

INDIVIDUAL SURVEY RESPONSE	
Contribution ID:	#01
Date submitted:	151946
	20 Sep 2019
1. Do you believe the proposed Extractives Industries Regulations will be effective?	Yes
Why/why not?	-
2. Are you supportive of the proposed change to risk based work plans that includes outcome-based requirements?	Yes
3. If not, what would you like to see improved?	-
4. Are you supportive of the proposed changes to require additional reporting of geological data?	Yes
5. If not, what would you like to see improved?	-
6. Are you supportive of the proposed changes to Rehabilitation requirements compared to the current Regulations?	Yes
7. If not, what would you like to see improved?	-
8. Should authority holders be required to report on progress with rehabilitation in their annual reports?	Yes
9. If so, what information on progress with rehabilitation should be included in an annual report?	-
10. Would you like to comment on any other aspects of the proposed Regulations?	-

INDIVIDUAL SURVEY RESPONSE	
Contribution ID:	#02
Date submitted:	153662
	24 Sep 2019
1. Do you believe the proposed Extractives Industries Regulations will be effective?	-
Why/why not?	Improved to current regulations
2. Are you supportive of the proposed change to risk based work plans that includes outcome-based requirements?	Yes
3. If not, what would you like to see improved?	-
4. Are you supportive of the proposed changes to require additional reporting of geological data?	Yes
5. If not, what would you like to see improved?	-
6. Are you supportive of the proposed changes to Rehabilitation requirements compared to the current Regulations?	Yes
7. If not, what would you like to see improved?	-
8. Should authority holders be required to report on progress with rehabilitation in their annual reports?	Yes
9. If so, what information on progress with rehabilitation should be included in an annual report?	<ul style="list-style-type: none"> • Appropriate design criteria required to avoid long term landform degradation • Quote the percentage of disturbed land rehabilitated to a stable state , independently assesses for viability and long term productivity by a qualified authority.
10. Would you like to comment on any other aspects of the proposed Regulations?	Community engagement - should be encouraged, sort and valued - as these are the most effected with the project

INDIVIDUAL SURVEY RESPONSE	
Contribution ID:	#03
Date submitted:	155841
1. Do you believe the proposed Extractives Industries Regulations will be effective?	Yes
Why/why not?	Addition needs to be made to regulate the extraction of Salt as this is an area not covered by any regulator
2. Are you supportive of the proposed change to risk based work plans that includes outcome-based requirements?	No
3. If not, what would you like to see improved?	Addition needs to be made to regulate the extraction of Salt as this is an area not covered by any regulator
4. Are you supportive of the proposed changes to require additional reporting of geological data?	Yes
5. If not, what would you like to see improved?	DATA IS IMPORTANT. Addition needs to be made to regulate the extraction of Salt as this is an area not covered by any regulator
6. Are you supportive of the proposed changes to Rehabilitation requirements compared to the current Regulations?	Yes
7. If not, what would you like to see improved?	Rehabilitation in the mining sector has historically been woefully inadequate, there needs to be consideration given to a radical overhaul of the current bond system as the inflation of costs to rehab the site during the life of a mine leaves a burden on the state when it collapses.
8. Should authority holders be required to report on progress with rehabilitation in their annual reports?	Yes
9. If so, what information on progress with rehabilitation should be included in an annual report?	Rehab requirements such as revegetation, land reclamation, amount spent on continual rehab, they need to report on the amount spent on works, they should include this into the mix.
10. Would you like to comment on any other aspects of the proposed Regulations?	Addition needs to be made to regulate the extraction of Salt as this is an area not covered by any regulator

INDIVIDUAL SURVEY RESPONSE	
Contribution ID:	#04
Date submitted:	158547
	08 Oct 2019
1. Do you believe the proposed Extractives Industries Regulations will be effective?	Yes
Why/why not?	-
2. Are you supportive of the proposed change to risk based work plans that includes outcome-based requirements?	Yes
3. If not, what would you like to see improved?	-
4. Are you supportive of the proposed changes to require additional reporting of geological data?	Yes
5. If not, what would you like to see improved?	-
6. Are you supportive of the proposed changes to Rehabilitation requirements compared to the current Regulations?	Yes
7. If not, what would you like to see improved?	-
8. Should authority holders be required to report on progress with rehabilitation in their annual reports?	Yes
9. If so, what information on progress with rehabilitation should be included in an annual report?	-
10. Would you like to comment on any other aspects of the proposed Regulations?	Why are both work plans and work authorities required for extractives above a certain depth? Given extractives are owned privately above a specified depth - what regulatory purpose does the work authority serve given there is no royalty paid? A work plan and planning permit should be sufficient. In a risk based framework the WA does not serve any purpose.

