



## Response to Submissions

### Draft Mining Proposal and Mine Closure Plan for Low Impact Mining Operations

Stakeholder  <i>Names are not displayed where the individual or organisation has marked the submission as 'In Confidence'</i>	Comment  <i>xxxx Used to protect the names of Departmental Officers</i>	Response/Action	* How supportive are you of the draft form?	* Is it easier than the current Small Operations Mining Proposal and Mine Closure Plan forms?	Is additional guidance required?
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<b>In Confidence 1</b>	I have not been involved in low impact mining in the last two years. I suggest these decisions be left to those involved.	Comments noted with thanks.	-	-	-
<b>In Confidence 2</b>	Q5 Land clearing seems to be in line with environmental management question.	Comments noted with thanks.	5	5	No
<b>In Confidence 3</b>	I was at the first meeting regarding this subject that was held in Kalgoorlie, I believe the outcome that I thought we were trying to achieve was a more simplistic application similar to the previous Low impact mining application that we used to have. I believe you either were not understanding our requirements or chose to ignore the aim of those discussions with the publication of this draft copy. This form is filled with requirements that you might believe are necessary but in real life is just a waste of time. As various prospecting groups have pointed out to you, this is low impact mining, that means we don't cause a lot of damage to start with. we already have greater than 93% compliance with regards to rehabilitation and we don't have the resources or time to waste filling out endless forms and completing days of studies that are not worth the paper there written on, I personally have not seen any improvement on the existing POW and believe if this is the best you can come up with in a draft form you really need to have a good look at yourself.	<p>Comments noted with thanks. The initial workshops in Kalgoorlie provided the basis for development of the draft Mining Proposal and Mine Closure Plan for Low Impact Mining Operations form. As this form is relevant to small miners across industry and the State, broader consultation has been undertaken to ensure all stakeholders are captured. Following initial consultation and feedback, the draft form has been revised and is being released for a further four week comment period in order to capture any further comments on the form.</p> <p>The draft form has been developed to assist those proponents looking to undertake low impact developmental mining who would otherwise have to prepare a full Mining Proposal to meet the requirements of the <i>Guideline for Mining Proposals in Western Australia (2016)</i>. The draft form is an update of the existing Mining Proposal and Mine Closure Plan for Small Operations incorporating some requirements of the <i>Guideline for Mining Proposals in Western Australia (2016)</i>. The goal is to improve on the current Mining Proposal and Mine Closure Plan for Small Operations form to make it easier to fill out, easier to assess and include all relevant information.</p> <p>This review does not propose changes to the existing Programme of Work – Prospecting form. The Programme of Work – Prospecting form can continue to be used.</p>	-	-	-

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<b>In Confidence 4</b>	Hello, I had a good scan of the doc and found it relevant for my size lease (10Ha). I believe it would be fairly easy to complete and not too onerous.	Comments noted with thanks.	-	-	-
<b>In Confidence 5</b>	<p>I am commenting on your Draft Mining Proposal and Closure Plan for Low Impact Mines.</p> <p>I take that the object of this form is to simplify low impact mining which is what this form will do. Particularly the mine closure side of sections 11-12 and 13 completely cover this and section 13 clearly states the AER will give an Annual Report.</p> <p>Therefore with this you have two forms which cover mining proposal, mine closure and an annual report on the rehabilitation progress. What could be more simple.</p> <p>Yet on Page 1 you state Mine Closure Plans 2015 a separate template will be available for updating mine closure plans as per the requirement of Section 84AA of the <i>Mining Act 1978</i>. I take this refers to what used to be the 3 Year reporting, now 5 Year on Mine Closure. As the draft form and the AER covers all that is needed, why continue with this form?</p> <p>To give you an idea of how time consuming and costly this form is we submitted a 3 Year report on xxxxx, xxxxx and xxxxx and even though nothing had changed in the 3 year term, by the time we answered the Department of Mines' questions through our Mining Consultants, it was a 67 page document. Something you would expect to submit for large scale mining, not small scale. Again creating far more work than necessary and not needed as the content is covered in other documents. Seeing that nothing had changed I would have expected the report to say nothing has changed.</p> <p>Therefore, I have no objection to this form being implemented providing the 5 year reporting is dropped; otherwise you will be creating more paperwork and achieving nothing.</p>	<p>Comments noted with thanks.</p> <p>All Mine Closure Plans (MCPs) approved by the Department of Mines, Industry Regulation and Safety (DMIRS) must be regularly reviewed over the life of a mine. The <i>Mining Act 1978</i> (WA) requires MCPs to be reviewed and submitted for approval by DMIRS every three (3) years or such other time as specified in writing by DMIRS. Proponents can liaise with the Department to seek extensions to the timeframes for re-submission. These will be assessed on a case-by-case basis.</p> <p>A separate template allows MCPs to be updated separately to a Mining Proposal which does not require regular resubmission for approval.</p> <p>The Mining Proposal and Mine Closure Plan for Low Impact Mining Operations form has been developed to ensure that the scale and detail required is commensurate to the closure risks and the life-of-mine remaining.</p>	-	-	-
Joseph Gallop	This draft will bring ease to many different types of prospector.	Comments noted with thanks.	8	5	Not indicated
<b>In Confidence 7</b>	Happy with form.	Comments noted with thanks.	9	9	Not indicated

