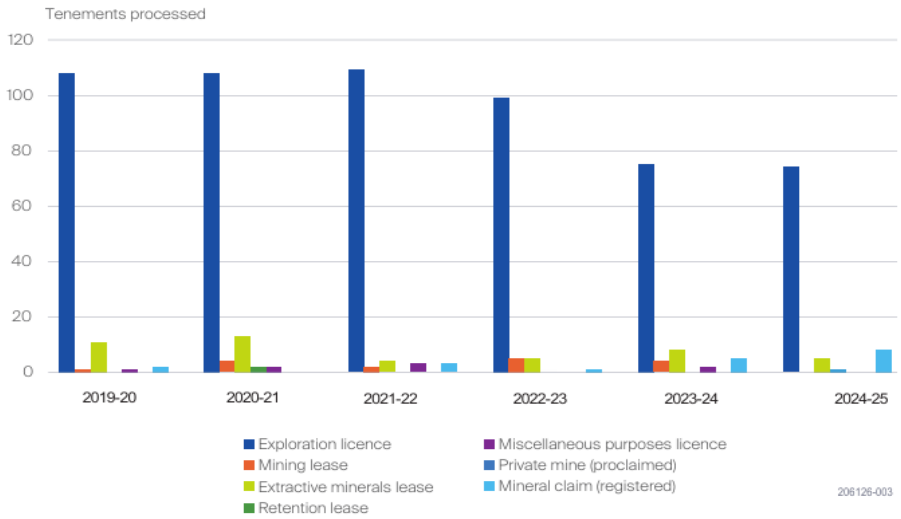
3.7 Utilise AI to digest information and assign to the required database fields, from companies previous single document submission.

4. Improve productivity across the exploration and mining approvals pathway

Exploration Licences

Industry continues to experience delays associated with the granting of exploration licences, renewals, subdivisions and amalgamations. DEM publishes service an annual While legislation allows subdivision and amalgamations, there remains uncertainty around how applications are assessed and approved. This lack of an established pathway creates uncertainty for tenement holders and can delay project planning and investment.

Over the past six years there has been a decrease in the number of exploration licences (ELs) granted, with a 32% reduction since FY 2021–22[18] (Appendix 1). The decrease is likely due to the limited availability of ground in South Australia's most prospective areas and a backlog in the release of relinquished ground through the Exploration Release Area (ERA) process.



Graph 1 – Tenements processed by type 2019-20 to 2024-25[12].

Of the 78 EL applications processed during the period, 83% were processed in the target timeframe of 6 months, compared to 49% for the FY 2023–24 period. While Industry appreciate these gains, with adequate resourcing of DEM and the MERS systems there is an opportunity to reduce the timeframe.

DEM implemented an extensive ERA program in 2026 to address the backlog. However, holding prospective land for four to five years remains a significant productivity constraint, limiting exploration opportunities and delaying investment in new discoveries at a time when strong commodity prices should be driving exploration activity and economic growth. While the competitive allocation process has merit, the State should consider releasing more land through open tender sooner to improve land access and investment outcomes.

Recommendations:

4.1 Resource DEM to meet target timeframes for approvals

4.2 Publish approval performance metrics on a quarterly basis.

[18] South Australia's Minerals Regulation Annual Report 2025-2025.

4.3 Update the MG33 Exploration Licence Guidelines to clarify subdivision and amalgamation assessment pathways.

4.4 Accelerate the release of prospective land through ERA and open land process

4.5 Facilitate structured support for Native Title Land Access Agreements on EL's acquired through ERA

4.6 Improve resourcing, systems and assessment processes to deliver more timely and predictable approvals.

Program for Environment Protection and Rehabilitation (PEPR)

Mineral explorers and miners comply with robust environmental legislation, to ensure risks to the environment and community, have been appropriately managed. Industry is committed to ensuring these risks have been duly considered and addressed in a risk-based manner, including using the mitigation hierarchy. The mining industry undertakes authorised activities under the legislative and regulatory provisions of the Mining Act and *Mining Regulations 2020*. This includes a rigorous environmental impact assessment process and management of environmental impacts, through approved Plans for Environment Protection and Rehabilitation (PEPRs).

A total of 121 exploration Programs for Environment Protection and Rehabilitation (EPEPR) assessments were completed during 2024-25 with 78% meeting the target assessment timeframes of 3 months. The 22% that did not meet timeframes either required consultation with other Government departments, or multiple requests for further information to satisfy the statutory assessment process.

While an Exploration PEPR (EPEPR) may take several months to get approved and has a target timeframe of three months in South Australia, the Western Australian Department of Energy, Mines, Industry Regulation and Safety (DEMIRS) aims to assess and finalise 80% of the equivalent Program of Works applications within 15 business days.

Issues identified by industry:

- PEPR assessment requirements are often disproportionate to the scale and risk of proposed exploration activities, with low-impact programs subject to approval processes and information requirements more suited to higher-risk operations.
- MERS is increasing rather than reducing administrative effort for PEPRs, with proponents required to re-enter information that is already held by Government and navigate workflows that add time and complexity to routine approvals.
- Current EPEPR pathways do not adequately accommodate emerging and novel exploration technologies and methods that can reduce environmental impacts, improve rehabilitation outcomes and strengthen community acceptance.
- Uncertainty regarding what constitutes a valid lodgement, amendment or approval pathway can create avoidable compliance risks and additional administrative work despite proponents acting in accordance with regulatory advice.
- Inconsistent interpretations of requirements between assessment officers, business units or agencies can result in proponents addressing conflicting advice, increasing costs and delaying project progression without improving environmental outcomes.
- Fixed statutory or commercial deadlines often apply to proponents, while corresponding regulatory decisions can be made without defined or enforceable

assessment timeframes, creating significant uncertainty for project planning and investment decisions.

- Administrative approvals and renewals can remain unresolved for years despite all required information having been provided, with delays sometimes only identified when applications are revisited through unrelated system or administrative reviews.
- Delays and inefficiencies in approval processes can require companies to divert resources away from exploration, project development and rehabilitation activities and into administrative management and regulatory follow-up.

