26 October 2026

To: Department of State Development, Infrastructure and Planning (DSDIP)

RE: Submission on the draft State Planning Policy (SPP)

Introduction

The Association of Mining and Exploration Companies (AMEC), while not directly involved in the Queensland Government's stakeholder consultation process, seeks to provide an informed industry perspective on the proposed changes outlined in the current planning reform package. These reforms include amendments to several key planning and legislative instruments that influence how development, land use, regional priorities and resource projects are assessed across Queensland.

The package includes proposed amendments to the following legislative instruments:

- Planning and Other Legislation Amendment Regulation 2026 – authorising law
- Section 284 of the *Planning Act 2016*
- Section 95 of the *Regional Planning Interests Act 2014*

AMEC's feedback is informed by its engagement with Queensland's minerals, exploration and emerging industries. AMEC members rely on clear, predictable and well-coordinated planning frameworks that support investment, project development and regional economic growth. Accordingly, AMEC considers it important to highlight how the proposed reforms interact with broader legislative changes currently underway and to ensure that Queensland's planning system remains aligned with the State's strategic economic priorities.

The stated objectives of the *Planning and Other Legislation Amendment Regulation 2026* are to support the State's regional planning program and reduce legislative duplication for Hinchinbrook Island, which is not impactful to the AMEC member base. An update to the list of local governments within the Far North Queensland Region to incorporate Etheridge Shire, removing Etheridge Shire from the Gulf Region, to support the release of the Far North Queensland (FNQ) Regional Plan 2026 impacts approximately 184 Exploration Permits for Minerals (EPM's) and 74 Mining Leases. There are also 37 EPM applications lodged demonstrating the resource potential in the area.[1]

The Queensland Government has released a revised State Planning Policy (SPP) for consultation. The revised policy is a modernised framework that is intended to support better housing delivery, better economic growth and more coordinated infrastructure investment across the State. The review seeks to improve the clarity, usability, and efficiency of the planning system and better align State interests with local planning instruments.

[1] Queensland Government GeoResGlobe data sourced 25/10/26

AMEC, in principle, supports the draft SPP, which introduces several structural and policy changes of direct relevance to the resources and exploration sector, including:

- Six strategic aspirations to underpin planning outcomes and to balance the competing State interests: build housing and strong communities; create connected and productive regions; deliver responsive infrastructure; promote efficient land use; support our existing economic drivers; and attract new industries.
- A new structure for the SPP designed to make it easier to navigate, understand and apply, with greater consistency in the way State interests are reflected in local government planning schemes.
- A new Environment, Heritage and Efficient Growth State interest to support coordinated growth whilst protecting the values of the environment, heritage places and the natural and rural landscape.
- Updated and streamlined State interests (new policies, revised assessment criteria) across land use, infrastructure, environment and economic development.

AMEC is particularly interested in matters that directly affect the development, growth and prosperity of the exploration and minerals sector represented by our membership. In the context of the proposed reforms and other legislative changes currently underway, this includes ensuring that mineral explorers and project proponents can successfully explore for and develop mineral resources within an approval and development framework that is appropriately scaled and proportionate to the nature, scale and risk of their activities.

AMEC considers it essential that low-risk, small-scale exploration activities are supported by streamlined, fit-for-purpose approval pathways, without unnecessarily burdensome or cumbersome regulatory requirements. Proportionate regulation is critical to maintaining exploration activity, encouraging investment and supporting the discovery of new mineral resources across Queensland.

Similarly, as projects progress from early-stage exploration through to more advanced development and operational stages, the regulatory framework should support their growth and evolution. Approval pathways should be sufficiently flexible to accommodate changing project scales and operational requirements, while maintaining appropriate environmental safeguards and regulatory oversight. This approach would help ensure that regulatory requirements remain proportionate throughout the project lifecycle, supporting investment certainty, resource development and the long-term prosperity of Queensland’s minerals sector.

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 beneficiaries of a good SPP reform.

