

# Environment Victoria response to LVRRS Overview

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## 1. What is your level of knowledge of mine rehabilitation in general?

Other - Not sure why this question is necessary.

## 2. What is important to you when you think about the rehabilitation of the Latrobe Valley coal mines?

The rehabilitated sites need to leave the Latrobe Valley with a positive legacy from coal mining and should create a positive amenity for the community that contributes to the future social and economic prosperity of the region.

Free prior and informed consent of the Traditional Owners of the land

Takes into consideration the impacts of climate change on the availability of water into the future and prioritises water for the community, environmental and cultural flows and agriculture

Minimising environmental impacts now and into the future. Ensuring minimum environmental flows and improvements to the Latrobe River system that has been severely degraded historically by the power industry

That all parts of the mining and power generation need to be cleaned up and included in the rehabilitation strategy - including coal ash and power station facilities

Mine operators need to bear the costs of fixing the damage that has occurred while they have profited. If water is deemed to be the only option for rehabilitation, mine operators should pay the full costs of the water needed.

## 3. What do you feel are the most important things Government can do as part of the planning, rehabilitation, and post-rehabilitation stages of the Latrobe Valley coal mines?

Provide clear and transparent communication about the risks and benefits of each option for rehabilitation to the community and stakeholders in the Latrobe Valley and across Gippsland.

Set transparent and enforceable consequences for when mining operators fail to meet the policies and principles.

Ensure decisions about any water supply agreements take appropriate account of climate projections and a likely much drier future in the Latrobe catchment. Given the significant volume of water sought by the mines, the state government should not merely hope that any water supply agreement (for example between Gippsland Water and a mine operator) is consistent with likely future water availability.

Require that the conditions of any water supply agreement to a mine for rehabilitation purposes be made publicly available. Other stakeholders with interests in the use of water in the Latrobe river system ought to know the conditions under which any mine operator will be able to access water. For example, what is the maximum annual amount, is there a minimum annual amount, what percentage of this annual amount will be allocated in any given year, how will annual allocations be treated as water availability diminishes.

Ensure free, prior and informed consent with Traditional Owners occurs before mine operator's rehabilitation plans are approved. This includes ensuring adequate time and resources are set aside to ensure proper consultation.

Make it clear before rehabilitation is completed who takes on the risks if/when current mine operators leave. For example, under what conditions will the land be able to be relinquished by the mine operators and returned to Crown land?

Ensure mine rehabilitation bonds are not returned to mine operators until the government is satisfied that the objectives of rehabilitation have been met and will remain met in perpetuity. Invest in research to identify best options for rehabilitation that do not involve pit lakes. Even if mine operators prefer pit lake options, an understanding of non-pit-lake options may be essential if water availability follows more pessimistic climate projections. Mine operators should be required to submit Environmental Effects Statements for their mine rehabilitation work plans, this should be mandatory - particularly if rehabilitation requires river diversions.

**4. What do you feel are the most important things the coal mine operators can do as part of the planning, rehabilitation, and post-rehabilitation stages of the Latrobe Valley coal mines?**

Ensure free, prior and informed consent with Traditional Owners occurs before mine operator's rehabilitation plans are approved. This includes ensuring adequate time and resources are set aside to ensure proper consultation.

Develop rehabilitation plans for their coal ash dumps, as well as the mines and power station decommissioning

Consult the community.

Mine operators need to bear the costs of fixing the damage that has occurred while they have profited, this includes access to water for the purposes of rehabilitation, especially given how contested water will increasingly become as a resource in a drying climate.

Ensure future use and amenity for the community

**5. What do you feel are the most important things community and stakeholders can contribute as part of the planning, rehabilitation, and post-rehabilitation stages of the Latrobe Valley coal mines?**

Visions for what the future looks like and how the land in and surrounding the mines can be repurposed

Community members and other stakeholders should be given an opportunity to comment on any rehabilitation plans that are submitted to the government for approval. As those who will live with the legacy of these coal mines, residents of the region must be given a major say in whether a particular plan for rehabilitation is acceptable, with mine operators required to amend their plans on the basis of this feedback.

**6. How would you like to be engaged in the rehabilitation process for the Latrobe Valley Brown Coal mines?**

Informed and engaged on issues to do with rehabilitation, particularly the use of water and impacts on the Latrobe River system, including the Gippsland Lakes.

**7. Overall, do the principles outlined in Section 4 of the LVRSS Overview meet your expectations (considering the important issues you identified above)?**

Agree.

**8. Are there any changes you would suggest to the proposed principles outlined in Section 4 of the LVRSS Overview? If so, please provide a short explanation as to why you have suggested these changes.**

Part One, principle 10 and part two, principle 8. Should include specific mention of the Ramsar listed Gippsland Lakes.

Provide a timeline of the technical reports becoming publically available  
Biophysical feasibility statements should be developed for other rehabilitation options, not just pit lake options.  
Rehabilitation of mines must include rehabilitation of the coal ash dumps

**9. Are there any specific elements of the LVRSS Overview that were not clear, or need further information to be provided in the LVRSS?**

If water is deemed to be the most feasible option and pit lakes take decades to fill, will mine operators be required to fully line the coal with clay to minimise fire risk?

When will issues around “water level fluctuations, spontaneous combustion, seismic risk, lake loading and ground surface rebound” be resolved?

Given the distance between the proposed pit lake, the Princes Highway and Morwell township how will a separation distance be achieved?

Given Hazelwood/Engie have made clear statements that they will be filling their mine with water in 2021, have they already satisfied the proposed criteria for a Declared Mine Rehabilitation Plan, or will they be required to submit a new plan that then goes through the appropriate assessment process?

If the timeline for the final mine rehabilitation strategy is delayed what impact will this have on Hazelwood’s timeline?

Consequences of companies not adhering to the principles and policies of the LVRSS

**10. Do you have any further comments on the LVRSS Overview?**

No response provided.

**Stakeholder group**

Other - Environment Victoria

**Postcode**

3053

**Age Group**

30-34

**Gender**

Female