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Amalgamated Prospectors and Leaseholders Association of WA Inc. (APLA)	<p>The proposed LIMO application is quoted as replacing the current Small Mining Proposal (SMP) and its accompanying Mine Closure Plan (MCP). APLA has concerns as follows:</p> <p><b>Introduction and background</b></p> <p>The premise of re-visiting and re-instating the LIMO from past years was to simplify and streamline applications and subsequent grants. This would allow small mining operations to exploit mineral resources that would be economically unviable to large mining companies. Based on this latest version that DMIRS has put out for comment, the proposed LIMO is seen by APLA as falling far short of that objective. In fact, APLA sees the proposal as far more onerous and demanding than what is currently available to us.</p> <p>Similarly, APLA feels that despite several lengthy meetings with DMIRS in Kalgoorlie over the past months, APLA was never given a copy of the penultimate version of the LIMO form prior to it being put out for public comment. This is disappointing and appears to be contrary to the need stated by the then Director Operations, Environment in those meetings, to rebuild trust between prospectors and DMIRS.</p>	<p>Comments noted with thanks. The draft Mining Proposal and Mine Closure Plan for Low Impact Mining Operations form has been developed to assist those proponents looking to undertake low impact developmental mining who would otherwise have to prepare a full Mining Proposal to meet the requirements of the <i>Guideline for Mining Proposals in Western Australia (2016)</i>.</p> <p>The draft form is an update of the existing Mining Proposal and Mine Closure Plan for Small Operations incorporating some requirements of the <i>Guideline for Mining Proposals in Western Australia (2016)</i>. The goal is to improve on the current Mining Proposal and Mine Closure Plan for Small Operations form to make it easier to fill out, easier to assess and include all relevant information.</p> <p>The initial workshops in Kalgoorlie provided the basis for development of the draft form. As this form is relevant to small miners across industry and the State, broader consultation has been undertaken to ensure all stakeholders are captured.</p> <p>See specific considerations below.</p>	-	-	-
Amalgamated Prospectors and Leaseholders Association of WA Inc. (APLA)	<p><b>Questions and point for discussion</b></p> <p>1. The original basis for the LIMO was that it was only to be used by small operators or sole director companies. i.e not for use by larger corporate mining companies. That criteria has been removed. Why?</p>	<p>The draft form has been developed to ensure that the scale and detail required is commensurate to the scope and scale of activities and risks associated with the operation. The draft criteria have been revised to clarify this.</p>			
Amalgamated Prospectors and Leaseholders Association of WA Inc. (APLA)	<p>2. It is clear from the Minutes of previous meeting that the DMIRS intends this LIMO system is to replace the current SMP model. Refer to point 2, Prospector Stakeholder Forum #2/2017, Minutes of the Meeting of 11/5/2017.</p> <p>a. Therefore, would the LIMO mean the SMP becomes redundant?</p>	<p>Yes. The draft form is an update of the existing Mining Proposal and Mine Closure Plan for Small Operations incorporating some requirements of the <i>Guideline for Mining Proposals in Western Australia (2016)</i> and consolidating these two documents. The goal is to improve on the current Mining Proposal and Mine Closure Plan for Small Operations form to make it easier to fill out, easier to assess and include all relevant information.</p>			
Amalgamated Prospectors and Leaseholders Association of WA Inc. (APLA)	<p>b. Would it also mean that any current operations that have been granted under the previous SMP method become null and void and a replacement LIMO would need to be made? There appears to no grandfather clause for operations currently under the SMP. If this is the case, then APLA feels it is unacceptable as there are operations that fall between the current SMP and the more prescriptive Mining Proposal (MP). If the SMP is removed than these operations may not</p>	<p>No. Any current operations that have been granted under the previous SMP will continue as approved. The proposed Mining Proposal and Mine Closure Plan for Low Impact Mining Operations form does not impact on previously approved activities.</p>			

