

*Thank you for providing an opportunity to comment on the Mine Rehabilitation – Discussion Paper.*

*I have a few thoughts on the topic that you may find helpful.*

- a. Should you choose to make the approval process harder for voids. The guidelines should preferably be regulations and be strong and clearly worded. \$1m in text to address all the issues raised and sent back to the proponent is far cheaper than \$50m plus to rehandle and fill or partially fill a void. You could easily end up with a harder approval process with the same outcome. It should be noted that nearly all the potential mine voids in the Valley are already approved and I note that they are exempt in this discussion paper.*
- b. What a void can be used for is very largely dependent on the use of the surrounding land. If the surrounding land is to be natural bush, trees, forest, biodiversity offset etc., then it is very hard to argue that the void is not compatible with these land uses except to say the water in the void does not have any biodiversity value.*
- c. There has been a push for a long time now for natural bush, trees, forest, biodiversity offset etc. on former mining land. This has been supported by the mining industry, as if done properly, is probably the cheapest outcome. It unfortunately ignores the fundamental reason why the land was cleared post European settlement and pre-mining in the first place. We need land to live on, be productive and provide employment. The current policy of more and more offset areas and lots of woodland ecosystems tends to ignore this. As we are located within 300km of Australia's largest city and 100km from the coast, the Hunter Valley valley floor is always going to be sought after for productive purposes and holding it as wild life habitat, when the valley is surrounded by it, will be difficult once the land is no longer held for mining purposes. I suggest far more emphasis is put on land that has some sort of productive purpose, as it has since 1788 on most arable land within 400km of the eastern seaboard.*
- d. There is an ongoing trend to put off rehabilitation, or more importantly put off post mine alternate land use until tomorrow, and of course tomorrow never comes. This is supported by a number of regulatory processes. There are a number of very difficult approval/mine safety legislation hurdles a mining company needs to jump through should an alternate land use be considered. The mine then claim it is not core business and so nothing happens. The whole legislative approval process needs to be designed around transitional and post mining land uses, not just have an amended policy tacked on the end.*
- e. Lastly and most importantly, the current rehabilitation requirements have a number of good and flexible requirements, and if applied well can provide good outcomes. Unfortunately due to pressures that you are probably now more familiar with than I, most mine sites just get the minimum attention necessary to satisfy some managers KPA's. This particularly applies to post approval processes. Should changes to planned land uses be warranted, it is very time consuming to work with the company, push the changes through the complex regulatory framework and find suitable post mining land users. It is not core mining business and so it is inevitable that government will need to foster this, at least in the early stages. The time available for this and the available skill sets available fall way short of any change being possible without significant reform from the field officer upwards.*

*Hope this info above helps with ideas to change a few trends that I see will be seen as bad policy by our children or grandchildren.*

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