Licence Applications

Are the proposed amendments to information requirements for licence applications likely to be effective? If not, what changes would you suggest and why?

15(1)(j), 16(h), 17(h). This should only apply if there is potential for a dispute or if the location is considered vague as per Section 24(2), but it is difficult to know if these are possibly the case from the applicants point of view prior to making the application. This would therefore require a survey at a later stage and so it needs to be removed as it is our view that the surveys should occur following the application for the license.

Work plans

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

Could we have a broad definition of "sensitive receptors"?

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)?

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

Yes

If not, what changes would you suggest and why?

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

Do the rehabilitation proposals meet the expectations of the community?

The idea of that the Community needs to be involved in rehabilitation is wrong. This should only involve the landowner/land manager, the Mines Dept administrator and the miner/explorer.

Advertising

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

Publishing advertisement can be a very tight time frame. It would be better to have 28 days prior to advertising (is this still the case?) and then 14 days to submit the advertisements

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

Newspapers are expensive, especially State wide ones. 22(1)(a)(ii)(B) is unnecessary & I would scrap both of them in favor of Mines Dept website where people can log in and find the information

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?
Yes
If not, what information should be collected and why?
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?
6 weeks
Should the reporting date for annual returns be changed to a date other than 30 June?
Yes
If yes, what date would be more appropriate?
The granting date is better, otherwise all the reports are due at the same time, creating a larger
burden.
burden.