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			Amalgamated Prospectors and Leaseholders Association of WA Inc. (APLA)	<p>meet the criteria of the LIMO and therefore will attract the overwhelming and expensive MP. APLA does not accept total reliance on the LIMO as the sole premise for future small mining operations.</p> <p>2. The SMP has a limit of 30,000 tonnes regardless of the style of operation taking place on a Mining Lease. Despite this, such tonnage limits have occasionally been successfully negotiated higher on various projects after consideration by a DMIRS assessor. Similarly, on page 1, dot point 2 of the LIMO criteria, the proposed LIMO is limited by a pre-submission limit of MRF/RLE of \$50,000.00. As such, APLA sees little benefit in adopting the proposed LIMO in place of the SMP as the limits are similarly restrictive but in differing ways.</p> <p>(a) Please explain why the LIMO, in the form presented here, is a practical alternative to the SMP.</p>	<p>The draft criteria have been revised with this consideration. The tonnage restriction and reference to RLE limit have been removed.</p>
Amalgamated Prospectors and Leaseholders Association of WA Inc. (APLA)	<p>3. Because the LIMO is designed for use on Mining Leases (ML) and it has an MRF/RLE limit of \$50,000.00 it has the effect of imposing a tonnage restriction on that Mining Lease. This in turn severely limits the scope of any proposed operation to the point of being unviable. In addition to these practical limits, an inferred tonnage limit such as this is contrary to the right of unlimited tonnage given to the holder of a Mining Lease under the terms of the Mining Act and its Regulations. The same can be said of the SMP but that limit as proven to be negotiable. However, other than being used in PL to ML conversions, APLA sees little point in either systems when a tonnage limit of 100,000 tonnes using POW-P can be achieved through the current Ministerial tonnage approval. This last point assumes the use of "rolling rehabilitation" to ensure the annual RLE/Levy is not breached. The practice of "rolling rehabilitation" is recommended by DMIRS as method of "footprint" control.</p> <p>a. APLA requests clarification that the "Low Impact Mining Operation" criteria at dot point 2 is not a "tonnage control".</p> <p>b. APLA requests additional clarification that the MRF/RLE liability will continue to be used as a retrospective measure and not as a mandatory pre-condition to the acceptance and grant of a LIMO application. ie. the limit is to be used as an estimate and not as a fixed limit. As read in dot point 2, it can be misconstrued as a means to refuse of the application.</p>	<p>The draft criteria have been revised with this consideration. The tonnage restriction and reference to RLE limit have been removed.</p>			

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Amalgamated Prospectors and Leaseholders Association of WA Inc. (APLA)	4. APLA asks, using the logic above, why does the LIMO have a restricted footprint PRIOR to application while the POW does not?	The draft criteria have been revised with this consideration.			
Amalgamated Prospectors and Leaseholders Association of WA Inc. (APLA)	5. As POW-Ps are in common use on Mining Leases (ML) for small prospective operations, APLA asks if the LIMO is being introduced so that that the use of POW-Ps on MLs is to be withdrawn? If so, then APLA cannot support the LIMO application system as it stands here.	No. This form has been developed for assessment of developmental mining activities that are outside the scope of prospecting. The Mining Proposal and Mine Closure Plan for Low Impact Mining Operations form can also be used in place of a full Mining Proposal to support a Mining Lease application.  This review does not propose changes to the existing Programme of Work – Prospecting form. The Programme of Work – Prospecting form can continue to be used.			
Amalgamated Prospectors and Leaseholders Association of WA Inc. (APLA)	6. Similarly, APLA see this version of the LIMO proposal to be nothing other than further environmental restriction of mining operations, when other current avenues that are less onerous are available from DMIRS.	The draft Mining Proposal and Mine Closure Plan for Low Impact Mining Operations form has been developed to assist those proponents looking to undertake low impact developmental mining who would otherwise have to prepare a full Mining Proposal to meet the requirements of the <i>Guideline for Mining Proposals in Western Australia (2016)</i> . The draft form is an update of the existing Mining Proposal and Mine Closure Plan for Small Operations incorporating some requirements of the <i>Guideline for Mining Proposals in Western Australia (2016)</i> . The goal is to improve on the current Mining Proposal and Mine Closure Plan for Small Operations form to make it easier to fill out, easier to assess and include all relevant information.  As part of this review, no changes are proposed to the other avenues of approval such as the Programme of Work – Prospecting form. When developmental mining is proposed, additional information is required beyond that provided in a Programme of Work – Prospecting form to ensure information is commensurate to the scale, scope and risk of the activities.			
Amalgamated Prospectors and Leaseholders Association of WA Inc. (APLA)	7. APLA maintains that the use of the MRF/RLE system to control and restrict any small mining operation is contrary to the intended control system of the MRF. The MRF system was predicated on a retrospective assessment and the encouragement of rolling rehabilitation. Whereas, in the LIMO the MRF appears to be used as a prospective control system. APLA sees this as the pre-cursor to commence using the MRF system as prescriptive control method rather than retrospective method. As such, the clause demanding an estimation of “less than \$50,000.00 MRF liability” is again, unacceptable.	The draft criteria have been revised with this consideration. The tonnage restriction and reference to RLE limit have been removed.			

