

## **Work plans**

**Are the proposed amendments to work plans and work plan variations effective? If not, what changes would you suggest and why?**

Risk management code of practice is a good idea but should not have to be strictly adhered to. To be used as a guideline only and will be useful for small operators but could conflict with larger companies that have set risk assessment guidelines in use. Concern that performance standards will be treated as enforceable measures rather than guidelines. There may be confusion, particularly with public reporting with including guidelines within a regulatory framework such as work plan. Must differentiate between what is a guideline and what is regulation. This will create confusion in a publicly available document. Draft work plan documents may need to be submitted for approval of other licences which may also have a public component.

**Should there be an option for regulated parties to apply the risk management approach, contained within a Code of Practice for risk management issued by the Minister under Part 8A of the Principal Act?**

**Yes**

**Do you have any comments on the proposed Code of Practice (refer to attachment C)?**

As mentioned the work plan may not be the place to introduce the code of practice as a regulatory approval. Most mining operations already work under a risk management approach so can align with government but there must be consultation with industry in how the guidelines are written and how they will be enforced.

## **Rehabilitation**

**Do the proposed changes to rehabilitation plans and progressive rehabilitation milestones sufficiently clarify the legal obligations to 'rehabilitate land in accordance with [a] rehabilitation plan' and to 'rehabilitate land in the course of doing work'?**

### **Response**

No

### **If not, what changes would you suggest and why?**

progressive rehabilitation needs to be stage based approach and not set in timelines as mining plans vary widely from initial work plan design. A variation in rehabilitation plan should not trigger a work plan variation. Concern over making rehabilitation part of a public document where community can "regulate" rehabilitation requirements without having background information. This could create mistrust from community in both industry as well as government regulation if rehabilitation plans have a timeline requirement and are perceived as not being regulated. A stage based approach would mitigate this risk and allow industry to be proactive in rehab plans. More clarification required to define domains. There should also be scope to cover multiple possible land uses over a landform. This may be driven by community expectations of land use.

**Do you support the move to a more flexible, proportionate, outcomes-based rehabilitation plan approach (as outlined in the proposed regulations and the preferred option in the RIS)?**

Yes

### **If not, please provide further comment**

I believe this approach will provide more confidence to community but must not be too strictly regulated (ie time constraints) or will be a negative approach.

**Do the rehabilitation proposals meet the expectations of the community?**

Can't please everyone but will please more than the current approach

## **Advertising**

**Are the proposed amendments to advertising requirements likely to be effective? If not, what changes would you suggest and why?**

Good idea to have access to more forms of advertising. Social media becoming very important tool.

There should be no constraint on where advertising is conducted. ie local paper vs regional or national.

**What alternative forms of advertising could be used to ensure interested parties are informed of proposed licences?**

Social media platforms, community social media

## **Reporting requirements**

**Are the proposed amendments to information requirements for annual reports and returns likely to be effective? If not, what changes would you suggest and why?**

No

**If not, what information should be collected and why?**

Rehabilitation requirements must be not regulated too tightly if becoming a public reporting tool.

Prefer to collect the information but not report publicly within a regulated document. Staged based rehab and not timeline approach and no liability estimate

**Is the 28-day time period for lodging returns an appropriate length for submitting the required documentation?**

No

**If not, what is an appropriate time period?**

Would prefer longer time to collate information.

**Should the reporting date for annual returns be changed to a date other than 30 June?**

No