

18 November 2019
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Dear Dr Delaire

COMMENTS ON MINING REHABILITATION PLAN GUIDELINE – CONSULTATION DRAFT

Thank you for the opportunity to comment on the Mining Rehabilitation Plan Guideline – Consultation Draft (Guideline). CMPA would much appreciate the following concerns with the Guideline be addressed.

- The Guideline is said to be a *'living document'*, however, there is no apparent reference to the legislative requirement for a variation every time the rehabilitation plan is amended.
- There is repetition between the requirements for the work plan and the rehabilitation plan.
- It is very doubtful that there will be any minimisation of regulatory burden.
- ERR will require officers with expertise in rehabilitation and with relevant qualifications.
- The lack of addressing other aspects such as *'plan for rehabilitation'* and where *'it is not a substitute for the legislation or regulations'* (page 2) limits the usefulness of the Guideline.

I would be happy to discuss my comments.

Yours sincerely



Dr Elizabeth Gibson
General Manager