

22 August 2025

Claire Cooper
Executive Director, Georesources Policy
Department of Natural Resources and Mines, Manufacturing and Regional and Rural
Development
resources-tenders@resources.qld.gov.au

Dear Claire,

RE: 2025 Land Release Review

Australian Energy Producers welcomes the opportunity to input into the Department's [2025 Land Release Review](#) consultation paper.

Australian Energy Producers is the peak national body of the explorers, developers, and producers of essential energy – oil, gas and lower-emission fuels. We represent the businesses that are ensuring energy security and delivering substantial economic benefits to Queensland, while helping to deliver a cleaner energy future.

Petroleum acreage allocation is a critical lever in resource sector development. The speed at which governments release and award acreage directly influences exploration activity, investment flows, and ultimately, state and national energy security and economic outcomes. Delays in this process have material costs, both in the form of lost opportunities and reduced competitiveness.

Australian Energy Producers supports the review's aim to accelerate the release of land for competitive tender. We commend the Department for identifying practical measures to improve efficiency and streamline land release. We do, however, consider that the reform ambition could be more far-reaching and a faster and more streamlined land release framework is achievable. Our five recommendations for the land release review are:

1. **Reduce the time taken to release land to six months**, so there can be two full cycles of land releases every year.
2. **Reduce the time taken to make decisions** on awarding land to no more than three months so unsuccessful applicants can refocus their efforts on the next land release.
3. The accelerated release schedule can be informed by an industry **nomination at any time**, or by areas proactively identified and supported by Geoscience Queensland.
4. **Prequalification** of applicants would reduce the time taken to make decisions and also allow more emphasis on the exploration work program.

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- 5. Simplify the consideration of land release** to only issues relevant to exploration. It is premature to impose any other constraints before the tenure's underlying geology has had a chance to be appraised.

We also note that before an explorer is granted a resource authority, they require the appropriate environmental authority. While this review may not encompass those subsequent steps, it is important that efficient acreage allocation is matched by streamlined additional / secondary approvals. An efficient tenure allocation system is redundant if the associated approvals take an equally long time to achieve. Aligning these elements will enable projects to commence sooner, maximising economic and community benefits.

Finally, in practice, the award of exploration tenure provides a proponent only with the exclusive right to seek further approvals. It does not override or diminish the regulatory protections that apply under environmental approvals, native title and cultural heritage legislation, landholder rights, or community engagement processes. It is therefore premature for the land release to pre-empt these protections by restricting the land available for exploration. Instead, we recommend that the Department enable proponents to design exploration programs that appropriately account for these existing requirements.

We commend the Department's commitment to fostering a new era of exploration in Queensland and look forward to working collaboratively on the successful implementation of these important reforms.

Yours sincerely,



Keld Knudsen
**General Manager States & Territories, and
Director Queensland**

Attachment 1: Australian Energy Producers feedback on the Land Release Review

Attachment One:

Australian Energy Producers feedback on the Land Release Review

Australian Energy Producers supports the review's objective to accelerate land release for competitive tender. We commend the Department for identifying practical measures that improve efficiency. We also see further opportunities to refine and streamline the process, bringing land to market more quickly and competitively.

Primarily, we recommend the Department deliver two full acreage release cycles each year. We also recommend that decisions on the award of tenure be finalised quickly (within three months), enabling unsuccessful applicants to redirect their efforts towards forthcoming land release opportunities.

To achieve efficiency the Department should develop more regular land releases informed by both direct industry expressions of interest (at any time) as well as input from the Geological Survey to identify and recommend prospective areas. We note that when the Department last sought expressions of interest for petroleum and gas exploration, the industry flagged 133,000 square kilometres of potential prospective area, however only 11 per cent of that (14,000 kilometres) was released for tender.

Members have noted that the former Greenfields Prospectivity Unit within the Geological Survey of Queensland was an essential source of advice to both Government and industry. The unit had the ability to access confidential exploration data before it was released for public access. Reinvigorating this unit and their role in the acreage release process would allow both an industry driven tenure demand, and a geological data supply perspective to inform the release of prospective exploration tenures.

