



# Feedback form

## Draft guideline: A guide to preparing revegetation plans for clearing permits under Part V of the *Environmental Protection Act 1986*

### Respondent information

**Company or association represented by this submission**

Nil

**Your name**

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**Why are you/your business or association interested in the draft guideline titled 'A guide to preparing revegetation plan for clearing permits under Part V of the *Environmental Protection Act 1986*'?**

Guidance statements are integral to ensuring proponents and other relevant stakeholders have a clear understanding of what their obligations are under various legislation as well as the expectations of government agencies. In effect, well defined guidance material will expedite approvals and project implementation processes and should aim to reduce duplication between legislation and/or agency requirements. Therefore I appreciate the opportunity to assist DER with the development of this guideline and provide feedback from an industry and proponent point of view on the efficacy of agency guidance statements.

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N/A

## Feedback on the draft guideline: A guide to preparing revegetation plans for clearing permits

Are there any parts of the draft guideline where the requirements are not clear? Please outline in the text box below, indicating the page, section number and title for each part being referred to.

In general this is a well defined revegetation guideline. However it only really considers the return and monitoring of native vegetation. Some consideration should be given to instances where revegetation may not be achievable or incompatible with the end land use e.g. on pastoral land where a return to a pasture or fodder species may be relevant. Detailed guidance on how a proponent should deal with this and negotiate with DER and other stakeholders would be very beneficial in this guideline. Though in instances such as this, the revegetation condition may not appear on an NVCP in the first place?

There could be greater alignment with and/or recognition of the 2015 DMP/EPA joint Guideline for preparing mine closure plans. For instance, for a mining project that is governed by both Mining Act and non-Mining Act tenure where the EP Act prevails, there could be two separate document requirements (Rehab & Closure Plan, Reveg Plan) to meet two conditions (tenement and NVCP) of similar intent, a dual purpose rehab/revegetation closure plan should be accepted by the DER and DMP that covers both areas of tenure. As there are many similarities between the requirements of this guideline and the DMP/EPA guideline, a dual purpose document would greatly reduce the administrative and cost burden on a proponent.

Defined roles and responsibilities section would aid inexperienced proponents in understanding where support from DER is available, and in what capabilities when preparing the revegetation plan. Where DER cannot assist, a proponent would then be accountable for seeking external SME advice should it not be available internally.

Please provide other comments or suggestions in the text box below, indicating the page, section number and title for each part being referred to.

Other suggestions:

pg 21/43 Table 5,— consider including fauna return (eg ants, reptiles) and grazing in monitoring data as these are indicators of success and threats.

pg 22/43 Add section **6.1.5 Fauna**— this would incorporate monitoring of native species return, feral presence (e.g. goats) and grazing observations/threats

pg 24-25/43 section 7 – the useful resources listed could be less specific and more general in nature. For instance, as this guideline is intended to be relevant across the States various environments, those referenced in section 7.6 are of no use to projects in the Midwest, Pilbara or Kimberley regions. Include the 2015 EPA/DMP Rehab an Closure Guideline in section 7.1, this is a very useful tool for proponents for other considerations such as soil quality, topsoil storage considerations etc.