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community deserves
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10 April 2025

Productivity Commission
Locked Bag 2, Collins St East
MELBOURNE VIC 8003

By email: circular.economy@pc.gov.au

Dear Sir/Madam,

RE: Productivity Commission Inquiry: Australia's Circular Economy: Unlocking the Opportunities

The LGAQ welcomes the opportunity to provide feedback to the Productivity Commission (the Commission) on the *Australia's circular economy: Unlocking the opportunities Interim Report* (the Report) published on the 5 March 2025.

The LGAQ, as the peak body for local government in Queensland, has been advising, supporting and representing local councils since 1896, enabling them to improve their operations and strengthen relationships with their communities.

The LGAQ does this by connecting councils to people and places; supporting their drive to innovate and improve service delivery through smart services and sustainable solutions; and providing them with the means to achieve community, professional and political excellence.

Local governments are instrumental in the delivery of waste management services for their communities and are therefore at the forefront of recognising the opportunities and navigating the challenges that arise through behaviour change initiatives that seek to shift Australia towards a circular economy.

Consistent with the LGAQ Policy Statement, Queensland councils are strongly committed in Australia's shift toward a circular economy and identifying opportunities for the introduction of economically, environmentally and socially sustainable recycling schemes that divert materials from landfill.

As a key stakeholder in enabling and developing local economies that support a more circular approach, local governments want to be seen as equal partners with State and Federal governments, which has been reinforced through the signing of the *Equal Partners in Government Agreement*¹ with the State Government last month.

Importantly, Queensland councils call on State and Federal governments to establish the necessary policy and legislative frameworks for the effective implementation of Extended Producer Responsibility for manufacturers to retain responsibility for products that enter the market throughout their life cycle to end-of-life.

Strong action led by State and Federal governments is needed to support the delivery of essential services by local government to move away from a linear approach to waste management, to one that complements waste minimisation options at the top of the *Waste Management Hierarchy*. This requires investing in recyclable commodity markets for more advanced technologies and establishing processing facilities in regional and remote Queensland.

¹ [Equal partners in government](#)



In the time available for making submissions to the Commission, the LGAQ has not been able to consult in detail with Queensland councils on each of the reform directions and information requests of the seven priority areas for circular economy as outlined in the Report.

There are however several reform directions discussed within the Report that resonate with key asks of local government as articulated within the LGAQ Policy Statement Positions (**Attachment 1**) and several LGAQ Annual Conference resolutions (**Attachment 2**) which represent the collective voice of Queensland councils.

As such, the overall intent of the reform directions outlined in the Report are supported in principle. In particular, key reform directions relating to recycled materials in public projects, sustainable procurement policies, organic waste, and addressing problem waste streams such as tyres and e-waste, align with the calls of Queensland councils.

In addition, Queensland councils have identified other opportunities to strengthen policy and legislative frameworks aimed at supporting a circular economy, including incentivisation of recyclable commodity markets, stronger regulatory reform to manage contamination from Per- and Poly-Fluoroalkyl Substances (PFAS), and product stewardship schemes for problem waste streams.

Within this submission, the LGAQ makes the following recommendations to the Committee for its consideration. These recommendations reflect the supporting information outlined in **Attachment 3** of this submission:

- **Recommendation 1:** The LGAQ recommends the Federal Government undertakes a comprehensive review of national standards and guidelines in conjunction with State, Territory and local governments to facilitate the use of recycled materials in infrastructure projects that provides flexibility, whilst also ensuring consistent application and performance measures.
 - **Recommendation 2:** The LGAQ recommends the State and Federal governments invest in long-term, sustainable resource recovery and recycling solutions by providing funding for eligible infrastructure projects and technologies that establishes new recyclable repurposing and processing facilities within Queensland.
 - **Recommendation 3:** The LGAQ recommends the State and Federal governments ban the importation and use of products containing PFAS chemicals to reduce the burden on local government to manage pollution within the waste stream.
 - **Recommendation 4:** The LGAQ recommends the State and Federal governments introduce mandatory product stewardship schemes for problem waste streams including tyres, refrigerant units, batteries, solar panels and PV systems.
 - **Recommendation 5:** The LGAQ recommends the State and Federal governments support the local government sector to transition to net zero emissions through targeted operational and capital grants programs for councils to:
 - Establish and maintain corporate emissions inventories (including mapping and annual emissions tracking) and corporate emissions reduction plans; and
 - Invest in capital projects and supplement operational expenses, including dedicated council staff, that support identified emissions reduction priorities and climate mitigation strategies.
 - **Recommendation 6:** The LGAQ recommends the Federal Government ensures detailed and extensive consultation with all levels of government, industry and the community on any proposed circular economy related reforms.
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Should you have any questions regarding this submission, please contact Tamarah Moore, Lead – Public Health and Waste Management