In some cases, industry has indicated that the requirements in South Australia are so onerous, time consuming and assessment timeframes so long, that they would consider dropping exploration licences and exploring for new discoveries in other States.

Recommendations:

4.7 Resource DEM to progress introduction of regional exploration PEPRs

4.8 Develop standard conditions and templates.

4.9 Publish assessment timeframes.

4.10 Publish live tracking of submissions for industry transparency and for DEM to identify bottlenecks in real time

4.11 Reduce duplication and re-entry of information.

4.12 Improve the MERS system for submission of EPEPRs

Scoping

The Mining Lease Scoping Process is widely supported by industry. Scoping has improved certainty by identifying requirements early and helping applicants understand assessment expectations. However, members continue to experience new information requests later in assessments, reducing the value of agreed Scoping outcomes. This results in additional consulting costs, rework, delays and reduced investment certainty.

Recommendations:

4.13 Introduce a target timeframe for DEM to review Draft Scoping reports.

4.14 Making agreed information requirements binding wherever practical.

4.15 Requiring justification for requests outside approved Scoping outcomes.

4.16 Encouraging multi-agency sign-off at the Scoping stage.

4.17 Measure the effectiveness of Scoping to reduce mining lease assessment timeframes by comparison to prior years without Scoping in place.

Mining Lease Assessments

DEM's target timeframe for assessing mining licence applications is six months, yet only around half of applications have met this target over the past six years. These delays can prevent companies from progressing mine development while market conditions remain favourable, delaying investment, jobs and economic benefits.

Once a project reaches mining lease stage, proponents often encounter extended assessment periods involving DEM, DEW, EPA, Commonwealth agencies, native vegetation approvals, biodiversity requirements, groundwater assessments and community impacts.

These processes frequently involve multiple rounds of requests for information and prolonged agency referrals. The resulting productivity impact with delays to financing, construction, regional jobs, royalty generation and increased holding costs.

Recommendations:

4.18 Meet the 6 month target timeframe for mining lease approvals.

4.19 Use Artificial Intelligence as part of the MERS assessment process enabling regulatory officers to progress more quickly to novel information assessment.

4.20 Use AI to ensure assessment validity, including cross checking with agreed Scoping terms and regulatory, policy requirements – system automated follow-up ensures immediate requests for further information from proponents.

4.21 Use AI to compile feedback and analysis from public consultation on mining applications potentially saving weeks on manually assessment and reporting.

4.22 Continue public reporting of mining lease assessment performance.

4.23 Introduce escalation pathways for delayed applications.

4.24 Use powers under the *State Development Coordination and Facilitation Act 2025* and the Coordinator General where appropriate for complex referral issues.

5. Streamline interagency referrals and national approvals under the EPBC Act

Agency Referrals and Statutory Timeframes

DEM generally acts as the lead regulator for mining and exploration approvals. However, most approvals require referrals to the Department for Environment and Water (DEW), the Environment Protection Agency (EPA) or other agencies.

Industry consistently reports that agency referrals are one of the largest causes of regulatory delay. A key concern is that referral agencies generally operate without statutory response timeframes. Explorers and miners often have little certainty regarding how long referral processes will take or when responses will be received.

Members also report:

- Different expectations between agencies.
- Multiple requests for technical reviews.
- Additional requests beyond agreed Scoping outcomes.
- Evolving requirements during assessment processes.

Recommendations:

5.1 Introduce transparent agency referral target timeframes and service standards.

5.2 Publish agency referral performance and real time systems tracking via MERS.

5.3 Require referral agencies to identify all information requests early.

5.4 Establish a ‘just ask once’ approach and minimise duplicated reviews.

5.5 Expand external agency participation in Scoping to create greater certainty about the information required for assessment.

Environment Protection, Biodiversity and Conservation Act bilateral approvals

The EPA, DEW and DEM should work with Commonwealth Government agencies to avoid duplication and ensure a single assessment and approval pathway that is streamlined with Commonwealth processes. This includes working closely with DCCEEW on the changes to the *EPBC Act 1999* that will impact the mining industry.

South Australia made progress on accredited environmental assessments following the introduction of the bilateral agreement for assessments in February 2026. However, this will need to be updated with new requirements of the updated EPBC Act legislation to be effective in December 2026. A bilateral agreement for the approval pathway is a priority for industry to remove unnecessary duplication and deliver a single decision-making process.

Recommendations:

5.6 Finalise the EPBC bilateral approval agreement with South Australia by early 2027.

5.7 Government to engage with the new Environment Information Australia agency on a national environmental database, streamlined data capture and accessibility.

6. Streamline groundwater approvals and plan for future water security

Groundwater Assessment, Approvals and Water Allocation Plans

Industry continues to identify groundwater assessment and approvals as one of the most complex and time consuming components of the mining approvals process. The primary productivity issue is the cumulative impact of overlapping requirements across DEM, DEW and EPA, combined with uncertainty regarding the level of assessment expected of proponents.

As outlined in AMEC's 2026 submission on the 'Draft Groundwater Guideline for Impact Assessment'[19], members frequently experience differing agency expectations, changing information requests and assessment requirements that extend beyond initial project scoping. This can result in duplication, rework, increased consultant costs and delays to investment decisions.

Industry supports a risk-based approach to groundwater regulation. Assessment requirements, monitoring programs and modelling expectations should be proportionate to project risk and the environmental outcomes required. Industry would also appreciate clearer decision pathways identifying the circumstances in which conceptual assessments, analytical modelling or numerical modelling are required. This is particularly important for explorers and emerging mining projects, where groundwater investigations can become a material barrier to project progression.

