

13 March 2026

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

Email: SEQKoalaStrategy@detsi.qld.gov.au

Re: CCAA submission on the SEQ Koala Conservation Strategy 2026–2036

Dear Officials

Cement Concrete and Aggregates Australia (CCA) welcomes the opportunity to provide comment on the South East Queensland Koala Conservation Strategy 2026–2036.

CCA supports effective, evidence-based koala conservation outcomes in South East Queensland. The extractive industry recognises the importance of protecting koala habitat while continuing to supply the essential materials required for housing, infrastructure and economic growth.

However, CCA is concerned that the proposed regulatory amendments outlined in Appendix 1 of the discussion paper, when applied to long-life, site-specific extractive industry operations, may result in disproportionate regulatory and economic impacts without delivering commensurate conservation benefits. In particular, the combined effect of the proposed new clearing thresholds, restrictions on exemptions, treatment of cumulative and consequential clearing, and lack of clarity on any new offset requirements risks undermining the viability of new and existing quarry developments.

CCA is also concerned that these changes are being proposed ahead of a robust evidence base demonstrating a need for tighter controls, and that in developing future policies, sufficient recognition is given to the progressive rehabilitation and temporary disturbance associated with extractive industry operations.

CCA encourages government to refine the proposed framework to ensure it is targeted, proportionate and aligned with the operational realities of extractive industry, while still delivering meaningful koala conservation outcomes.

Our full submission is contained overleaf.

Should officials wish to discuss this matter, please contact CCA's State Director, Mr David Rynne via david.rynn@ccaa.com.au and

Yours sincerely

MICHAEL KILGARIFF
Chief Executive Officer

About CCAA

CCAA is the voice of the \$15 Billion heavy construction materials industry representing cement manufacturers, concrete suppliers, and extractive operators throughout Australia.

Our members range from large global companies to SMEs and family operated businesses and are engaged in the quarrying of sand, stone and gravel, the manufacture of cement and the supply of pre-mixed concrete.

These businesses service local, regional, and national construction and infrastructure markets to meet Australia's building and construction needs through the provision of roads, railways, bridges, ports, airports, hospitals, schools, and footpaths.

Full CCAA submission

1. What government is proposing (Appendix 1)

Appendix 1 proposes amendments intended to “clarify” and “simplify” the koala habitat regulatory framework. The practical changes most relevant to extractive industry relate to: (i) clearing thresholds for exemptions, (ii) how exemptions interact (partial exemptions and stacking), (iii) how “consequential” clearing is counted, and (iv) offsets guidance for “significant residual impacts”.

2. Key proposal A – Clearing thresholds (800 m² on >1 ha lots) and the 500 m² extractive exemption

A1. What is being proposed

Appendix 1 proposes to set numerical thresholds for exempt clearing as follows:

- up to **500 m²** on premises of 1 hectare or less
- up to **800 m²** on premises greater than 1 hectare

In addition, a 500 m² exemption for extractive industry is proposed to provide consistent treatment across vegetation categories. Importantly, this extractive industry exemption does not increase or replace the general thresholds and operates within the same framework.

In effect, these provisions establish how much clearing can occur before regulatory approval is triggered.

A2. Why these thresholds are low for extractive industry

While these thresholds may be appropriate for residential or small-scale rural development, they are set at a very low level for extractive industry.

Quarry operations typically:

- occur on large sites (30-120+ hectares),
- operate over decades, not years (80+ years is common),
- involve staged disturbance and progressive rehabilitation, and
- require ongoing small-scale clearing for access, safety, drainage and fire management.

In this context, thresholds of 500 m² and 800 m² are quickly reached by routine, low-impact activities, even where disturbance is temporary and rehabilitated.

A3. Practical effect for quarries

Because clearing is treated cumulatively over time:

- extractive operations can reach the threshold early in the life of a project,

- after which otherwise routine works are more likely to require assessment,
- despite the overall scale of the site and the managed nature of impacts.

This policy will shift the extractive industry from a predictable approvals pathway to an uncertain process where small, necessary works progressively increase approval risk.

A4. Why this is problematic

- The thresholds do not reflect the scale, duration or rehabilitation profile of extractive industry.
- They increase the likelihood that extractive activities are drawn into assessment and offset regimes without a proportionate conservation benefit.
- They create regulatory uncertainty that can undermine investment decisions for new quarry developments supplying essential materials.

A5. Constructive alternative

CCAA supports the use of thresholds but believes they should be higher or applied differently for extractive industry, for example by:

- setting higher clearing thresholds for extractive industry that reflect site scale and long-life operations, and/or
- applying thresholds per approved stage or discrete activity, rather than cumulatively across decades, and/or
- linking thresholds to net permanent habitat loss, with progressive rehabilitation explicitly recognised.

3. Key proposal B – Removal of “partial exemptions” (what happens when the threshold is exceeded)

B1. What is being proposed

Appendix 1 proposes to:

“Clarify that the total area of proposed interference must be equal to or less than the threshold, otherwise the total area is assessable.”

This wording removes the concept of partial exemptions. In effect, once a threshold is exceeded, clearing is no longer treated in parts.

This proposal governs what happens after a threshold is crossed, not where the threshold is set.

B2. Practical meaning for quarries (worked example)

A quarry on a site greater than 1 hectare, subject to an **800 m² threshold**:

- Planned clearing: **750 m²** (within the exemption)

- During detailed design or construction:
 - safety, drainage or geotechnical requirements change
 - an additional **70 m²** of clearing is required

Total clearing becomes **820 m²**.

Under the proposed approach the **entire 820 m²** becomes assessable development - not just the additional **20 m²** above the threshold.

