

Consultation Report

Consultation outcomes for proposed amendments to the
Environmental Protection Act 1994 and other portfolio legislation

Contents

Background.....	2
Purpose.....	2
Consultation process overview	3
Overview of submissions received	4
1. EP Act proposals to streamline and reduce burden	5
1.1 Provide for the making of mandatory codes as an alternative to environmental authorities.....	5
1.2 Provide a consistent environmental risk basis for regulating environmentally relevant activities.....	7
1.3 Clearly identify the State's priorities for environmental protection in the EP Act	8
1.4 Provide a mechanism to codify 'best practice environmental management'	10
1.5 Providing consistent general administrative requirements across approvals	10
2. Other proposals relating to Progressive Rehabilitation and Closure Plans (PRCPs).....	11
2.1 Assist environmental authority holders transitioning into the PRCP framework under the EP Act.....	11
2.2 Clarify when offence provisions apply in circumstances where an application has lapsed	12
2.3 Provide a new category of approval for transitional applications for PRCP schedules	12
2.4 Allow for audits of PRCP schedules to be determined by the administering authority.....	13
2.5 Allow for a new notice to submit a PRCP application following an environmental authority transfer	14
2.6 Provide for removal of the public interest evaluation process	15
2.7 Clarify that environmental authority holders who have fallen out of the PRCP framework may re-apply	16
3. Other proposals to amend the EP Act, NC Act and Water Act (chapter 3)	17
3.1 Clarify that the definition of waters in the EP Act includes groundwaters	17
3.2 Enhance powers for a court to order forfeiture of property which may be used in the ongoing conduct of an offence	17
3.3 Enhance powers for a court to order confiscation of proceeds from environmental crimes under the EP Act	18
3.4 Ensure adequate time is available to gather evidence in summary proceedings under the EP Act	18
3.5 Clarify when the residual risks requirement lapses.....	19
3.6 Amend the EP Act to ensure the information stage is not shortened when an amendment application is received.....	20
3.7 Provide greater clarity and consistency on the requirements for third-party accreditation programs under the EP Act	21
3.8 Remove requirements to publicly notify terms of reference for environmental impact statements	21
3.9 Provide consistency in authorised officer functions and powers where these intersect with the Planning Act	22
3.10 Clarify the dictionary definition of protected area under the NC Act	23
3.11 Clarify chapter 3 of the Water Act	24
4. Additional amendments.....	25
4.1 Destination 2045: Delivering Queensland's Tourism Future.....	25
4.2 Recognition of Impact Assessment Reports and PRCP minor amendments	26
Appendix 1: List of submitters	27

Background

On 10 June 2025, the Queensland Government released the consultation paper, [*Realising efficiencies and streamlining in the Environmental Protection Act 1994 and other portfolio amendments*](#) (the consultation paper) to seek feedback on proposed regulatory amendments to the *Environmental Protection Act 1994* (EP Act), the *Nature Conservation Act 1992* (NC Act), and chapter 3 of the *Water Act 2000* (Water Act).

The Queensland Government invited feedback on 23 proposed amendments, arranged under the following parts:

- Part 1 – Environmental Protection Act (EP Act) proposals to reduce regulatory burden, make the Act more responsive to emerging challenges and remove barriers to investment (5 proposals);
- Part 2 – EP Act proposals relating to Progressive Rehabilitation and Closure Plans (PRCPs) (7 proposals); and
- Part 3 – Other proposals to amend the EP Act, NC Act and Water Act (11 proposals) to improve administrative efficiency.

The feedback informed preparation of a draft Bill, the *Environmental Protection (Efficiency and Streamlining) and Other Legislation Amendment Bill 2025* (the Bill). Consultation on an exposure draft of the Bill 2025 occurred from Wednesday 24 September 2025, with feedback invited until 17 October 2025.

The Bill also includes proposed amendments to deliver a single integrated permission for tourism activities on parks and forests. However, these amendments were subject to an alternative consultation process and were not referenced in the consultation paper or the exposure draft of the Bill.

Purpose

The purpose of this report is to summarise the results of consultation undertaken by the Government regarding proposed amendments to the EP Act and other portfolio amendments.

This report outlines key themes raised through the consultation process and the Government's response to the feedback received on each proposal.

Consultation process overview

1. Public release of the consultation paper

A general briefing about the proposed amendments outlined in the consultation paper was provided for stakeholders and other potentially interested parties on 10 June 2025.

Approximately 90 individuals attended the general briefing. The consultation paper was then emailed to attendees and stakeholders, as well as publicly released via publication on the Department of the Environment, Tourism, Science and Innovation's (the department's) website. Feedback on the consultation paper was invited until 14 July 2025.

Following the release of the consultation paper, the department further engaged with targeted stakeholders regarding the regulatory proposals. This included meetings with peak bodies and working groups for the resources, energy, waste, and aquaculture sector. Meetings also occurred with conservation groups and local governments.

2. Targeted consultation on the exposure draft of the Bill

On 24 September 2025, an exposure draft of the Bill was provided to individuals and organisations that had made a submission about the consultation paper. It was also provided to additional targeted stakeholders that were considered to have an interest. Some supplementary information was provided alongside the exposure draft of the Bill to aid interpretation and understanding.

Submitters, key stakeholders and other interested parties were invited to a general briefing on 29 September 2025 about the exposure draft Bill. This provided a summary of the regulatory proposals that would and would not be progressed as part of the Bill in consideration of the feedback received. Over 120 individuals attended.

Further targeted engagement with key stakeholders and other interested parties was undertaken on the exposure draft of the Bill following its distribution. In addition, meetings with First Nations representative bodies, local government, small scale miners, and landholders with specific interest in Chapter 3 of the Water Act were held following the general briefing to gain further feedback on the regulatory proposals.

Feedback on the exposure draft of the Bill was invited from submitters until 17 October 2025.

Overview of submissions received

During the first phase of consultation, 61 written submissions were received on the proposals in the consultation paper from a range of stakeholders and interested parties including:

- agricultural and aquacultural groups;
- conservation organisations;
- industry peak bodies;
- landholder organisations;
- legal professional groups;
- local government bodies and local governments; and
- resource, energy and waste organisations.

This report conveys responses to the proposals thematically in stakeholder groups, without attributing names of groups or individuals to specific statements. The report provides a summary of the feedback received and does not reflect all the views expressed by stakeholders and other interested parties.

Overall, stakeholders had mixed views on the proposals, with strong support from some and reservations and queries from others. Stakeholders often did not respond to all proposals, instead responding to those matters most likely to affect their members or their interests. Submissions also included other suggestions and proposed amendments that were considered as 'out of scope' for this Bill. However, these have been recorded and will be reconsidered in the future should the opportunity arise.

