

31 October 2023
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Via email: MRFFreview@marsdenjacob.com.au

SUBJECT: MINING REHABILITATION FUND REVIEW

Dear Phillipa

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide comments on the review of the Mining Rehabilitation Fund (MRF).

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 **supports** the continuation of the MRF in its current form with the following comments that should improve the efficiency and effectiveness of the Fund:

- The current contribution rates to the Fund are fair and reasonable and should continue.
- The Fund should set a KPI for the proportion of funds spent on administration compared to the funds spent on works on the ground in rehabilitating abandoned sites. CCAA understands from publicly available Annual Reports that for 2021-22 it was of the order of 30 (administration): 70 (works on ground), previous years it was the reverse, i.e., 70 (administration): 30 (works on ground). In order to achieve a key aim of the Fund, which is to rehabilitate abandoned sites, the KPI should be 30 (administration): 70 (works on ground). Leaving such sites unrehabilitated impacts the whole industry's social licence and should be addressed as efficiently as possible.
- Data duplication between the MRF and the DMIRS EARS system should be streamlined and harmonised. Only one report is required under the EARS annual report providing exactly the same information as required for the MRF. The data requirements for both IT systems should be consistent, so that the MRF can read the relevant data from the EARS system. This will improve consistency of reporting and significantly reduce administrative and compliance costs for DMIRS.
- For operations with multiple tenement owners, there should only be the requirement to report once per tenement, not for each owner to report on the operation separately. This only increases administrative burden and increases the likelihood of data errors.

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