

27 March 2026

Department of the Environment, Tourism, Science and Innovation
Brisbane QLD 4000

Email: HeritageFeedback@detsi.qld.gov.au

**Re: CCAA submission to Delivering a fresh start for Queensland's heritage
Discussion paper**

Dear Officials

Cement Concrete & Aggregates Australia (CCA) appreciates the opportunity to provide input on the Queensland Government's discussion paper "*Delivering a fresh start for Queensland's heritage.*"

CCA represents Australia's heavy construction materials industry, including quarrying and extractive operations that are critical to the delivery of infrastructure and development across Queensland.

CCA supports the Government's preferred reform pathway (Option 3 – legislative reform of the *Queensland Heritage Act 1992*) and the objective of improving transparency, consistency and alignment with contemporary planning frameworks.

Key Positions

1. Improved Predictability in Heritage Listing

CCA supports reforms to replace the current open nomination system with a more structured, priority-based process. Greater predictability in heritage listing is essential for long-life extractive industries, where investment decisions depend on regulatory certainty over extended timeframes.

2. Temporary Protection Notices – Need for Clear Limits

While CCA acknowledges the intent of introducing interim protection, it is critical that temporary protection notices are:

- Subject to clear, objective evidentiary thresholds;
- Strictly time-limited; and
- Applied in a manner that minimises disruption to lawful, approved operations.

Even short-term delays can have significant operational and contractual impacts for quarrying activities.

3. **State Code 14 Review – Avoid Expansion of Triggers**

CCAA supports a review of State Code 14 to improve clarity and consistency. However, the review should focus on **clarifying and streamlining** the “on or adjoining” trigger, rather than expanding its scope, to avoid unnecessary regulatory burden on projects with limited or indirect heritage interaction.

4. **Recognition of Extractive Industry Operations**

The reforms should explicitly recognise the operational realities of extractive industries, including:

- Long-life, staged quarry development;
- The need for flexibility in sequencing extraction; and
- The importance of maintaining continuity of supply for construction materials critical to the State’s infrastructure pipeline.

5. **Balanced Compliance and Duty of Care Provisions**

CCAA notes the proposed introduction of a general heritage duty of care and strengthened enforcement powers. These measures should be proportionate and clearly defined to ensure they do not create undue compliance uncertainty or retrospective obligations for industry.

Conclusion

Overall, CCAA supports the direction of reform toward a more modern and structured heritage framework. The success of these reforms will depend on ensuring that improved procedural certainty is not offset by increased regulatory ambiguity or expanded triggers that constrain development.

CCAA would welcome ongoing engagement with Government as reforms are developed.

Should officials wish to discuss this matter, please contact CCAA’s State Director, Mr David Rynne via david.rynn@ccaa.com.au and 0431 729 509.

Yours sincerely



MICHAEL KILGARIFF
Chief Executive Officer