16 March 2026

Mr Stephen Bennett MP, Member for Burnett
Chair
Primary Industries and Resources Committee
Parliament House
George Street
BRISBANE QLD 4001
Email: PIRC@parliament.qld.gov.au

Dear Mr Bennett,

## RE: Resources Safety and Health Queensland and Other Legislation Amendment Bill 2026

The Queensland Renewable Energy Council (QREC) thanks the Primary Industries and Resources Committee (PIRC) for the opportunity to provide a submission on the *Resources Safety and Health Queensland and Other Legislation Amendment Bill 2026* (the Bill) introduced into parliament by the Minister for Natural Resources and Mines, Minister for Manufacturing and Minister for Regional and Rural Development, The Honourable Dale Last MP on 3 March 2026.

## Introduction

QREC is the only dedicated industry peak body for the Queensland renewable energy sector, representing developers, transmission, investors and suppliers to renewable energy projects. With its members, QREC advocates for the responsible and sustainable development of renewable energy projects across the state, with a strong focus on collaboration and regional engagement.

Renewable energy, as the Premier and Minister for Veterans, The Honourable David Crisafulli MP told the National Press Club last month, is a "golden opportunity" for Queensland. By championing innovation, transparency, and inclusive growth, QREC plays a vital role in supporting regional economies, driving investment, and securing Queensland's clean energy future—delivering sustainable, reliable, and affordable energy for all.

QREC fosters strong relationships across key sectors and works closely with other associations representing agriculture and resources, local governments, regional economic development organisations and other key stakeholders to maximise the benefits and co-existence from these projects.

## Coexistence Queensland (CQ) and the Land Access Ombudsman (LAO)

A strong framework to facilitate sustainable coexistence between landholders, communities and the renewable energy industry is vital. CQ and the LAO play important roles in the State's coexistence frameworks for both the resources and renewable energy sectors.

QREC limits its comments to the sections of the Bill that relate to CQ and the LAO. Our priority interest is seeking clarity on whether the intention is to extend the LAO's remit to complaints about renewable

energy infrastructure. We also have concerns about the potential consequences arising from the proposed governance arrangements which would see the appointed members of CQ becoming the LAO advisory council, and the Chief Executive Officer of CQ deemed to be the LAO.

CQ plays an important role in this framework with the role of managing and improving the sustainable coexistence of Queensland landholders, regional communities, and the resources and renewable energy industries. It has a facilitative role, focussed on fostering strong relationships, forging partnerships and providing trusted information and advice to stakeholders.

By contrast, the LAO provides an independent dispute resolution service to investigate and resolve disputes relating to an alleged breach of a conduct and compensation agreement or a make good agreement – statutory agreements under Queensland resources legislation. A key component of the role of any ombudsman is fairness and impartiality when considering complaints.

QREC is concerned that the proposed new governance arrangements for the LAO could potentially erode community and landholder trust in either, or both, of these institutions. The key risk arises from operationally intertwining the two entities leading to perceptions that LAO dispute investigations are influenced by policy or engagement priorities led by CQ, or that CQ's facilitation role is no longer viewed as neutral which would dilute its effectiveness in supporting sustainable coexistence outcomes.

Additionally, QREC notes on page 6 of the explanatory notes to the Bill that no further budget is being allocated to the LAO, and that existing staffing requirements will be retained with no additional staffing proposed. This gives rise to potential concerns about the ability of the LAO to operationalise the expansion of its functions as proposed in the *Mineral and Energy Resources and Other Legislation Amendment Act 2024* (MEROLA Act), and potential impacts on the effectiveness of CQ delivering on its existing remit.

Therefore, QREC recommends the Committee:

- Confirm renewables will not be included within the remit of the LAO through this Bill. QREC notes that any such change would require detailed consultation with the renewable energy sector, which has not occurred during the development of the Bill.
- Based on CQ's existing remit across the renewable and resources sectors and the proposed amendments to the governance arrangements for the LAO, ensure the Bill recognises the need for:
    1. clear operational separation between the dual roles of the CQ Chief Executive Officer and the LAO, and that this separation is articulated, including how it will work in practice;
    2. the establishment of appropriate conflict of interest frameworks to identify and manage any potential conflicts arising from the dual roles and proposed LAO advisory council role for CQ members;
    3. the specification of sustainable and transparent resourcing arrangements for both CQ and the LAO, particularly given the removal of the levy to fund the LAO which was proposed under in the MEROLA Act (noting QREC did not support the introduction of the levy at the time); and
    4. preservation of the clear distinction between CQ's facilitative functions and the LAO's formal independent dispute resolution role.

We thank you and the Committee for your time and consideration as you prepare your report and subsequent recommendations on these regulatory reforms and would be happy to appear before the

Committee at its public hearing on 25 March 2026. Please contact QREC's Director, Sustainability and First Nations, Frances Hayter at fhayter@qrec.org.au if you have any questions about this submission or would like us to appear before the PRIC.

Yours sincerely,

Katie-Anne Mulder
**Chief Executive Officer**

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