

## OVERVIEW OF KEY COMMENTS

The comments provided principally relate to the following (in no particular order)

- i) The actual area of final mine voids needs to be recorded and compared with the total area disturbed by mining which in turn is compared to the total area disturbed by agriculture in NSW.
- ii) The specific roles of each of the agencies, groups and individuals referred to the guidelines with respect to rehabilitation should be clearly spelled out. Ideally, the number of agencies inputting to rehabilitation activities should be minimised – please consider this when preparing the final guideline.
- iii) Greater clarity is required with what is really required by a “detailed description of mine rehabilitation and closure”. Please, for many mines where there is no certainty that they will be approved, it is inappropriate to go into so much detail at the planning stage. This equally applies to those mines that have a high certainty of approval. It is respectfully suggested that requirements to prepare detailed staged plans for rehabilitation for inclusion in the EIS, is unnecessary given the range of variables that contribute to the areas / depths that are actually mined and the quantity / quality of the products produced. Mining professionals need to be employed in government agencies to assess proposals at a DA stage without such detailed plans. The request for such a level of detail simply increases the time to develop mines and increases upfront costs when there is no certainty of approval.
- iv) Many of the comments in the document are based upon the DPE’s / DRG’s experience with coal mines and not necessarily open cut metalliferous mines. A range of comments are provided that require a re-think of the approach to ensure the Government is not placing further (and unnecessary) restraints on the development of metalliferous mines in NSW.
- v) The requirement for detailed evaluation of rehabilitation costs up front as part of a proposal is not appropriate. Miners are now fully aware of their rehabilitation liabilities through the preparation of RCEs prior to project commencement and/or the next stage of their operation. A lack of understanding of these costs in the past could have contributed to their lack of funds to carry out appropriate rehabilitation.

A properly enforced RCE / security process will be far better than requiring miners to “guess” up front before they have detailed mine plans and an understanding of conditions, etc. which will influence rehabilitation costs.
- vi) A number of miners and particularly regulators do not place sufficient emphasis upon the need to rehabilitate open cut voids as they are developed with terminal faces. Greater emphasis should be placed on leaving overburden on terminal benches and planting trees / shrubs at that stage. Miners are often too keen to keep “going down” when with a bit of planning and little expense, all benches (that will remain above the re-established groundwater level) would be vegetated. This needs to be promoted in the Policy.
- vii) It remains a great frustration that miners are required to prepare both a Landscape and Rehabilitation Plan and a Mining Operations Plan where the focus is now placed largely upon rehabilitation. It would be preferable that the Landscape and Rehabilitation Plan is no longer required for mining operations, and instead, only a comprehensive MOP. It remains RWC’s preference to re-introduce requirements for MOPs to include a greater quantity of detail regarding mining operations and not just focus on rehabilitation. In our experience, more accurate rehabilitation planning is achieved when there is greater emphasis placed upon documenting the staged mining sequence.
- viii) I have run out of time to assemble more meaningful comments. I would be pleased to discuss any of the comments in the attached documents.