

17 January 2014

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The Research Director
State Development, Infrastructure and Industry Committee
Parliament House
George Street
BRISBANE QLD 4000

Attention: Ms Erin Pasley
Via email: sdiic@parliament.qld.gov.au

Dear Ms Pasley

SUBMISSION ON THE REGIONAL PLANNING INTERESTS BILL 2013

Thank you for the opportunity to provide a submission on the Regional Planning Interests Bill 2013 (the Bill). Bandanna Energy strongly supports the Deputy Premier's efforts to refocus Queensland's system of regional planning for economic growth. We acknowledge and respect the agricultural industry and value its critical importance as one of the four pillars of the Queensland economy.

Bandanna Energy Limited (ASX: BND) is a Queensland company and is uniquely positioned to become Australia's next coal producer (further information about Bandanna Energy can be found at www.bandannaenergy.com.au).

Bandanna Energy's Springsure Creek Project is an example of how the mining and agricultural industries can coexist by meeting landholder, mining company and government objectives and including co-investment to deliver enduring regional benefits. In essence, we are achieving the Bill's aim *"to manage the impact of resource activities and other regulated activities on areas of the State that contribute, or are likely to contribute, to Queensland's economic, social and environmental prosperity."*

The Springsure Creek Project, first commenced in earnest in 2008, is also an example of how to meet Regional Policy 2 in the Central Queensland Regional Plan to *"Maximise opportunities for coexistence of resource and agricultural land uses within Priority Agricultural Areas."* In doing so, we will ensure that that agricultural production on the surface of our underground mine at least maintains, if not improves in productivity, generates much needed revenue, while providing 585 direct full-time positions and 1,120 positions during the mine's operation for locals and Central Queenslanders more widely.

The Springsure Creek Coal Project (an underground longwall mine and associated infrastructure, located 47km south east of Emerald) is being developed and assessed within existing legislation, regulations, guidelines, policies and plans. To meet, and in some cases exceed these requirements, we have developed the Springsure Creek Agricultural Project to ensure agricultural considerations are a key component of the Project as a whole. Importantly, in recognition of the Government's policy initiatives regarding regional planning and coexistence, Bandanna Energy has gone beyond the existing regulatory requirements to ensure the Project establishes a new benchmark for interaction

between two critical pillars of the State's economy. The Springsure Creek Coal Project and the Springsure Creek Agricultural Project are being undertaken as part of the broader Springsure Creek Project. Further information on the Springsure Creek Project can be found at www.springsurecreekproject.com.au.

We are continuing to design the Springsure Creek Project (and any future Bandanna Energy projects) to meet the Government's 2040 vision to double agricultural production and to generate an economically strong, competitive and agile resource industry over the next 30 years. Indeed, we willingly amended the design and structure of our proposed project to accommodate the directions of the LNP Policy documents and now Government and public comments as the Bill has been developed. That said, while we have anticipated the intent of the process, we would be concerned if the, as yet to be released, regulations under the Bill imposed additional costs and delays to approvals at this late stage of the Project's development path.

The cost of unnecessary delays due to inadequate transition provisions for a well advanced project that tried to anticipate the policy outcome will go far beyond the impacts on our investors and the local jobs our project will create. It has significant ramifications for the timeliness and viability of important downstream infrastructure such as the Wiggins Island Coal Export Terminal (WICET), of which Bandanna Energy is the second largest shareholder and to which we have already made a significant investment commitment.

Under the Central Queensland Regional Plan, the Springsure Creek Coal Project is on and under land being used for a Priority Agricultural Land Use (PALU) within a Priority Agricultural Area (PAA). In preparation for this, we have designed the Project to enable coexistence with agriculture (i.e. for mining and agriculture to operate concurrently).

It is on this premise that Bandanna Energy has developed its Coexistence Policy (attached).

Bandanna Energy's definition of coexistence is:

"Working together with the agricultural community to ensure agriculture and mining can occur concurrently in an economically sustainable manner."

Bandanna Energy has engaged with, and will continue to engage with, landholders who already influence our on-farm conduct, and to protect their interests so as to provide certainty over the ability to invest and grow both our businesses securely.