AMEC raised similar concerns in its submission to the EPA's review of the Environment Protection (Water Quality) Policy 2015, noting the potential for regulatory duplication, uncertainty regarding new groundwater requirements and overlap with existing mining assessment processes[20]. AMEC also highlighted concerns that the introduction of a "future

[19] https://amec.org.au/wp-content/uploads/2026/08/0731-AMEC-SA-SUB-DEM-Groundwater-Guideline-for-impact-assessment.pdf

[20] https://amec.org.au/wp-content/uploads/2024/12/20241209-AMEC-Submission-EPA-Water-Quality-Policy.pdf

use" environmental value may increase assessment complexity and regulatory burden without a clearly demonstrated environmental benefit. From a productivity perspective, new requirements like this should be clearly linked to improved environmental outcomes and avoid creating unnecessary cost, delay or duplication.

Industry remains concerned that changes to groundwater policy and guidance can create additional costs and delays where projects are already undertaking multi-year groundwater monitoring programs and baseline studies.

Recommendations:

6.1 Improve coordination of groundwater assessments across DEM, DEW and EPA.
6.2 Publish clear groundwater assessment flowcharts and a decision pathway.
6.3 Align groundwater assessment requirements with project risk.
6.4 Apply fit-for-purpose groundwater data and modelling requirements.
6.5 Provide clear transition provisions for changes to groundwater policy and guidelines.
6.6 Improve access to Government held groundwater data and information sharing to reduce costs and duplication.

Sustainable Water Supply and Water Access

Access to secure and sustainable water supplies is a critical enabler of mineral exploration and mining. AMEC supports sustainable management of water resources, providing recent feedback on groundwater management through South Australia's Water Allocation Plans[21] [22].

From a productivity perspective, water allocation systems should operate efficiently, transparently and provide confidence that future mining developments can access water through established market mechanisms. This requires accessible water markets, efficient transfer processes and proportionate assessment requirements.

Water availability is a key consideration during exploration, project assessment and operational planning. However, members report that approvals for water exploration, groundwater investigations and water licences can be lengthy and administratively burdensome, delaying project development and investment decisions.

As competition for water increases across communities, agriculture, mining, renewable energy projects and data centres, long-term planning is needed to provide certainty for future investment. Without it, competing demands risk increasing costs, constraining development and reducing productivity.

Industry supports strategic investments such as the Northern Water Project and recognises that alternative water sources, including desalination, will be important to supporting future mining, industrial and regional development. However, planning for these projects should occur within a broader framework that supports coexistence and avoids unnecessary land use or tenement conflicts that could sterilise future resource development opportunities.

[21] https://amec.org.au/wp-content/uploads/2026/08/0727-AMEC-SA-DRAFT-Limestone-Coast-Lscape-Board-WAP.pdf
[22] https://amec.org.au/wp-content/uploads/2025/03/20250214-AMEC-Submission-EP-LandscapeBoard-Water-Allocation.pdf#new_tab

Recommendations:

6.7 AMEC continues to ask for a long term strategic plan for sustainable water supply supporting communities, agriculture, mining, industry and emerging opportunities[23].

6.8 Improve the efficiency and transparency of water licensing, transfer and approval processes.

6.9 Ensure water transfer and allocation assessments are proportionate to risk and avoid unnecessary administrative burden.

6.10 Improve sharing and accessibility of groundwater data to reduce costs and duplication.

6.11 Prioritise and streamline approvals for water exploration activities associated with mineral exploration and project development.

6.12 Support coexistence between water infrastructure, desalination projects and mineral development to avoid unnecessary conflicts and delays.

7. Improve regulatory certainty and efficiency in environmental approvals

Biodiversity Act Implementation and Regulatory Certainty

The introduction of the *Biodiversity Act 2025* is a significant environmental regulatory reform affecting exploration and mining in South Australia. While industry supports biodiversity outcomes, the Act is in the early stages of implementation and the operational regulations, standards and administrative arrangements are still being developed and released for consultation over the coming years.

A key concern of industry is that the introduction of the *Biodiversity Act* and associated regulations creates a risk of additional native vegetation and environmental assessment requirements, potentially adding regulatory layers, increasing administrative burden and extending approval timeframes.

Under the previous Native Vegetation Act framework, powers and functions could be delegated to suitably qualified agencies and officers, including the Director, Minerals Regulation within the Department for Energy and Mining. Equivalent arrangements should be retained under the *Biodiversity Act* to ensure decisions draw on specialist mining industry expertise. This will improve regulatory productivity, reduce duplication, support timely approvals and maintain robust environmental outcomes.

A new Significant Environmental Benefit (SEB) scheme is to be developed by the Minister under the *Biodiversity Act* and this has the potential for changes in cost and criteria which will be the subject of consultation. AMEC has previously advised Government[24] of Industry concerns about changes to the SEB. This includes understanding what will be required to meet the more stringent requirements under the Biodiversity Act to demonstrate “on-ground offsets to be achieved” and what will be required to demonstrate biodiversity outcomes.

Given the substantial investment required of Industry under the Biodiversity Act, monitoring and reporting should focus on whether offsets, restoration activities and financial

[23] https://amec.org.au/wp-content/uploads/2025/11/1010-SUB-SA-EPA-30-year-strategy.pdf#new_tab
[24] https://amec.org.au/wp-content/uploads/2025/03/20250218-AMEC-Submission-DEW-Draft-Biodiversity-Bill-FINAL.pdf#new_tab

contributions deliver measurable biodiversity improvements. This would strengthen accountability, improve the effectiveness of regulatory investment and help ensure compliance costs are proportionate to the environmental outcomes achieved.

Recommendations:

7.1 Provide a clear implementation roadmap and transitional arrangements for future biodiversity reforms.

7.2 Retain and expand one window assessment arrangements through DEM delegations.

7.3 Avoid duplication between biodiversity approvals and existing Mining Act, PEPR, native vegetation and environmental assessment processes.

7.4 Utilise specialist mining expertise in biodiversity assessments affecting exploration and mining projects.

7.5 Ensure there is no increase in regulatory burden as future biodiversity regulations are developed.

7.6 Ensure new biodiversity frameworks support environmental outcomes without creating unnecessary approval delays, duplicated assessments or increased uncertainty for investment decisions.