A number of submitters suggested that further consultation was required for them to understand the implications of the proposals and provide considered feedback. First Nations representative bodies stated that initial notifications about the consultation process commencing did not reach them and they would prefer to have been engaged directly much earlier about the proposed changes. They sought clearer explanations of the proposals and the implications the changes would have for Native Title rights and rights holders and queried whether the Bill constituted a 'future act' under the *Native Title Act 1993*. The amendments are not considered to be a future act, however further engagement is proposed to support implementation.

Stakeholder feedback and government responses

The following section steps through the feedback received on each proposal put forward at each stage of the consultation process. It also outlines the Government's response to the feedback. Each proposal is referenced as per the consultation paper. A copy of the consultation paper and explanation of the proposals is available at: [Realising efficiencies and streamlining in the Environmental Protection Act 1994 and other portfolio amendments](#).

1. EP Act proposals to reduce regulatory burden, make the Act more responsive to emerging challenges and remove barriers to investment

1.1 Provide for the making of mandatory codes as an alternative to environmental authorities

Stakeholder feedback

Stakeholders were generally supportive of introducing mandatory codes.

Some agreed that replacing environmental authority requirements with mandatory codes would target 'red tape' and reduce operational costs for both industry and government. Some submitters said a public register should be created recording activities under mandatory codes, to increase transparency and reduce any uncertainty for the government or public as to how a project is being regulated. Progressive implementation of mandatory codes via staging of reviews of low-risk ERAs in tranches was also generally supported.

Some submitters queried aspects of implementation. For example, categorisation of an ERA as low risk must be done with care to avoid uncertainty and potential confusion. First Nations representative bodies suggested a definition of what was meant by 'low risk', and clarification on how individual activities and cumulative impacts would be tracked and managed.

Industry and waste stakeholders sought clarification about the prescriptive nature of conditions in codes that would lack flexibility to account for site-specific activities. Several groups suggested an 'opt-in' or 'hybrid' application of the codes to maintain flexibility for operators. Submitters also sought clarification on the relationship between the mandatory codes and site-specific environmental authorities, particularly for ancillary or prescribed ERAs.

Other resource and industry stakeholders queried whether mandatory codes may duplicate or operate in conflict with existing environmental authority conditions or tenure approval processes under both the EP Act and the *Mineral Resources Act 1989*. Resource groups recommended that future codes be referred to as 'Standard or Prescribed Codes', to avoid confusion about its application.

Environmental and landholder groups queried whether the introduction of mandatory codes could unduly limit departmental oversight of ERAs (if proponents are required to self-assess compliance) resulting in poorer environmental outcomes. They also sought reassurances about the sufficiency of compliance and enforcement effort by the government and

suggested that insufficient effort for code-managed ERAs may lead to poorer environmental outcomes.

Local governments sought further details on the financial and operational support being provided to councils under the framework, as well as transitional arrangements for existing authorities to mandatory code. Local government also sought further engagement on the development of any such codes.

Most submissions raised that mandatory codes must be drafted in consultation with affected parties, based on contemporary best practice principles and evolving standards. Aquaculture groups suggested a dedicated working group to guide development, piloting and review of industry-specific codes. One submitter suggested a periodic review of regulated ERAs to validate risk assessments. Several stakeholders suggested the Technical Report ([link](#)) could be further improved to provide a better definitive source of information for identifying activities suitable for transition to mandatory codes. A First Nations representative suggested that the Technical Report was too broad to relate to specific lands, and as it had not specifically considered cultural heritage it had missing and incomplete data. It was posed the report may underestimate the risk of environmental harm from activities, including in the context of unforeseen accidents or natural disasters.

One submitter queried whether introducing mandatory codes may reverse the intent of previous reforms aimed at ensuring quicker and easier environmental authority approvals, noting ERA standards already provide a streamlined, risk-based approach for lower risk activities.

Some changes to drafted provisions were suggested in response to consultation on the exposure draft Bill. Some submitters indicated they were more comfortable with the proposal following their review of the exposure draft due to gaining a greater understanding of how the proposal would work. Others reiterated issues they had raised previously. Additional feedback was also provided on detailed provisions such as the parameters for requiring a person carrying out a code-managed ERA to be registered.

Government response

The proposal to establish mandatory codes as an additional regulatory tool under the EP Act will be progressed. Activities regulated under a mandatory code will continue to be classified as ERAs under the Act, but the codes renamed to ERA codes. An ERA code could be established for an activity for which risks are well known and practices to avoid these risks are well established, understood by industry and able to be routinely implemented.

Drafted provisions have been adjusted in response to submitter feedback on the exposure draft Bill to ensure workability. To provide regulatory flexibility, the EP Act will give new operators the option to apply for a site-specific environmental authority where they cannot meet the conditions of a new ERA code. Existing operators will be entitled to elect to remain subject to their current environmental authority rather than transitioning to a new ERA code. This approach is analogous to the 'opt-in' and 'hybrid' models suggested by submitters, ensuring continuity for operators while upholding strong environmental protections.

ERA codes provide an opportunity to review the level of regulatory oversight for ERAs and balance the need for regulation to manage the risk of environmental harm with the

opportunity to reduce regulatory burden. Activities with higher risks of environmental harm will continue to be regulated as per existing arrangements. Prescribed conditions currently used to regulate small-scale mining activities will be transitioned into an ERA code or ERA standard.

Regulatory oversight and compliance approach

The ERA codes will set clear expectations about acceptable standards of environmental performance. In addition, the department will publish guidance material and information about how to meet the requirements. Compliance and enforcement measures will be established for activities subject to an ERA code, however smaller penalties will apply to reflect the lower risk nature of the offence.

To ensure transparency and accountability, a regulation may require operators to be registered to operate under an ERA code. This information would be made publicly available and there will be an offence for conducting such activities without being registered.

Consultation and development of ERA Codes

The Government is committed to working with industry and the community to ensure the successful implementation of ERA codes, using a staged approach. The development of an ERA code will include a full consultation process similar to the process for the making of ERA standards under chapter 5A part 1 of the EP Act. This references impact assessment, public notification and consideration of submissions. Any final ERA code will need to be prescribed by regulation, and subject to scrutiny by the Parliament and disallowance. The previously prepared [Technical Report](#) may be one of the sources of information to inform which activities may be suitable for regulation via an ERA code, however consultation will be required to establish any new Code.

1.2 Provide a consistent environmental risk basis for regulating environmentally relevant activities

Stakeholder feedback

There was broad conceptual support for the proposal.