Yours sincerely,

Alison Smith
CHIEF EXECUTIVE OFFICER



Attachment 1: LGAQ Policy Statement Positions

The LGAQ Policy Statement² (2023) is a definitive statement of collective voices from our councils in Queensland. The following statements represent the agreed policy positions of local government as outlined in the LGAQ Policy Statement, and as relevant to the provision of waste management services and transitioning to a circular economy:

5.4 Waste Management

5.4.5 Extended Producer Responsibility

- 5.4.5.1 Local government strongly supports the principle and introduction of Extended Producer Responsibility.
- 5.4.5.2 The State and Federal governments should establish the necessary policy and legislative frameworks for the effective implementation of Extended Producer Responsibility.

5.4.6 Costs of Waste Management

- 5.4.6.1 The principles of 'user pays' and 'polluter pays' should be applied where possible in addressing the issue of charging for waste management services.

5.4.7 Recycling

- 5.4.7.1 Local government is strongly committed to a circular economy for waste management supported through the introduction of economically, environmentally and socially sustainable recycling schemes.
- 5.4.7.2 Local government supports the removal of regulatory barriers that unnecessarily restrict the wide implementation of economically, environmentally and socially sustainable recycling schemes.
- 5.4.7.3 Local government strongly supports the principle of the integration of waste management from 'cradle to grave' with a move away from a linear approach to waste management especially with a focus on those waste minimisation options at the top of the waste management hierarchy: waste avoidance and reduction, and materials re-use and recycling.
- 5.4.7.4 Local government supports the development of expanded markets for recyclables through influencing government policy and committing to promoting and marketing recycled products.

5.4.9 Landfill Management

- 5.4.9.1 Local government supports improved actions to divert materials from landfill to conserve valuable landfill airspace.

5.4.10 Single Use Plastic

- 5.4.10.2 Local government supports appropriate extended producer responsibility for currently unavoidable single use plastics, such as food grade foil. Responsibility for management of these materials has to be in line with the 'polluter pays' principle.

² [LGAQ Policy Statement \(2023\)](#)



5.4.11 Alternate Waste Technologies

5.4.11 Research into and incentives for alternate waste technologies (for example – anaerobic digestion) should be included in the Waste Management and Resource Recovery Strategy for Queensland as an alternative to landfill disposal where socially, environmentally and economically viable.



Attachment 2: LGAQ Annual Conference Resolutions

The following resolutions have been passed by Queensland councils at previous LGAQ Annual Conferences and are relevant to moving towards a circular economy and matters raised in the Interim Report:

- **Resolution 44 (2024) – Kerbside collection support for rural and remote councils**
 - The LGAQ calls on the State Government to provide recurrent operational grants to low rate base councils, subsidising 100 percent of the operational costs of kerbside recycling collection, paid in arrears on a fixed price, per bin lift basis.
 - **Resolution 46 (2024) – Establishing long-term sustainable recovery and recycling processing solutions within regional Queensland**
 - The LGAQ calls on the State Government to:
 - Undertake an urgent investigation into the current state of play of kerbside commingled recycling within Regional Queensland including an Options Assessment and a Funded Regional Commingled Recycling Infrastructure Plan based on the preferred option; and
 - Invest in long-term, sustainable recovery and recycling processing solutions to service regional areas.
 - **Resolution 48 (2024) – Clarity on the State Government’s pathway to statewide Food Organics Garden Organics (FOGO) implementation**
 - The LGAQ calls on the State Government to provide clarity on the pathway to statewide FOGO implementation by addressing local government questions relating to end markets, PFAS data and limits, regulations, costs and viability of services.
 - **Resolution 49 (2024) – Ban the importation and use of products containing PFAS-group chemicals**
 - The LGAQ calls on the State and Federal governments to ban the importation and use of products containing PFAS-group chemicals by the end of 2026, including products not covered by the Industrial Chemicals Environmental Management Standard (cosmetics, personal care products, food packaging, clothing) rather than requiring local government waste service providers to upgrade treatment technology, to protect community health and the environment from these chemicals.
 - **Resolution 59 (2024) – Flexible policy schedule for compost end product use**
 - The LGAQ calls on the State Government to provide a flexible policy schedule for compost end product use. That the State Government provide organic processing operators with a flexible policy schedule that allows for different uses of compost end product, dependent on the PFAS level. This framework would allow for the operator to determine end markets that surpass the PFAS limit described within ERA53 Model Operating Conditions.
 - **Resolution 60 (2024) – Alignment of specifications for resource recovery products and infrastructure project requirements**
 - The LGAQ calls on the State Government to undertake a comprehensive review into the end-of-waste criteria for resource recovery products against the specification for materials used in Federal, State and local infrastructure projects.
 - **Resolution 63 (2024) – Prioritise future energy opportunities in existing and decommissioned mines, and end of mine life assets**
 - The LGAQ calls on the State Government to undertake a comprehensive investigation, develop policy and remove impediments in legislation, and invest in the repurposing of existing and decommissioned mines for energy production and storage.
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- **Resolutions 66 (2024) – Local government representation on the Net Zero Economy Authority**
 - The LGAQ calls on the Federal Government to appoint local government to the Net Zero Economy Authority board.
 - **Resolution 10 (2023) – Enabling the Circular Economy**
 - The LGAQ calls on the State Government to provide urgent investment certainty for local governments and industry that will develop a circular economy across Queensland, by fast-tracking the delivery of new resource recovery infrastructure and associated services, with front-ended funding under a long-term infrastructure plan.
 - **Resolution 23 (2023) – Establishment of a Recycled Products Directory for Queensland**
 - The LGAQ calls on the State Government to develop and administer a recycled products directory for Queensland to facilitate streamlined sourcing and procurement of recycled content from local suppliers.
 - **Resolution 84 (2023) – Unlawful dumping of end-of-life tyres (EOLT)**
 - The LGAQ calls on the State and Federal governments to implement a mandatory product stewardship scheme to:
 - Prohibit the return of end-of-life tyres (EOLT) to customers following changeover of tyres, or
 - Alternatively, mandate the requirement for record keeping relating to the trade of tyres.
 - **Resolution 85 (2023) – Disposal of solar panels**
 - The LGAQ calls on the State and Federal Governments to develop solutions for the disposal of solar panels, possibly including:
 - Reclamation, recycling, and implementation of a levy mechanism for solar panels to ensure better waste disposal; and
 - Exploring manufacturers' liability for the photovoltaic (PV) panels to encourage sustainable management; and
 - Working with State Government to legislate industry wide solutions.
 - **Resolution 123 (2023) – State Government incentivisation of the recyclables commodity market**
 - The LGAQ calls on the State Government to incentivise:
 - The establishment of new recyclable repurposing and processing facilities within Queensland, which adopt methods that make sure of low value/underutilised recyclable waste feedstocks profitable; and
 - The purpose of advanced recyclable processing technologies by Materials Recovery Facility Operators.
 - **Resolution 135 (2023) – Supporting the local government sector to transition to net zero emissions**
 - The LGAQ calls on the State and Federal governments to support the local government sector to transition to net zero emissions through targeted operational and capital grants programs for councils to:
 - Establish and maintain corporate emissions inventories (including mapping and annual emissions tracking) and corporate emissions reduction plans; and
 - Invest in capital projects and supplement operational expenses, including dedicated council staff, that support identified emissions reduction priorities and climate mitigation strategies.
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- **Resolution 48 (2022) – Non-competitive Funding to Harmonise Kerbside Bin Collection Services**
 - *The LGAQ calls on the State Government to commit to a non-competitive funding program for local governments to facilitate harmonisation of kerbside bin collection services.*
 - **Resolution 35 (2021) – Capacity Building for the Procurement of Low Emissions Products and Services**
 - *The LGAQ calls on the State Government to develop:*
 - *A targeted, long-term capacity building program for Queensland businesses, particularly suppliers to government, to support their transition to low emissions products and services, and*
 - *Guidance and capacity building for local governments to advance their emissions reduction goals through procurement.*
 - **Resolution 27 (2020) – Product Stewardship for Various Waste Streams**
 - *The LGAQ lobby the State Government to fast track the implementation of product stewardship programs which support the principles of a circular economy and reduce the cost to local government of management waste. The desired outcome is that national product stewardship schemes are implemented for various waste streams such as refrigerant units, mattresses and solar panels to ease the financial burden on local governments an manage the disposal of such items.*
 - **Resolution 31 (2020) – Waste Management – Recycling of Tyres**
 - *The LGAQ lobby the Federal Government to impose a levy on all tyres imported to or produced in Australia to assist Councils meeting the cost of recycling or disposal of tyres under the State Government’s Waste Management levy and Waste Reduction Targets.*
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Attachment 3: Specific Feedback and Supporting Information

