



# The Sustainable Engineering Society

*...engineering in harmony with ecology*

Sustainable Engineering Society  
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MQRA Project Team  
Business and Stakeholder Solutions  
Department of Natural Resources and Mines

***By Email***

Dear Sir/Madam

**Re: Mining lease notification and objection initiative discussion paper**

The Sustainable Engineering Society is a society of Engineers Australia that exists to promote environmental and sustainability issues of relevance to the environmental engineering profession and other environmental professionals. Environmental engineers and other environmental professionals complete and contribute technical expertise to many environmental assessments of mining activities and are particularly informed and experienced.

Analysis of the discussion paper raises a number of concerns, primarily the distortion of stakeholder consideration during the notification and objection process and subsequent assessment. It would appear that the primary beneficiary of the initiative is the applicant.

In our professional experience, the best environmental and sustainability outcomes arise when both the benefits and costs are properly recognised, considered and consequences appropriately mitigated.

The discussion paper proposes a significant reduction in stakeholder engagement, which has the potential to reduce the range of identified consequences and therefore lead to reduction or omission of appropriate analysis of those consequences. Ironically, experience indicates that, although the applicant may initially perceive such an approach as advantageous, the failure to properly understand the consequences of a proposal can substantially increase costs to the applicant over the life of a project. In our opinion, nobody wins under the proposed regime.

The implication of removing the public notification process for mining lease applications will effectively result in the vast majority of mining lease applications in Queensland having no public notification at all.

Limiting community objection rights to “site-specific” environmental authority applications will remove existing community participation rights in up to 90% of mining projects in Queensland.

SENG urges the Queensland Government to adopt a regulatory environment that achieves positive natural and social capital returns to the community, in addition to economic returns. Simply achieving economic

benefit at the expense of degraded natural environments and societal disruption leaves Queensland poorer in the long term. The discussion paper fails to achieve this balance, and should be withdrawn.

To facilitate the reduction of 'Red Tape', SENG recommends that a signed statement should accompany any mining lease application that involves low or high risk environmental relevant activity from a Registered Professional Engineer Queensland (Environment). This statement should certify that the environmental impacts have been reviewed and clearly identify the strategies proposed to mitigate risks associated with those impacts. If the application is subsequently approved, these impacts should form the basis of any subsequent environmental impact statement.

There exists a pool of fully qualified environmental engineers and other environmental professionals, working within industry standards and regulatory regimes, available to ensure that appropriate outcomes are achieved. It would be appropriate for the Queensland Government to mandate the involvement of such professionals in the approval process for mining leases to ensure that sustainable benefits are realised.

Early consultation on the perceived impacts will reduce the cost of mining development, as all parties would have a greater understanding of the proposal and its potential consequences. The Queensland Government must empower all stakeholders to participate in a meaningful way to the considered and professional analysis of mining impacts and the development of acceptable mitigation strategies, together.

Yours sincerely



**Dr Alice Howe**  
SENG National Board Chair  
On behalf of the SENG National Board



**Sandy Stewart**  
SENG Queensland Branch Chair  
On behalf of the SENG QLD Branch

cc: Campbell Newman MP, Premier of Queensland  
Queensland Environmental Defenders Office