Response to Submissions – Round 2
Draft Mining Proposal and Mine Closure Plan for Low Impact Mining Operations

Stakeholder *Names are not displayed where the individual or organisation has marked the submission as 'In Confidence'*	Comment *xxxx Used to protect the names of Departmental Officers*	Response/Action	* How supportive are you of the draft form? * 10 extremely supportive, 5 supportive, 1 not at all (–) not indicated	* Is it easier than the current Small Operations Mining Proposal and Mine Closure Plan forms?	Is additional guidance required?
MBS Environmental	Generally the form looks like a big improvement on the previous one, and should assist small operators to understand the expected level of environmental performance. It might be good to suggest a search of a larger area than just the tenements on Naturemap, as often searches of small areas will return no results because no survey have been completed in the area	Comments noted with thanks.	10	10	–
In Confidence 17	Dear Commitee, At the conclusion of the last workshop we were promised further workshops to be able to systematically work through the draft Mining Proposal and Closure Plan Im not happy with the current draft mining proposal and closure plan as it will force bona fide prospectors and explorers out of business as it will push me into a full blown mining proposal category where I cannot afford the financial costs of employing consultants to prepare a mining proposal The department has asked for written comments I have found many times over that the department does not always understand matters that are put in writing,	Comments noted with thanks. The initial workshops in Kalgoorlie provided the basis for development of the draft form. As this form is relevant to small miners across industry and the State, broader consultation has been undertaken to ensure all stakeholders are captured. Following initial consultation and feedback, the draft form was revised and was released for a further nine-week comment period to capture any further comments on the form. It is intended that the form will be published and made available for use. The Department welcomes any feedback on the form's use.			

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	This is why workshops are required as you can clearly discuss the matters, knowing that the department understands what you are referring to and then try to look for solutions that actually help us small miners and not put us out of business I am requesting the department hold further workshops on this draft form as was promised by xxx and another DMP officer. To not hold any further workshops as promised I regard the department as misleading stakeholders to suit their own agenda of forcing the small miner out of business and the mining industry.				
In Confidence 18	I am not satisfied the with the current Draft Mining Proposal and Closure Plan and would like the opportunity for input into proposed changes. I have been involved in the prospecting industry based in Kalgoorlie for 30 years. At the last workshop in Kalgoorlie attendees were promised further workshops to work through the rest of the draft document. It appears that the department is not listening to industry and is making changes without consultation and input from the end users. It is not acceptable to make changes where attendees were promised further workshops to work through the form and now to be totally excluded from being able to have any input the document. I request that further workshops be held just as they were held before to try and find some consensus with a good working document that actually helps and reduces the regulatory burden upon prospectors.	Comments noted with thanks. The initial workshops in Kalgoorlie provided the basis for development of the draft form. As this form is relevant to small miners across industry and the State, broader consultation has been undertaken to ensure all stakeholders are captured. Following initial consultation and feedback, the draft form was revised and was released for a further nine-week comment period to capture any further comments on the form. It is intended that the form will be published and made available for use. The Department welcomes any feedback on the form's use.			
In Confidence 19	I now wish to have the comments recorded for the submissions closing 22 December 2017. My Comments for this Draft Mining Proposal and Mine Closure Plan are that the Department is trying to force small miners and prospectors out of the industry by creating barriers to entry with increased duplication, increased paperwork and complexity and making it cost prohibitive such that full time bona fide small miners will no longer be able to operate and participate in the industry.	Comments noted with thanks. The initial workshops in Kalgoorlie provided the basis for development of the draft form. As this form is relevant to small miners across industry and the State, broader consultation has been undertaken to ensure all stakeholders are captured. Following initial consultation and feedback, the draft form was revised and was released for a further nine-week comment period to capture any further comments on the form.			

