



Environment Centre NT

protecting nature | living sustainably | creating a climate for change

Attention: Rod Applegate
Department of Industry and Resources
Darwin NT 0800

Mode of delivery: By email

14th March 2017

Dear Sir,

RE: Response to Environmental Security Bonds

Thank you for extending this opportunity to submit comments relating to Environmental Security
The mission of the Environment Centre NT is to

- protect and restore biodiversity, ecosystems and ecological processes,
- foster sustainable living and development, and
- cut greenhouse gas emissions and build renewable energy capacity.

The Environment Centre NT (ECNT) works by

- advocating for the improvement of environmental policies and performance of governments, landholders, business and industry;
- partnering on projects and campaigns with conservation and climate organisations, governments, Indigenous organisations, community groups, businesses, and landholders;
- raising awareness amongst community, government, business and industry about environmental issues and assisting people to reduce their environmental impact;
- supporting community members to participate in decision making processes and action;
- recognising the rights, aspirations, responsibilities and knowledge of the Territory's Indigenous peoples; and,
- acknowledging that environmental issues have a social dimension.

For 35 years, ECNT has positively contributed to the development of environmental laws and policies in the NT, provided a voice for the community on environmental issues , educated community members about how they can reduce their environmental impact and put forward innovative and well-informed projects and policies.



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ECNT's response to policy relating to Environmental Security Bonds and the current policy of non-disclosure

ECNT welcomes the review by Department of Primary Industry and Resource into the current policy of non-disclosure of mining security amounts, in the government's commitment to openness and transparency. We appreciate the opportunity to put forward our views and acknowledge the need for a change in the current policy.

We contend that security bonds for every individual mine should be made public, in place of the current practice of the Department only disclosing *the total amount* of security bonds held by the Government.

Given that there is a history of insufficient security bonds being held by mining companies in the Northern Territoryⁱ upon sudden closure of the mine, we suggest that publically disclosing the amount of the security bond will enable greater rigour, scrutiny and engagement at the beginning of the mine sites life. This will help to ensure there are sufficient funds to cover the full costs of rehabilitation in the event a mining company fails or in the event they are unable to fulfil the responsibility of full rehabilitation.

Northern Territorians have a right to know the amount of the environmental security bond given that in the event of early mine closure, the responsibility and costs (beyond the held security bond) to rehabilitate the mine may fall to government and ultimately the tax payer. Openness and transparency of the environmental security bond will also enable the public to understand and scrutinise the potential liabilities of mining projects and the performance of the government in managing them.

In relation to security bonds in general, we call for increased rigour in the calculation of these bonds and more prescriptive criteria, through legislative reform. It would be appropriate for this to include the requirement that the minister to be satisfied that there is sufficient funds to cover all of the rehabilitation costs.

Thank you again for the opportunity to comment on this very important matter.

Regards,

Shar Molloy
Director ECNT
08 8901 7783

ⁱ Including Mount Todd mine, Frances Creek mine, Redbank Mine, Roper mine and Bulong Nickel Project