INDIVIDUAL SURVEY RESPONSE	
Contribution ID:	#05
Date submitted:	161245
1. Do you believe the proposed Extractives Industries Regulations will be effective?	No
Why/why not?	<p>Any quarry proposal must come up with measures to mitigate hazards. These measures must reduce the risk to low. No one will put in a proposal where the risk of a hazard is high because it will not get approved.</p> <p>Quarries and all industry are governed by standards administered by the EPA. The outcomes must meet these requirements if they don't alternative measures must be implemented. The outcome is prescriptive, risk analysis does not come into it.</p>
2. Are you supportive of the proposed change to risk based work plans that includes outcome-based requirements?	No
3. If not, what would you like to see improved?	There are no real changes. The proposal is still for risk based work plans.
4. Are you supportive of the proposed changes to require additional reporting of geological data?	Yes
5. If not, what would you like to see improved?	-
6. Are you supportive of the proposed changes to Rehabilitation requirements compared to the current Regulations?	No
7. If not, what would you like to see improved?	<p>Clause 11.2.f. is irrelevant , Rehabilitated land should not pose any risk, otherwise it would not be approved. In any case surely this clause is covered in Clause.9.</p> <p>End uses for quarry sites can change over time and should not be too prescriptive otherwise more work plan variations would be required.</p> <p>Scheduling of rehabilitation works may lead to large numbers of Work Plan variations due to vagaries in the market. Areas may be rehabilitated out of sequence or delayed due to varying usage of material.</p> <p>11.2.c. What does this mean?</p> <p>11.2.a.Land uses for rehabilitated land should be up to the landowner and relevant town planning constraints. It is unfair for community views to impose another layer restrictions.</p>
8. Should authority holders be required to report on progress with rehabilitation in their annual reports?	No
9. If so, what information on progress with rehabilitation should be included in an annual report?	-
10. Would you like to comment on any other aspects of the proposed Regulations?	<p>Reporting.</p> <p>Density can vary, particularly in a clay and shale quarry. Is the operator required to test different materials every year for no benefit?</p>

INDIVIDUAL SURVEY RESPONSE	
Contribution ID:	#06
Date submitted:	163261
1. Do you believe the proposed Extractives Industries Regulations will be effective?	No
Why/why not?	Potentially not effective since the mitigation of risks will be taken care of via EPA as a referral authority. The risk analysis is likely to bog down and confuse the process which will be clearly described via EPA if required.
2. Are you supportive of the proposed change to risk based work plans that includes outcome-based requirements?	No
3. If not, what would you like to see improved?	Regulation 9(b) should be deleted since rehabilitation hazards will be identified as required by regulation 11(2)(f) during the 'identification and assessment of relevant risks that the rehabilitated land may pose'. Given these hazards will be detailed in the rehab plan they should not be requested in the work plan by two separate regulations. If necessary, 11(2)(f) could be reworded to include reference to 'hazards'.
4. Are you supportive of the proposed changes to require additional reporting of geological data?	No
5. If not, what would you like to see improved?	Regulation 19(3)(f)(iv) <ul style="list-style-type: none"> o Is 'maximum depth of extraction' supposed to be metres below natural or original surface level, or is it simply a RL? Why is this relevant? The maximum depth allowed for extraction has already been specified in the work plan and /or Work Authority Conditions, so including this requirement only forces extra cost in terms of surveying onto the work authority holder. o The RIS mentioned 'depth drilled' which is very different to 'maximum depth of extraction'. Has this been wrongly described in the RIS or the Regulations?
6. Are you supportive of the proposed changes to Rehabilitation requirements compared to the current Regulations?	-
7. If not, what would you like to see improved?	Regulation 11 (1) <ul style="list-style-type: none"> o Add to this subregulation "Subregulation (2) does not apply to work plan variations to work plans originally lodged prior to 1 July 2021." Regulation 11 (2)(a) <ul style="list-style-type: none"> o There will be very little value in consulting the current community regarding a rehabilitation plan that may or may not eventuate as described at the end of the quarry's life in 30 or 40 years when not only the community but the surrounding landscape is likely to be significantly different. The community will have the chance to object to any planning permit application for use of the rehabilitated land at the appropriate time – the appropriate time for community input to impose restrictions is not prior to the submission of the work plan.