We recognise that streamlining the assessment process to accelerate the release, decision making and award of tenure needs to be delivered so that the quality of the assessment is not lowered. Pre-qualifying companies before lodging tenders can accelerate decision making processes because the Department would already understand applicant's financial, technical, and operating capabilities, reducing duplicative assessment. The other advantage of this pre-qualification is that it would allow the tenure assessment to have an increased focus on the quality of the exploration work program.

It is also premature to apply the full range of competing land-use considerations (such as environmental, agricultural, etc) at the acreage release stage. These matters are more appropriately addressed once exploration has established the underlying threshold issue of economic geology. Queensland already has a proliferation of policies and legislation that constrain or precondition development, but it is unnecessary to impose these extensive requirements on exploration releases before the geology has even been explored and appraised.

Petroleum Tenure and Exploration economics

Unlike other land uses, the allocation of petroleum tenure only grants a company with the exclusive right to apply for more approvals to explore for resources owned by the Crown. Governments have established legislative frameworks to determine when, where, and for how long exploration can occur, under what conditions, and by whom. Tenure allocation mechanisms shape not only who explores, but also how exploration proceeds. Poorly designed systems distort investment decisions, encourage inefficient exploration practices, and erode economic value.

Because petroleum acreage allocation is a critical lever in resource sector development, the speed and integrity of these decisions directly influence exploration activity, investment flows, and the State's ability to deliver on energy security and economic objectives. Transparent, predictable allocation processes are essential to minimise the risk of undue influence, preserve public trust, and secure the best outcomes for the people of Queensland.

At its simplest, petroleum exploration is an investment calculation: the potential value of an exploration program must outweigh the technical and non-technical costs of proceeding. This calculation reflects two fundamental outcomes: the probability of technical success and discovery, or the more likely probability of exploration failure. For junior explorers in particular, this equation is even more pronounced, as most do not have existing cash flows from production operations to fund exploration costs. The speed and efficiency of allocating permits for junior explorers is therefore vital in attracting ongoing capital investment.

An efficient acreage allocation system is therefore a vital upstream lever in exploration economics. It must be:

- **Predictable.** Timely acreage release enables companies to plan capital deployment, align technical teams, and secure partners.
- **Clear, certain, and transparent.** Clarity reduces non-technical risk and directly improves the probability of success.
- **Efficient.** Streamlined processes sustain market interest and competitive bidding, driving stronger technical work programs and better economic returns for the State.

Conversely, delays or opaque processes reduce competitiveness, increase capital flight to other jurisdictions, and can distort exploration decisions. We recommend that the Queensland Government reinstate a points-based evaluation system – designed in consultation with industry as a means of providing greater transparency for applicants.

Specific feedback on the consultation paper

Background (pages 1-2)

Australian Energy Producers submits that considerations such as the “*responsible management*” of the State's resources and “*an appropriate financial return to the community*” (page 1) are premature considerations at the early land release stage. This stage of the cycle should focus narrowly on geological discovery and resource definition. A sharper geological specific objective would simplify the Department's assessment and enable land to be released more efficiently.

The consultation paper itself recognises this by stating: “*By exploring land, we can assess resource potential... and determine if it can be economically recovered and produced.*” (emphasis added). Exploration release processes should therefore remain focused on prospectivity and not attempt to anticipate future questions around hypothetical production scenarios.

To encourage exploration, land release should be straightforward, predictable, and mechanistic, excluding broader policy considerations such as alignment with “government needs” or balancing environmental, agricultural, and community interests (page 2). These matters are more appropriately addressed through subsequent approvals if, and only if, a viable resource is discovered. Accordingly, we recommend that land release processes avoid emotive or speculative criteria and instead adopt a scientifically objective approach centred exclusively on geological prospectivity.

