

Georesources Policy

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**Re: Streamlining the land release process**

Thank you for the opportunity to provide comment on the 2025 Land Release Review Report<sup>1</sup>.

Environmental Advocacy in Central Queensland (**EnvA**) is a grassroots community group based in the largest coal mining region in Australia. We are concerned about the direct impacts of coal mining and coal seam gas projects on our environment and their contribution to greenhouse gas (**GHG**) emission driving climate impacts.

EnvA generally supports the **goals** of the Review to:

- ensure land is made available in a way that is efficient, transparent, and aligned with industry and government needs—while also balancing environmental, agricultural, and community interests, and
- recognise the need for resource exploration (and production) to sustainably coexist with other land uses in a way that is balanced, empathetic, and forward-looking—where industry and community thrive together.

However, we are concerned that some of the proposed changes may undermine these **goals**, with unintended negative risks to the environment, communities and Queensland's long-term interests. Our concerns are further detailed in our submission below.

## **Streamlined competitive tender process**

### Consultation and notification

The proposed streamlined land release process provides limited opportunities for communities, landholders and Traditional Owners to have their views heard and addressed. This is contrary to aims of the review outlined above.

The Review's stated objectives emphasise industry needs but make little reference to landholders, Traditional Owners, or the wider community, despite the website identifying the desire 'to strengthen early and meaningful engagement with landholders, Traditional Owners and communities' as a key area for improvement<sup>2</sup>.

While we welcome the inclusion of public comment at the Expression of Interest (**EOI**) stage, it is unclear how this will be promoted. Relying on a public portal is inadequate—many affected people will not be aware of opportunities to engage.

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<sup>1</sup> [2025 Land release review paper](#)

<sup>2</sup> [Streamlining the land release process webpage](#)



Current exploration approval processes already lack sufficient public notification. For example, Queensland Coking Coal (**QCC**) was recently granted approval for a Bulk Sampling Project on EPC 1233. The community only became aware of this project when a Directions Notice was issued for unauthorised clearing.<sup>3</sup> The project was not referred under the *Environment Protection and Biodiversity Conservation Act 1999*, despite being in known endangered species habitat, and contrary to the QCC documentation identifying the area as an avoidance area to protect koala and greater glider habitat.<sup>4,5</sup> Better consultation would have alerted regulators and prevented regulatory breaches now under criminal investigation.<sup>6</sup>

## **Recommendations**

1. Develop a clear, accessible notification process in consultation with communities, to ensure impacted landholders, Traditional Owners, and local governments are alerted to EOIs.
2. Introduce an additional consultation step under the *Mineral Resources Act 1999* and *Environmental Protection Act 1994* prior to approving Mineral Development Licences (**MDLs**) or Exploration Permits (**EPs**). Communities and interest groups should be consulted alongside local government at this stage.

## Land constraints and environmental protection

EnvA is supportive of outlining priority areas for exploration to ensure that:

- government interests align with industry interests,
- areas for release must coexist with other land uses, and
- it is balanced, empathetic and forward-looking - where industry and community thrive together.

The consultation paper notes that GeoResGlobe will be used to assess land constraints when evaluating EOIs, but the criteria for assessing “land constraints” remain vague. Transparency on these matters is essential.

The latest *Statewide Landcover and Tree Study* (SLATS) report<sup>7</sup> shows 332,000 ha of woodlands and forests were cleared between August 2022–23—a 3% increase on the previous year. Of this:

- 6,600 ha was cleared for mining.
- 49% of this clearing was in the Brigalow Belt bioregion,
- 44% of the clearing was within the Great Barrier Reef catchment area, and
- at least 3,000ha of endangered regional ecosystems was cleared.

Queensland cannot afford to continue this rate of loss.

## **Recommendations**

1. Make all land constraint assessments open and transparent. At a minimum, constraints must include:
  - endangered and threatened regional ecosystems,
  - habitat for endangered and vulnerable species,
  - state biodiversity corridors,

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<sup>3</sup> [Directions Notice \(June 2024\).](#)

<sup>4</sup> [EnvA \(2024\) Letter to the Federal Environment Minister in relation to potential illegal clearing at the Vulcan South Coal Mine](#)

<sup>5</sup> [EnvA \(February 2025\) Letter to the Federal Environment Minister in relation to clearing outside the approved disturbance area at the Vulcan South Coal Mine](#)

<sup>6</sup> [EnvA \(2025\) Koalas and greater gliders under serious threat from the approval of the Vulcan South Coal Mine](#)

<sup>7</sup> [Queensland Government \(2025\) 2022-23 SLATS Report](#)

- prime agricultural land,
  - protected areas, offset areas, and Nature Refuges, and
  - rivers and creeks within the Great Barrier Reef catchment.
2. Ensure priority land releases align with Queensland’s clean energy transition.<sup>8</sup> New coal and gas projects are incompatible with climate goals and should be excluded from future land release (detail provided in Attachment 1).

