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Dear Paul

Consultation on the Closure and Rehabilitation Policy and Supporting Guidelines

Cement Concrete & Aggregates Australia (CCAA) appreciates the opportunity to provide input into the development of the Department's Closure and Rehabilitation Policy and supporting guidelines.

As the peak body representing quarrying and construction materials producers in South Australia, CCAA and its members are committed to responsible resource development and to achieving closure outcomes that are safe, stable and environmentally sound. We support the establishment of a clear, practical and outcome-focused framework that provides both environmental assurance and regulatory certainty.

CCAA recommends that the Policy be underpinned by the following principles.

- **Flexibility and proportionality for long-life operations**
Many South Australian quarries have operational lives extending decades and many will last more than 100 years or more. Over these timeframes, planning regimes, community expectations and potential end land uses can change substantially. Closure obligations should therefore be proportionate to the stage of mine life and recognise that detailed end-state design is not always appropriate where long-term land use remains uncertain. Furthermore, potential land use as residential or commercial mean that it may be inappropriate to undertake progressive rehabilitation that may be incompatible with the final end use.
- **Adaptive and staged closure planning**
Closure planning should be structured as a staged and iterative process. In early and mid-life phases, review cycles of approximately 10 years are appropriate, with increasing frequency as operations approach cessation. This reflects contemporary industry practice and acknowledges that extraction methods, market conditions and regulatory settings evolve over time.
- **Alignment with the planning framework**
Given the absence of fixed statutory review cycles within South Australia's planning system, long-term land use outcomes cannot always be predicted with confidence. The Policy should therefore avoid requiring premature commitments to specific end uses and instead allow conceptual end-use descriptions to be progressively refined as greater certainty emerges.
- **Outcome-based standards**
Closure expectations should focus on achieving landforms that are safe, stable, non-polluting and resistant to erosion. A performance-based approach will enable site-specific solutions and innovation, while avoiding prescriptive engineering requirements that may not be justified by local conditions.

- **Clarity and regulatory certainty**

Greater clarity is needed regarding the distinction between conceptual, interim and detailed closure plans, including clear triggers for progression between stages and defined information requirements at each phase of the life of the quarry.

CCAA considers that the effectiveness of the current framework could be strengthened through the following refinements:

- **Differentiated expectations across mine life**

Guidance should more clearly distinguish between early-life and late-life operations. For quarries with many decades of remaining resource, closure documentation should remain appropriately strategic and high-level, reflecting the inherent uncertainty associated with long-term planning and land use change.

- **Managing end-use uncertainty**

The Department should explicitly acknowledge that early-stage closure plans may contain broad conceptual end-use statements, with detailed design elements developed closer to cessation when planning settings and community expectations are clearer.

- **Recognition of evolving extraction geometry**

Operational realities frequently result in changes to pit configuration, final contours and drainage layouts over time. The Policy should clearly permit material updates to closure landform concepts and rehabilitation strategies as quarry development progresses.

- **Clear reporting expectations**

Industry would benefit from more explicit guidance outlining:

- Minimum reporting requirements.
- What constitutes acceptable evidence of progressive rehabilitation; and
- When the Department expects detailed design documentation.

Such clarity would support consistency and improve regulatory efficiency.

From CCAA's perspective, the principal challenges associated with effective closure planning are:

- The long-term uncertainty surrounding post-extraction land use;
- The dynamic nature of quarry development over multi-decade lifespans; and
- Expectations for detailed closure planning that may not align with the level of certainty available in early operational stages.

To assist industry in implementing best practice rehabilitation, CCAA supports the development of practical technical guidance addressing:

- Progressive shaping and trimming of quarry faces;
- Establishing stable slope gradients;
- Crest rounding and contour blending;
- Topsoil and overburden management methodologies;

- Drainage and erosion control design;
- Provision for post-closure access and maintenance, and
- Templates, case studies and structured checklists aligned with outcome-based objectives would be particularly valuable.

The planning and land use environment in South Australia is evolving at an increasing pace, influenced by population growth, infrastructure demand and emerging industries. For long-life quarry operations, this makes long-term certainty challenging. A closure framework that is flexible, staged and performance-based will better accommodate this reality while maintaining strong environmental safeguards.

CCAA looks forward to continued engagement with the Department as the Policy and supporting guidelines are refined and would welcome the opportunity to contribute further to their development. Please contact our State Director, Jason Kuchel at jason.kuchel@ccaa.com.au or on 0448 848 848.

Yours sincerely



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