

Monday, 8 October 2007

Victorian Environmental Assessment Council
8 Nicholson Street
EAST MELBOURNE VIC 3002

Via email: veac@dse.vic.gov.au

Dear Sir/Madam

RE: RIVER RED GUM FOREST INVESTIGATION – DRAFT PROPOSALS PAPER

The Construction Material Processors Association (CMPA) represents a broad spectrum of those involved in construction material processing businesses engaged in the extracting processing or otherwise working in hard rock, gravel, sand, masonry, clay, lime, soil, gypsum or recycling. Our members are located throughout Victoria, including within the study area.

We make the following comments to this submission. Please note that some members hold concerns about the impact that many of the recommendations will have upon the study area's users, however it is not within our organisations charter to comment on these areas.

1. Land Use (p x)

Firstly we would like to compliment VEAC on identifying the earth resources as an independent land use.

That said, the report suggests that there will be an increase in land available for the earth resources. This is not the case as areas currently classified as 'State Forests' and proposed to change to 'National Park' will expand the sterilisation of future resources.

It is our recommendation that this decrease be more clearly articulated.

2. Principles & Guidelines (dot point 1, p 62)

"Native vegetation should preferably not be removed for extraction, particularly where the same extractive resource is available on already cleared land ..."

This suggests that earth resources can be won where environmentally convenient, rather than where it is geologically present in economic quantities of an appropriate quality. The earth resources that our members extract are therefore very limited.

It is our recommendation that this point be revisited.

3. Principles & Guidelines (dot points 1 & 5, p 62)

"...or where the resource is shallow and extraction will be short term"

"Extraction sites should be rationalised to the smallest practical number of sites"

These suggest that those resources that are shallow in nature, of limited life or serving a close market should not be encouraged. The CMPA completely disagrees with this sentiment of economic rationalisation and highlights the overall lower environmental impact such sites create. They are likely to have a smaller footprint, be opened for a shorter period of time and being shallow, present exciting, environmentally beneficial rehabilitation options. Often such sites serve a local market, therefore reducing the environmental impact of transportation.

Beyond the clear environmental benefits, such resources provide a clear economic benefit to communities where there few other opportunities, providing support to many through the different skills, goods and services they require.

It is our recommendation that dot points one and five be removed.

4. Principles & Guidelines (dot point 4, 6 & 7, p 62)

"Reclamation of extraction sites needs to be of a high standard"

"Sites in use should be progressively rehabilitated"

"Disused extraction sites should be rehabilitated where possible, including the removal of rubbish, measure taken to stabilise the surface and ensure public safety, and revegetation as required"

This point is not correct in that it has not reference the Extractive Industries Development Act to understand the obligations it places upon Work Authority holders. The sites that are disused and of a poor standard are not examples of the current regulatory regime.

5. Principles & Guidelines (dot point 11, p 62)

"In large public areas, the land managers may extract stone from appropriate sites as required for management needs"

This could only occur if these land managers went through the same public process to gain a Work Authority as any other person wishing to access the land and that it allowed others to enter into these areas to carry out similar activities. This would also be applicable to the expansion of existing pit areas, where a further Work Authority or Planning Permit variation is required.

6. K2 Stone Reserves (p 63) **and Earth Resources** (p 73)

"The majority of existing stone reserves are no longer operational..."

"A number of stone reserves ...are no longer in use and have been proposed for rehabilitation..."

Sites should not be withdrawn from use unless they have been fully worked out of economic resource.

The third and second paragraphs respectively suggest that those sites which are no longer active should be reverted to other land uses. Although we agree to this for sites where the resource has been fully exhausted, the CMPA does not support reallocating or closing sites that still have a resource available as such sites provide options when future growth occurs with minimal environmental impact. An assessment of the geological reserves of each such site would need to occur prior to such a decision being made.

Once again, the CMPA appreciates this opportunity to provide comment to a VEAC study. We sincerely hope that these comments are acted upon and where they not, justification provided. This is essential, as it provides our members with an understanding and appreciation of VEAC's final decision and future decisions.

If there is any further information that the CMPA can provide and may be of assistance to the study, please do not hesitate to contact me on the details above.

Yours sincerely



Sarah Andrew
CMPA Project Manager