Support from most submitters was contingent on further clarity and justification, to avoid unintended regulatory gaps or increased uncertainty. Industry largely supported a more consistent regulatory approach but warned that risk frameworks must not recapture previously deregulated activities, like concrete batching, for example.

One submission supported the fundamental premise of the proposal but suggested that resource activities be prescribed in the Act, rather than a lesser statutory instrument. This is because the state owns the resources, the subject of the activity. Another submission suggested that greater reliance on subordinate legislation may reduce industry certainty, as it is more easily amended compared to Act level provisions.

The resources sector generally supported the proposal but noted the importance of clear risk thresholds and flexible application of regulatory pathways, depending on project needs and complexity. Some suggested that moving ERA definitions from the EP Act to regulation could open the door to legal uncertainty or judicial challenge.

Environmental, local government and waste sector groups emphasised the need for ongoing dialogue and robust public consultation during the development and implementation of proposed amendments.

Targeted consultation on the exposure draft Bill largely reiterated feedback provided on the consultation paper, with a number of stakeholders again emphasising the need for continued consultation (e.g. any future changes to the regulation of ERAs).

Government response

Given the broad support for this proposal, the Government will introduce the amendments as proposed. This is expected to improve flexibility in the EP Act for implementing risk-based approaches to defining ERAs including opportunities for deregulating activities like monitoring.

The proposal does not change the current effect of the legislation or ERAs, and any future subsequent changes to ERAs would be subject to consultation, regulatory impact analysis and the ability for Parliamentary scrutiny through a regulation amendment process.

1.3 Clearly identify the State's priorities for environmental protection in the EP Act

Stakeholder feedback

The proposal to introduce State Environmental Protection Priorities (SEPPs) received support from some groups, or conditional support and opposition from others. Several submissions noted the proposal needed further refinement and clarification to enable stakeholders to provide a well-informed and comprehensive response.

Across all stakeholder groups, consistent themes emerged, including the need for SEPPs to:

- align with existing environmental frameworks;
- avoid duplication with existing legislation;
- reflect government priorities; and
- reduce complexity, cost and administrative burden.

Environmental groups welcomed the opportunity to establish a clear and standardised list of SEPPs, provided priorities are developed through robust consultation and align with existing legislative frameworks. Waste groups also saw potential benefits, noting that clearly defined SEPPs could provide greater certainty but were curious as to how existing facilities with SEPP areas would be impacted.

Some landholder groups agreed that introduction of SEPPs could be advantageous, if all matters currently listed as either Matters of State Environmental Significance (MSES) or Environmentally Sensitive Areas (ESAs) are included. Some local government groups queried the workability of SEPPs due to the possibility of overlap with MSES and ESAs, calling for further consultation on local matters for inclusion if the proposal proceeds. Legal professional groups suggested clarifying the legal status of SEPPs in relation to exiting MSES

and environmental protection policies as essential to avoid confusion and potential legal conflicts.

Both agricultural and aquaculture groups were supportive of SEPPs, provided they incorporate priority agricultural areas and address emerging issues, such as subsidence. A First Nations representative group sought strong environmental protections under the ERA codes for land, water and culture, including recognition of Country and cultural values.

Industry and resource groups queried whether creating a new list would add duplication and complexity, with limited improvements to efficiency. These groups highlighted that existing frameworks are well understood by industry, professionals and the public and SEPPs may, in practice, inadvertently operate as an additional layer of regulation.

In response to the targeted consultation on the exposure draft of the bill, including consulting on the draft list of matters for inclusion, the majority of stakeholders reiterated previous feedback. This included comments which queried the need for the change, along with a preference to avoid duplication and potential uncertainty. Submissions also queried referring to the matters as 'priorities' and whether including a new criterion relating to SEPPs in the standard criteria could influence decision-making and cut across the existing hierarchy for avoiding, minimising, mitigating and offsetting impacts to values.

Government response

The Government has decided to proceed with the proposal to provide for improved understanding of the environmental values that are considered a priority for protecting in Queensland. However, the proposal has been amended to refer to Significant Environmental Values (SEVs) rather than SEPPs. This is considered to better reflect that these matters are a subset of the environmental values that are already protected under the EP Act and that they are a focus due to their identification in other Queensland regulatory instruments.

The Bill will provide for a consolidated list of SEVs to guide the identification of ERAs and the administration of the EP Act. An environmental value, or an area that has environmental values, may be declared to be a SEV under a regulation of an environmental protection policy if the Minister is satisfied the value or area is of State interest and should be protected under the Act as a priority.

The list of SEVs will not introduce further regulatory requirements or burden; rather, it will clarify and consolidate into one place those environmental values that are a priority. Identified cultural values that are not otherwise an environmental value will not be included due to the scope of the EP Act and these matters being protected in alternative frameworks.

SEVs will be a key mechanism used to guide administration of the Act – for example, it will be a consideration in establishing environmentally relevant activities. However, as environmental values are already considered in decision-making, no further amendments to individual decision-making criteria are necessary (e.g. for deciding variation and site-specific environmental authority applications under section 176 of the EP Act).

The proposed SEVs represent environmental values that are most relevant to the administration of the EP Act and are largely consistent with MSES defined Queensland's State Planning Policy. Where discrepancies occur, this is to ensure that the MSES included are fit-

for-purpose for the EP Act, which is based on environmental values and attributes rather than statutory trigger maps. The final list of SEVs will be refined through further stakeholder consultation, and will be prescribed via a regulation amendment.

1.4 Provide a mechanism to codify 'best practice environmental management'

Stakeholder feedback

This proposal did not receive broad support. Submissions highlighted the need for a clear and precise definition of 'best practice environmental management' (BPEM). A few submitted that principles of 'best practice' are inherently dynamic and evolve with contemporary standards, suggesting that codification could pose significant challenges in maintaining relevance and adaptability.

Some environmental groups and landholders supported the proposal to codify BPEM, noting that prescriptive conditions will provide clear guidance to industry and ensure proponents adhere to requisite standards. Submissions from the waste industry were supportive, provided consultation is undertaken, site-specific environmental authorities remain in place and acknowledgment that technical input from industry would be required to determine the content of BPEM codes.

This proposal was not included in the exposure draft Bill.

Government response

This proposal is not proposed for progression in the Bill as it did not receive broad support from submitters and was considered not to aid the intent to increase outcome certainty, particularly for existing operations. The government will consider administrative mechanisms, such as the development of additional guidance material, to achieve the desired outcome.

1.5 Providing consistent general administrative requirements across approvals

Stakeholder feedback

There was limited support for the proposal to provide for general administrative conditions to be applied across environmental authorities. While some submissions acknowledged the benefits of standardisation, most indicated this proposal would not improve administrative efficiency.

This proposal was not included in the exposure draft Bill.