The Springsure Creek Project is an example of how Bandanna Energy will demonstrate coexistence at a property and local and regional community scale during construction, operation, closure and beyond. Actions being undertaken in this regard include:

- Current negotiations of agreements with directly impacted landholders under the *Mineral Resources Act 1989*. Agreements will include either, or a combination of:
 - Additional or upgraded capital to assist with increasing efficiency and productivity in a sustainable manner;
 - 'Put or call' option during the life of the mine;
 - 'Make good' provisions (e.g. repairing structures impacted by subsidence, short term loss of ground water);
 - Land swap or grant; and
 - Financial payments.

- Mine and infrastructure design that takes into consideration the current and future business needs of properties impacted by the Project. In particular, the involvement of landholders in the development of Subsidence Management Plans;
- Negotiations with the Department of Natural Resources and Mines (DNRM) and the Department of Environment and Heritage Protection (EHP) to condition the Project to meet or exceed productivity¹ (through either conditions on the Environmental Authority (EA) or Mining Lease (ML));
- A commitment to consulting with local communities on the development of relevant management plans, e.g. Road Use Management Plan;
- Development of a Local Content Strategy in accordance with Queensland Resources Council (QRC) Guidelines;
- Working with Central Highlands Regional Council to support planning and development initiatives in communities impacted by the project (e.g. upgrade of road infrastructure and the Springsure Community Plan);
- A multi-million dollar road upgrade program, including localised widening of Glenorina Road, an upgrade of Milroy Downs Road and paving of the gravel sections of the 7-kilometre long Wyntoon Road and Kilmore Access Road;
- Supporting the sustainable growth of the agricultural industry by sharing information and data (e.g. groundwater, funding local training and employment in the agricultural industry and funding for local agricultural events; and
- Implementation of a Coexistence Research Program developed as part of the Springsure Creek Agricultural Project. The purpose of the research program is to identify ways underground longwall mining and agriculture can coexist. Bandanna Energy has committed \$3.6 million over five years to the Research Program, including the establishment of the Springsure Creek Agricultural Coexistence Research Committee (ACRC). The ACRC is guiding the Coexistence Research Program through:
 - Setting the research framework, questions and program;
 - Developing criteria for and selecting research providers;
 - Receiving updates (milestone reports/results) from the researchers;
 - Providing guidance on any research issues;
 - Timing of research; and
 - Disseminating research findings to relevant stakeholders.

The following are independent members of the ACRC who are leading farm consultants, soil and socio-economic scientists from private practice and universities:

- David Hamilton, Hamilton Agriculture and current Chair;
- Professor Steven Raine, University of Southern Queensland;
- Professor Helen Ross and Associate Professor Jim Cavaye, University of Queensland;
- David Freebairn, RPS Australia East; and
- Professor Robert Darmody, University of Illinois at Urbana-Champaign.

¹ Agricultural production conditions need to take into consideration land ownership. Consideration needs to be made for where the landholder is not the mining tenement holder and the landholder maintains resource company their right to change the in land use over time.

Bandanna Energy invited members of the ACRC and landholders who will be directly impacted by subsidence to travel to the Illinois Basin in the United States of America to meet with regulators, landholders and mining companies who manage subsidence. This trip occurred in July 2013.

Further information about the ACRC (including the Coexistence Research Plan, report on the trip to the Illinois Basin and an update on research projects) can be found on their website, www.springsurecreekacrc.com.au.

In February 2013, Bandanna Energy embarked on a comprehensive consultation process on the draft Environmental Impact Statement (EIS). Bandanna Energy actively encouraged stakeholders to provide submissions on the draft EIS, including holding public information sessions and follow up meetings to explain the Project and clearly identify issues to be included in submissions from government regulators, landholders and the community. EHP received 49 submissions and each submission was individually addressed explaining how the final EIS had been updated in response to concerns or issues raised in the specific submission. One of the positive outcomes of this process was the opportunity to expand our groundwater monitoring program.

We currently maintain a project specific website (www.springsurecreekproject.com.au), which is regularly updated with project milestones, a toll free 1800 number and enquiry email address where stakeholders can call or email to ask questions. Registered stakeholders, potential employees and potential suppliers receive regular project updates via direct e-mail. Bandanna Energy staff regularly meet with stakeholders providing project updates and gaining feedback on project development.