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Amalgamated Prospectors and Leaseholders Association of WA Inc. (APLA)	<p><b>Page 1 (bottom) of the LIMO Application</b></p> <p>The requirement for a Project Management Plan (PMP) was never part of the discussions held between APLA and DMIRS during the course of the LIMO's drafting. Adding this requirement to the current draft is making the use of a POW-P on a Mining Lease even more attractive as the POW-P makes no mention of a PMP. APLA again asks whether the LIMO will not only supplant the SMP but also the use of POW-P on Mining Leases?</p> <p>Surely, the 16 pages of the LIMO makes up the PMP? Is it really necessary to compel a proponent to meet the requirement of a PMP when all that is required is an 'intra-departmental' notification that would meet that requirement. It cannot be beyond the scope and ability of DMIRS to deduce planned actions from a POW or LIMO. APLA maintains the PMP requirement does not meet the original criteria of "simplicity" for the revamped LIMO.</p>	<p>Under the <i>Mines Safety and Inspection Act 1994 (WA)</i>, a mining operator must have an approved project management plan (PMP) in place before any construction or mining operations commence. A PMP also needs to be submitted when recommencing mining operations involving underground or open cut mining operations if the mine was not being used immediately before the commencement day.</p> <p>The requirement for a PMP does not impact the assessment and approval of a Mining Proposal and Mine Closure Plan for Low Impact Mining Operations.</p>			
Amalgamated Prospectors and Leaseholders Association of WA Inc. (APLA)	<p><b>Section 3, "Tenement Conditions", tick box #1</b></p> <p>APLA sees little point in asking a proponent to accept that a LIMO application may fail if the applicant fails comply with "Tenement Conditions" <b>prior</b> to the LIMO application being granted and work commences. APLA cannot see the logic in asking for compliance on something that hasn't yet taken place, isn't yet in print, hasn't yet been stipulated etc. Adherence to "Tenement Conditions" is compulsory under the current Mining Act, so why is there a need to duplicate that here? This is not the first example of DMIRS Environmental Section needlessly duplicating the Mining Act.</p>	This section has been revised. There is an inclusion in the Checklist to ensure that applicants are aware of their tenement conditions.			
Amalgamated Prospectors and Leaseholders Association of WA Inc. (APLA)	<p><b>Section 3, "Tenement Conditions", tick box #2</b></p> <p>APLA asks how anyone can confirm that they understand something that "may be imposed" in the future. i.e a "future act"? APLA sees it as unreasonable and probably ridiculous to demand such compliance. A proponent cannot be asked to confirm they understand something of which they are not aware and has yet to be written, introduced or specified.</p>	This section has been revised. Conditions which may be imposed have been provided for information.			
Amalgamated Prospectors and Leaseholders Association of WA Inc. (APLA)	<p><b>Section 4 of the LIMO – "Social Impacts etc - "Heritage"</b></p> <p>The syntax used here assumes that there is "something to report". The phrase "desktop survey" is used within the Aboriginal Heritage Act and the Aboriginal Heritage Register (AHR) reporting system to define the depth and complexity of a survey or otherwise. Used as it is here in the LIMO, implies that such a desktop survey is to be</p>	Section 4 of the draft form has been updated for clarification. There is no change in requirements beyond that currently existing in the SMP form.			