7.7 Government should adopt an outcomes based approach to biodiversity regulation.

Environmental Data Capture, Sharing and Accessibility

Mineral explorers and miners already undertake extensive environmental investigations and provide substantial environmental information to support licence applications, approvals, compliance activities, mine closure and rehabilitation. These studies are often completed at considerable cost and generate valuable datasets that could support future assessments, reduce duplication and improve baseline environmental understanding.

Improved environmental data sharing has the potential to deliver significant productivity benefits across the approvals system by lowering assessment costs, reducing duplication and supporting faster, more informed decision-making. Industry supports robust environmental data collection and dissemination, recognising that better use of existing data can improve both environmental outcomes and regulatory efficiency.

As new environmental and biodiversity reporting frameworks are developed, including implementation of the Biodiversity Act, industry seeks to ensure that environmental data systems maximise the value of existing datasets rather than create additional reporting burdens. New data collection requirements should be proportionate, avoid duplication of information already provided to Government and be applied consistently across all sectors undertaking activities that may affect environmental values.

From a productivity perspective, there is a significant opportunity to create a more integrated and accessible environmental information framework. Industry supports the development of a centralised environmental data platform that consolidates environmental information currently held across multiple systems, including biodiversity, carbon farming, water and data from environmental monitoring.

Better integration of environmental information into systems already used by Industry such as SARIG and MERS, would reduce transaction costs, improve assessment efficiency and support more consistent regulatory decision-making.

South Australia's geological data systems provide a strong example of how this can be achieved. Through SARIG, the Geological Survey of South Australia has created a world-class platform that captures, stores and shares geological information collected by both Government and industry. This approach has improved exploration productivity, reduced duplication and enabled more informed investment decisions.

A similar model should be adopted for environmental information, allowing environmental datasets collected by industry and Government to be shared to create enduring value for future assessments, approvals and land-use decisions.

Recommendation:

7.8 Develop a centralised environmental data platform that integrates biodiversity, water and environmental datasets to streamline Industry access.

7.9 Expand integrated environmental information into systems already used by Industry such as SARIG and MERS.

8. Exploration and mine closure and rehabilitation

AMEC members report delays in closure and relinquishment processes, including:

- Delays of up to a year receiving feedback on closure PEPRs.
- DEM requiring PEPRs to be resubmitted for multiple rounds of review.
- New issues emerging late in assessments that had been earlier presented.
- Changes in assessment officers with inconsistent requirements.
- Delays obtaining specialist technical advice not available internally – in some cases adding 6-12 months to the assessment process.

These issues can prolong relinquishment processes by years and create uncertainty for landholders, communities and proponents.

DEM consulted on a new Mine Closure Guideline in 2026. Industry supports the development of clearer mine closure and rehabilitation guidance and recognises the importance of achieving appropriate environmental and post-mining land use outcomes.

The current regulatory framework also lacks practical guidance and tools to support efficient closure planning. Information relevant to mine closure is spread across multiple webpages, policies, guidelines and references, making it difficult for proponents to identify requirements and plan efficiently.

From a productivity perspective, delayed closure assessments tie up capital, prolong regulatory obligations, delay land relinquishment and divert resources away from productive activities without necessarily improving closure outcomes.

Recommendations:

8.1 Establish statutory service standards and target assessment timeframes for closure and relinquishment approvals.

8.2 Improve consistency between assessment and compliance functions and maintain continuity of assessment personnel wherever practical.

8.3 Ensure timely access to specialist expertise to avoid unnecessary delays.

8.4 Develop practical, consolidated closure and rehabilitation guidance, templates and tools in a single accessible location.

9. Implement a more flexible Financial Assurance Framework

Financial assurance requirements play an important role in ensuring the State is protected from rehabilitation liabilities. However, the current bond based system can create a significant productivity burden, particularly for exploration companies and lower risk operations, by requiring capital to be tied up for extended periods rather than invested in exploration, project development and job creation.

AMEC has indicated that industry supports the proposed amendments in the *Statutes Amendments (Energy and Mining) Reforms 2026*[25]. This would allow mineral tenement holders to contribute to the Mining Rehabilitation Fund (MRF) through a prescribed levy, either as an alternative or supplement to rehabilitation bonds and represents a positive productivity reform.

Similar pooled fund models operate successfully in Western Australia and Queensland and have demonstrated that environmental liabilities can be effectively managed while reducing the upfront financial burden placed on industry.

A risk-based financial assurance framework would align rehabilitation security requirements with the actual risk posed by an operation. For lower-risk activities, particularly mineral exploration, reducing upfront bonds would free capital for exploration, resource definition and project advancement while maintaining environmental accountability. This is particularly important for junior explorers that often face significant capital constraints.

Industry supports the proposed amendments and considers that a flexible financial assurance framework can maintain strong environmental protections while improving investment attractiveness and reducing unnecessary regulatory costs. Importantly, the obligation to rehabilitate disturbed land would remain unchanged, ensuring proponents continue to be accountable for their environmental responsibilities.

The ability to refine and adjust the scheme through regulations, rather than requiring further legislative amendment, will also enable any unintended commercial or operational consequences to be addressed more efficiently over time.

Recommendation:

9.1 Implement the proposed Mining Act amendments to enable MRF contributions and staged bonds aligned with progressive rehabilitation liabilities.

9.2 Introduce options for lower risk exploration and mining activities.

9.3 Consult with industry on any financial assurance reform.

10. Develop a contemporary Multiple Land Use and Coexistence Framework

South Australia's current Multiple Land Use Framework was developed in 2016 and no longer reflects the modern land-use environment. Land use competition now includes exploration and mining, agriculture, renewable energy, electricity transmission, carbon farming, biodiversity projects and nature repair initiatives.

[25] https://amec.org.au/wp-content/uploads/2025/09/0930-SUB-to-DEM-Statute-Amendment-Bill-2025.pdf#new_tab

Unlike many other developments, mineral resources are fixed in location. Renewable energy, biodiversity and carbon projects often have greater flexibility regarding location. Policy settings that inadvertently sterilise mineral resources may have long-term consequences for investment, exports and future economic development.

