

3 March 2023
Tyler Sujdovic
A/Executive Director
Resource & Environmental Compliance
Department of Mines, Industry Regulation and Safety
100 Plain Street
East Perth WA 6004

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

SUBJECT: DRAFT PoW GUIDANCE AND EXPLORATION REHABILITATION GUIDANCE

Dear Tyler

Cement Concrete & Aggregates Australia (CCAA) welcomes the opportunity to provide comments to the Department of Mines, Industry Regulation and Safety (DMIRS) on the draft Program of Work Guidance and Exploration Rehabilitation Guidance.

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. For your information, a list of CCAA members in Western Australia is provided in Appendix 1.

CCAA supports the release of these guidelines that aim to streamline processing times and clarify DMIRS' expectations so that both the proponent and regulator have a joint understanding of what compliance looks like in a practical sense.

CCAA provides the following more detailed comments to improve clarity for these guidelines:

PoW Guide

- Section 1.3.1 EPA: there should be an allowance for discretion for different types of exploration works given the large exclusion areas proposed by DMIRS, e.g. – a 50mm drill hole within a State Forest does not present the same environmental risk profile as a test pit in a State Forest. Whilst the spatial application system gives the proponent the option to exclude areas from their work program, there is the potential for extended approval wait times if exploration works are required to be referred to other government departments. This has flow on effects of potentially not being able to reach minimum expenditure of exploration licences due to extended approval timeframes, other permits/approvals expiring, etc and as a matter of principle, should be minimised where ever possible.
- Section 1.4.2 Dieback Management: CCAA **recommends** the Guide also link to the 2021 Dieback Working Group [document](#), *Best Practice Guidelines for Management of Phytophthora Dieback in the Basic Raw Materials Industries* which provides up to date information in a risk based format for exploration works.

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.

Please do not hesitate to contact me to discuss any of these issues in more detail.

Yours sincerely



ROGER BUCKLEY






State Director Western Australia

APPENDIX 1

CEMENT CONCRETE & AGGREGATES AUSTRALIA

MEMBERSHIP

FOUNDATION MEMBERS

 <p>ADBRI Adbri Limited</p>	 <p>Boral Australia</p>	 <p>Cement Australia Pty Ltd</p>
 <p>Hanson HEIDELBERGCEMENTGroup Hanson Australia Pty Ltd</p>	 <p>Holcim Holcim (Australia) Pty Ltd</p>	

WESTERN AUSTRALIA

ORDINARY MEMBERS

<p>B&J Catalano Pty Ltd Flyash Australia Pty Ltd Fulton Hogan Industries Lime Industries Pty Ltd</p>	<p>Pilatti Bros Transport Ransberg Pty Ltd T/a WA Premix and WA Bluemetal Urban Resources Pty Ltd</p>	
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ASSOCIATE MEMBERS

<p>Concrete Colour Systems Concrete Waterproofing Manufacturing Pty Ltd T/a Xypex Australia</p>	<p>GCP Applied Technologies Sika Australia Pty Ltd Westrac</p>	
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