The Springsure Creek Coal Project is one of the few coal projects in Australia that is continuing to progress despite the weak operating environment for the resources sector, and is scheduled to start operation in mid-2015 (subject to approvals from the Queensland and Commonwealth Government). The Project is able to deliver the following economic benefits to the State while coexisting with agriculture:

- Contribution of \$997.8 million to Queensland's economy over its expected 40 year life, with the Queensland Government forecast to receive approximately \$3.4 billion in additional tax payments over the life of the project, the majority of which will be in royalties from Springsure Creek Coal;
- On an average annual basis, provision of an approximately \$81.8 million per annum additional revenue to the Queensland Government and \$172.8 million per annum additional revenue to the Australian Government;
- Creation of 1,022 full-time jobs in Queensland during construction of the first stage of the project between 2014 and 2015, and a further 2,104 jobs indirectly. This includes 380 direct full-time positions and 560 flow-on jobs in the Central Highlands, Rockhampton and Gladstone regional council areas surrounding the proposed underground mine;
- Contribution of approximately \$199 million to the economy, and directly support of a further 406 full-time equivalent positions and 984 indirect positions during the second stage of construction; and
- When both stages of the project are operational, production of 11 million tonnes per annum (Mtpa) of coal and support for 585 direct full-time positions in the Central Highlands, Rockhampton and Gladstone regional council areas, and a further 1,120 flow-on jobs.

Bandanna Energy has invested in excess of \$160 million (including exploration, environmental assessment, land acquisition, project feasibility and development and Bandanna's substantial investment in the development of the Wiggins Island Coal Terminal) since 2008 and at this point in time, the Project is close to finalising the approvals process with the Queensland and Commonwealth Governments. Bandanna Energy is currently negotiating with EHP to develop a voluntary condition requiring agricultural productivity to be maintained or improved. Once this is finalised:

- The Strategic Cropping Land (SCL) Protection Decision is expected from DNRM in late January 2014;
- Upon receipt of the SCL Protection Decision, the draft Environmental Approval will be finalised and the draft Environmental Authority for MLA70486 (mine site) will be on public notice;
- The Environmental Authority for MLAs 70502 (infrastructure corridor) and 70501 (train load out facility) is expected to be on public notice soon after.

In summary, the Springsure Creek Project can and should be a benchmark for assessing the effectiveness of the Priority Agricultural Area coexistence criteria as part of the Regional Planning process. Bandanna Energy has proactively amended the design and structure of the proposed Project and made significant investments over time to accommodate Government changes in legislation, policies, guidelines and plan and based on feedback from key stakeholders such as directly impacted landholders and Central Highlands Regional Council. It would be disappointing for the Project to be delayed at this stage as an unintended consequence of the Regional Planning Interests Bill commencement.

Attached is our detailed submission on the Regional Planning Interest Bill 2013.

Thank you again for the opportunity to comment on the Regional Planning Interests Bill. If you require any further information in regard to this correspondence, please contact Rachel Gibson, Manager Community and Coexistence on (07) 3041 4400 or alternatively via email at rachelgibson@bandannaenergy.com.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Michael Gray", is written over the typed name and title.

Michael Gray
Managing Director

Enc.

Coexistence Policy¹

Vision

The complementary conduct of mining and agricultural activities in a mutually beneficial and sustainable framework.

Objectives

To mine natural resources in a way that provides an economic return for shareholders while maintaining and improving agricultural productivity on operating farming properties that are directly impacted by our mining projects.

How we define coexistence

Coexistence is defined as:

Working together with the agricultural community to ensure agriculture and mining can occur concurrently in an economically sustainable manner.

Commitments

We are committed to:

- establishing and funding mine projects including the development of project specific agricultural plans (e.g. the Springsure Creek Agricultural Plan);
- involving landholders and other land use stakeholders in the development and implementation of the project specific agricultural plans, with consideration given to the definition of productivity, the scope of productivity targets and productivity base lines with a view to no net loss of agricultural productivity;
- complying with the regulatory operating conditions as they relate to productivity.

Responsibilities

We will ensure that we are accountable for meeting the Company's commitments by:

- communication of the policy to all our employees, contractors, suppliers, and local community;
- the management of employees and contractors with responsibility for the implementation of the policy;
- encouraging amongst our employees, local communities, contractors, suppliers, investors, business partners and other interested third parties a culture that reflects the intent and meets the objectives of this policy;

¹ Version 1 dated 13 August 2013

- demonstrating active stewardship of the land, freshwater systems and biodiversity with which we interact, with a recognition of the role of coexistence in the Company's environmental policy and the execution of environmental commitments; and
- respecting people's relationships, investment and history with the land upon which mining and agricultural activities are undertaken.