B3. Why this is problematic for extractive industry

- It creates a clear “all-or-nothing” outcome, where small, unavoidable adjustments trigger full assessment.
- It removes the flexibility needed to safely manage complex, evolving quarry sites.
- It encourages overly conservative designs or repeated precautionary applications simply to avoid inadvertently crossing a hard regulatory line.
- It increases cost and delay without necessarily improving conservation outcomes.

B4. Constructive alternative

A more proportionate approach would be to retain partial exemptions, so that:

- clearing up to the threshold remains exempt, and
- only clearing above the threshold is assessed,

while still requiring appropriate avoidance, minimisation and conditions for the assessed component.

This preserves regulatory integrity while avoiding unnecessary outcomes for the extractive industry.

4. Key proposal C – Counting ‘consequential’ clearing (firebreaks, fences, tracks)

C1. What is being proposed

Problematic statement / proposal:

- Consequential clearing (e.g., future fire management lines, necessary fences/roads) is proposed to form part of the assessment when calculating impacts.

C2. Practical meaning for quarries

Quarry fire and safety controls are adaptive and sometimes urgent. The proposal expects proponents to anticipate future safety/fire/fencing works and count them upfront - despite these works being driven by changing conditions, regulatory obligations, and risk management.

C3. Why this is problematic

- Creates uncertainty and compliance risk (you are assessed on future works you cannot precisely define today).
- Discourages proactive fire and safety management if it increases the assessed footprint.
- Increases the likelihood of offsets being triggered due to inflated impact calculations.

C4. Constructive alternative

Create clear standing exemptions (or simplified notifications where truly needed) for mandatory fire and safety works undertaken under approved management plans, and separate these from development impact calculations for offsets purposes.

5. Key proposal D – Restricting cumulative/stacking use of exemptions

D1. What is being proposed

Problematic statement / proposal:

Appendix 1 states:

“The review found that clearing from using a number of exemptions cumulatively is having a significant impact on the amount of koala habitat that is being cleared. Amendments will reduce the ability to use several exemptions together.”

In effect, the amendments will reduce the ability to use several exemptions together (including through interactions with the vegetation management framework).

D2. Practical meaning for quarries

Extractive sites often rely on multiple lawful exemptions for different purposes over time (e.g., fencing, access, fire management). Limiting how exemptions interact may remove workable pathways for legitimate, low-risk works.

D3. Why this is problematic

- Increases regulatory complexity and approval frequency.
- Creates operational inflexibility, particularly where safety and fire obligations overlap with environmental controls.
- May not materially improve koala outcomes if the affected works are small and managed.

D4. Constructive alternative

Permit stacking for extractive industry where (a) works are low-risk/necessary, (b) total net permanent habitat loss is limited, and (c) progressive rehabilitation commitments are enforceable.

6. Broader policy concerns

6.1 Inside vs outside KRAs

CCAA has previously raised that the framework needs to recognise the extractive industry to cover activities within and outside of KRA's.

KRAs do not capture every essential resource. Quarry materials are site-specific and non-relocatable whether or not a site is mapped as a KRA. Uncertainty for non-KRA resources can sterilise supply and increase construction costs.

Constructive suggestion: Explicitly state that extractive industry (inside and outside KRAs) is assessable rather than prohibited, and ensure associated essential activities (e.g., batching, asphalt, recycling, depots) are appropriately recognised where they directly support construction supply chains.

6.2 Evidence base and the case for better data before tightening

The proposal relies on concerns about exemption use and cumulative impacts, while acknowledging that historical data limitations have made it difficult to comprehensively quantify clearing outcomes.

CCAA suggests that tightening rules ahead of reliable data risks solving the wrong problem and imposing disproportionate costs on essential industries that may not be driving the majority of habitat loss.

We encourage Government to first improve its monitoring and reporting first (targeted to the areas of uncertainty), then review thresholds/exemptions with an evidence base. A staged approach will promote improved compliance and avoid unintended consequences.

7. Offsets

7.1 What the discussion paper proposes

Appendix 1 references improving guidance for the assessment and conditioning of offsets for significant residual impacts, but does not directly address offset cost, feasibility, or the difference between temporary disturbance with rehabilitation and permanent habitat loss.

7.2 Why offsets are a critical economic issue for quarries

Offsets can represent a very large cost line item, particularly where suitable land is scarce or expensive. For new quarry developments, offset costs can materially change project economics and, in some cases, make a proposal unviable - even where the project supplies essential materials for housing and infrastructure.

The proposed regulatory changes may increase offset exposure by:

- Increasing the amount of clearing captured in assessment (thresholds + no partial exemptions)
- Inflating the assessed footprint by counting consequential clearing

- Tightening interpretation of cumulative impacts.

These mechanisms can convert manageable impacts into 'significant residual impact' findings that trigger offsets.

7.3 Constructive options for a better offsets approach

CCAA suggests government consider an offsets approach that remains conservation-focused but is workable for essential industries:

- Base offsets on net permanent habitat loss (not temporary, managed disturbance that is rehabilitated).
- Credit progressive rehabilitation and long-term habitat outcomes as part of the impact/offset calculus.
- Allow staged offset delivery aligned with staged disturbance (life-of-mine), rather than requiring upfront delivery for the entire life cycle.
- Provide clearer pathways (e.g., offset banks or standardised pricing mechanisms) to reduce feasibility risk and delays.

9. Conclusion

CCAA supports the SEQ Koala Conservation Strategy's objectives. Our submission seeks to ensure that regulatory settings are targeted, proportionate and evidence-based, and that they reflect the operational realities of extractive industry. With the refinements suggested above, government can strengthen koala outcomes while safeguarding the supply of essential construction materials for South East Queensland.