Government response

This proposal it is not proposed for progression in the Bill as it did not achieve broad support from submitters. The department will consider alternate approaches to achieve the desired outcome.

2. Other proposals relating to Progressive Rehabilitation and Closure Plans (PRCPs)

2.1 Assist environmental authority holders transitioning into the PRCP framework under the EP Act

Stakeholder feedback

The proposal to amend section 431A of the EP Act received varied feedback from submitters.

While there was general support to clarify the scope of the framework, submitters queried whether removing the reference to “the mining activity” would result in the offence applying more broadly. Submissions from local government groups and industry said that reference to mining activity should be retained, whereas some environmental groups supported removal.

Resource groups largely supported the proposal, on the condition that:

- amendment to section 431A does not limit the development of legacy mine sites;
- amendment to section 359 must ensure the trigger for Environmental Enforcement Orders (EEOs) remains clearly defined and proportionate to risk; and
- section 359 should not apply when lawful rehabilitation is underway but administrative processes (e.g. PRCP schedule approval delays) are pending.

Some resource groups also highlighted that rehabilitation directions notices should only be used where necessary. Other resource groups raised issues in relation to implementation that were considered as beyond the scope of the proposal.

In response to the exposure draft Bill, some submitters sought further clarification on the operation of the drafted provisions.

A First Nations representative sought greater engagement between environmental authority holders and First Nations communities, suggesting that Traditional Owners are well placed to provide assistance to ensure effective rehabilitation. Such engagement may also assist Traditional Owners to fulfil their cultural obligations to look after Country.

Government response

The amendment will provide that operators who have fallen out of the PRCP framework are not prevented from conducting activities such as rehabilitation and maintenance and allow for compliance measures to be targeted on achievement of an approved PRCP schedule.

However, there will be a change in the application of the rehabilitation direction, to allow it to be applied where a PRCP schedule has not been approved, rather than limited to when section 431A offence is enlivened.

Several submitters expressed uncertainty about whether removing the reference to the activity would mean that the section 413A offence would apply more broadly. However, the offence retains its application only to site-specific mining sites which are transitioning into the PRCP framework. The relevant EEO will only be able to be directed at the completion of the PRCP schedule, and does not limit mining activity, including rehabilitation.

2.2 Clarify when offence provisions apply in circumstances where an application has lapsed

Stakeholder feedback

Submissions were generally supportive of the recommendation but questioned if the department could improve timeframes administratively. Resource groups emphasised that any clarification must be carefully implemented to preserve procedural fairness and avoid penalising applicants for administrative timing issues that are beyond their control.

Feedback on the exposure draft did not raise additional concerns.

Government response

The Government will proceed with the amendment as proposed. Government will continue to prioritise working with industry to reduce delays in decision-making.

2.3 Provide a new category of approval for transitional applications for PRCP schedules

Stakeholder feedback

Stakeholders were generally supportive of the proposal to create a new category of approval for transitional application for PRCP schedules, subject to seeing drafted provisions. One submission stated that the new category of Managed Post-mining Land Use (MPMLU) would reduce uncertainty by clarifying future use of land, whilst promoting flexibility to integrate use that aligns with broader regional economic development, like eco-tourism or Traditional Owner activities.

Other submissions raised the need for additional clarification, highlighting perceived restrictions on what activities may be considered as a post-mining land use. The ongoing management of MPMLU-designated areas was queried, and it was suggested that the category should not justify delays in finalising PRCP approvals.

The resources sector was generally supportive of the proposal, provided that the MPMLU category is clearly defined and not used as a default or indefinite substitute for closure. Resources and landholder groups suggested the new category only apply to transitional PRCPs.

Environmental groups queried whether the proposal provides enough incentive for mine operators to adequately rehabilitate mine sites. One group flagged existing 'loopholes' by which proponents enter new landholder agreements to transfer ownership to avoid fulfilling rehabilitation obligations and that this must be addressed to avoid shifting environmental and financial risks on to the community.

Targeted engagement on the relevant amendment occurred separately to the release of the exposure draft Bill and did not result in additional queries.

Government response

Rather than including a new category, an alternative proposal is being progressed to further clarify the operation of existing decision-making processes.

The amendment addresses a point of ambiguity relating to approvals of land forms that are carried forward in land outcome documents. The intent is to ensure that approvals that existed prior to the introduction of the PRCP framework are not fettered, and a PRCP schedule to progressively rehabilitate can consider best practice management in the context of historical considerations.

2.4 Allow for audits of PRCP schedules to be determined by the administering authority

Stakeholder feedback

Submissions from the resource industry was largely supportive of this proposal, but environmental groups were not.

One submission stated the proposed change better reflects the nature of rehabilitation timelines, where observable progress may not align with rigid audit cycles, particularly for large, long-life or staged projects.

Resource groups said that guidance material must be provided to proponents, outlining circumstances where an audit could be triggered and adequate notice periods. One submission said that proponents should retain the right to seek clarification or extension where audit requirements are complex or resource intensive. The ability to voluntarily commission audits or monitoring reports was also suggested, including for internal review or stakeholder engagement purposes.

Several resource groups suggested that auditing should not be conducted earlier than every three-years. One submitter said that proponent-led annual reporting on rehabilitation efforts and compliance with PRCPs should complement the increased auditing gap.

A few landholder and environmental groups noted that the 2023-24 annual report of the Office of the Queensland Mine Rehabilitation Commissioner shows that rates of disturbance are greater than rehabilitation. It was queried whether removing the requirement for three-yearly audits would provide less incentive to rehabilitate. Agriculture groups echoed similar sentiments, saying that industry should be held accountable on a regular basis to avoid risk of delaying rehabilitation obligations. Some submissions suggested a minimum audit schedule. One submission suggested that a minimum of regular three yearly audits should be undertaken once rehabilitation has commenced.

Government response

The Government acknowledges the differing feedback, however will proceed with the amendment as proposed. This is because the current three-year audit cycle for PRCP schedule holders to commission has proven too short to capture meaningful environmental change, creating unnecessary administrative and financial burden.

Allowing the administering authority to set audit timing enables more targeted and timely audits, focusing on key rehabilitation milestones or significant environmental changes. This flexible, risk-based approach ensures effective oversight while reducing unnecessary administrative costs to government and industry.

2.5 Allow for a new notice to submit a PRCP application following an environmental authority transfer

Stakeholder feedback

Minimal comments were received in submissions regarding this proposal. To the extent that submitters did provide comment, most noted support for allowing for a new notice to submit a PRCP application following an environmental authority transfer.