INDIVIDUAL SURVEY RESPONSE	
Contribution ID:	#06
Date submitted:	163261
	14 Oct 2019
	<p>Regulation 11 (2)(d&e)</p> <ul style="list-style-type: none"> o Objectives are fine, but there are too many unknowns around the specifics of the final landform and use to accurately determine measurement criteria and milestones. Milestones could vary significantly depending on the availability of funds and the financial health of the work authority holder at the time of rehab. <p>Regulation 11 (2)(f)</p> <ul style="list-style-type: none"> o Surely this is unnecessary – if there are any substantial risks associated with the rehabilitated land then the plan is not good enough. There should not be any risk. <p>General comments:</p> <ul style="list-style-type: none"> o Determining measurement criteria and milestones will be time & money wasted to prepare something that is highly likely to need significant amendment by the time final rehab occurs. It could result in the need for running amendments to the rehab plan. What are the consequences (if any) for milestones not being achieved, particularly when the milestones were proposed some 30 or 40 years previously? o Would it not be simpler to have a very basic rehab plan (e.g. a lake with gently sloping vegetated sides) which needs no risk assessment as a 'default' for all sites, and only require the fully detailed risk-based plan if a more complicated or unusual option is proposed for the final land use?
8. Should authority holders be required to report on progress with rehabilitation in their annual reports?	No
9. If so, what information on progress with rehabilitation should be included in an annual report?	-
10. Would you like to comment on any other aspects of the proposed Regulations?	Regulation 19(4)(a) should surely read '...not including costs...' instead of '...less costs...'? There will be a big difference between the two, and 'less costs' could result in a product with negative value.

INDIVIDUAL SURVEY RESPONSE	
Contribution ID:	#07
Date submitted:	165975
	16 Oct 2019
1. Do you believe the proposed Extractives Industries Regulations will be effective?	Yes
Why/why not?	-
2. Are you supportive of the proposed change to risk based work plans that includes outcome-based requirements?	Yes
3. If not, what would you like to see improved?	-
4. Are you supportive of the proposed changes to require additional reporting of geological data?	No
5. If not, what would you like to see improved?	-
6. Are you supportive of the proposed changes to Rehabilitation requirements compared to the current Regulations?	No
7. If not, what would you like to see improved?	-
8. Should authority holders be required to report on progress with rehabilitation in their annual reports?	No
9. If so, what information on progress with rehabilitation should be included in an annual report?	-
10. Would you like to comment on any other aspects of the proposed Regulations?	-

INDIVIDUAL SURVEY RESPONSE	
Contribution ID:	#08
Date submitted:	166753
	17 Oct 2019
1. Do you believe the proposed Extractives Industries Regulations will be effective?	Yes
Why/why not?	-
2. Are you supportive of the proposed change to risk based work plans that includes outcome-based requirements?	Yes
3. If not, what would you like to see improved?	-
4. Are you supportive of the proposed changes to require additional reporting of geological data?	Yes
5. If not, what would you like to see improved?	-
6. Are you supportive of the proposed changes to Rehabilitation requirements compared to the current Regulations?	Yes
7. If not, what would you like to see improved?	-
8. Should authority holders be required to report on progress with rehabilitation in their annual reports?	Yes
9. If so, what information on progress with rehabilitation should be included in an annual report?	-
10. Would you like to comment on any other aspects of the proposed Regulations?	No

INDIVIDUAL SURVEY RESPONSE	
Contribution ID:	#09
Date submitted:	167609
1. Do you believe the proposed Extractives Industries Regulations will be effective?	No
Why/why not?	-
2. Are you supportive of the proposed change to risk based work plans that includes outcome-based requirements?	No
3. If not, what would you like to see improved?	-
4. Are you supportive of the proposed changes to require additional reporting of geological data?	Yes
5. If not, what would you like to see improved?	-
6. Are you supportive of the proposed changes to Rehabilitation requirements compared to the current Regulations?	No
7. If not, what would you like to see improved?	Contact between department people and work permit holders to be more constructive
8. Should authority holders be required to report on progress with rehabilitation in their annual reports?	No
9. If so, what information on progress with rehabilitation should be included in an annual report?	-
10. Would you like to comment on any other aspects of the proposed Regulations?	Instead of officers just turning up without not calling or no notice please give us the respect we deserve