General Remarks

For AMEC members, reforms that support economic growth and recognise emerging growth sectors and regional economic opportunities that may not have existed a decade ago represent a positive step forward.

However, achieving these outcomes requires a balanced approach. The proposed changes, and their implementation through local government planning schemes and regional planning frameworks, must not inadvertently undermine investment certainty or delay project delivery by duplicating existing assessment processes and regulatory requirements.

Of particular concern is the potential for duplicative assessments to arise in demonstrating cumulative impacts, or for proponents to be required to undertake multiple studies and assessments to secure approvals for projects that rely on transport connections and State infrastructure. Such duplication may increase regulatory costs, extend approval timeframes and create unnecessary uncertainty for project proponents, without necessarily delivering additional planning or environmental benefits.

Furthermore, introducing the new Environment, Heritage and Efficient Growth State Interest, alongside changes to bioregional planning frameworks and proposed reforms to the national environmental regulatory framework under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act), may create overlap or inconsistency in assessment requirements. Without clear alignment between these frameworks, proponents may face additional regulatory complexity, uncertainty about applicable assessment requirements, and potentially conflicting obligations across State, regional and Commonwealth approval processes.

AMEC therefore considers that successful planning reform must be supported by clear implementation guidance, effective coordination between levels of government and a commitment to avoiding unnecessary duplication. A well-integrated and proportionate planning framework should facilitate development, support emerging and established industries, and maintain appropriate environmental and heritage protections without creating additional regulatory barriers to investment and resource development in Queensland.

Implications for Developers and Proponents

The reforms require stronger alignment with regional priorities, infrastructure sequencing and cumulative impact considerations. For AMEC members, this means:

- Infrastructure capacity, the transport corridors and the availability of services will be the key factors in determining approval risk.
- Cumulative regional effects (especially for projects of strategic connectivity) will be subject to a more rigorous assessment.

- This is a planning environment where early alignment with regional plans and State interest is absolutely vital for AMEC members if they are to avoid any delays or uncertainty.

Implications for Assessment and Approvals

Assessment pathways will tighten as regional plans, bioregional frameworks and updated State interests converge. This will:

- Require councils to test applications against regional housing, infrastructure, and economic targets.
- Introduce new layers of cumulative impact assessment in relation to EP(ES)OLA, bioregional planning and offset reforms.
- Without clear direction and without proper cross-agency coordination, AMEC proponents could end up with conflicting or duplicative requirements across the planning and environmental systems, which would add to the complexity.

Importance of Legislative Alignment for Investment Confidence

Alignment across legislative reforms is critical for Queensland's investment future and AMEC members. The planning reforms are occurring alongside:

- EP(ES)OLA Bill 2025 (EIS trigger changes)
- Bioregional Planning (new environmental baselines and cumulative impact frameworks)
- National EPBC reforms (closely tied to State offset reform)

These reforms are all highly interrelated. If they're not properly sequenced and communicated, you end up with uncertainty, risk of duplication and a loss of confidence amongst the investors who are looking at the long term viability of the projects.

For AMEC coherent, integrated and predictable legislative regimes are fundamental to maintaining Queensland's competitiveness and to underpinning continued investment in exploration, mining and the emerging industries.

Implications for Developers and Proponents

Queensland is progressing a major shift toward coordinated, region-wide planning through the release of 13 new or updated Regional Plans, supported by companion Regional Infrastructure Plans. This represents a move away from fragmented, council-by-council planning toward a system in which land use, infrastructure delivery, and long-term growth sequencing are strategically aligned at a regional scale.

AMEC are in support of the high level aspirations set out in the draft State Planning Policy, our concerns would centre primarily on the level of detail in the material that is currently being released for consultation, high-level aspirations set out in the draft State Planning Policy; our concerns would centre primarily on the level of detail in the material that is currently being released for consultation, which is not there. The SPP reforms are not a standalone exercise; they are part of a much wider and interlinked legislative reform agenda.