Objectives of the review (page 3)

Australian Energy Producers suggests that having six “key” objectives is too many. The objective of the review should be simply to ensure that the land release process “*is more efficient and responsive to industry needs.*” We therefore suggest that the proposed set of six key objectives could be simplified to the below:

Key objectives in the review	AUSTRALIAN ENERGY PRODUCERS comments
1. Ensure the process promotes efficient allocation of petroleum tenure so that acreage is allocated to the highest value use.	Exploration isn’t an exclusive land use, so the focus on value seems premature.
2. Provide a smoother and more certain process to improve investment confidence and bring more projects to production.	Processes that are more certain will be more efficient & faster.
3. Maintain a steady pipeline of exploration opportunities, with more frequent land releases.	This seems more like an outcome of reforms than an objective.
4. Shorten the land release process to bring land to market sooner.	Acceleration should be the overarching objective.
5. Improve transparency in government decision making by targeting priority commodities and areas.	Greater transparency and feedback will allow for better quality future bids.
6. Provide government with more flexibility to determine the most appropriate way of releasing land for exploration (or production).	Flexibility is at odds with objectives 2, 4 and 5. Flexibility should be focussed on responding to industry needs.

Considering land constraints using GeoResGlobe (page 5)

Australian Energy Producers suggests that there should be a mechanism for the Department to ground-truth the *GeoResGlobe data* to ensure that it is current and comprehensive when the Department use it to assess coexistence and land use constraints. In many cases, initial exploration activities may be able to work in and around these other land uses, so it is important that companies tendering are aware of the information that the Department will use to assess their bids and competing work programs.

Consultation with local governments (page 5)

Testing community aspirations with local governments (as stated on Page 5) at the exploration land release stage may be premature. Community views on resource development are generally informed by experiences with exploration and are more relevant to more intensive production activities and should therefore not determine the prioritisation of land releases for exploration.

Exploration activities are often preliminary, short-term, or light touch (for example, flying a drone over country) and initial scouting is unlikely to concern local governments. Requiring extensive consultation at this stage risks creating unnecessary burdening on local governments, which already operate with limited resources, and may create consultation fatigue.

Industry typically consults with local governments before commencing exploration. If the Department consults again before releasing land, it duplicates effort and adds unnecessary complexity. Early consultation may also foster unrealistic expectations that local governments hold a veto over exploration releases, despite the fact that resource discoveries ultimately benefit all Queenslanders.

Carrying over unprioritised EOIs (page 6)

Australian Energy Producers suggests it might be useful for the Department to clarify that the manageable number of land release areas should be based on feedback from industry rather than the Department's capacity to service the EOIs.

Stakeholder and community notifications (page 6)

Australian Energy Producers understands that the existing system of notifying landholders when tenure is awarded has been called into question because of privacy concerns around accessing rate payer's contact details. If this is the case, and the matter can't be swiftly resolved, the notification stage may need to be revisited. We would expect the notification required for a land release for tender would be quite minimal and very different to that required for production or commercialisation tenures.

Simplified tender documentation (page 6)

Australian Energy Producers supports the simplification of the tender documentation. For instance, in the case of compliance with resource legislative requirements or compliance with

health and safety legislative requirements we suggest that these could be taken as a condition of application. No credible proponent would submit a tender that fails to meet legislative obligations.

Alternative land release methods (page 7)

Australian Energy producers would be interested to understand more about options presented on Page 7 to expand the availability of land to petroleum and gas exploration in the interests of expanding an existing petroleum project, or establishing a flexible land release process across all resources.

These opportunities could play an important role in stimulating greater exploration activity in Queensland. We recommend close collaboration between industry and the Department to further refine these proposals and develop practical mechanisms that will unlock new opportunities for exploration.

In summary

Australian Energy Producers supports the intent of the review to accelerate the release of land for competitive tender. We congratulate the Department on finding so many ways to get land released more efficiently. Our only criticism would be the reform ambition has been too modest, and a faster more streamlined land release process could be achieved.

While the proposals in the review are significant and reducing decision-making time by eight months is a great achievement, reducing the decision-making time down to just six months, one-third of the time taken now, would provide a huge fillip for Queensland's investment appeal. We encourage the Department to leave no stone unturned in their quest to foster a new era of exploration in Queensland.