Resource groups said that environmental authority transfers between related entities should be eligible for the revised PRCP application timeframe under the same terms as an external transaction. However, environmental and landholder groups did not agree, submitting that sale or transfer of an environmental authority should not waive or delay rehabilitation compliance requirements. One submitter said if a mine operator does not have a valid PRCP, the mine should not be able to be sold.

Most resource group submitters supported the grace period of 60 business days following the transfer. However, one submission noted that 20 business days may be insufficient time for the new holder to comply with statutory obligations. This feedback reinforced the rationale for extending the timeframe to 60 business days in the exposure draft Bill, which was seen by many as a more workable and balanced approach to ensuring compliance without compromising environmental outcomes.

Feedback on the exposure draft did not raise additional concerns.

Government response

The Government has considered stakeholder comments and has decided to proceed with the proposal as drafted. The amendments clarify transitional rights to encourage investment and mitigate legal and financial risks for purchasers, whilst encouraging achievable rehabilitation planning.

The 60 business days is an adequate timeframe to issue a new notice under section 754, which will set out the specific timeframes for the new environmental authority holder to submit an application under the PRCP framework. Importantly, it is not expected that the PRCP will be completed within this initial 60 day period. Rather, this timeframe is intended to allow for administering the transition to a new holder for the environmental authority. Where the new authority holder is a related entity, they are still new holders of the tenure and therefore will need to comply with the requirements of the environmental authority.

2.6 Provide for removal of the public interest evaluation process

Stakeholder feedback

Most submissions expressed support to implement the proposal to remove the public interest evaluation process. While submissions were supportive, this was on the basis that public interest matters continue to be addressed through the broader environmental authority and PRCP public assessment pathways. Resource groups stressed that public interest considerations were an important part of their social licence to operate and the proposal must not limit existing rights for public consultation, merit review, or objections.

Submissions from legal professional groups said that public interest evaluations should be retained. One submitter said that removing the public interest evaluation process may increase the risk of challenges to decisions made by administering authorities on PRCP applications. This could be on the basis that public interest considerations were inadequately addressed or only superficially considered. Another submission stated that public interest evaluation should remain, and mechanisms should be implemented to review and update plans as communities evolve.

Submissions from environmental groups suggested low use to date of the public interest evaluation power is not a reason to remove it. First Nations representative bodies queried whether the removal of this requirement also removed a trigger point for engagement, and they prefer greater engagement rather than less. Local government groups suggested that the proposal could broaden the scope for deregulation, impacting both high and low risk activities requiring a PCRCP.

Most of the submissions on the exposure draft Bill confirmed the matters previously raised and supported the amendments.

Government response

The Government has considered stakeholder comments and will proceed with the amendments as proposed due to the view that the administrative process for public interest evaluations does not deliver.

Public interest remains an integral component of the application and approval processes for environmental authorities and PRCP schedules. This is reflected in the public interest considerations embedded in the EIS process as well as submissions and consideration of the PRCP. This proposal is to remove a subsequent additional step related to the approval of land identified as a non-use management area in the PRCP schedule. The public interest evaluation process is effectively redundant as the issue can already be adequately considered. Instead, the process adds unnecessary complexity and duplication without clear benefits. This duplication reduces certainty for industry, increases administrative burden and delays approvals.

Additional guidance material on consideration of public interest will be prepared to address the suggestion of some submitters to ensure fulsome consideration of public interest in a PRCP.

2.7 Clarify that environmental authority holders who have fallen out of the PRCP framework due to a lapsed application may re-apply

Stakeholder feedback

Submissions were supportive of this proposal, understanding the change as administrative in nature. One submission suggested that it will provide important regulatory clarity and flexibility for resource proponents and ensure a lapsed application does not create unintended compliance consequences or a permanent exclusion from the framework. Another submission said the change appears to be a workaround for proposals being refused and delays the assessment process. It encouraged the department to go further in addressing the root cause of the issue.

Government response

As the proposal addresses a gap in the existing regulatory process for impacted environmental authorities, it will be progressed as part of the Bill.

3. Other proposals to amend the EP Act, NC Act and Water Act (chapter 3)

3.1 Clarify that the definition of waters in the EP Act includes groundwaters

Stakeholder feedback

Submissions were mostly supportive of the proposed amendment, however during drafting it was determined that this amendment was not required. As such, this proposal was not included in the exposure draft Bill.

Government response

The existing application and interpretation of the definition of waters by government, courts, stakeholders and industry is that it includes groundwaters. As such, the proposed amendment was deemed not to be necessary and therefore will not proceed.

3.2 Enhance powers for a court to order forfeiture of property which may be used in the ongoing conduct of an offence under the EP Act

Stakeholder feedback

Stakeholders provided mixed feedback on the proposal. While many were generally supportive, some sought additional clarification, and others—primarily from the resource sector—sought an alternative outcome to the proposed amendment.

Environmental organisations largely supported the proposal, noting that the changes would assist the department in fulfilling its environmental protection responsibilities.

Feedback from the resource sector was varied. One submission supported the proposal in principle, noting its alignment with similar provisions in other legislation, such as section 129 of the *Radiation Safety Act 1999*. Conversely, other industry peak bodies did not support the proposal due to extended legal exposure for historical conduct, procedural uncertainty, and a lack of clarity. They contended that existing legislation is sufficient to address the scenarios outlined in the consultation paper. One submission suggested that a full Impact Analysis Statement (IAS) process be undertaken to support this change.

In response to the exposure draft Bill, some submitters expressed the need for ensuring appropriate due process, fairness and transparency for economic stability.

Government response

This proposal will be progressed to incentivise compliance by extending the authority to the court upon conviction of an offence, to order not only the forfeiture of the property seized as evidence of the offence, but also the property used in the commission of the offence.

Enhancing powers for seizure and forfeiture will better prevent repeat offending and better safeguard the environment and public health and safety. There are reasonable protections in place to mitigate unintended consequences, particularly because the final decision-

making power is vested in the judiciary and the court can consider whether ordering the forfeiture of property would have undue impacts on a third party.

The department undertook a summary IAS on the relevant amendments in line with the Queensland Government Better Regulation Policy. The IAS will be published on the department's website.

3.3 Enhance powers for a court to order confiscation of proceeds from environmental crimes under the EP Act

Stakeholder feedback

Stakeholder feedback on the proposal was mixed, ranging from full support to submitters raising multiple queries.

Local governments mostly supported the proposal. They highlighted that the amendment would enable the department to recover property and benefits derived from a 'confiscation offence' after an offender is charged or convicted. This would also assist in recovering costs associated with material or serious environmental harm, particularly in cases where the offender is bankrupt.

In contrast, submissions from the resource sector did not support the proposal, arguing that confiscation powers should be limited to indictable offences and that extending them to summary offences requires strong justification.

