

26 November 2019

DRG Consultation Mailbox
Division of Resources and Geosciences
NSW Department of Planning, Industry and Environment

By email: consultation.drg@planning.nsw.gov.au

NSW Draft Mineral Exploration Minimum Standards

Dear Madam or Sir,

Cotton Australia is the key representative body for Australia's cotton growing industry, supporting about 1,200 cotton farming families from 152 regional communities across NSW, Queensland and now into Victoria.

We welcome the opportunity to comment on the *draft Mineral exploration Minimum Standards*, noting that it has been drafted to deliver action 4.4 of the *NSW Minerals Strategy 2019*.

Cotton Australia considers that the protection and sustainability of land and water resources and enhancement and maintenance of landholder land access rights is of utmost importance. While we recognise that the mining industry offers potential economic benefits to Australia, without proper regulation and enforcement the mining industry also poses significant risks to the Australian Cotton Industry.

Consequently Cotton Australia's long-held mining policy principles include:

- Protecting the productive capacity of agricultural land from mining extraction activities.
- Opposing any mining development unless and until it can be definitively proven, that the development will have no impact on the productive capacity of the land.
- That any existing or approved mines are rehabilitated to their pre-development productive capacity, within five years of ceasing production.

It is from this policy position we provide the following brief comments.

We understand that exploration licence and assessment lease applications will still be required to outline the activities the applicant or transferee expects to undertake, including community engagement and environmental management. However it is disappointing that the proposed minimum standards will not be used as a compliance or enforcement instrument during the authorised term of the exploration licence or assessment lease.

Cotton Australia recommends that the *draft Minimum Standards for Exploration* make more explicit reference to the potential disruption to the landscape and the landholder during exploration. It is imperative that the biosecurity status of the farming enterprise is maintained from the moment reconnaissance activities begin through to restoring and/or remediating exploration and assessment areas that have been disturbed during the exploration works program.

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We note the *draft Minimum Standards for Exploration* make reference to the applicant or transferee's nominated technical manager having 5 years or more exploration experience or membership of a recognized relevant professional organization. The document could take a similar approach the potential disruption incurred during exploration.

In Cotton Australia's view that the draft minimum Standards must also make reference to the Department's existing "Land Access Arrangement for Mineral Exploration" (2013) [<https://www.resourcesandgeoscience.nsw.gov.au/landholders-and-community/minerals-and-coal/template-for-land-access>].

Additionally that the draft Minimum Standards must require the applicant or transferee to demonstrate they are conversant with this document's contents. Hence the Department's 'decision-maker' would be able to access not just the technical abilities but the manner in which the applicant or transferee proposes to conduct its activities.

For more information, submission please do not hesitate to contact me on 02 9669 5222 or jenniferb@cotton.org.au.

Yours sincerely,



Jennifer Brown
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Cotton Australia