AMEC note (in keeping with our feedback over the past year) that the current amendments to Queensland's planning framework are not simply a set of ad hoc, routine updates to a 10-

year-old system. They are part of a much wider and ongoing reform agenda across several Queensland Departments. The lack of transparency, lack of coordination and poor cross departmental alignment is becoming increasingly of concern to the industry.

Several major reform processes are occurring simultaneously, each with distinct and direct implications for exploration, mining, regional development and environmental assessment. These include:

- EP(ES)OLA Bill 2025 (proposing significant changes to EIS triggers and the pathways for assessment) and its direct relevance to regional planning processes (in particular where projects are of regional interest and where cumulative effects across a range of regional systems are to be assessed).
- Bioregional Planning (which introduces new regional environmental baselines, cumulative impact considerations and strategic ecological priorities) must be fully integrated with regional land use planning, infrastructure sequencing and project assessment.
- National EPBC reforms (closely tied to the State Offset reforms in Queensland). The move at the Commonwealth level to net gain, strategic restoration and bioregional environmental standards will have a direct bearing on how Queensland goes about designing, applying and administering offsets under the Environmental Offsets Act and the various planning instruments.

Taken together, these reforms represent a fundamental restructuring of how projects are planned, assessed and conditioned in Queensland. Yet the connections between them are not clearly articulated, and the sequencing of reforms lacks transparency. For industry, this creates uncertainty, risk of duplication, and difficulty understanding how new obligations will interact across planning, environmental, and regional development systems.

AMEC will continue to push for a coherent, integrated and transparent reform programme which takes account of these interdependencies and provides clear guidance for proponents as they navigate the multiple regulatory changes at the same time.

Although this aspect does not hold immediate bearing on AMEC’s membership; it is worth noting that Local Government's will be required to more closely align development assessment processes with clearly defined regional priorities (for example infrastructure sequencing and service capacity and regional economic development objectives). As a result, development approval decisions may be increasingly influenced by the extent to which proposed developments align with these priorities. This reinforces the importance of ensuring regional priorities appropriately recognise the economic contribution of the resources sector and support investment, exploration and project development across Queensland.

For new industries and resource sector development, this introduces a new dimension to the way projects might be assessed. The requirement to consider regional priorities and long-term sustainability outcomes leads to the question of how a Local Governments, will go about assessing the baseline impacts of a project against the wider regional objectives.

This isn't a new issue for the industry, but it is normally considered for projects with a sufficient scale and size to attract a Coordinated Assessment. The problem with the

expanded regional scope is that it could have some unintended consequences. Take a project near Cloncurry for example. That project would be required to assess its impacts against the regional objectives which would apply to Mackay (a very distant centre) simply because both Cloncurry and Mackay fall within the same regional planning region.

Such an approach risks overreach. AMEC considers that any new assessment framework must include:

- a clear test of relevance, ensuring only impacts that are genuinely connected to the project and regions are considered
- a proportionate test of materiality, preventing assessments from being expanded unnecessarily across unrelated or distant regional areas

Without those safeguards, proponents could face assessment requirements that are disproportionate, unclear, or that simply don't reflect the realities of project delivery.

AMEC supports regional planning, but it must be practical, focused, and appropriate to the communities and infrastructure systems affected by the project.

Mapping

The State Planning Policy (SPP) Interactive Mapping System (IMS) is a key planning tool which spatially defines the extractive resource, the associated processing area and the buffer required to protect the operation and ensure land use compatibility.

The mapping layers will generally identify:

- resource deposits (geological extent and operational footprint)
- processing and handling areas
- buffer zones around extraction and processing sites to minimise land-use conflict and manage impacts
- critical infrastructure corridors, including designated haul routes, state-controlled roads, and rail connections
- additional buffers around transport corridors to prevent sensitive land uses from encroaching into high-impact areas

These layers are absolutely critical for the protection of long term resource operations, for maintaining freight efficiency and for ensuring that any planning decisions we make don't in any way compromise the strategic infrastructure.