The objective should not be to prioritise one industry over another. Rather, Government should seize the opportunity to maximise productivity of South Australia's land base through coexistence wherever practical, recognising the findings of AMEC's 'Coexistence: The Key to Unlocking Productivity'26 report, that coexistence itself is a key productivity enabler.

Recommendations:

Develop a contemporary Multiple Land Use Framework that:

10.1 Establishes an industry reference group to advise on multiple land use.
10.2 Establishes coexistence principles and supports compatible land uses.
10.3 Provides objective decision-making criteria.
10.4 Establishes conflict resolution and compensation pathways.
10.5 Improves certainty for all stakeholders.
10.6 Aligns policy settings across all relevant legislation.
10.7 Ensures emerging land uses do not unintentionally sterilise strategic mineral resources.
10.8 Maximises the productivity of South Australia's land base.

11. Strategic infrastructure planning to support resource sector growth

Access to reliable, secure and cost-competitive infrastructure is a fundamental enabler of productivity and investment across the resources sector. Mineral explorers and mining companies rely on access to transport, energy, water and export infrastructure from the earliest stages of project evaluation through to operations and mine expansion.

Infrastructure certainty is a critical factor in feasibility studies and investment decisions. As demand for infrastructure grows across mining, renewable energy, defence, manufacturing, data centres and regional development, capacity constraints and uncertainty around future infrastructure can delay projects, increase costs and reduce South Australia's competitiveness.

Many future mining developments will depend on access to common user infrastructure, strategic transport corridors and long term water supplies[27]. Without coordinated planning, otherwise viable projects can be delayed, downsized or fail to proceed altogether.

A growing challenge is the lack of pre-planned infrastructure corridors developing regions. Proponents are required to secure approvals for roads, rail[28], power, pipelines, transmission infrastructure and water infrastructure on a project-by-project basis. This increases costs, extends development timeframes and can create unnecessary land use conflicts. Early

[26] Coexistence: The Key to Unlocking Productivity.
[27] https://amec.org.au/wp-content/uploads/2026/08/0809-AMEC-SA-SUB-DIT-DEM-Northern-Water-EIS.pdf
[28] https://amec.org.au/wp-content/uploads/2025/12/1202-AMEC-SUB-ESCOSA-Tarcoola-Darwin-Railway-5yr-Review.pdf#new_tab

corridor planning would provide greater certainty, reduce duplication and support coexistence between mining, agriculture, renewable energy, defence and other land uses.

Industry also notes that much of South Australia's critical rail and port infrastructure is privately owned. Efficient and commercially viable third-party access arrangements are essential to support new mining developments and ensure future projects can access domestic and export markets.

Recommendations:

11.1 Develop and implement a long-term resources infrastructure plan aligned with South Australia's future mining, industrial and regional development opportunities.

This should include:

11.2 Deliver resource industry priorities identified in South Australia's 20-Year State Infrastructure Strategy.

11.3 Introducing Government facilitated common-user infrastructure planning that aggregates demand across industries and regions.

11.4 Introducing Government pre-approvals for priority infrastructure corridors

11.5 Utilisation of State Development Areas and the Coordinator-General framework to facilitate coordinated infrastructure planning and approvals.

11.6 Support for commercially viable third-party access to rail and port infrastructure.

11.7 Ongoing consultation with the mining industry regarding infrastructure planning, economic studies and future resource province development opportunities.

12. Streamline regulatory information and guidance on Government websites

South Australia's regulatory guidance information includes the following documents available across the DEM website:

- 11 Mineral Policies
- 32 Mineral Regulatory Guidelines – with broken links throughout, taking users to the SARIG Catalogue to search for relevant documents several clicks later
- 19 Terms of Reference (TOR)
- 19 Information Sheets
- Multiple forms, templates
- Some information is available through the online portal and only accessible to those with a MERS login. This is a deterrent to new entrants seeking to understand the requirements before licence application.

In addition, information relevant to the mining industry on the regulation of environmental impacts and water licencing is hosted on other websites:

- The EPA website hosts Groundwater Guidelines with five more in preparation, along with policies on radiation protection, air quality, site contamination, industrial noise [29].
- The DEW also have water data, licencing and permit information[30] and are developing groundwater modelling guidelines.
- The Australian Government EPBC Act requirements.

[29] https://www.epa.sa.gov.au/environmental_info

[30] https://www.environment.sa.gov.au/licences-and-permits/water-licence-and-permit-forms

While comprehensive, the information architecture across the various South Australian Government and Commonwealth Government websites has become a source of red tape.

A new explorer may need to navigate more than 80 separate policies, guidelines, terms of reference and forms before understanding what approvals apply.

Companies frequently move between the DEM, DEW and EPA website, forms, policies and guidance documents and MERS and SARIG digital platforms to determine their obligations. This represents a significant compliance burden before approval preparation even begins.

Recommendations:

12.1 Consolidate overlapping guidance material from across multiple State and Commonwealth Government websites.

12.2 Create a New Explorer Starter Pack.

12.3 Develop a single source regulatory handbook for the entire mining life cycle hosted on the DEM website.

12.4 Remove duplication and streamline policies, TORs, guidelines, information sheets and MERS instructions.

13. Other mineral exploration and mining productivity enablers

While this submission focuses primarily on reducing regulatory barriers and improving approval efficiency, AMEC also highlights several productivity enablers that can help drive investment, improve competitiveness and support the long-term growth of South Australia's resources sector.

Leverage Geological Data and AI to Improve Exploration Productivity

Geological data is one of the most effective productivity enablers for the resources sector. Government investment in geological data reduces exploration risk, improves targeting, accelerates investment decisions and helps companies deploy capital more efficiently.

South Australia has developed a strong international reputation for the quality of its geological information systems, ranking third in the world for Geological Databases in 2025[31]. The SARIG platform remains a significant competitive advantage for the State, enabling data-driven exploration and mining decisions.