## **Alternative land release methods**

### Expanding an existing project

Expanding an existing project of either exploration or production should not be managed differently to a new project proposal. The land constraints and impacts on the environment and community usually differ from the original project and must be assessed in a similar way to a new proposal in consultation with the local governments, landholders and the broader community.

### Direct applications

We note that some flexibility already exists under the MR Act where:

- The Minister can accept direct applications for minerals (except coal) or choose to undertake a competitive tender process.
- Small coal exploration permits (up to six sub-blocks) can be granted if the area is contiguous to an existing coal project.

We recommend that direct applications should only be considered where:

- the Proponent owns the land or holds a suitable existing tenure over the land (i.e. holds the lease over the land),
- the land constraints (as proposed for the EOI process) are appropriately considered, and
- there is an opportunity for meaningful public consultation with the views and concerns raised given due consideration.

### Flexible land release processes across all sectors

Providing the Minister with broad flexibility to bypass competitive tendering risks undermining transparency. All decisions should be based on clear legislative and policy frameworks to avoid conflicts of interest and potential legal challenges.

### Dedicated land release intelligence team

EnvA supports establishing a land release intelligence team. However, its membership must reflect the full spectrum of government responsibilities—not just resource interests.

Members should include experts in:

- ecology and water science,
- relevant legislation and policy, and
- human rights and the balance between resource extraction and community wellbeing.

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<sup>8</sup> [Clean Energy Jobs Act 2024.](#)

## Conclusion

EnvA supports the goals of the Review but remains concerned that the proposed reforms, as currently outlined, may fail to achieve them. Stronger provisions for consultation, transparent land constraint criteria, and alignment with Queensland's climate and biodiversity commitments are essential.

We urge the government to:

- strengthen community notification and consultation,
- clearly define and apply land constraints,
- exclude new fossil fuel projects from priority land release, and
- ensure transparency and accountability in decision-making.

Thank you again for the opportunity to comment. We would appreciate being kept informed of the progress of the Review and would be pleased to clarify or expand on any of the matters raised.

Kind regards



**Dr Coral Rowston**

Director

Environmental Advocacy in Central Queensland

## Attachment 1

### Coal and gas impacts: Climate, Legal, and Market Context

The scientific consensus is unequivocal: expansion of fossil fuel production is incompatible with limiting global warming to safe levels.<sup>9</sup> It is our strong view that new fossil fuel sources, including coal and gas, should not be explored or developed, and policy direction must align with the urgent need to decarbonise to mitigate further impacts of climate change.

#### Legal framework

Australia has international agreements and legislated national emission reduction targets including:

- Australia, alongside 196 other nations, is a signatory to the Paris Agreement<sup>10</sup>, which commits countries to pursue efforts to limit warming to 1.5°C and well below 2°C. Meeting these targets requires the immediate cessation of new fossil fuel developments.
- A legislated 43% emissions reduction from 2005 levels by 2030 and net zero by 2050.<sup>11</sup> Australia will soon set a new, strengthened 2035 emissions reduction target and climate plan to the United Nations.
- State and Territory targets add up to an estimated 66–71 % reduction in Australia’s emissions levels by 2035.<sup>12</sup>
- The Queensland Government is committed to net zero emissions by 2050 with an already met interim target of at least 30% reduction by 2030, and at least 75% below the net GHG emissions by 2035.<sup>13</sup>
- Australia is a signatory to the Global Methane Pledge which, with the other 120 State signatories, is working to collectively reduce global methane emissions across all sectors by at least 30% below 2020 levels by 2030.<sup>14</sup>
- The International Court of Justice recently confirmed that Australia has an international legal obligation to undertake appropriate climate action. Ongoing approvals and support for fossil fuel projects may result in legal liability under international customary and treaty law.<sup>15</sup>

Expanding fossil fuel production is inconsistent with these commitments.

#### Contribution of coal and gas to GHG emissions

The burning of fossil fuels for energy is the largest contributor to global carbon emissions. While Australia does not report CO<sub>2</sub> from the combustion of exported fossil fuels, our coal, oil, and gas exports—when burnt overseas—release climate pollution equivalent to 2.5 times Australia’s annual domestic emissions.<sup>16</sup> Regardless of where fossil fuels are burnt, they contribute significantly to global warming, intensifying extreme weather events and damaging marine ecosystems.<sup>17</sup>

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<sup>9</sup> [Intergovernmental Panel on Climate Change, \*Climate Change 2022\*](#)

<sup>10</sup> [UN Framework Convention on Climate Change, Adoption of the Paris Agreement, 21<sup>st</sup> Conference of the Parties, Paris \(2015\)](#)

<sup>11</sup> [Climate Change Act 2022](#)