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	<p>carried out by the either by the LIMO applicant and/or the Dept of Planning Lands and Heritage (DPLH) with any results or otherwise being placed on the AHR.</p> <p>a. Please clarify what is actually meant by this phrase when used in the context of a LIMO application.</p> <p>b. Does it simply mean "a search of AHR using the internet" or does it mean a complex desktop survey requiring archaeologists, anthropologists and the services of the DPLH?</p> <p>Presently, should a search of the Heritage Register reveal that no surveys have been done and there is concurrently no Native Title (NT) covering the affected tenement, there is no requirement for anything other than a declaration that the LIMO applicant has searched the Aboriginal Heritage (AH) register and has therefore carried out the required "due diligence".</p> <p>The way the text reads in this section of the LIMO, an AH survey must be carried out regardless of the requirements of the Aboriginal Heritage Act. This section therefore seems to make an AH survey mandatory in all cases. Clauses 1 and 2 are an additional burden that are not mentioned in current POWs. Current POW practice is a simple "tick box" to indicate that a search of the AH Register has been carried out. APLA feels that there is potential for misinterpretation here as the LIMO seemingly oversteps it's remit by introducing another layer of bureaucracy that is not required under AH Guidelines.</p> <p>The current position is that if there is no requirement to sign a Regional Standard Heritage Agreement (RSHA) then there is no requirement to carry out an AH survey on ground or desktop. Currently, in such cases there is only a requirement to search the AH Register. The LIMO seems to extend this to requiring a survey in all cases regardless of the existence or not of Native Title (NT) or a Regional Standard Heritage Agreement. Section 2.2 of the AH Guidelines refers and is the position taken by DMIRS in the past.</p> <p>c. Therefore, APLA asks has something changed here within AH guidelines that is unknown to APLA? Why not simply use the current tick-box arrangement used in POW-Ps?</p>				

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Amalgamated Prospectors and Leaseholders Association of WA Inc. (APLA)	<p><b>Section 11, "Closure Objectives"</b></p> <p>APLA has expressed its views that it does not agree with the use of the phrase,"an agreed post-mining land use". APLA maintains this view for reasons already expressed in past LIMO discussions. APLA is disappointed that this phrase has once again insinuated its way into the LIMO proposal despite previous assurances to the contrary that this would not happen.</p>	Best practice closure planning includes a post-mining land use that is acceptable to key stakeholders. DMIRS acknowledges that end land uses may change over time and that information can be reflected in a Mine Closure Plan. The agreed end land use may change in iterations of Mine Closure Plans as more information is acquired through progressive rehabilitation and continued stakeholder engagement. The draft form has been updated to reflect this.			
Amalgamated Prospectors and Leaseholders Association of WA Inc. (APLA)	<p><b>Summary</b></p> <p>Despite several days of meetings and work done by DMIRS and APLA on the LIMO application, APLA believes that further explanations are warranted due to the limits applied subsequent to those meetings and the uncertainty of any future operations being viable under the terms of the LIMO. APLA also expresses disappointment that the LIMO was offered for public comment prior to the document being finalised by stakeholders. In addition, several lines of enquiry and clarification were raised in the meetings and were minuted. Many of these enquiries have not been followed up or commented on. A copy of those minutes is attached. The absence of any answers to these points not only disappoints APLA but also contradicts DMIRS policy regarding consultation. "No answers" infers that consultation has been dispensed with.</p> <p>Comments from DMIRS are most welcome and we hope that further discussions will be forthcoming.</p>	Comments noted with thanks. The initial workshops in Kalgoorlie provided the basis for development of the draft Mining Proposal and Mine Closure Plan for Low Impact Mining Operations form. As this form is relevant to small miners across industry and the State, broader consultation has been undertaken to ensure all stakeholders are captured. Following initial consultation and feedback, the draft form has been revised and is being released for a further four week comment period in order to capture any further comments on the form.			
<b>In Confidence 8</b>	Hi there I just had a quick look and overall looks like a more common sense approach making it easier for a small operations person to understand the formatted questions, Questions look more relevant, sorry only had time for a quick look.	Comments noted with thanks.	-	-	-
<b>In Confidence 9</b>	<p>Dear Committee,</p> <p>Thank you for the opportunity for input to this draft.</p> <p>It is very important to have an easy document to get small miners back into operation.</p> <p>It is commonly said now that the department make it "to hard" to get small mines going these days and you have to be really big and have many millions of dollars or otherwise don't bother. I don't believe that there is any one in your department that is a small operator and has to pay there own bills to get a mine going. Your department lacks this experience.</p>	Comments noted with thanks. The draft Mining Proposal and Mine Closure Plan for Low Impact Mining Operations form has been developed to assist those proponents looking to undertake low impact developmental mining who would otherwise have to prepare a full Mining Proposal to meet the requirements of the <i>Guideline for Mining Proposals in Western Australia (2016)</i> . The draft form is an update of the existing Mining Proposal and Mine Closure Plan for Small Operations incorporating some requirements of the <i>Guideline for Mining Proposals in Western Australia (2016)</i> . The goal is to improve on the current Mining Proposal and Mine Closure Plan for Small Operations form to make it easier to fill out, easier to assess and include all relevant information.	-	-	-