The draft State Planning Policy (SPP) does not clearly articulate how buffer zones will be defined and applied, how extractive resource deposits will be spatially identified, or how critical infrastructure corridors will be protected. Further clarity is also needed on how these mapping layers will interact with regional plans and local planning schemes. For industry, this lack of detail creates uncertainty regarding how strategic resource areas will be protected and how future development proposals will be assessed against these spatial constraints.

AMEC sees a significant opportunity to strengthen the SPP by integrating the IMS with GeoResGlobe, which holds authoritative data on mining activities and tenure, including

mineral deposits, exploration permits, mining leases, and project locations and boundaries. Aligning these systems would establish a single, accurate and transparent spatial information source to support planning and resource development, improve consistency across government agencies, ensure resource deposits are accurately represented, and assist councils and proponents in making informed decisions. This integration would also reduce duplication and inconsistencies between spatial datasets and strengthen the long-term protection of strategically important resource areas.

Implications for Assessment and Approvals

For proponents, regional strategy will now directly influence project feasibility. Factors such as:

- infrastructure investment timing
- transport and utility capacity
- regional employment land planning
- identified growth areas and constrained areas

These will determine whether a site is viable and whether a proposal is likely to be approved in a timely manner. A project that clearly falls within regional priorities will be subject to less assessment risk and will have greater certainty of approval and benefit from improved access to infrastructure coordination.

AMEC notes that the revised Minerals section (p26) is a significant reworking of the State Planning Policy's definition of 'extractive resources'. Previously, the State Interest covered both mining and extractive resources. The draft now provides an expanded definition of what is meant by extractive resources (with minerals being included).

AMEC welcomes the change as it is most likely intended to clarify the difference between quarry materials and other resource types; it is also important to ensure that this delineation is not done in isolation and that the approach is consistent with the Queensland Government's other States' policy directions for example;

- the Critical Minerals Strategy,
- the Government's commitment to supporting mineral development, particularly in the North West Minerals Province (NWMP), and
- broader economic development objectives associated with emerging industries and strategic minerals.

It's not clear from the draft SPP whether this approach would risk creating a policy inconsistency between the planning framework and the Government's economic and industry strategies. Minerals development (particularly critical minerals) is predicated on having clear planning pathways, protection of strategic resource areas and alignment between planning and resource development.

AMEC would recommend that the State Planning Policy provides clear guidance on how mineral development is to be supported within the planning system. This is particularly important in the case of the NWMP where mineral development is a fundamental pillar of the economy and where the way it is supported in the planning system needs to be linked to the

other legislative drivers (i.e. Bioregional Planning and the National EPBC reform), which also have regional drivers as a key concept in their approach to addressing development pressures.

It's critical that minerals are properly captured in the planning system to ensure alignment with Queensland's strategic intent and to underpin ongoing investment in exploration and mining.

Importance of Legislative Alignment for Investment Confidence

Regional Plans now set the long-term strategic direction for growth across Queensland. Early engagement with these plans and clear alignment of proposals to regional priorities can reduce assessment delays and improve project viability.

For AMEC members, this shift underscores the importance of ensuring regional planning frameworks recognise the needs of the resources sector, including industrial land supply, transport corridors, workforce housing, and regional infrastructure essential to exploration and mining operations.

The draft SPP repeatedly states that it is intended to "support existing economic drivers". AMEC would like to reiterate that in practice this should clearly include the mining and extractive industries, which are foundational contributors to Queensland's regional economies, its export performance and its long term employment.

The current draft doesn't clearly set out how these industries will be supported within the planning framework. The reference to supporting the existing economic drivers is very broad and without any specific mention of the minerals and extractive industries the intent is likely to be lost or interpreted in a variety of ways across the different regions and assessment processes.

Mining, exploration and the associated supply chain are the key economic drivers for Queensland, particularly in the North West Minerals Province (NWMP), the Bowen Basin and the wider North and Central Queensland resource corridors.

