

21 November 2023

Our Ref: TPL15

Department of Mines, Industry Regulation and Safety

To Whom it May Concern,

RE: FEE FOR OBJECTION UNDER THE MINING ACT 1978

Thank you for the opportunity to provide a submission to the proposed amendment to the Mining Regulations 1981 to introduce a prescribed fee of \$859 for lodgement of objections under the *Mining Act 1978*.

Over recent years, the Nannup community has become more aware of mining activities and are taking a higher level of interest in those that are up for consultation, lodging objections and or lodging support.

There are a number of concerns that the Shire has with the proposed \$859 fee for lodging objections as part of the *Mining Amendment Act (No.2) 2022*.

1. Value of the Fee.

The fee is far too high. It is understood that Department of Mines, Industry Regulation and Safety (DMIRS) are attempting to install a flat fee for all, whether the submitter be a large company, small business, landowners, residents, impacted landowner, government body or any other form of entity/person. This approach is wrong as it is not affordable for the average resident, small business entity and small local governments.

It is suggested that a non-standard fee system is applied as per the following;

- a) Directly impacted landowners, such as those who an application impacts directly on their property either being on their property or on a neighbouring property to an application area. These landowners should be able to make an objection at no cost.
- b) Non-directly impacted members of the public should be able to make an objection for a nominal set fee of \$20 per application and be limited to one objection for application.
- c) Local Government bodies and small business owners should be able to make an objection to an application for a set fee of \$100 per application.
- d) Large businesses who are not mining companies should be able to make an objection to an application for a set fee of \$500 per application.
- e) Mining companies of small size should be made to make an application for a set fee of \$1,000 per application.
- f) Mining companies of small size should be made to make an application for a set fee of \$3,000 per application.



2. Equal Fees for both objectors and supporters.

The exact same fee structure as listed in part 1 should be implemented for all lodgements whether they object or support the application.

The proposed DMIRS fee structure sends the message that DMIRS want to make it as difficult as possible for objectors to make submissions and as easy as possible for supporters to make submissions, whether this was intended or not, this is the message that is being sent in the current proposal.

I believe that the above alternative proposals would provide better government leadership through a fairer and transparent process with equal rights for both objectors and supporters and ensuring that communities are genuinely heard during applications.

If you would like any clarification or have any queries regarding the above mentioned, please do not hesitate to contact myself on (08) 9756 1018 or via email to nannup@nannup.wa.gov.au

Yours sincerely,



DAVID TAYLOR
CHIEF EXECUTIVE OFFICER

