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14/02/17

Mrs Anne Royal

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Executive Director

Mineral Resources

Dr Ted Tyne

Dept. State Development

GPO Box 320

ADELAIDE SA 5001

Dear Dr Tyne,

I would like to submit my views on some areas of the Mining Act review as covered in the discussion paper, following the sections as that paper sets out.

1.5 I feel that landowners need to be notified and consulted on changes to mining operations as soon as they become apparent. This would be especially important if overlapping EIs are allowed, or if the changes bring increased impacts.

2.1.1 It seems that some miners avoid tenement rehabilitation by crying poor when their activities are done. Perhaps the minister should exact payments in full rather than a bond (as far as can be determined) of the PEPR required. This could be held in a Trust account, so that the Department isn't chasing miner compliance. The public should be able to comment on the process as rehabilitation often has effects beyond the immediate landowners.

2.5 I do think that private mines should come under the same regulations, including their proximity to boundaries and exempt land, as they are just as liable to damage water tables etc. as other miners. This could rectify overlapping PEPRs and clarify infrastructure and compliance requirements.

Further to the idea of full rehab. payment into a trust account rather than a bond, this account should not become a general pool of money, but should have each miner's funds sequestered for them to redraw under ministerial control as required. I do think a straightforward process for revoking private mines is needed.

3.5.1 I can see that subdivision of EIs could ease the burden of one explorer who only seeks one mineral in a tenement, while others in that tenement likewise meet their conditions. I wonder how confusing this will be to oversee though, and the risk that a third-party transfer could lead to back-door foreign ownership, as predatory miners hide behind multi-layered shell companies.

Overall, most processes achieve transparency by being as simple as possible.

Thank you for considering this submission.

Regards

A handwritten signature in black ink, appearing to read "Anne Royal".

Anne Royal