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Submission to:

Financial Assurance Review
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This submission alerts the Financial Assurance Review of NRM Regions Queensland, and its 14 member Regional Groups', capabilities and preparedness to provide the independent monitoring of mine site rehabilitation in Queensland in accordance with the principles outlined in the *Better Mine Rehabilitation for Queensland* discussion paper.

Introduction

NRM Regions Queensland (*formerly Queensland Regional NRM Groups Collective*) is comprised of the 14 natural resource management regions covering the entire state of Queensland (*see map on page 6*).

Each NRM region works with government, community and industry to sustainably manage Queensland's natural resources. NRM Regions Queensland (NRMRQ) supports a "triple bottom line" approach to development activities which are undertaken in Queensland. However, it believes the appropriate balance of activities, which deliver on economic, social and environmental wellbeing, must be carefully considered so that no one component is severely compromised by the progression of another.

Development and implementation of an effective mine rehabilitation regime is one mechanism that safe guards against the drive for economic development happening at the expense of environmental and, in some cases, social wellbeing. NRMRQ welcomes the introduction of better measures to ensure a stable environment is left behind for future generations once a mining right ceases.

In order to achieve this the 'life of mine plan' must take into consideration the collection of viable baseline and impact data and the relevant data sets which are defensible and statistically accurate over a long period of time.

NRMRQ's response to the "Better Mine Rehabilitation for Queensland" discussion paper is limited to those areas where we feel we have adequate knowledge and experience to contribute informed opinion.

Our Interest

NRMRQ shares the concerns expressed in the discussion paper, in particular “low rates of rehabilitation are concerning because:

- There is more disturbed land at risk of becoming a financial liability for the State.
- Environmental values are at greater risk due to emissions of contaminants from site-specific disturbed land as well as from cumulative impacts on a regional scale.
- Failure to convert to alternative economic uses affects post mining employment and economic opportunities for regional communities.
- Failure to deliver on rehabilitation by mining companies erodes community trust and builds resistance to further industry development.
- There is increased likelihood of costs transferring to the State from mines that claim tenure or are abandoned.”ⁱ

NRMRQ also notes that the Queensland Government is committed to a package of comprehensive reforms which include:

- “A redesigned financial assurance framework tailored to operators based on their size and level of risk.
- Pooling financial assurance from mining companies into an interest-earning multi-million-dollar rehabilitation fund.
- More options, such as insurance bonds, to make it easier for miners to provide their financial assurances.
- More funds to rehabilitate abandoned mines.
- Measures to ensure mined land is rehabilitated progressively rather than toward the end of a mine’s life.
- Regular checks and reporting on progressive rehabilitation.
- Better planning for rehabilitation and regular monitoring and reporting.
- More realistic calculation of rehab costs and a phase out of discounts on financial assurances for miners.”ⁱⁱ

NRMRQ supports the proposed policy statement contained in the Discussion Paperⁱⁱⁱ but in particular:

“These areas (rehabilitated sites) must be managed to be safe, stable and non-polluting and the mining companies must make provision for the on-going management of these areas as part of the residual risk payment to government on surrender of the lease. Such areas may include final voids and tailings and waste rock storages, and the need must be demonstrated on a case by case basis.

For new mines, the community will be consulted on the life-of-mine plan in the environmental authority application process. Existing mines will also transition to have a life-of-mine plan, prepared with a consultative process. Any significant amendment to the life-of-mine plan will also be the subject of public consultation.

Information on the progress towards the post mining land use and the monitoring of the success of rehabilitation activities will be communicated to the public throughout the life of the mine.”

NRMRQ has particularly strong interest in the rehabilitation process and ongoing monitoring of rehabilitated areas. There are too many examples where poorly rehabilitated areas have resulted in contamination of surrounding land and water. For this reason, NRMRQ supports the recommendation that there needs to be improved assessment and reporting of rehabilitation performance through more regular monitoring.

Our Skills

Queensland Regional Natural Resource Management (NRM) bodies are trusted, independent, community based organisations who have been working with land managers to improve land management techniques and achieve good environmental outcomes for nearly 20 years. In particular, NRM Bodies bring a range of financial, environmental monitoring and assessment, and social engagement skills to ensure that waterways, groundwater, wetlands and landscapes in general aren't affected by nutrient and other chemical contamination.

These bodies have built an unrivalled bank of knowledge and on-the-ground and desktop experience that can be drawn upon and applied to mine rehabilitation work, in particular:

- monitoring,
- data interpretation and impact assessment, and
- reporting of rehabilitation performance.

We understand that the success of this policy is underpinned by the quality of the monitoring data that is collected and the interpretation of the monitoring data in context of the site-specific environment. This is determined by a myriad of factors including: monitoring design, monitoring hardware and software, duration of monitoring program and keen understanding of site-specific factors (such as naturally elevated levels of heavy metals). Sufficient quality data needs to be collected to undertake defensible statistical analysis, which in turn will allow for the unambiguous assessment of the rehabilitation performance. Queensland Regional NRM Bodies have proven skills in all the steps required to undertake this work.