Recent investments in the SARIG Catalogue, Core Intelligence Program, API connectivity and HyLogger 4 core scanning have improved access to geological information and demonstrated the productivity benefits that flow from modern digital geoscience systems. The Core Intelligence Platform has been particularly well received by industry due to its ability to extract additional value from existing drill core and geological datasets.

As exploration targets become deeper, more technically challenging and more expensive to test, easy access to high-quality geological information becomes increasingly important. Better data allows companies to reduce desktop assessment time, prioritise the most prospective opportunities, avoid duplication of work and make more informed exploration and development decisions.

[31] https://www.fraserinstitute.org/sites/default/files/2026-02/annual-survey-of-mining-companies-2025.pdf

There is also significant opportunity to use artificial intelligence, advanced analytics and digital technologies to unlock additional value from historical exploration records and the South Australia Drill Core Library. AI-assisted geological logging, hyperspectral analysis, mineral identification and predictive prospectivity mapping can improve exploration targeting, accelerate discoveries and maximise the return on decades of Government and Industry investment in data collection.

Recommendations:

13.1 Allocate funding to expand the Core Intelligence Platform for new insights and maintain the Hylogger core-scanning program and service for Industry.

13.2 Maintain long-term investment in SARIG, geological databases and digital geoscience infrastructure to improve decision making and data driven exploration.

13.3 Expand investment in AI enabled geoscience and core library digitisation to maximise the value of South Australia's geological data and sample collections.

Maintain Investment in Co-Funded Exploration Programs

The Geological Survey of South Australia's pre-competitive geoscience programs remain a critical foundation for exploration investment. However, it is ultimately industry led drilling, sampling and geophysical surveying that delivers new mineral discoveries and future mines.

Industry welcomes the South Australian Government's $12 million commitment to re-establish a co-funded exploration program through the Plan for Accelerating Exploration (PACE). This investment is particularly timely given the increasing cost of exploration and the need to reverse recent declines in exploration activity. A revitalised PACE program will help secure the pipeline of future mines and the regional economic growth they support.

Programs such as PACE and the Accelerated Discovery Initiative (ADI) have demonstrated a strong return on investment, helping to generate new discoveries, support innovation and attract private capital into high-risk greenfields exploration. Previous PACE funding directly contributed to the discovery of the Carrapateena copper-gold-silver deposit, demonstrating the long-term economic benefits that can arise from modest Government investment.

These programs are effective productivity initiatives because they:

- Mobilise significant private-sector investment, with previous programs generating approximately $19 of private investment for every Government dollar invested.
- Support greenfields exploration and testing of new geological concepts.
- Encourage innovation and adoption of new exploration technologies.
- Share financial risk between Government and Industry.
- Send a strong signal that South Australia is an investment-ready jurisdiction.
- Help secure the next generation of mines, jobs, exports and royalty revenue.

Recommendation:

13.4 Continue and expand co-funded exploration programs such as PACE Minerals

South Australian Critical Minerals Strategy

South Australia is endowed with significant critical mineral resources and is well positioned to support global supply chains associated with the energy transition, defence technologies, advanced manufacturing and emerging industries.

Despite these advantages, South Australia remains the only Australian jurisdiction yet to release a formal Critical Minerals Strategy. Other states and territories have already introduced dedicated strategies, investment attraction programs and policy frameworks designed to compete for global investment.

A published strategy would provide greater certainty to investors and establish a clear Government vision for how South Australia intends to support critical minerals exploration, mining, processing and export opportunities. It would promote the State's capabilities and attract exploration, development and downstream processing investment.

Importantly, a Critical Minerals Strategy is not simply an industry development initiative. It has the potential to improve productivity by aligning Government policy, attracting investment, coordinating infrastructure planning and supporting value-adding opportunities across the supply chain.

Recommendations:

13.5 Publish a South Australian Critical Minerals Strategy and Investment Prospectus.

13.6 Introduce a Critical Minerals Development Fund.

13.7 Establish a critical minerals Industry reference group.

Grow Community Understanding and Social Licence for Exploration and Mining

Competition for land access is increasing across multiple sectors, including mining, renewable energy, transmission infrastructure, conservation initiatives and agriculture. As a result, landholders and communities are increasingly required to navigate complex approval processes and understand a range of legal, technical and regulatory requirements.

Industry has consistently observed that uncertainty and misinformation regarding exploration and mining approvals can adversely affect community confidence and social licence. While individual companies can engage directly with communities on specific projects, there remains a role for Government in providing consistent, impartial and factual information about the resources sector and the regulatory framework that governs it.

The Landowner Information Service, operated independently through Rural Business Support, provides a trusted source of information for landholders, communities and other stakeholders seeking to understand land access processes, exploration activities and mining approvals.

From a productivity perspective, well informed landholders and communities are better equipped to engage with exploration and mining proponents, make informed decisions and participate confidently in land access discussions.

Improved understanding of rights, responsibilities and regulatory protections can help reduce misunderstandings, facilitate more efficient agreement making and support timely progression of exploration and development projects. This also contributes to broader community confidence in the regulatory framework governing the resources sector.

Recommendation:

13.8 Continue funding the Landowner Information Service to support informed decision making and strengthen the social licence of the industry.

Final Comments

AMEC supports practical reforms that improve productivity while maintaining environmental, cultural heritage, landholder and community protections.

Improving certainty around decision-making, introducing enforceable and transparent timeframes, strengthening agency coordination and reducing duplication would deliver some of the most significant productivity improvements available to South Australia's mining and exploration industry.

The reforms outlined in this submission provide practical opportunities to reduce red tape, improve investment certainty, accelerate project delivery and support long-term economic growth while maintaining South Australia's high environmental and social standards.

Opportunity for targeted consultation with the mining industry

AMEC thanks the Commission for the opportunity to provide written feedback on the Red Tape Review. AMEC would be pleased to facilitate a consultation forum with member companies and representatives of the Commission.