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	I wish for all of my comments to be quoted in full, not in part as if this is not done, once again the department just selectively misrepresents matters with incorrect and misleading information to others just as it had done in the past which creates the problems. The Release of this LIMO form without having any further consultation face to face workshops that were promised has just reinforced just how morally corrupt the department is with its officers They have misled and deceived people which warrants nothing less a Royal Commission to expose to serious misconduct of officers involved in this process. I wish to record my utmost disgust with the way the LIMO Form has been released without no further workshop face to face consultation which was promised by officers at the very last meeting At the last consultation meeting XXX and XXX both told people in the room that they would have further workshops on the LIMO Form These two people specifically asked people in the room if further face to face workshops were agreeable and acceptable to which all in the room agreed as a way forward. I reiterate we have been misled and deceived by departmental officers. I can now see why the Department did not want to have fully transcribed transcripts of all these LIMO workshop meetings as to do so would so expose the manipulation and truth being exposed. The disappointing aspect to all this is it clearly shows the department environmental division has an agenda to shut the small miners and prospectors out of the industry by making it so hard, with increased duplication, increased paperwork and complexity whilst at the same time falsely maintaining to members of the public that they strongly support small miners and prospectors in the industry At the very first meeting XXX from the Department clearly told everybody in the room that the Department had changed this LIMO form in the last TEN years (10) years without any form of consultation and the department was now faced with increased paperwork which was also making it harder for genuine small miners and prospectors.	It is intended that the form will be published and made available for use. The Department welcomes any feedback on the form's use.			

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	The Department should be clearly honouring statements and commitments made by XXX and XXX to have further face to face workshops to refine and get a workable LIMO document that actually helps small miners and prospectors By having further face to face workshops to refine the LIMO form they can demonstrate they actually support exploration and mining and gain the confidence of all in the industry. This will provide for responsible orderly development of the industry. Another important point sometimes people do not have the literacy skills to articulate comments about a LIMO Form with submissions in a manner in which the Department understands so the Department clearly runs off with a misinformed view or misinformed position, That is why face to face workshops are the best method of addressing matters to find a conciliatory approach and agreeable LIMO Mining form and closure plan which can help the industry as a whole.				
In Confidence 20	In relation to the new LIMO Approvals form, I query the date for the next stakeholder workshop. Having received your draft document on the 2nd Nov, I now look forward to the next workshop as promised at the last meeting in July 2017. I would like to see a room full of people with their livelihoods and vested interests question the ambiguity of this hollow document. I fear, in its current draft, that the prospectors and small scale miners who rely on a government department to manage and protect their future will be plucked off one-by-one! By people who do not have any skin in the game and whose future will be unaffected by their actions. Please get the people at risk, whose future need this document to be right, back to the table.	Comments noted with thanks. The initial workshops in Kalgoorlie provided the basis for development of the draft form. As this form is relevant to small miners across industry and the State, broader consultation has been undertaken to ensure all stakeholders are captured. Following initial consultation and feedback, the draft form was revised and was released for a further nine-week comment period to capture any further comments on the form. It is intended that the form will be published and made available for use. The Department welcomes any feedback on the form's use.			

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In Confidence 21	In general the form looks good. I have a few suggestions: 1. "For tenements with multiple tenement holders, have all of the holders consented to this proposal being submitted?" Modified to: "For tenements with multiple tenement holders, have all of the holders received copies of the Proposal and provided written consent to this particular Proposal being submitted?" 2. 2.6 modified to "Please describe any additional flora and/or fauna surveys conducted on the tenements. Please include any relevant documents as appendices." 3. 9.5 allow an option to consider water used to hypersaline and conduct operations in light of that assumption rather than require testing. 4. Include an email option in notifying the pastoralist.	Comments noted with thanks. 1. Mining Proposals covering tenements held by multiple tenement holders must include an authorisation from all tenement holders. 2. As per the Guidelines for Mining Proposals in Western Australia (2006) surveys must be undertaken by suitably qualified persons. 3. This section has been revised to: "Describe the water source, quality of the water (if known) and how it will be stored and utilised on site. Provide the height and/or depth of any dams/turkeys nests." 4. This refers to a standard tenement condition. Under the Mining Act, where any land in an application for a mining tenement is held subject to a pastoral lease, the applicant shall within the prescribed period, post a copy of the application by registered post or certified mail to the holder of that lease at his usual or last known place of abode or business. The application must be accompanied by a map with clearly delineated boundaries of the tenement land.			