Environmental organisations supported the proposal, recognising its potential to strengthen the department's ability to fulfil its environmental protection responsibilities.

This proposal was not included in the exposure draft Bill.

Government response

The proposal does not require Act level changes to be implemented and as such will not proceed in the Bill.

3.4 Ensure adequate time is available to gather evidence in summary proceedings under the EP Act

Stakeholder feedback

Stakeholder feedback on the proposal was mixed.

Local governments and environmental organisations supported the amendment, with local governments noting it would provide greater flexibility in investigating non-compliance under the EP Act and the Waste Act. However, they emphasised the need for additional support for local government in managing more complex cases.

Environmental groups agreed the proposal would assist the department in fulfilling its environmental protection responsibilities, though sought assurances that extended evidence-gathering timeframes would not exacerbate ongoing environmental harm. A submission from the waste sector supported the amendment, noting it aligns more closely with timeframes in other state jurisdictions.

Conversely, resource industry peak bodies were not supportive of the proposal, citing risks of disproportionate negotiation practices, prolonged legal uncertainty during operational transitions, and procedural fairness issues.

Responses to the exposure draft Bill showed increased support for the proposal from industry, including support for the removal of the subjective threshold of the 'complainant's knowledge'.

Government response

The Government will progress with a modified approach to implementing the proposal in light of feedback received.

As a key point of ambiguity and delays has been decision making regarding when 'complainant's knowledge' has commenced for summary offences, this concept is to be removed, allowing for simpler interpretation, and benefits to all parties. In conjunction with that amendment, the timeframe for summary offences generally is proposed to become a consistent two years.

For a specific list of offences where significant complexity regarding evidence is experienced, or where evidence of harm may take considerable time to become evident, the timeframe of two years will be extended to three years. This responds to stakeholder feedback that five years as previously proposed may be too long, and that it should only apply to a small number of specifically justified offences.

Indictable offences in the EP Act are not subject to the same time limitations as summary offences. However, indictable offences are often commenced summarily by government and hence limited as a result of this approach. There are, however, some summary offences where the timeframes are too restrictive and do not allow for the department to adequately respond where a breach has occurred. This problem creates a loophole for operators not complying with the law.

The department has undertaken a summary IAS of the proposed arrangements for summary offences in line with the Queensland Government Better Regulation Policy. The IAS will be published on the department's website.

3.5 Clarify when the residual risks requirement lapses

Stakeholder feedback

The proposal received widespread support from stakeholders.

Local government groups supported the proposal to clarify that a surrender decision does not take effect until the residual risk requirement has been fulfilled, ensuring alignment with the original policy intent.

The resource sector highlighted the need for clear timeframes, with some advocating for a fixed six-month period to avoid ambiguity, while others suggested a more flexible approach. For example, a default six-month timeframe could be extended by the administering authority for complex sites. This flexibility was deemed crucial for addressing the unique challenges of resource projects.

In response to the exposure draft Bill, submitters sought additional clarification and flexibility in how the timeframe for lapsing an application would apply or could be deferred.

Government response

Based on stakeholder feedback about the need for clarity, the Government will proceed with a variation to the proposal. To address ambiguity, provisions will be included to:

- prescribe the stated reasonable period as six months from the day the written notice is given to the applicant about the surrender decision; and
- clarify that the original stated reasonable period may be extended, with the written agreement of the applicant, if a longer period is deemed necessary for the applicant to meet the residual risk requirement. The extension must be granted in writing prior to the end of the original stated period.

3.6 Amend the EP Act to ensure the information stage is not shortened when an amendment application is received

Stakeholder feedback

The proposal to amend section 238 of the EP Act received widespread support from stakeholders.

Submissions from resource groups highlighted the benefits of process integrity, regulatory consistency, and clarity for applicants. They noted that it addresses an unintended outcome of the current drafting, where the information request stage could be shortened if a notice of change was submitted early.

One submission from the environmental consultancy sector supported the amendment but cautioned against its use to unnecessarily extend assessment and decision timeframes. They suggested that information requests are sometimes used to compensate for under-resourcing or a lack of confidence in decision-making by assessing officers.

Another submitter expressed reservations about the proposed changes, advocated similarly for addressing root causes of delays being under-resourcing and unclear guidance from the department.

One response to the exposure draft Bill showed further industry support for the proposal, while another highlighted that the root cause of timing issues should also be addressed.

Government response

The Government will progress this proposal due to the support from submissions and anticipated benefits for the administration of assessment processes.

3.7 Provide greater clarity and consistency on the requirements for third-party accreditation programs under the EP Act

Stakeholder feedback

Few submissions addressed this proposal, with most expressing full or partial support, one objection, and one request for clarification.

Local government supported the proposal and emphasised the need for transparency and public scrutiny.

The resource sector also supported the proposal for improving clarity and consistency regarding third-party accreditation programs under the EP Act, though they called for further details and stakeholder consultation. One resource industry peak body remained undecided and sought clarification.

No additional queries were raised in response to the drafted provisions in the exposure draft Bill.

Government response

It is proposed to progress with this proposal with no variations. One submitter sought an alternative outcome for this proposal, however the sentiments appeared to misunderstand provisions about recognition of Best Management Practice programs under the EP Act. These suggestions were considered to be beyond the scope of the proposal.

3.8 Remove requirements to publicly notify terms of reference for environmental impact statements

Stakeholder feedback

Stakeholder feedback on the proposal was mixed, ranging from full support to multiple queries.

Submissions from resource industry peak bodies supported the proposed amendment, viewing it as a positive step to streamline processes by removing duplication and confusion. They argued that public notification of draft terms of reference offers limited value to the community. This is because it occurs before full technical assessments and impact information are available, and that the change would reduce overlapping submission and notification periods.

Conversely, environmental groups and First Nations representative bodies did not support the amendment. Environmental groups emphasised that public notification of terms of reference allows for environmental impact statements to address all relevant impacts from the outset. First Nations representative bodies suggested that this process allows for provision of information to applicants about when surveys are best undertaken to record presence or absence of seasonally affected wildlife and raised concerns that the proposal may lead to less early engagement in the process.

One submission recommended retaining public notification but streamlining the process through reduced notification periods or simplified submissions.

In response to the exposure draft Bill, no new queries were raised. However, issues previously raised were reiterated by some submitters.

Government response

The Government will proceed with this proposal but retain a provision in the Bill that allows the chief executive to consult with any person at their discretion regarding an EIS. This will reduce regulatory and administrative burden for industry and government, hasten assessment timelines, and address the duplication with the draft EIS public notification process.

Guidance material provided for proponents will be reviewed to ensure it encourages seeking early advice about seasonal variations regarding the presence of wildlife.

