



Committee Secretary  
Economics and Governance Committee  
Parliament House  
George Street  
Brisbane Qld 4000

**Sent via email: [egc@parliament.qld.gov](mailto:egc@parliament.qld.gov)**

Dear Committee Secretary,

**Submission to parliamentary committee inquiry into the Mineral and Energy Resources (Financial Provisioning) Bill 2018**

The Australian Marine Conservation Society (AMCS) is the leading charity devoted solely to caring for Australia's oceans and their wildlife. AMCS has over 260,000 member and supporters in Australia whom we represent and work with on key marine issues facing the nation. Our focus includes working to protect the Great Barrier Reef, establishing Marine Protected Areas, improving fisheries management and protecting and recovering threatened ocean wildlife. We also work to protect the coasts from inappropriate development and to tackle human induced climate change, mitigating its impacts on the marine environment.

AMCS appreciates the opportunity to have input into the committee inquiry into the Mineral and Energy Resources Bill. AMCS strongly supports the premise of the new bill. Currently, the State has 220,000 hectares of disturbed area, with an estimated rehabilitation cost of \$8.7 billion. The proposed Adani Carmichael Mine threatens to disturb 28,000ha of land and has been estimated to have a rehabilitation cost of \$1.5 to \$2 billion. Something needs to be done to protect Queensland's environment and Queenslanders taxpayer money.

The new Bill is a welcome start in reforming the FA framework to ensure it is effective. AMCS supports:

- **Upfront plan:** The requirement that proponents must plan up front how they intend to leave a site once they have finished mining it through a Progressive Rehabilitation and Closure Plan (PRC Plan). Opening this plan up for public comment prior to the mine being granted an environmental authority is a big step forward for mining assessment in Queensland.
- **Better milestones:** Requirements for proponents to set rehabilitation milestones, which may be more enforceable than current progressive rehabilitation conditions. These should have limits on how flexible these milestones are allowed to be, to ensure that they are truly enforceable.

- **Requirement that all proponents provide some form of FA.**

**While the Bill makes some significant progress AMCS suggests the amendments below to strengthen the Bill:**

- **Prohibit final voids being left by miners:** The Bill, as drafted, will still allow for holes ('voids') from mining a site to be left unfilled, rather than placing an obligation on miners to fill these voids in and rehabilitate all land as exists in other countries, such as the USA. Queensland should not be left with holes throughout the State, when the filling of these voids could be factored into the costs of the mine from the start? The companies that have profited from digging the holes and mining our resources must bear the cost of filling those holes and rehabilitating all of the land that was impacted.
- **Ensure that the risk assessment undertaken for companies, and the FA contribution and form required, are available for public scrutiny** - to ensure the process is transparent and accountable to the public, which will in turn increase the quality and community trust in the process.
- **Provide for extended standing for the public to seek reasons or judicial review of any decision around financial assurance or review of the transfer of an authority to a new entity.**
- **Introduce a residual risk payment.** The Queensland Treasury Corporation in their Review of Queensland's Financial Assurance Framework recommends that a payment and process be implemented to account for residual risks left from a closed resource site, to protect the state against the damage of mine sites that continue long after the mine has been closed. We suggest that this is supported by the Committee in its Report on the Bill.

Yours sincerely



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