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Committee Secretary
State Development, Natural Resources and Agricultural Industry Development Committee
Parliament House
George Street
Brisbane QLD 4000
Email: sdnraidc@parliament.qld.gov.au
Date: 19 March 2019

Re: Submission to the Natural Resources and Other Legislation Amendment Bill 2019

Dear Committee Secretary,

WWF welcomes the opportunity to provide the following comments and recommendations regarding the Natural Resources and Other Legislation Amendment (NRaOLA) Bill 2019, which was referred to the State Development, Natural Resources and Agricultural Industry Development Committee (the Committee) on 26 February 2019.

As they are our primary areas of interest, our comments and recommendations below are limited to the proposed amendments in the NRaOLA Bill to the *Water Act 2000* and the *Mineral and Energy Resources (Financial Provisioning) Act 2018*.

Proposed amendments to the *Water Act 2000*

As they will greatly increase its effectiveness and operational efficiency, WWF supports and endorses the proposed amendments to the *Water Act 2000* (the Act) under part 3 of the NRaOLA Bill – particularly the amendments that strengthen the Acts compliance and enforcement provisions, facilitate balanced gender representation on the boards of water authorities and clarify the application of several of its existing provisions.

Recommendation

The Committee should endorse all of the proposed amendments to the *Water Act 2000* under part 3 of *Natural Resources and Other Legislation Amendment Bill 2019*.

Proposed amendments to *Mineral and Energy Resources (Financial Provisioning) Act 2018*.

If implemented, clauses 213, 214 and 215 of the NRaOLA Bill will replace 'rehabilitation' with 'remediation' in the *Mineral and Energy Resources (Financial Provisioning) Act 2018* (MaER(FP)) provisions that relate to abandoned mines, which according to the Bills explanatory notes is necessary in order to distinguish between the rehabilitation obligations that a mine operator must meet under the *Environmental Protection Act 1994* and the activities that government undertakes on legacy and abandoned mine sites.

WWF-Australia does not support the proposed amendments to the MaER(FP) Act in the NRaOLA Bill for the following reasons:

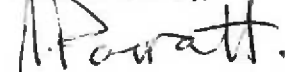
- Rehabilitation is the action of restoring something that has been damaged to its former condition, whereas remediation is the process of improving or correcting a situation that is dangerous. Therefore, only requiring abandoned mine sites to be remediated means that just dangerous things will be addressed rather than the current requirement for them to be restored to a pre-mining condition
- As they will no longer need to be rehabilitated, it's unlikely that abandoned mine sites that are only remediated will ever sustain productive post mining land uses
- As they are unlikely to ever sustain productive post mining land uses, abandoned mine sites that are just remediated will need to be continually maintained at considerable expense by Queensland taxpayers
- The proposed amendments pre-empt the outcomes of the Abandoned Mines Program review, which is currently underway
- As the current program lacks the appropriate ambition needed to deal effectively with the risk to the State from abandoned mines, downgrading the requirement from 'rehabilitation' to 'remediation' will lock in an inadequate level of commitment and response to addressing the numerous risks associated with the multitudes of abandoned and legacy mines across Queensland.

Recommendation

As they will increase the risk to Queensland taxpayers, the Committee should reject the proposed amendments to the *Mineral and Energy Resources (Financial Provisioning) Act 2018* under part 5 of the *Natural Resources and Other Legislation Amendment Bill 2019*.

Please do not hesitate to contact me should you require and further information or clarification regarding the matters raised above.

Yours sincerely,



Nigel Parratt
Water and Catchment Liaison Officer
WWF Australia