Queensland regional NRM bodies are committed to and utilise best practice and often internationally recognised scientific analytical tools in areas such as water monitoring, soil health, biodiversity and revegetation. This means we are innovative in both our techniques and solutions when it comes to assessment and management actions.

NRM bodies are trusted by government, industry and the community to deliver robust, accessible and independent reporting on landscape and catchment wide environmental indicators such as Healthy Land & Water's annual Waterways Report Card (<http://hlw.org.au/report-card>). Many of the 14 regional groups are already engaged by governments to work with industry to provide 'best practice' training and auditing of post-course implementation (i.e. Grazing BMP, Hort. 360, Cane BMP). In addition, NRM regions implement, monitor, assess and adapt the success and benefits of many natural asset rehabilitation projects.

NRM regional bodies also have recognised skills in carbon farming initiatives and accounting that would be of interest to mine owners required to undertake extensive revegetation activities.

Our Presence

Given the understandably elevated level of community interest in effective mine rehabilitation, we believe it is essential that the community has ease of access to those responsible for monitoring compliance.

NRM regional bodies have an unrivalled, existing presence across the entire state and therefore effective access to often remote areas where many Queensland mines are located. NRM regional bodies are committed to long-term community engagement and already have an on-the-ground presence in each region ensuring they are visible and accessible to communities and understand the challenges brought about by operating in often remote and very diverse landscapes.

An added strength to the presence of NRM regional bodies in communities is that the regional bodies also cooperate and collaborate at a state level through the vehicle of NRM Regions Queensland (NRMRQ). This collaboration extends to the national level.

NRMQR provides a single point of contact for government and industry to engage across multiple regions to deliver targeted and cost-effective solutions and to exchange information, knowledge and experience leading to continuous improvement in the services on offer.

NRM regional bodies are overseen by independent boards ensuring that appropriately high levels of governance, transparency and reporting are applied. At our core, we work in the public interest and are therefore well placed to play an independent audit role as recommended by the papers authors.

NRM regional bodies have proven to be resilient organisations having a presence across Queensland for nearly 20 years. Resilience and confidence in a secure and long-term future ensures that consistent monitoring of life-of-mine plans can be achieved from the time that initial permits are granted to the closure of the mine and on-going rehabilitation and monitoring activities.

Recent research into the success of regional delivery models in contributing to, and achieving, long-term sustainability outcomes (environmental, economic and social) stems from having resilient intuitions and capacity building through a stable presence in the region and strategic and integrated regional planning, connectivity and collectively endorsed approaches.

Our Partners

Regional NRM bodies are skilled at forming strategic partnerships with universities and other research institutions to ensure that our monitoring activities remain cutting edge and can respond to new challenges offered up by governments and industry.

For example, the Expert Scientific Advisory Committee of Healthy Land and Water comprises senior and internationally recognised scientists and experts in freshwater, estuarine and marine science, ecology and research, along with scientists in social and economic fields, biodiversity, natural resource management and climate science. Complemented by an expert panel of over 150 scientists from multiple disciplines, Healthy Land and Water, along with many other NRM Bodies, have access to a broad range of experts to support, guide and provide peer review to ensure best practice assessment and solutions.

Many regional NRM bodies have developed close strategic relationships with local government, water utilities, government-owned corporations and industry groups and work closely with them to meet a range of environmental objectives. In addition, all NRM bodies have very close links, and deliver in partnership, with multiple state government departments.

Our Independence

It is vital that government and the community can be confident that the monitors and assessors are truly independent and their reporting of rehabilitation activities accurate, robust and evidence based.

Regional NRM groups pride themselves on their independence and therefore the respect and confidence expressed by government, industry and the community on tasks performed over an unrivalled period of time. We are fiercely protective of our hard-earned reputations and view this as an invaluable asset in how we outwardly engage.

Due to existing funding sources from both federal and state agencies, Regional NRM groups already are required to undergo regular auditing of expenditure and activities to ensure taxpayers are receiving value for money and the services for which the bodies have been contracted to deliver.

By building on these current audits, government and communities can be assured that quality mine rehabilitation monitoring will be delivered over the short, medium and long terms.

Our Commitment

Queensland's regional NRM bodies commends the government on addressing an issue of such importance to our economy, society and environment.

By further, deep engagement with government, we believe the State's 14 regional NRM groups are up to the challenge of providing Queensland with the robust, transparent and comprehensive monitoring service envisaged in the *Better Mine Rehabilitation for Queensland* discussion paper.

NRM Regions Queensland's mission is:

“To provide a cohesive and co-operative forum to collaborate, support advocate for and add value to Regional Groups to affect positive natural resource condition of change.”

Our commitment is to deliver on this mission and in doing so deliver the outcomes sought by the Queensland Government. We would therefore welcome the opportunity to further engage on this worthy and vitally important endeavour.



STEPHEN ROBERTSON
Chair



ANDREW DRYSDALE
CEO

ⁱ Better Mine Rehabilitation for Queensland – Discussion Paper p.5

ⁱⁱ Joint Media Release “Mine ‘Bond’ & Rehab Reforms Protect Environment, Jobs” 7 May 2017.

ⁱⁱⁱ Better Mine Rehabilitation for Queensland – Discussion Paper p.6

Map of Queensland's Regional Body Regions.