Further amendments to address the preferences of First Nations representative bodies to be informed and included early in the environmental impact assessment process have not been developed, as the matter can be effectively addressed by the administering authority, rather than the project proponent, when conducting the consultation. In making a decision whether to consult, the administering authority must satisfy section 6 of the EP Act, which requires regard to be given to the views and interests of Aboriginal peoples and Torres Strait Islander peoples under Aboriginal tradition and Island custom. In addition, the decision of the administering authority needs to be compatible with section 28 of the *Human Rights Act 2019*.

Applicants required to prepare an environmental impact statement are already required to publicly notify the application on a website that is accessible to the public. Government will consider further whether additional guidance or administrative approaches can improve awareness for other interested parties about this part of the application and assessment process.

3.9 Provide consistency in authorised officer functions and powers where these intersect with the Planning Act

Stakeholder feedback

Submissions from stakeholders were generally supportive of the proposal. Some raised the need for additional clarification.

Local government submissions supported the amendment to align authorised officer functions and powers under the *Planning Act 2016* (Planning Act) and the NC Act emphasising the importance of the Queensland Government retaining primary responsibility for wildlife management and biodiversity protection.

Submissions from environmental groups expressed support for increased enforcement powers under environmental laws, noting that these changes would enhance the department's ability to fulfil its environmental protection responsibilities.

Some submissions from the resource sector called for more caution to expanding regulatory powers. It was suggested that aligning these powers with those under the Planning Act requires further analysis. It was also suggested that existing mechanisms for

evidence collection, such as involving local governments or obtaining landholder consent, are sufficient. They also queried whether the NC Act operates independently of the Planning Act and if offences under the two acts are duplicative.

No additional issues were raised in response to the exposure draft Bill.

Government response

The proposal will be progressed to ensure the effective administration of the NC Act.

The Bill will not introduce any new obligations or compliance triggers for proponents or landholders and will not increase regulatory burden. No new conservation officer powers are proposed. Rather, it will align the function and powers of authorised officers under the NC Act with other legislation that is comparatively linked to the Planning Act. This means that the existing powers authorised officers are afforded under the NC Act will be able to be used to investigate offences under the Planning Act that relate to NC Act matters – for example, koala priority areas and koala habitat areas under the Nature Conservation (Koala) Conservation Plan 2017. These existing powers are appropriate for collecting evidence of Planning Act offences and are consistent with the standard suite of investigative powers afforded authorised officers under other legislation. This will not result in duplicative offences or parallel enforcement processes across departments. Instead, it will ensure that the agency responsible for the NC Act is able to undertake compliance action, when appropriate.

3.10 Clarify the dictionary definition of protected area under the NC Act

Stakeholder feedback

Stakeholder submissions were generally supportive of the proposal, however some sought further clarification.

Local government submissions supported the amendment, highlighting that improving the clarity of the definition of a protected area under the NC Act aligns with the priorities of Queensland councils.

Industry responses were mixed, with some supporting the proposal, while others argued that current definitions are already clear and context-specific, cautioning that further clarification could create unnecessary complexity.

Some submissions emphasised the need for more detail, particularly regarding potential impacts on existing co-management and joint management arrangements and highlighted additional references to “protected area” in the Act that may require consideration.

No additional issues were raised in response to the exposure draft Bill.

Government response

The Government acknowledges the feedback received on the proposal to clarify the dictionary definition of “protected area” in the NC Act. The Government will proceed with the proposal as outlined, with the exception of the definition of protected area in section 70B, as this section is due to expire in December 2025.

While some submissions queried whether the changes created undue complexity, amendments are limited to the schedule dictionary of the NC Act to ensure all meanings of the term “protected area” are properly referenced. This clerical change aims to improve interpretation of the legislation and will not impact regulatory or management arrangements.

3.11 Clarify chapter 3 of the Water Act

Stakeholder feedback

Stakeholders generally supported the intent of the proposal to clarify chapter 3 of the Water Act. However, a number of stakeholders noted a lack of sufficient detail in the proposal, and that this made it difficult to evaluate its effectiveness and limited the ability to provide feedback.

Some environmental and legal professional groups supported the proposals (particularly amendments to provide review and appeal mechanisms), noting consequential improvements to procedural fairness, access to justice and better public interest outcomes in water management. Some resource group submitters were supportive, insofar as the proposals operate to reduce red tape and streamline processes, rather than increase regulatory burden. Noting that local councils have primary responsibility for potable water services, local government groups supported the amendments in principle.

Following the provision of additional details about the proposed amendments in the exposure draft Bill, some additional issues were raised. Industry and landholder groups were generally supportive of the proposals. However, some industry submitters indicated a preference for no increase in reporting requirements and queried reporting of make-good agreements and the frequency with which information would be required.

Feedback was also provided regarding the alignment of baseline assessment plans for landholder bores with the cumulative management area Underground Water Impact Report (UWIR). Industry submitters sought to ensure timetables for the plans are not prescriptive so that it did not constrain the ability to update or reschedule production plans. An additional suggestion was for UWIRs to be prepared on a five-yearly cycle rather than the proposed three-yearly cycle. A landholder also suggested that instead of contacting each individual bore owner regarding the development of a draft UWIR, that circulation of a notice in a relevant newspaper may be a suitable alternative approach.

Additional information including a supplementary paper and an exposure draft Bill was provided to targeted stakeholders in response to feedback that the consultation paper did not have sufficient details. Workshops with targeted stakeholders were also undertaken regarding drafted provisions.

Government response

The proposals will be progressed in the Bill, subject to some variation to address submission feedback. This includes clarifying the timing of a bore owner application for a bore assessment notice, transitioning to five-yearly cycles for an UWIR while making sure that

they can be amended to take account of new baseline assessment plans that are prepared within the five years.

Regarding queries about reporting obligations, affected resource tenure holders are already required to provide information to the Office of Ground Water Impact Assessment on a regular basis for the purposes of an annual review. Information from make-good agreements will not relate to sensitive content (i.e., a tenure holder will not be required to disclose the specific amount of monetary compensation should that be the agreed make good measure).

4. Additional amendments

4.1 Destination 2045: Delivering Queensland's Tourism Future

Tourism activities in Queensland occur in a diversity of natural and built environments across the State, including State lands. The nature-based tourism industry is underpinned by Queensland's parks and forests. For example, in 2018, national parks and other protected areas attracted 2.6 million international and domestic visitors per year and contributed \$2.64 billion to the Queensland economy.

Commercial ecotourism and organised events on areas administered by Queensland Parks and Wildlife Service (QPWS) in areas such as protected areas, recreation areas, State marine parks, and State forests, and are regulated under legislation to ensure protection of the environment and amenity, the visitor experience and to provide for the collection of user fees which contribute to the ongoing management and administration of these places.