<sup>12</sup> [Climateworks Centre \(2024\). Leading climate policies from Australia's states and territories](#)

<sup>13</sup> [Clean Economy Jobs Act 2024](#)

<sup>14</sup> [Australia joins Global Methane Pledge \(2022\)](#)

<sup>15</sup> [International Court of Justice\(23 July 2025\). Obligations of States in respect of Climate Change - Summary of the Advisory Opinion](#)

<sup>16</sup> [Climate Council \(2025\). Stronger target, safe future – Why Australia’s 2035 climate target matters](#)

<sup>17</sup> [Waratah Coal Pty Ltd v Youth Verdict Ltd & Ors \(No 6\) \[2022\] QLC 21](#)

Climate change is already impacting Australian communities across the country through more frequent and severe droughts, storms, floods and ocean warming leading to coral reef bleaching and algal blooms.

### Demand for gas

The downward trend in gas demand for manufacturing, electricity generation, and residential use is clear. In the 2023–24 financial year, domestic gas consumption fell to a 25-year low, down 32% over the past decade <sup>18</sup>.

The Australian Energy Market Operator (**AEMO**) and the Australian Competition and Consumer Commission (**ACCC**) anticipate a broad decline in gas demand from commercial, residential, and industrial sectors, but an increase in demand for gas-powered generation to firm electricity supply. <sup>19</sup>

With respect to the anticipated increase in gas demand for firming electricity when coal fired power stations retire, it is important to note that Australia is one of the world's largest gas exporters<sup>20</sup>, with 70–80% of production shipped overseas. Some of this gas is surplus to the importing country's needs. For example, in 2024 Japan on-sold at least 600 petajoules of Australian liquefied natural gas (LNG) to other countries — more than the total annual domestic consumption of Eastern Australia. <sup>21</sup> There are opportunities to address any short-term gas shortfall for firming electricity by retaining a modest additional share of Australian gas for domestic use. A review of Australia's Gas Market is currently in progress.<sup>22</sup>

### Demand for coal

There are varying projections on the future demand for thermal and coking coal into the future.

Government projections show Australian thermal coal exports peak this year and decline to 2030, with a weakening demand from our key Asian export markets. <sup>23</sup> Demand for thermal coal will largely be influenced by:

- The pace of renewable and alternative energy generation in export partner markets,
- The impact of a predicted global LNG supply glut and consequent lower LNG prices on coal demand, and
- The scale and pace of coal power unit retirements, which are forecast to be triple the number of projected new builds over the outlook period.

Global demand for metallurgical coal is expected to fall as low emissions steel production gains pace. Australia's two largest metallurgical coal export markets are Japan and India, with India shifting towards steel-making using domestically produced green hydrogen and Japan having sufficient scrap metal supplies for its transition to electric arc furnace steel production in the near term. <sup>24</sup>

### Social and economic impacts

A declining coal market and the current low coal prices could accelerate mine closures in Australia.

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<sup>18</sup> [Institute for Energy, Economics and Financial Analysis \(December 2024\) LNG exports prompt fall in eastern Australia's gas demand.](#)

<sup>19</sup> [Australian Energy Market Operator \(March 2025\). Gas statement of opportunities](#)

<sup>20</sup> [The Australia Institute, Gas: The Facts.](#)

<sup>21</sup> [IEEFA: How Japan cashes in on resales of Australian LNG at the expense of Australian gas users.](#)

<sup>22</sup> [Australian Government \(2025\) Gas Market Review Consultation](#)

<sup>23</sup> [DISR \(2025\) Resources and Energy Quarterly](#)

<sup>24</sup> [Institute for Energy Economics and Financial Analysis \(2025\) Australian coal exports face numerous downside risks, new projections show.](#)

This is already becoming evident in Central Queensland with Bowen Coking Coal having already placed two of its coal mines under care and maintenance (Broadmeadow East and Bluff mines)<sup>25</sup> and has now entered voluntary administration<sup>26,27</sup>. These circumstances significantly jeopardise employment security for coal mine workers. There is also a high risk to the local environment and impacted landholders as mine closure and rehabilitation obligations cannot be met.

This raises questions over the continued approval of new coal mine developments. Australia already has more coal mines approved than will be required as the demand continues to decline as the world transitions to a clean energy economy. Encouraging the development of new or expanding coal mines is contrary to international agreements, State and Federal legislation and will impact on local communities.<sup>28</sup>

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<sup>25</sup> [Bowen Coking Coal \(3 July 2025\) ASX announcement](#)

<sup>26</sup> [Company Update and Appointment of Voluntary Administrators](#)

<sup>27</sup> [ABC \(30 July 2025\) Owners of Bowen Basin mine enter administration amid coal price slump](#)

<sup>28</sup> [Institute for Energy Economics and Financial Analysis \(2025\) Australia's coal production limits far exceed actual output, so why approve new mine developments?](#)