The Built Environment

(Interim Report, Reform direction 4.1 & 4.2)

Infrastructure

Currently, there is a perceived gap between specifications required for materials used in State and local infrastructure projects, for example, use within the construction of roads, parks, gardens and playground equipment. Queensland councils are seeking action by the State Government to review end-of-waste codes approved under the *Environmental Protection Act 1994* and the *Waste Reduction and Recycling Act 2011* for recyclable products such as crushed concrete, crushed glass, mulch and compost.

As part of previous consultation with industry and government representatives, feedback provided to the LGAQ identified that one of the main barriers to advancing low carbon materials in transport infrastructure was the lack of national or state-based standards, coupled with long lead times to adopt changes to existing standards.

This presents a significant barrier to the adoption of low-carbon materials in transport infrastructure for both government and private industry due to continued uncertainty, despite clear benefits being demonstrated over traditional methods.

The LGAQ urges that the Commission consider policy measures to enable fit-for-purpose use of recycled materials in public projects, particularly for crushed concrete, crushed glass, mulch and compost to align with the *LGAQ Annual Conference (2024) Resolution 60 – alignment of specifications for resource recovery products and infrastructure project requirements*.

Land use planning

Other opportunities within the built environment must remain cognisant of the diversity of housing requirements within a state as decentralised as Queensland and that there isn't a 'one-size-fits-all' approach. While, at a high level, it may be plausible to perceive variances in local planning schemes as unnecessary, local governments recognise that this autonomy is important to uphold social cohesion and community safety among other factors.

As such, given the diversity of Queensland's character and climate, it is essential to maintain the autonomy of Queensland councils, as the level of government closest to the community and best able to recognise and respond to local opportunities and constraints.

Recyclable products

Local governments want to be seen as equal partners and there are many opportunities for a collaborative effort from all levels of government to shift Australia towards a circular economy. Local governments within Queensland are looking for ways to increase visibility of recyclable product markets to not only contribute to the goals under the *National Waste Policy Action Plan*, but to also encourage continued and sustainable growth in local recycling industries.

As a continuation of the work of the State Government under the *Queensland Procurement Strategy*, an initiative that establishes a recycled products directory for Queensland will create a coordinated and streamlined approach to sourcing and procuring recycled content from local suppliers and give confidence in the quality of recycled materials, which is important for manufacturers and consumers. Such an initiative aligns with the *LGAQ Annual Conference (2023) Resolution 23 – establishment of a recycled products directory for Queensland*.



To promote growth within this sector, investment is needed from Federal and State governments to establish new recyclable repurposing and processing facilities and provide funding for more advanced technologies available to Materials Recovery Facility (MRF) operators within Queensland that make use of low value or underutilised recyclable feedstock. Most large regional councils have been offering kerbside recycling collection for years however due to the cost and distance disparities, many rural and remote areas are yet to offer these services. Queensland councils are seeking funding that facilitates harmonisation of kerbside bin collection services which is reflected in several LGAQ resolutions including the *LGAQ Annual Conference (2023) Resolution 123 – State Government incentivisation of the recyclables commodity market*, and the *LGAQ Annual Conference (2022) Resolution 48 – non-competitive funding to harmonise kerbside bin collection services*,

Net Zero

Recognising State and Federal Government zero net emissions targets for 2050, Queensland councils are committed to working in partnership with all spheres of government, industry and the community to develop and implement effective risk management strategies focusing on emissions reduction.

Furthermore, consistent with the LGAQ Policy Statement, local government is also committed to providing a leadership role to assist local communities, including industry, to understand and address climate risk including acute and chronic physical risks and transition risks associated with moving to a low carbon economy.

Much of the sector is already taking great strides in progressing towards net zero, however councils are at varying stages of the journey. Projects being undertaken by some councils include energy efficient street lighting, installing solar and electric vehicle charging stations, capturing biogas and flaring landfill gas emissions and diverting organic waste from landfill.

They do this while navigating a challenging financial environment as evidenced by the latest Queensland Audit Office report into local government financial sustainability, which found that 48 out of Queensland's 77 councils are at moderate to high risk of not being financially sustainable³.