Application

This policy applies to mine development and operational activities of Bandanna Energy Limited and its subsidiaries (**the Company**) where authority, delegated or otherwise, to make decisions in relation to mine development and operations is ultimately the authority of the Board of the Company and the activities are managed by the Company.

The policy does not apply to activities and assets in which the Company has an ownership or other commercial interest but which are not subject to the authority of the Board or managed by the Company (**Independent Projects**). Where appropriate, a copy of the policy will be made available to the management team of an Independent Project, with the Company's request that the policy be considered for adoption by the Independent Project having regard to the objectives of the policy.

Submission on the Regional Planning Interests Bill 2013

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Bandanna Energy's submission is based on four key areas:

- Clarification of transitional arrangements;
- Increased complexity of the approvals framework;
- Clarification of regulatory details; and
- Timeframes.

Bandanna Energy has interests in a number of coal exploration tenements directly impacted by the Bill. Most significantly and immediately impacted of Bandanna's coal interests are Mining Lease Application (MLA) 70486 (wholly within EPC 891), MLA 70501 and MLA 70502, which make up the Springsure Creek Coal Project. The applicant is Springsure Creek Coal Pty Ltd, a wholly owned subsidiary of Bandanna Energy Limited. It is within this context and by reference to the Springsure Creek Coal Project that we have provided our response to the Bill.

Our main concern with the Bill in its current form is the limited transitional arrangements for a decision under the SCL Act, specifically Section 92(2). The Bill currently states:

"The applicant for the decision is taken to have been issued a regional interests authority (the transitional authority) for the resource activity in the strategic cropping area."

As it currently reads, this means that Bandanna Energy's application for a decision under the SCL Act MLA70486 and MLA70502 and decisions (if successful) would no longer apply because the MLAs are over a Priority Agricultural Area (PAA) (under the Central Queensland Regional Plan) not a Strategic Cropping Area (SCA).

It is recommended that the wording of Section 92 is changed to the following:

"The applicant for the decision is taken to have been issued a regional interests authority (the transitional authority) for the resource activity in the area of regional interest."

Linked to this is, only those Compliance Certificates and Protection Decisions that are made before the commencement of the Bill will transition into Regional Interest Authorities, rather than those applications for decisions that have been submitted.

It is recommended that the Bill recognise the applications for decisions under the SCL Act that have been lodged (rather than decisions made), and for those applications to be assessed under the Strategic Cropping Land Act 2011 rather than the Regional Planning Interests Bill.

If these changes were made, it would mean that Bandanna Energy’s applications for decisions under the SCL Act could be assessed under the SCL Act, rather than delayed and assessed under a different process under the Regional Planning Interests Bill.

If these changes were not made, it would present significant timeframe delays and costs to the Project. This would create an increased level of uncertainty for landholders, infrastructure suppliers, project funders and potential joint venture partners. Such a result would not achieve any additional level of environmental scrutiny as Bandanna Energy has of its own initiative already committed to the highest possible regulatory standard - to achieve increased productivity from agricultural land post mining. As such, there appears to be limited justification for the introduction of additional regulatory delay to an assessment process which commenced in late 2010.

There would also be significant ramifications for the timeliness and viability of important downstream infrastructure such as the Wiggins Island Coal Export Terminal (WICET), of which Bandanna Energy is the second largest shareholder and to which we have already made a significant investment commitment.

Reference	Comment
Clarification of transitional arrangements	
<p>Gap in the SCL transitional arrangements (section 92(2)) and different approvals for different geographical parts of the Project</p>	<p>MLA70486 (mine) and MLA70502 (infrastructure corridor) both have land that is identified to be SCL and other land that is not. Under the current approvals process, Springsure Creek Coal must apply for an SCL Protection Decision in order to obtain the grant of those mining leases.</p> <p>Springsure Creek Coal has submitted applications for Protection Decisions and these decisions are expected in late January 2014 (MLA70486) and late February 2014 (MLA70502).</p> <p>However, the MLAs are in PAAs under the Central Queensland Regional Plan.</p> <p>If Springsure Creek Coal is granted a decision under the SCL Act, s92 of the Bill could provide the relevant transitional arrangement.</p> <p>However, the transitional arrangement only applies to “the resource activity in the strategic cropping area”. It is assumed that this is an oversight and was not intended and this could be addressed by changing the wording of s92(2) to:</p> <p style="padding-left: 40px;">“the applicant for the decision is taken to have been issued a regional interests authority (the transitional authority) for the resource activity in the area of regional interest.”</p>