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<p><b>In Confidence 10</b></p>	<p>Dear Sir,</p> <p>I wish for all of my comments to be quoted in full, not in part as if this is not done, once again the department just selectively misrepresents matters with incorrect and misleading information to others just as it had done in the past which creates the problems</p> <p>The Release of this LIMO form without having any further consultation face to face workshops that were promised has just reinforced just how morally corrupt the department is with its officers</p>	<p>Comments noted with thanks. The initial workshops in Kalgoorlie provided the basis for development of the draft form. As this form is relevant to small miners across industry and the State, broader consultation has been undertaken to ensure all stakeholders are captured.</p> <p>Following initial consultation and feedback, the draft form has been revised and is being released for a further four week comment period in order to capture any further comments on the form.</p>	<p>–</p>	<p>–</p>	<p>–</p>

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	<p>They have misled and deceived people which warrants nothing less a Royal Commission to expose to serious misconduct of officers involved in this process.</p> <p>I wish to record my utmost disgust with the way the LIMO Form has been released without no further workshop face to face consultation which was promised by officers at the very last meeting</p> <p>At the last consultation meeting xxxxx and xxxxx both told people in the room that they would have further workshops on the LIMO Form</p> <p>These two people specifically asked people in the room if further face to face workshops were agreeable and acceptable to which all in the room agreed as a way forward. I reiterate we have been misled and deceived by departmental officers.</p> <p>I can now see why the Department did not want to have fully transcribed transcripts of all these LIMO workshop meetings as to do so would so expose the manipulation and truth being exposed.</p> <p>The disappointing aspect to all this is it clearly shows the department environmental division has an agenda to shut the small miners and prospectors out of the industry by making it so hard, with increased duplication, increased paperwork and complexity whilst at the same time falsely maintaining to members of the public that they strongly support small miners and prospectors in the industry</p> <p>At the very first meeting xxxxx from the Department clearly told everybody in the room that the Department had changed this LIMO form in the last TEN years (10) years without any form of consultation and the department was now faced with increased paperwork which was also making it harder for genuine small miners and prospectors.</p> <p>The Department should be clearly honouring statements and commitments made by xxxxx and xxxxx to have further face to face workshops to refine and get a workable LIMO document that actually helps small miners and prospectors</p> <p>By having further face to face workshops to refine the LIMO form they can demonstrate they actually support exploration and mining and gain the confidence of all in the industry. This will provide for responsible orderly development of the industry.</p>				

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	Another important point sometimes people do not have the literacy skills to articulate comments about a LIMO Form with submissions in a manner in which the Department understands so the Department clearly runs off with a misinformed view or misinformed position, That is why face to face workshops are the best method of addressing matters to find a conciliatory approach and agreeable LIMO Mining form and closure plan which can help the industry as a whole.				
The Chamber of Minerals and Energy of Western Australia (CMEWA)	The move towards a single, consolidated form is positive. Integrating Mining Proposals and Mine Closure Plans more broadly (such as for larger operations transitioning in to decommissioning and closure) would also be a positive move. Closure Planning should be integrated throughout the mine life cycle and allowing their approval processes to be better integrated is supported.  The use of "low impact" instead of "small" is also supported as this demonstrates a clear move towards a risk-based approach.	Comments noted with thanks. See specific considerations below.	-	-	-
The Chamber of Minerals and Energy of Western Australia (CMEWA)	Excluding operations that do or may require a DWER Part V Licence is very restrictive, particularly in light of some recent decisions and advice from DWER that expand the types of activities captured by Part V Licensing. It is recommended instead that DMIRS instead ask in the form if a Part V licence is held or is expected to be required and if yes, what category and production level.	The draft criteria have been revised. This has been incorporated into Section 7.			
The Chamber of Minerals and Energy of Western Australia (CMEWA)	Given the form is targeting low impact operations, it is more likely that the form will be completed by a non-environmental / non-approvals professionals who may be unfamiliar with the process. Some of the language used may not be widely understood outside these circles and hence it may be worth revising or at least specifically requesting an existing LIMO to review the form and confirm terminology used will be widely understood.	The form has been updated with this consideration.			
The Chamber of Minerals and Energy of Western Australia (CMEWA)	It is recommended that all questions be numbered (not just the sections) to aid referencing questions and communication about the form.  The use of hyperlinking and electronic field entry / check boxes etc is good and will assist the form to be quickly and easily completed.	The form has been updated to include numbering for all questions.			

