



21st November 2023

Department of Mines, Industry Regulation and Safety (DMIRS)
RTD Consultation
Locked Bag 100
EAST PERTH WA 6892

RTD.Consultation@dmirs.wa.gov.au

Dear Officers,

SUBMISSION ON: Proposed Fee for Objections under the *Mining Act 1978*

The Urban Bushland Council WA Inc. (UBC) is pleased to present this submission in response to your invitation to address the issues of relevance to us.

The UBC is the peak WA community organisation for urban bushland recognition and protection. UBC is an incorporated, not for profit organisation registered as a charity (<https://www.bushlandperth.org.au/>). We are a voluntary community association with an active membership of 90 volunteer groups (each with their own local membership from 10-165 individuals) and an additional 100 individual 'supporter' members – all with a common interest in conservation and protection of areas of urban bushland in WA.

UBC advocates to all levels of Government for natural areas protection. We do this with limited resources through the amazing efforts of our 'Friends Groups' and their many volunteers – from all walks of life 'working' to improve and maintain the health of patches of neighbourhood nature.

DMIRS Proposal

The UBC is most concerned that significant barriers are being proposed to reduce the opportunity for effective, inclusive community/public/stakeholder engagement with the introduction of a fee to lodge objections to exploration &/or mining lease applications.

This concern is exacerbated as it appears to be contradictory to DMIRS' stated valuing of stakeholder input as highlighted on the agency website (refer extract below)

Extract: DMIRS website <https://www.dmirs.wa.gov.au/corporate/open-consultations>

Effective and ongoing stakeholder engagement enables better planned and more informed policies, projects and services including a greater understanding and management of issues and potential risks. For stakeholders, the benefits of engagement include the opportunity to have their issues heard and contribute to the decision-making process.

The following engagement principles are used when conducting our business:

Inclusive – We understand and acknowledge stakeholders' views and consider the issues from their perspective, and be clear and open in our communications.

Relevant – We are risk-based and adaptive, and continuously adjusting our focus in response to changing circumstances, seeking the best outcome for the people of Western Australia.

Responsive – We keep stakeholders informed of issues that affect them by providing transparent, timely, consistent and accessible information and feedback, and engage in a manner that encourages mutual trust and respect.

Stakeholders are individuals, groups or organisations affected, directly or indirectly, by our activities and those that affect our activities. These include the broader community, internal staff, communities affected by mining or petroleum activities, local State and federal governments, community groups, Aboriginal communities and industry groups.

Whilst the UBC is cognisant that there are costs associated with due diligence regarding effective and meaningful consultation and assessment of exploration and mining leases, we are also sure that the Government does not want community members to not engage in the process through costs that are non-trivial. We believe the Department should be resourced sufficiently so that it can deliver its commitment to consultation. Perhaps the annual budget needs to be reviewed accordingly.

In addition, the adoption of a cost recovery mechanism from proponents (eg relative to the size &/or value of their impact) should be assessed.

The UBC would welcome the opportunity to meet with you to further discuss DMIRS concerning approach.

Yours sincerely

Chairperson
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Urban Bushland Council WA Inc

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