However, as the level of government that is funded the least – earning around three cents in every dollar of taxation revenue compared to 80 cents for the Federal Government and almost 17 cents for the State – councils cannot continue to shoulder further cost and responsibility burdens from others and be expected to deliver more for less.

Local governments recognise they have an important role to play in supporting progress towards the net zero emissions goal, but there is a need for greater levels of dedicated State and Federal government funding for the planning and delivery of these initiatives. This is reinforced by the *LGAQ Annual Conference (2023) Resolution 135*, that calls on the State and Federal governments to support the local government sector to transition to net zero emissions through targeted operational and capital grants programs for councils.

As councils continue their journey to reduce emissions, including consideration of emissions in supply chains (scope 3 emissions), there will be a growing demand for businesses that can provide emissions-related information on their products and services and can demonstrate reductions or offsets.

A focus on capacity building would allow businesses to compete for local government projects and assist them in their transition to supporting local and state aspirations for a low emissions products and services. This would also result in improved sustainability outcomes throughout the life of the procurement, as well as flow through sustainability improvements for supporting industries.

³ [QAO Financial Audit report - Local government 2023 \(Report 8: 2023-24\)](#)



As such, Queensland councils are calling for:

- development of a targeted, long-term capacity building program for Queensland businesses, particularly suppliers to government, to support their transition to low emissions products and services, and
- guidance and capacity building for local governments to advance their own emissions reduction goals through procurement.

Initiatives such as these align with the *LGAQ Annual Conference (2021) Resolution 35 – capacity building for the procurement of low emissions products and services*.

Organics

(Interim Report, Information request 5.3)

Queensland councils have identified several key areas that must be addressed by the State Government to provide assurances that implementation of initiatives for organic waste remain viable. Those key areas include:

- Access to and capacity of local product end markets,
- Fit-for-purpose regulatory policy and standards relating to limits of PFAS,
- Fit-for-purpose regulatory policy and standards relating to odour control, and
- Funding support arrangements to ensure the implementation of such initiatives does not financially impact upon households.

The *Queensland Organics Strategy and Action Plan* set the overarching goals for Queensland. The State Government has invested funding for initiatives such as FOGO to support these goals, however the uptake by Queensland councils has been hindered by the abovementioned barriers, and councils are, as a result, opting for a scaled back approach by introducing Garden Organics (GO) initiatives instead in some areas of the state.

Additionally, the operational conditions for Environmentally Relevant Activity (ERA) 53, are limiting operators from accepting certain feedstock to avoid PFAS contamination and maintain compliance. This will ultimately lead to a significant reduction in organic processing capacity and impact on the viability of the sector. To provide assurances to operators, the State Government must consider flexibility in regulatory policies related to compost end product use, to ensure these materials continue to be diverted from landfill and remain in line with the overarching goals for Queensland.

Queensland councils are urging that the State Government provide clear direction for a pathway to statewide FOGO implementation that addresses the concerns relayed by local government, in order to harness to the potential of achieving overarching goals and actions identified within the *Queensland Organics Strategy and Action Plan*.

Opportunities to reduce barriers to improving use of organic waste materials aligns with the *LGAQ Annual Conference (2024) Resolution 48 – clarity on the State Government's pathway to statewide Food Organics Garden Organics (FOGO) implementation*, and the *LGAQ Annual Conference (2024) Resolution 59 – flexible policy schedule for compost end product use*.

More broadly, Queensland councils remain concerned that products containing PFAS continue to be consumed within Australia, and that local governments are burdened with the costs of minimising the impact this is causing on the environment and to public health. Councils providing essential services of not only waste management, but also water and wastewater services, are burdened with compliance of strict regulatory limits imposed, without strong commitment from the State and Federal governments to stop contamination at the source.



Through the *LGAQ Annual Conference (2024) Resolution 49 – ban the importation and use of products containing PFAS-group chemicals*, Queensland councils are calling on the State and Federal governments to expand on the current bans imposed under the *Industrial Chemicals Environmental Management Standard* and ban the importation and use of all products containing PFAS-group chemicals. This will support the efforts of local government in minimising the impact of PFAS contamination through the delivery of essential services.

Product stewardship schemes for problem waste streams

(Interim Report, Information request 8.1, 8.2, 9.2 & 9.3)

Tyres

Queensland councils have not observed a decline in the number of tyres being disposed to landfill despite introduction of national stewardship schemes. As the closest level of government to communities, councils consider that it is likely due to the prohibitive costs of recycling in rural and remote areas. More is needed by the Federal Government to consider imposing a levy on tyres, the revenue for which could then be reinvested into the sector to support growth of local recyclable markets and lowering the costs for local government.