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<i>xxxx Used to protect the names of Departmental Officers</i>		<i>* 10 extremely supportive, 5 supportive, 1 not at all (-) not indicated</i>			
<b>In Confidence 11</b>	<p>Hello Team,</p> <p>I have attended the past couple of stakeholder meetings and left the last one expecting invitation to further meetings. It seems I may have missed something in that, we have jumped straight to 'draft for comment' phase when we were promised further consultation and further workshops.</p> <p>In the last meeting there appeared to be only one other person with similar aspirations as mine. The topic lead into this area and the consensus was for it to be included on this form for small scale underground operations.</p> <p>Underground operations, in particular, shaft or whinze mining would have to be the lowest footprint operation anyone could hope for. And I am astounded it is not encouraged more!??</p> <p>Some of the benefits are;</p> <ul style="list-style-type: none"> <li>• very small project area</li> <li>• low fuel consumption</li> <li>• very little (if any) waste generation</li> <li>• selective, high grade mining = less treatment tonnes = less tailings</li> <li>• quick, easy and inexpensive site rehabilitation</li> </ul> <p>As a stakeholder/leaseholder/career miner, I am very concerned that the current opportunity to get the small guy back in the game is going to be lost. We all have a duty to future generations of miners and mining families to do what we can to get this right!</p> <p>Lets get back to the table please.</p>	<p>Comments noted with thanks. The initial workshops in Kalgoorlie provided the basis for development of the draft Mining Proposal and Mine Closure Plan for Low Impact Mining Operations form. As this form is relevant to small miners across industry and the State, broader consultation has been undertaken to ensure all stakeholders are captured. Following initial consultation and feedback, the draft form has been revised and is being released for a further four week comment period in order to capture any further comments on the form.</p> <p>The form does not prevent the application of underground operations provided the criteria are met, however these operations may have additional safety requirements to be considered outside of this form. Further detail has been added to clarify this.</p>	-	-	-
<b>In Confidence 12</b>	<p>Dear DMIRS Team,</p> <p>I wish to say the draft form presented is not what our unfinished workshops had progressed to.</p> <p>The Draft was sent out prematurely whilst work was still in progress.</p> <p>On top of that extra items were added.</p> <p>The sector who would primarily use a Limo and who were who were at the workshops are very disappointed of the DMIRS handling of this.</p>	<p>Comments noted with thanks. The initial workshops in Kalgoorlie provided the basis for development of the draft Mining Proposal and Mine Closure Plan for Low Impact Mining Operations form. As this form is relevant to small miners across industry and the State, broader consultation has been undertaken to ensure all stakeholders are captured.</p> <p>Following initial consultation and feedback, the draft form has been revised and is being released for a further four week comment period in order to capture any further comments on the form.</p>	-	-	-

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	Please let's get back to making this form like the old Limo, being simple, that was the purpose of revisiting this idea. Look forward to regrouping and finishing of the task we started.				
<b>In Confidence 13</b>	Being a novice in the mining industry I will be guided by the views of the Amalgamated Prospectors and Leaseholders Association of WA Inc.  The draft form needs more work done to it and I have provided some suggestions that you may like to consider in the process of finalising the forms.	Comments noted with thanks. Specific comments provided on the form have been incorporated.			
<b>In Confidence 14</b>	Criteria – activities that do not require a Native Vegetation Clearing Permit (NVCP).  This criterion will cause a huge amount of angst and extra costs to be basic raw material part of the industry. An NVCP is required throughout the South West Mineral Field and will have huge impacts on sand/gravel, limestone, and gypsum proposals across the region. For example – a proposed gypsum operation in the Wheatbelt should come under the new LIMO but all gypsum operations require an NVCP. This criterion will also affect sand operations in rivers across the state. Most of this type of operation are demand-driven and only operate a few days a year and are therefore “small operations” but if they are forced to submit an application for a new operation on the 2016 guidelines then most will not bother due to the huge additional cost.  Section 5 “Land Clearing” conflicts with the criterion on page 1.	Comments noted with thanks. The criteria have been revised.			
<b>In Confidence 14</b>	Criteria – does not require referral under Part IV of the EPA 1986 – this criterion could affect a genuine small operation within 2km of a townsite or the coast. Such operations should be exempt and be allowed to use the new LIMO.	The Memorandum of Understanding between DMIRS and the Office of the <i>Environmental Protection Authority (2016)</i> ( <a href="http://www.dmp.wa.gov.au/Documents/Environment/ENV-MEB-016.pdf">http://www.dmp.wa.gov.au/Documents/Environment/ENV-MEB-016.pdf</a> ) states that the parties (DMIRS and EPA) will liaise with the other party at pre-referral stages, where appropriate, in cases where consultation criteria, such as operations within 2km of a declared occupied townsite, are triggered. The requirement for DMIRS and EPA to liaise does not necessarily mean that referral will be required. Mining Proposals which may require referral to the EPA require further detail to be provided above that addressed in the Mining Proposal and Mine Closure Plan for Low Impact Mining Operations form.			