INDIVIDUAL SURVEY RESPONSE	
Contribution ID:	#10
Date submitted:	170222
1. Do you believe the proposed Extractives Industries Regulations will be effective?	No
Why/why not?	<p>They leave a lot open to officers of the State to interpret. For example - Section 5 Definitions (d) "aligns with the principles of sustainable development " What does this mean? This statement is not a definition! Does it mean, requires no more care or maintenance than that of a normal landowner? Does it mean the hole has been filled back in?</p> <p>The regulation still includes major overlay and duplication with planning, without resolving the Work Authority Approval vs Planning Approval chicken and egg!! Part 11 particularly (a) "that considers community views expressed during consultation" and "sustainable".</p>
2. Are you supportive of the proposed change to risk based work plans that includes outcome-based requirements?	No
3. If not, what would you like to see improved?	<p>The current centralised RRAMS "risk assessment" databased is not user friendly, complicated and serves little purpose. Does a note pad that can access the RRAMS system via the internet meet the compliance requirement Part 6 Record keeping 24. (c)?</p> <p>The work plan should be a clear and simple document. This process requires the production of a Work plan to suit RRAMS and another to suit the management of the quarry.</p>
4. Are you supportive of the proposed changes to require additional reporting of geological data?	No
5. If not, what would you like to see improved?	The aggregation of information required is over-reach and to be required within 31 days of the end of financial year unrealistic.
6. Are you supportive of the proposed changes to Rehabilitation requirements compared to the current Regulations?	No
7. If not, what would you like to see improved?	<p>What the change is, is not evident.</p> <p>Some sites can be progressively rehabilitated while others can not.</p> <p>The way it is written one would expect that this would not be clear and an operator penalised if the Department don't see rehabilitation happening. Irrespective of the fact.</p>
8. Should authority holders be required to report on progress with rehabilitation in their annual reports?	-
9. If so, what information on progress with rehabilitation should be included in an annual report?	-
10. Would you like to comment on any other aspects of the proposed Regulations?	<p>Yes or No only option is not helpful.</p> <p>The regulation should state that a quarry is deemed "in use or being used" if a Work Authority is registered, an approved work plan exists, a rehabilitation bond is held and the quarry not been rehabilitated.</p>

INDIVIDUAL SURVEY RESPONSE Contribution ID: Date submitted:	#10 170222 21 Oct 2019
	<p>It is unclear whether 24 c means that the record can be held at the head office, if it is an occasional use quarry.</p> <p>The mandatory reporting of what is essentially commercial information, then discoverable through Freedom of Information discovery is over-reach</p>

INDIVIDUAL SURVEY RESPONSE	
Contribution ID:	#11
Date submitted:	170306
1. Do you believe the proposed Extractives Industries Regulations will be effective?	No
Why/why not?	<p>The ERR has not demonstrated a clear understanding of the mining industry, as many of the enforcement officers we encounter, and possibly the authors, appear have never worked in the mining industry. Often these persons do not have the professional qualifications or practical experience to match the personnel that they are dealing with.</p> <p>Contrary to the stated intention to reduce red tape, my professional experience is of the opposite, with an increased burden requiring the hiring of consultants to navigate through.</p>
2. Are you supportive of the proposed change to risk based work plans that includes outcome-based requirements?	No
3. If not, what would you like to see improved?	<p>Risk-based work plans are always subjective, and primarily functional in business for financial risks. Mining is fundamentally an engineering undertaking, based in physical disciplines that can clearly determine the outcome. Work plans need to clearly state the objective, the method by which the outcome will be achieved, and all measures use to ensure protection of the public and the environment, as well as ensure a successful outcome. Other states have tried the risk-based approach in mining and now returned to the previous practices - Victoria should not have to perform this exercise at cost to the tax payers as well.</p>
4. Are you supportive of the proposed changes to require additional reporting of geological data?	No
5. If not, what would you like to see improved?	<p>Reporting of geological data, particularly in relinquishment reports, should be thoroughly vetted by senior geologists specifically working in the same regional geology to ensure all information is sensible in relation to adjoining areas.</p>
6. Are you supportive of the proposed changes to Rehabilitation requirements compared to the current Regulations?	Yes
7. If not, what would you like to see improved?	-
8. Should authority holders be required to report on progress with rehabilitation in their annual reports?	Yes
9. If so, what information on progress with rehabilitation should be included in an annual report?	<p>Extra costs to rehabilitate due to unsuccessful rehabilitation due to both natural causes, such as severe dry or wet spells, and human environmental damage by the general public, such as detectors digging under tree roots or dozing areas on mining leases.</p>
10. Would you like to comment on any other aspects of the proposed Regulations?	<p>There needs to be more public education about mining leases and the legal rights of the tenants.</p>