This would provide the Commission with the opportunity to hear directly from explorers, mining companies and those working alongside them on regulatory and approvals matters.

This engagement would enable the Commission to gain valuable first-hand insights into the practical impacts of regulation, including examples, experiences and case studies that may be commercially confidential and therefore not otherwise available through the public consultation process.

For further information contact:
Peta Abbot, Director South Australia – 0475 834 554 | peta.abbot@amec.org.au

APPENDIX 1 – AMEC List of reforms and all recommendations

1. Restore exploration licence certainty of tenure

1.1 Progress passage of Mining Act amendments that provide a clear pathway for Special Circumstances Extensions beyond the 18-year tenure limit.

1.2 Investigate tenure mechanisms to reset the clock, where appropriate, following unrelated acquisitions.

1.3 Government must provide early guidance regarding alternative licencing options should the Bill not pass before tenements begin expiring in May 2027.

1.4 Commit resources to DEM to debottleneck administration of Special Circumstances Extensions or alternative licences to ensure exploration continuity.

2. Reform native title and cultural heritage land access processes

Native Title Mining Agreements and Land Access

2.1 Government should commit to a clear reform pathway and implementation timeframes over the next 12 months.

2.2 Introduce statutory response timeframes for Industry to meet with Native Title holders to negotiate agreements.

2.3 Facilitate early engagement between proponents and Traditional Owners where relationships and meeting timeframes are difficult to establish.

2.4 State Government to work with Native Title holders and Industry to develop standard NTMA templates such as ILUA's with agreed standard clauses

2.5 Publish process maps and indicative timeframes.

2.6 Appoint a dedicated DEM liaison officer to provide improved guidance and support for Industry and Native Title holders.

2.7 Establish a dedicated Government support function to assist agreement making.

2.8 Continue consultation on longer term reforms.

Aboriginal Cultural Heritage Surveys

2.9 Support Native Title groups to build capacity for the required survey services.

2.10 Provide greater transparency on survey costs and expected delivery timeframes.

2.11 Review processes by which anthropologists and archaeologists are engaged.

2.12 Consider support for strategic regional heritage survey programs.

2.13 Investigate introduction of confidential heritage survey registers to reduce duplicating surveys.

2.14 Improve transparency regarding survey scheduling and report delivery timeframes.

2.15 Consider establishing a body to coordinate heritage surveys and sacred sites independently, outside of Native Title agreements. Similar to the Aboriginal Areas Protection Authority32 under the Northern Territory ALRA legislation.

2.16 Consider reforms to the Aboriginal *Heritage Act 1988*

[32] Aboriginal Areas Protection Authority: aapant.org.au

3. Address Mining and Exploration Regulatory System (MERS) inefficiencies

3.1 Undertake a 'lessons learned' review of MERS Stage 1 implementation, ahead of Stage 2 implementation.

3.2 Resolve MERS Stage 1 functionality issues before further expansion.

3.3 Continue the MERS Industry reference group and call for additional participants.

3.4 Review Industry logins to streamline personnel permissions to ensure they can access appropriate tenement information.

3.5 Improve interoperability with existing systems including spatial data.

3.6 Publish performance metrics including the number of tickets raised by industry and RFIs issued to Industry where MERS fails to capture required data

3.7 Utilise AI to digest information and assign to the required database fields, from companies previous single document submission.

4. Improve productivity across the exploration and mining approvals pathway

Exploration Licences

4.1 Resource DEM to meet target timeframes for approvals

4.2 Publish approval performance metrics on a quarterly basis.

4.3 Update the MG33 Exploration Licence Guidelines to clarify subdivision and amalgamation assessment pathways.

4.4 Accelerate the release of prospective land through ERA and open land process

4.5 Facilitate structured support for Native Title Land Access Agreements on EL's acquired through ERA

4.6 Improve resourcing, systems and assessment processes to deliver more timely and predictable approvals.

EPEPR

4.7 Introduce a target timeframe for DEM to review the Draft Scoping report

4.8 Making agreed information requirements binding wherever practical.

4.9 Requiring justification for requests outside approved Scoping outcomes.

4.10 Encouraging multi-agency sign-off at the Scoping stage.

4.11 Measure the effectiveness of Scoping to reduce mining lease assessment timeframes by comparison to prior years without Scoping in place

Scoping

4.12 Introduce a target timeframe for DEM to review Draft Scoping reports.

4.13 Making agreed information requirements binding wherever practical.

4.14 Requiring justification for requests outside approved Scoping outcomes.

4.15 Encouraging multi-agency sign-off at the Scoping stage.

4.16 Measure the effectiveness of Scoping to reduce mining lease assessment timeframes by comparison to prior years without Scoping in place.

Mining Lease Assessments

4.17 Meet the 6 month target timeframe for mining lease approvals.

4.18 Use Artificial Intelligence as part of the MERS assessment process enabling regulatory officers to progress more quickly to novel information assessment.

4.19 Use AI to ensure assessment validity, including cross checking with agreed Scoping terms and regulatory, policy requirements – system automated follow-up ensures immediate requests for further information from proponents.

4.20 Use AI to compile feedback and analysis from public consultation on mining applications potentially saving weeks on manually assessment and reporting.

4.21 Continued public reporting of mining lease assessment performance.

4.22 Introduce escalation pathways for delayed applications.

4.23 Use powers under the *State Development Coordination and Facilitation Act 2025* and the Coordinator General where appropriate for complex referral issues.

5. Streamline interagency referrals and national assessment and approvals under the EPBC Act

Agency Referrals and Statutory Timeframes

5.1 Introduce transparent agency referral target timeframes and service standards.

5.2 Publish agency referral performance and real time systems tracking via MERS.

5.3 Require referral agencies to identify all information requests early.

5.4 Establish a 'just ask once' approach and minimise duplicated reviews.

5.5 Expand external agency participation in Scoping to create greater certainty about the information required for assessment.

Environment Protection, Biodiversity and Conservation Act bilateral approvals

5.6 Finalise the EPBC bilateral approval agreement with South Australia by early 2027.

5.7 Government to engage with the new Environment Information Australia agency on a national environmental database, streamlined data capture and accessibility.