End-of-life tyres (EOLT) are a common item that is dumped illegally, accounting for over 15 percent of illegal dumping investigations in one North Queensland regional local government area.

With limited recourse to identify an offender, councils are burdened with the ongoing costs of disposing illegally dumped tyres with limited means to recuperate these costs. It has been the experience of some councils that a large number of EOLT being illegally dumped, are those that are returned to customers following the purchase of new tyres, placing the responsibility on the customer to dispose of these tyres appropriately and pay the applicable fees for doing so. The lack of traceability of EOLT results in investigations undertaken by councils in accordance with provisions of the *Waste Reduction and Recycling Act 2011*, failing to identify an offender and being unable to take the necessary enforcement action.

There are however conscientious car dealerships that are charging fees to dispose of customers' EOLTs lawfully, however, due to the lack of mandated product stewardship schemes for this problem waste stream, the issue persists unabated. Local governments are therefore calling on both the State and Federal Governments to implement mandatory product stewardship schemes that seek to either:

1. Prohibit the return of EOLT to customers following replacement of tyres, or
2. Mandate record keeping requirements that will ensure traceability from the point of trade.

These important asks of Queensland councils to address problem waste streams aligns with the *LGAQ Annual Conference (2023) Resolution 84 – unlawful dumping of end-of-life tyres (EOLT)*, and the *LGAQ Annual Conference (2020) Resolution 31 – waste management – recycling of tyres*.

Electronic waste (e-waste)

One of the fastest growing solid waste streams, e-waste, is made up of various discarded household items and appliances that if not disposed of correctly, contribute to dangerous fires and the release of harmful chemicals putting local governments at risk, as they find solutions to recover these resources and effect behaviour change within communities.

With limited access to processing facilities capable of dismantling and recovering resources from e-waste, councils are burdened with the exorbitant costs of transport and disposal. Additionally, the hazardous nature of storing these items raises concerns when establishing accessible drop-off



locations to encourage the community to dispose of these items appropriately, rather than ending up in the general waste stream.

In line with the *Waste Management Hierarchy*, the priority is to prevent e-waste from occurring by reducing the need to buy new with more high-quality products on the market, or to re-use items through second-hand markets, however the desired outcome expressed by Queensland Councils is for national product stewardship schemes for items such as refrigerant units, solar panels, photovoltaic (PV) systems, and batteries (including embedded batteries and portable battery storage units). Queensland councils acknowledge a need for greater emphasis placed on manufacturers to take on the responsibility and to wear the costs of disposal of these products at end of life.

As the installation of solar panels and PV systems are only increasing; an estimated 1000,000 tonnes of solar panels to landfill by 2035, Queensland councils are urging the State and Federal governments to develop solutions for the disposal of solar panels which considers:

- Reclamation, recycling and implementation of a levy mechanism for solar panels to ensure better waste disposal,
- Exploring manufacturers' liability for the PV panels to encourage sustainable management, and
- Work within all levels of government to implement legislation that achieves industry-wide solutions.

Product stewardship schemes for e-waste align with the *LGAQ Annal Conference (2023) Resolution 85 – disposal of solar panels*, and the *LGAQ Annual Conference (2020) Resolution 27 – product stewardship for various waste streams*.

Mining

(Interim Report, Information request 7.1)

Across Queensland there are several existing and decommissioned mines that have capacity to support energy storage and production. The current State Government policies and legislation for the rehabilitation of mine sites impedes the ability of these sites to be repurposed, where progressive rehabilitation is required to restore sites to their pre-mining state.

The critical infrastructure of active and decommissioned mines offers cost efficiencies for new energy projects however the policies that are in place to minimise environmental impacts, don't consider the broader scope of the opportunities to harness naturally occurring methane, blue hydrogen and other Coal Seam Gas to support Australia's energy demands.

Queensland councils want to work with the State Government to develop policies that create an appropriate regulatory framework and removes impediments to the repurposing of existing and decommissioned mines into energy storage and production facilities that offers sustainable, long-term and cost-effective storage solutions that improve progress towards state renewable energy targets.

This aligns with the *LGAQ Annual Conference (2024) Resolution 63 – prioritise future energy opportunities in existing and decommissioned mines, and end of mine life assets* in the broader scope of unlocking opportunities within the circular economy.