Reference	Comment
	<p>It is also unclear if a RIA will be required for those areas within the MLAs for the Springsure Creek Project that are not covered by the transitional arrangement for the SCL. If an RIA is required, then an additional approval will still be required. If the duplication of process was intended, Bandanna Energy submits that such an outcome is not consistent with the Queensland Government’s commitment to cut red tape for Queensland’s businesses.</p> <p>It is not only the Springsure Creek Project that will be impacted by this, but also all other projects that have a ML or MLA that has a SCL Protection Decision but does not have an approved Plan of Operations and overlap an area of regional interest.</p>
<p>SCL Transitional Arrangements – lodgement of application rather than decision</p>	<p>Bandanna Energy submits that the transitional arrangements should provide for a project to be assessed under the existing regime (the SCL Act), where an application for a decision under the SCL Act has been submitted; rather than only once a decision is made. Such a process is consistent with the transitional arrangements for the Sustainable Planning Act (s 317 and 495). This will avoid the government, partially arising from the fact that there are no statutory timeframes under the SCL Act, to delay or finalise decisions so they can be either avoid or be incorporated into the Regional Planning Interests framework.</p>
<p>Increased complexity of the approvals framework</p>	
<p>An additional layer of regulation</p>	<p>If Springsure Creek Coal is required to gain a Regional Interests Authority, (and based on the current provisions of the Bill, it will) as well as other existing regulatory approvals, it will result in significant (unknown) time delays and further increased project uncertainty for landholders and potential joint venture partners.</p> <p>Whilst Bandanna Energy supports the objectives of the Bill (see covering letter), it does not agree the Bill provides the best avenue for achieving those objectives. The Explanatory Notes to the Bill identify that three alternative ways of achieving the policy objectives and Bandanna Energy submits that the first alternative, namely “amending the resources Acts to include an assessment process through which regional interests can be considered as part of the granting of tenure” is the most appropriate avenue, particularly given the current <i>Modernising Queensland Resource Acts Program</i> currently being undertaken by the government.</p>

Reference	Comment
<p>Gaining approval from the Queensland Government</p>	<p>Bandanna Energy is regularly attempting to allay ongoing concerns from potential joint venture partners about the uncertainty around the regulatory approval framework for the Project, as well as the potential for another approval requirement.</p> <p>The costs incurred to gain environmental approvals, linked with increased timeframes due to increased requirements and complexity, are included in the cost projects when seeking a joint venture partner(s). The recent regular amendments to the approvals framework is making the cost of 'doing business' higher in Queensland than other States or Territories in Australia and in regions overseas.</p> <p>It is Bandanna Energy's submission that the RIA process should be included in the Resources Act (see section "An additional layer of regulation") to minimise the potential for additional costs in the approvals process.</p>
<p>Maintaining approvals</p>	<p>The imposition of, under s17(1) and (2), the requirement for a resource holder to seek a RIA when applying for an amendment to, a renewal of or re-grant of existing resource authority or an application for an application for a major amendment to an EA puts an increased burden on the resource holder (time and cost). It also creates uncertainty because, as the processes are not linked, the question is raised, what if the RIA is not granted when the resource authority or EA applications are approved and the project is an operating mine?</p> <p>It is submitted that the RIA is granted in parallel with the EA and resource authority as it is a land use planning decision and that approval continues to be valid until the resources authority expires or is cancelled. The RIA should be commensurate with decisions made at a similar scale rather than at a more detailed level, e.g. per longwall panel and property which are more aligned to the Plan of Operations.</p> <p>In addition, certainty regarding the timeframe for the RIA process is required to enable appropriate project planning. As such, it is Bandanna Energy's submission that the RIA approvals process should include mandatory timeframes for both the applicant and the chief executive and, if those timeframes are not complied with, deeming provisions, similar to the Sustainable Planning Act, that either deem that the application has been accepted or refused.</p>