The *Destination 2045: Delivering Queensland's Tourism Future Discussion Paper* invited collaborative insights to develop a comprehensive 20-year tourism plan. Public consultation on the Discussion Paper was open from 18 December 2024 until 28 February 2025 and comprised 16 regional consultation workshops and six sessions with industry representatives. This process was supported by a communications campaign that included media, social media, website and email messages to encourage engagement and input.

During consultation, tourism industry feedback indicated concerns regarding excessive red tape, such as operators having to obtain multiple permits and approvals for the same activity. In response to this feedback, the final strategy, *Destination 2045: Delivering Queensland's Tourism Future*, includes a commitment (Initiative 1.2) to improve permitting process for operators by developing a single permission for businesses undertaking tourism operations in protected areas. For clarity and in recognition of the interconnected nature of tourism operations occurring across multiple tenures, the single integrated permission initiative will be created to also include State forests, State marine parks and recreation areas which are often included in tourism operators' itineraries.

Amendments to the *Forestry Act 1959* and the *Recreation Areas Management Act 2006* proposed in the Bill, and subsequent amendments to subordinate legislation, will deliver on the government's commitment for a single integrated permission which can be granted to businesses conducting tourism activities on lands or waters administered under the four pieces of QPWS legislation.

HQ Plantations Pty Ltd (HQP) are managers of plantation licence areas within State forests administered under the *Forestry Act 1959* and are involved in permitting tourism activities in these areas. Targeted consultation occurred with HQP in September 2025, and in-principle support was provided for the amendments, provided that existing shared permitting arrangements continue.

Consultation occurred with the Great Barrier Reef Marine Park Authority who regulate tourism activities in the Commonwealth Great Barrier Reef Marine Parks. The Great Barrier Reef Marine Park Authority expressed no reservations regarding progression of the tourism related amendments.

Other administrative changes to permitting provisions in the Bill have been subject to public consultation in 2023 as part of the remake of the Nature Conservation (Protected Areas Management) Regulation 2017, Recreation Areas Management Regulation 2017 and the Forestry Regulation 2015.

4.2 Recognition of Impact Assessment Reports and PRCP minor amendments

After the exposure draft was shared with stakeholders, two additional proposals were drafted.

The first involves amending the EP Act to recognise the Impact Assessment Report (IAR) and its associated processes under the *State Development and Public Works Organisation Act 1971*. This amendment is intended to streamline assessment by aligning the treatment of the IAR with that of the environmental impact statement, which is already recognised under the EP Act. As a result, where an environmental authority application has undergone the IAR process, certain stages of the application process will not apply.

The second proposal removes the requirement to update the PRCP, when an amendment application is determined to be a minor amendment to the approved PRCP Schedule. This change was informed by industry consultation and reflects the view that minor amendments typically pose low environmental risk and involves limited operational change. Requiring a PRCP plan update in these circumstances imposes an unnecessary administrative burden on both industry and government, without adding value to the decision-making process.

Targeted consultation on the drafting of these additional proposals was conducted. No queries of substance were raised and the proposal are included in the final Bill.

Appendix 1: List of submitters

Table 1: Submitters on consultation paper

1. AARC Environmental Solutions	31. Greater Whitsunday Alliance Ltd
2. Alinta Energy Pty Ltd	32. Holcim (Australia) Pty Ltd
3. Anglo American	33. Ipswich City Council
4. Arrow Energy	34. Isaac Regional Council
5. Association of Mining and Exploration Companies (AMEC)	35. JJ's Waste & Recycling
6. The Australasian Institute of Mining & Metallurgy (AusIMM)	36. Koala Action Inc
7. Australian Pacific LNG Pty Ltd	37. Local Government Association of Queensland
8. Australian Barramundi Farmers Association (ABFA)	38. Lock the Gate Alliance
9. Australian Energy Council	39. Mackay Conservation Group
10. Australian Energy Producers	40. New Hope Group
11. Australian Flexible Pavement Association	41. Natural Resource Assessments Pty Ltd
12. Australian Prawn Farmers Association (APFA)	42. PacGold Ltd
13. Australian Tyre Recyclers Association Inc	43. Property Rights Australia Inc
14. Bar Association of Queensland	44. Qcoal Pty Ltd
15. Brickworks Building Products Pty Ltd	45. Queensland Conservation Council
16. Brisbane City Council	46. Queensland Farmers Federation
17. Caravan Parks Association Ltd	47. Queensland Law Society
18. Cement, Concrete & Aggregates Australia	48. Queensland Mine Rehabilitation Commissioner
19. Coexistence Queensland	49. Queensland Resources Council Ltd
20. Officer at City of Gold Coast	50. Queensland Renewable Energy Council Ltd
21. Officer at City of Gold Coast	51. Senex Energy Pty Ltd
22. Officer at City of Gold Coast	52. Seqwater
23. Darling Downs Environment Council Inc	53. Shell
24. Environmental Advocacy in Central Queensland Inc	54. Stanmore Pty Ltd
25. Environmental Defenders Office Ltd	55. Unitywater
26. The Environment Institute of Australia and New Zealand Inc	56. Urban Development Institute of Australia Ltd
27. EnviroMETS (Qld) Ltd	57. Waste Management and Resource Recovery Association of Australia Ltd (WMRR)
28. Epic Environmental Pty Ltd	58. Waste Recycling Industry Association Queensland (WRIQ)
29. Glencore Australia Pty Ltd	59. Whitsunday Conservation Council Inc
30. Glendon Farming Co	60. One submission from a member of the public
	61. One confidential submission was received

Table 2: Submitters on exposure draft of the Bill

1. AARC Environmental Solutions	16. MetMin
2. Arrow Energy	17. Natural Resource Assessments and Environmental Consultants
3. Association of Mining and Exploration Companies	18. PacGold
4. Australia Pacific LNG	19. Queensland Boulder Opal Association
5. Australian Energy Producers	20. Queensland Conservation Council
6. Australian Institute of Mining and Metallurgy	21. Queensland Opal Miners Association
7. Cement Concrete and Aggregates Australia	22. Queensland Resources Council
8. City of Gold Coast	23. Queensland Sapphire Miners Association Inc
9. Environmental Advocacy in Central Queensland	24. Queensland Water Directorate
10. Environmental Defenders Office	25. Santos
11. Glencore	26. Shell Australia
12. Glendon Farming Co	27. Urban Development Institute of Australia Queensland
13. Holcim	28. Wargabadda Nywaigi Peoples RNTBC
14. Local Government Association of Queensland	
15. Logan City Council	