

12 September 2025

Attention: Manager, Private Protected Area Program
Department of the Environment, Tourism, Science and Innovation
stewardship@detsi.qld.gov.au

Dear Program Manager,

Re: A Fresh Start for Private Protected Areas

Australian Energy Producers (AEP) welcomes the opportunity to provide a brief submission to the [review](#) of Queensland's Private Protected Areas announced on [1 August 2025](#). As the peak national body representing the explorers, developers and producers of essential energy – oil, gas and lower-emission fuels – our members are committed to ensuring Queensland's energy security, while delivering [substantial economic benefits](#) to the state and supporting a cleaner energy future.

Ongoing demand for natural gas remains strong in both domestic and international markets, driven by its role as a reliable, lower-emissions fuel that supports electricity generation, industrial production, manufacturing, and critical minerals processing. In Queensland, natural gas is not only a foundation of the state's energy system but also a key export commodity underpinning regional jobs and government revenues.

Access to land for petroleum exploration and development is comparable to other public purposes such as roads, rail, power lines, pipelines and other infrastructure. AEP strongly supports policies that promote co-operation and co-existence within the landscape. Petroleum developments have a modest footprint and readily coexist alongside agricultural, biodiversity, cultural and conservation outcomes.

We suggest that the scope of the discussion paper is too narrowly focussed on the role of landholders without considering the underlying role of resource tenure and other broader public interests in multiple and sequential land uses. There shouldn't be a presumption that a nature refuge needs to be an exclusive land use like a National Park.

AEP recommends that the resource potential, and future exploration of land, should be explicitly considered before a nature refuge is declared. There's a public interest in understanding the value and potential of the resources that belong to the Crown, which is why the Resources Department and the Geological Survey of Queensland should both be consulted before any conservation agreement is negotiated by the Queensland Government.

In managing the impacts of the industry's operations in Queensland, the use of environmental offsets has increasingly become a standard part of the assessment project since the *Environmental Offsets Act 2014* was passed. The Act states that an environmental offset must achieve a conservation outcome for the impacted prescribed environmental matter. Many of these offsets have been secured under voluntary declarations (VDecs) under the *Vegetation Management Act 1999* as set out in the [21 June 2019 guide](#).

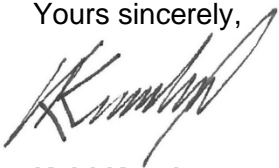
AEP has recently heard from members that at the Commonwealth level, the assessment of the Department of Climate Change, Energy, the Environment and Water (DCCEEW) is that a VDec is insufficient to secure offsets in the long term and instead will now request a binding covenant or other legally binding written agreement that protects or preserves the offset site in perpetuity, such as a nature refuge.

If it becomes the Federal Government's policy that covenant is required to secure offset, (and it is not yet clear to AEP if that is DCCEEW's official view), then this review of private protected areas should encompass the industry offsets and perhaps also rehabilitation. AEP recommends that the review needs to consider other sources of establishing private protected areas as a result of regulatory requirements placed on the broader energy industry – natural gas, mining, renewable energy generation and transmission.

Australian Energy Producers supports the work that is being done to pilot the recognition of Other Effective area-based Conservation Measures (OECMs) in Queensland. It may well be that this pilot could also look at some of the work being done by the [Queensland Mine Rehabilitation Commissioner](#), particularly around native ecosystems as a post-mining land use.

We welcome the opportunity to work with the Department as this process continues and stand ready to provide further information, technical expertise and data to assist in the finalisation of the Private Protected Areas Program.

Yours sincerely,



Keld Knudsen
General Manager States/Territories & Director Queensland
Australian Energy Producers