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**Nature Reserves Preservation Group
of Kalamunda, Inc.**

21 Nov 2023

TO: RTD.Consultation@dmirs.wa.gov.au
CC:

SUBJECT: Submission on the Fee for Objections under the Mining Act 1978

This submission is made on behalf of the Nature Reserves Preservation Group of Kalamunda (NRPG), a non-profit community organisation which has worked for 30 years to preserve the natural areas in Kalamunda and surrounds. As such we recognise that our Native Forests and ecosystems are incredibly precious, biodiverse and globally unique, and they have been subject to extensive clearing and mining which threatens their survival.

The NRPG objects to the imposition of the proposed increase of fee to \$859 to lodge objections to mining tenement and other applications on the following grounds:

- It is unrealistic to expect volunteer/non-profit organisations to pay these fees and will therefore will inhibit the exchange of local and technical expertise, particularly in light of the fact that the WA EPA specifically asks for this kind of information to enhance the detailed understanding of important issues and threats to our Environment.
- Recent experience with a company proposing a mining tenement indicates that some of these applications are largely speculative at a time of a 'frenzied boom' in the search for metals and minerals needed for the 'green' transition. However, it is important that in the rush for this, we do not do further damage to our climate by destroying our natural environmental carbon sinks in the process. It is frequently volunteer and non-profit organisations which raise issues and objections on valid grounds, and it is unfair to place a further burden on them, when the industry (which if it is serious) stands to make substantial profit. Therefore the burden should be on the applicant.
- The present requirement on volunteer/no-profit groups to have to attend Wardens Court hearings to make an Objection, is already a burden which discourages them from objecting and should be dropped to simply allow the Objections to be submitted by email, at no cost, as it is with almost all other public consultations.

NRPG appreciates this opportunity to comment on such an important topic and we look forward to the simplification of the 'Objection' process, rather than increase the impediments to 'open and free' consultation.

Yours sincerely,

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