- underpin regional employment
- drive infrastructure investment
- support emerging industries such as critical minerals, battery manufacturing and renewable energy supply chains
- contribute significantly to State revenue and export growth

Given this, AMEC considers it essential that the SPP:

- Provides clear guidance on how our industry is supported through land-use planning, infrastructure coordination and regional growth strategies
- Ensures consistency with the Critical Minerals Strategy and other State economic priorities

Clear recognition within the SPP will help ensure that planning decisions, regional plans and infrastructure sequencing continue to support the industries that underpin Queensland's economic strength.

Recommendations

1. AMEC Recommendation – Minerals and Alignment Across Reforms

AMEC recommends that the State Planning Policy provide clear and explicit guidance on how exploration and minerals development is intended to be supported within the planning framework. This is particularly important in regions such as the North West Minerals Province (NWMP) and the North East Critical Minerals Zone, where mineral extraction is a foundational economic driver and a core focus of Queensland's Critical Minerals Strategy.

To ensure consistency and avoid policy misalignment, the SPP must articulate how exploration and minerals development interacts with, and is supported by, other major legislative and strategic reforms currently underway, including:

- Bioregional Planning, which establishes regional environmental baselines, cumulative impact frameworks and strategic ecological priorities that directly intersect with land-use planning and project assessment.
- National EPBC Reforms, which identify regional planning as a key mechanism for managing development pressures, offsets, and environmental outcomes under future national environmental standards.

These reforms are deeply interconnected. Without clear alignment, proponents risk facing fragmented or contradictory requirements across planning, environmental and regional development systems.

AMEC therefore considers it essential that the SPP:

- Clarifies how resource projects, exploration projects, exploration and minerals development is intended to be assessed and supported in regional planning contexts.
- Ensures consistency with bioregional planning, EPBC reforms and State offset reforms.
- Provides transparent guidance to avoid duplication, overreach or misinterpretation across agencies.

A coherent and integrated approach will strengthen investment confidence, support Queensland's exploration and critical minerals agenda, and ensure the planning system reflects the State's broader economic and strategic priorities.

2. AMEC Recommendation on IMS

AMEC recommends that the final SPP:

- clearly define extractive resource deposits and associated buffers
- articulate how critical infrastructure corridors will be mapped and protected
- integrate IMS mapping with GeoResGlobe to ensure accuracy and consistency
- provide transparent guidance on how these spatial layers will be used in assessment and approvals

This level of clarity is essential to support investment certainty, protect strategic resource areas, and ensure planning decisions align with Queensland's broader economic and critical minerals objectives.

Concluding Remarks

AMEC is committed to working constructively with the Queensland Government to ensure that the SPP, and the broader suite of interconnected reforms, deliver a planning and environmental system that is nationally aligned, scientifically robust, and operationally practical. The resource sector relies on clear, predictable and well-coordinated frameworks that reflect contemporary ecological science, regional planning priorities, and the realities of on-ground implementation across Queensland.

The draft SPP sets out strong aspirations, many of which AMEC supports. However, the detail required to operationalise these aspirations, particularly regarding minerals, extractive resources, mapping layers, regional planning alignment, and cumulative impact assessment, could be improved. The SPP must clearly articulate how minerals development is supported within the planning framework, how strategic resource areas and critical infrastructure corridors will be protected, and how regional planning will interact with bioregional planning, EP(ES)OLA reforms, and forthcoming national EPBC changes.

These reforms are deeply interdependent. Without transparent sequencing, clear guidance and cross-agency coordination, proponents face uncertainty, duplication risk and inconsistent assessment pathways. A coherent, integrated approach is essential to maintaining investment confidence, supporting emerging industries, and ensuring Queensland's planning system aligns with the State's economic priorities, including the Critical Minerals Strategy and development of the North West Minerals Province.

AMEC looks forward to continuing to work with government to refine the SPP and associated reforms, ensuring the final framework is practical, balanced and capable of delivering strong environmental outcomes alongside sustainable economic growth for Queensland.

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