

**From:** [REDACTED]  
**To:** [EGC](#)  
**Subject:** Please amend the bill urgently  
**Date:** Thursday, 8 March 2018 5:52:38 PM

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**I was horrified that governments have to clean up after private sectors mess. It is just more money unaccounted for by big business. At no time should they not be responsible for the damage they cause our environment.**

**EDO Qld recommends that the Bill is amended to:**

1. prohibit final voids being left by miners.(remove provisions allowing 'non-use management areas' as provided for in cl 104, new ss 126D(2) and 126C, and cl 99, amended s112, all amending the Environmental Protection Act 1994 (Qld);
2. not allow the cost of the rehabilitation and limit of impacts to the tenure site to be excuses to not rehabilitate;
3. ensure public scrutiny is available of the risk assessment undertaken for companies, and the FA contribution and form required - to ensure the process is transparent and accountable to the public, which will in turn increase the quality and community trust in the process (clause 201, amend s540); and
4. for transparency, 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 environmental authorities – given that the potential risk faced by the State from poor management of FA and transfer of authorities is a public interest matter (new section required).

**EDO Qld supports some good provisions in the Bill that:**

1. require resource proponents to explicitly 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) (cl115, amend s160). This plan must be opened for public consultation prior to the mine being granted an environmental authority which would be is a big step forward for mining assessment in Queensland;
2. require proponents to set rehabilitation milestones which may be more enforceable than current progressive rehabilitation conditions (cl 104, new s126D(1)(b)). However, we note that there should be limits on how flexible these milestones are allowed to be, to ensure that they are truly enforceable. Current conditions around progressive rehabilitation have been very difficult to enforce to ensure they are met. For this reason, providing a financial incentive through an adequate FA in form and amount, to encourage progressive rehabilitation, is highly beneficial in addition to these milestones; and
3. requires all proponents to provide some form of FA (cl 173, new s297);

**Residual risk payment is a further essential element of FA and rehabilitation reforms**

The QTC Report 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. It is essential that the Queensland Government accounts for this risk by introducing an upfront payment from the commencement of the mine. This will help to ensure that all impacts of a project are considered, valued and accounted for when the proponent is applying for and the government is assessing a project. Unfortunately this was not included in the Bill as it is still being considered by the State Government. EDO Qld is advocating that this initiative is introduced as part of this reform package.

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