

9 February 2024
Kristian Dawson
Executive Director
Resource Tenure Division
Department of Energy, Mines, Industry Regulation and Safety
100 Plain Street
East Perth WA 6004

Via email: RTD.Consultation@dmirs.wa.gov.au

SUBJECT: REVIEW OF STANDARD CONDITIONS FOR MINING TENEMENTS

Dear Kristian

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide comments to the Department of Energy, Mines, Industry Regulation and Safety (DEMIRS) on the Draft Standard Conditions for Mining Tenements.

CCAA is the peak industry body for the heavy construction materials industry in Australia including the cement, pre-mixed concrete and extractive industries. Our members operate cement distribution facilities, concrete batching plants, hard rock quarries and sand and gravel extraction operations throughout Western Australia.

CCAA welcomes efforts to streamline administrative processes and reduce unnecessary red tape. CCAA **supports** the revised standard conditions as published and makes the following comments to improve their application and efficiency of process:

- The standard conditions should be applied to mining tenements where they are relevant and applicable and match the circumstances of that site. For example, conditions regarding salinity should not be included where none exists on hills or where there are no water courses in the tenement.
- DEMIRS should ensure their workflow and administrative processes support the successful introduction of these conditions. For example, the condition that the Mining Proposal must be approved prior to any ground disturbance needs timely DEMIRS processes as well as proponent education to ensure the appropriate information is provided to DEMIRS in the first place to limit any unnecessary delays in this approval step.

Western Australia's regulatory environment needs to be internationally competitive to continue to attract capital to invest into the state to ensure a sustainable and competitive heavy construction materials industry. This in turn facilitates Western Australia's productivity, housing affordability and lower infrastructure costs.

Yours sincerely



ROGER BUCKLEY

State Director Western Australia