6. Streamline Groundwater Approvals and Plan for Future Water Security

Groundwater Assessment, Approvals and Water Allocation Plans

6.1 Improve coordination of groundwater assessments across DEM, DEW and EPA.

6.2 Publish clear groundwater assessment flowcharts and a decision pathway.

6.3 Align groundwater assessment requirements with project risk.

6.4 Apply fit-for-purpose groundwater data and modelling requirements.

6.5 Provide clear transition provisions for changes to groundwater policy and guidelines.

6.6 Improve access to Government held groundwater data and information sharing to reduce costs and duplication.

Sustainable water supply and water access

6.7 AMEC continues to ask for a long term strategic plan for sustainable water supply supporting communities, agriculture, mining, industry and emerging opportunities[33].

6.8 Improve the efficiency and transparency of water licensing, transfer and approval processes.

6.9 Ensure water transfer and allocation assessments are proportionate to risk and avoid unnecessary administrative burden.

[33] https://amec.org.au/wp-content/uploads/2025/11/1010-SUB-SA-EPA-30-year-strategy.pdf#new_tab

6.10 Improve sharing and accessibility of groundwater data to reduce costs and duplication.

6.11 Prioritise and streamline approvals for water exploration activities associated with mineral exploration and project development.

6.12 Support coexistence between water infrastructure, desalination projects and mineral development to avoid unnecessary conflicts and delays.

7. Improve regulatory certainty and efficiency in environmental approvals

Biodiversity Act Implementation and Regulatory Certainty

7.1 Provide a clear implementation roadmap and transitional arrangements for future biodiversity reforms.

7.2 Retain and expand one window assessment arrangements through DEM delegations.

7.3 Avoid duplication between biodiversity approvals and existing Mining Act, PEPR, native vegetation and environmental assessment processes.

7.4 Utilise specialist mining expertise in biodiversity assessments affecting exploration and mining projects.

7.5 Ensure there is no increase in regulatory burden as future biodiversity regulations are developed.

7.6 Ensure new biodiversity frameworks support environmental outcomes without creating unnecessary approval delays, duplicated assessments or increased uncertainty for investment decisions.

7.7 Government should adopt an outcomes based approach to biodiversity regulation.

Environmental Data Sharing and Accessibility

7.8 Develop a centralised environmental data platform that integrates biodiversity, water and environmental datasets to streamline Industry access.

7.9 Expand integrated environmental information into systems already used by Industry such as SARIG and MERS.

8. Improve mining operations compliance, closure and rehabilitation processes

8.1 Establish statutory service standards and target assessment timeframes for closure and relinquishment approvals.

8.2 Improve consistency between assessment and compliance functions and maintain continuity of assessment personnel wherever practical.

8.3 Ensure timely access to specialist expertise to avoid unnecessary delays.

8.4 Develop practical, consolidated closure and rehabilitation guidance, templates and tools in a single accessible location.

9. Implement a more flexible financial assurance framework

9.1 Implement the proposed Mining Act amendments to enable MRF contributions and staged bonds aligned with progressive rehabilitation liabilities.

9.2 Introduce options for lower risk exploration and mining activities.

9.3 Consult with industry on any financial assurance reform.

10. Develop a contemporary multiple land use and coexistence framework

Develop a contemporary Multiple Land Use Framework that:

10.1 Establishes an industry reference group to advise on multiple land use.

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10.3 Provides objective decision-making criteria.

10.4 Establishes conflict resolution and compensation pathways.

10.5 Improves certainty for all stakeholders.

10.6 Aligns policy settings across all relevant legislation.

10.7 Ensures emerging land uses do not unintentionally sterilise strategic mineral resources.

10.8 Maximises the productivity of South Australia's land base.

11. Strategic infrastructure planning to support resource sector growth

11.1 Develop and implement a long-term resources infrastructure plan aligned with South Australia's future mining, industrial and regional development opportunities.

This should include:

11.2 Deliver resource industry priorities identified in South Australia's 20-Year State Infrastructure Strategy.

11.3 Introducing Government facilitated common-user infrastructure planning that aggregates demand across industries and regions.

11.4 Introducing Government pre-approvals for priority infrastructure corridors

11.5 Utilisation of State Development Areas and the Coordinator-General framework to facilitate coordinated infrastructure planning and approvals.

11.6 Support for commercially viable third-party access to rail and port infrastructure.

11.7 Ongoing consultation with the mining industry regarding infrastructure planning, economic studies and future resource province development opportunities.

12. Streamline Government websites and regulatory information services

12.1 Consolidate overlapping guidance material from across multiple State and Commonwealth Government websites.

12.2 Create a New Explorer Starter Pack.

12.3 Develop a single source regulatory handbook for the entire mining life cycle hosted on the DEM website.

12.4 Remove duplication and streamline policies, TORs, guidelines, information sheets and MERS instructions.

13. Other mineral exploration and mining productivity enablers

Leverage Geological Data and AI to Improve Exploration Productivity

13.1 Allocate funding to expand the Core Intelligence Platform for new insights and maintain the Hylogger core-scanning program and service for Industry.

13.2 Maintain long-term investment in SARIG, geological databases and digital geoscience infrastructure to improve decision making and data driven exploration.

13.3 Expand investment in AI enabled geoscience and core library digitisation to maximise the value of South Australia's geological data and sample collections.

Continue Investment in Co-Funded Exploration Programs

13.4 Continue and expand co-funded exploration programs such as PACE Minerals

Publish a South Australian Critical Minerals Strategy and Prospectus

13.5 Publish a South Australian Critical Minerals Strategy and Investment Prospectus.

13.6 Introduce a Critical Minerals Development Fund.

13.7 Establish a critical minerals Industry reference group.

Grow Community Understanding and Social Licence for Exploration and Mining

13.8 Continue funding the Landowner Information Service to support informed decision making and strengthen the social licence of the industry.