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<b>In Confidence 14</b>	Section 3 "Tenement conditions" – No materials shall be extracted from below the bed load zone of rivers running through the lease" – this is short-sighted and unrealistic. The unconsolidated nature of river sand often makes it impossible for heavy machinery to work on a river bed and clay material is required for form a reasonable access track. This clay material is readily available below the sand. This is a safety issue and should be addressed as such. Flooding of the river, especially after cyclones, often causes more environmental impact than a small sand extraction operation.	This section has been revised. Conditions which may be imposed have been provided for information.			
<b>In Confidence 14</b>	Section 2 "Existing Environment" – what is a suitable search buffer? To the tenement holder it may be 1km; to the DBCA it is likely to 10km or 25km.	This section has been revised. The search should include consideration of the scale of the operation and the location/potential risk of disturbing conservation significant flora or fauna. The search radius should be chosen to ensure all relevant features are captured so proponents can confirm whether the proposed activities will have any impact on conservation significant flora or fauna.			
<b>In Confidence 14</b>	If a Nature Map search shows that there may be significant flora in the buffer area and DBCA cannot supply any photography of a particular plant or plants, DMIRS should be providing specific advice on what management approach should be taken. It is unrealistic to expect an applicant for a lease using the LIMO to detail a management approach for significant flora when there are inadequate photographic records.	If flora and fauna species of conservation significance are returned in the search results then further work, including on-ground surveys, may be required. This should be discussed with the relevant DMIRS Environmental Officer.			
<b>In Confidence 14</b>	Checklist – this needs to be vetted by industry before finalising.	The checklist has been added to the revised draft.			
<b>In Confidence 15</b>	Was alright don't know what has changed ?? but I am happy as long as I find out thank u	Comments noted with thanks.			
<b>In Confidence 16</b>	No comments.	Noted.	2	1	
<b>In Confidence 17</b>	It is noted that the form only applies to "agreed Low Impact Mining Operations (LIMO)". It would be useful if the form could also be used for low impact mining activities associated with an existing 'standard' Mining Operation. For example, the installation of a monitoring bore at an existing licensed minesite could be approved as a miscellaneous activity using the LIMO form. It's acknowledged that the new Mining Proposal system accommodates these minor changes well, however, in some instances transitioning into the new system will take some time (e.g. companies with numerous minesites with long mining/ approvals histories).	The draft form has been developed to assist those proponents looking to undertake low impact developmental mining who would otherwise have to prepare a full Mining Proposal to meet the requirements of the Guideline for Mining Proposals in Western Australia (2016). The draft form is an update of the existing Mining Proposal and Mine Closure Plan for Small Operations incorporating some requirements of the Guideline for Mining Proposals in Western Australia (2016).  The draft form has been developed to ensure that the scale and detail required is commensurate to the scope and scale of activities and risks associated with the operation.			

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		As stated, the intent is that minor changes associated with larger operations will be managed via assessment under the 2016 Guideline Mining Proposal system.			
<b>In Confidence 17</b>	Section 2 (Existing Environment) outlines requirements for a flora and fauna review. This text information and requirement would be better placed with Section 5 (Land Clearing) so that the requirement is only triggered if clearing of native vegetation is proposed. i.e. is there any value in doing a flora and fauna review, if native vegetation if not being cleared?	This section is intending to link into the description of the existing environment to capture any potential impacts from disturbance.			