Reference	Comment
Uncertainty of regulatory details	
<p>Assessment processes and conditioning associated with a Regional Interest Authority (RIA)</p>	<p>The Bill creates a third separate approvals stream for the MLAs which is not aligned with the MLA or Environmental Authority (EA) approvals process.</p> <p>Section 18(1) prohibits Bandanna Energy from carrying out a resource activity in an area of Section 30 of the Bill and states that an assessment application must be:</p> <ul style="list-style-type: none"> (a) Made to the chief executive in the approved form; (b) Accompanied by a report: <ul style="list-style-type: none"> (i) assessing the resource activity or regulated activity’s impact on the area of regional interest; and (ii) identifying any constraints on the configuration or operation of the activity; and (c) Accompanied by the fee prescribed under a regulation. <p>The Bill does not align with the approvals process for obtaining the relevant resource authority with the potential result that Springsure Creek Coal will face significant delays to the commencement of the project despite having obtained the grant of the MLAs and associated EAs.</p> <p>Bandanna Energy has spent over \$2m and 2 years developing the Environmental Impact Statement (EIS) for the Springsure Creek Coal Project, with extra time (over one year) and costs (\$1m) for the public notification process, supplementary EIS and Environmental Management Plan, just for MLA 70486.</p> <p>If Bandanna Energy’s submission that the process should be included in the Resources Acts (see section entitled “An additional layer of regulation”) is not accepted, Bandanna Energy alternatively submits that if a terms of reference for the report is required under s30(b) of the Bill, the terms of reference should align with the EIS terms of reference to reduce time and costs associated with project approval.</p> <p>Furthermore, the Bill does not identify how <i>Regional Interest Conditions</i> attached to an RIA approval will interact with conditioning on an EA or ML. Bandanna Energy submits that conditioning a project on different authorities issued by separate government departments will work best if there is a clear delineation between departmental responsibilities and objectives. It is Bandanna Energy’s experience that the conditioning of the Springsure Creek Coal Project under both the SCL Act and EP Act simultaneously has been challenging because of uncertainty in the extent of Departmental jurisdictions.</p>

Reference	Comment
<p>Another opportunity for public notification</p>	<p>Bandanna Energy welcomes the opportunity for the public to provide comments, submissions and raise issues. However there is a concern that without the relevant information or education, stakeholders may get lost in the different approval processes requiring public comment and will suffer from ‘consultation fatigue’.</p> <p>The public notification of the environmental impact assessment process under the <i>Environmental Protection Act 1994</i> and the public notification of the Environmental Authority and Mining Lease under the <i>Mineral Resources Act 1989</i> already provide opportunities for comments, submissions and objections. Division 4 provides another opportunity for public submissions under the Regional Planning Interests Bill, which in Bandanna Energy’s submission, is unnecessary.</p> <p>This process adds another layer of complexity to the approvals process and it is submitted that, if Bandanna Energy’s submission that the process should be included into the Resources Acts (see section entitled “An additional layer of regulation) is not accepted, there is information provided to all stakeholders as to the subject matter of each and how they participate in the processes under each of the pieces of legislation (EP Act, <i>Environmental Protection (Greentape Reduction) and Other Legislation Amendment Act 2012</i>, MR Act and RPI Bill)).</p>
<p>Identification of coexistence criteria</p>	<p>The identification of coexistence criteria is an attachment to the Central Queensland Regional Plan, however it is a critical piece of information in order to assess if a project should embark on developing an EPC within PAA in the Central Queensland Regional Plan area.</p> <p>We welcome the opportunity to participate in or provide further feedback on the criteria. Our feedback will be based on our experience of:</p> <ul style="list-style-type: none"> • Designing a project within a SCL protection area and developing management strategies to protect and maintain SCL; • Guidance from the ACRC on coexistence; • Undertaking an environmental approval process under the previous legislative framework and the recent Environmental Protection (Greentape Reduction) and Other Legislation Amendment Act 2012; • Addressing legacy issues and building working relationships with project stakeholders.

Reference	Comment
Timeframes	
Lack of statutory timeframes	Without clear statutory timeframes to identify when the decisions will be made, there is increased uncertainty of the process for resource applicants and holders, and landholders alike due to unknown delays.