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By email: Claire.Cooper@resources.qld.gov.au

CC: Resources-Tenders@resources.qld.gov.au

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Re: Draft Abandoned Mines Re-Commercialisation Principles

Dear Claire,

Thank you for the opportunity to comment on the draft abandoned mine re-commercialisation principles (Principles').

AusIMM has engaged subject matter experts across our membership, including recognised post-mining land use experts from our Social & Environment, Geomechanics and Consultants societies, to inform the comments and recommendations we make in this submission.

Our key recommendations are to:

1. Develop a clear, coherent and comprehensive regulatory framework for all post-mining land use in Queensland, including the re-commercialisation of abandoned mines.
2. Pursue an integrated, place-based approach to strategic post-mine planning, reflecting the site-specific nature of individual projects and the broader social, environmental, heritage and economic factors pertaining to each host community and region.
3. Ensure decisions about the nature and extent of public support for re-commercialisation are consistent with this place-based approach, align with government's broader priorities and reflect value for money.
4. Invest in programs to build capability and develop a professional workforce with the skills and knowledge required to identify and deliver positive post-mining outcomes.

We provide further information on these recommendations in the pages that follow.

Importantly, AusIMM commends the Queensland Government's commitment to a principled and consistent approach to abandoned mine re-commercialisation. We strongly support the overarching goal to deliver public benefit, net environmental improvement and economic performance through Government involvement in abandoned mine re-commercialisation.

To discuss this submission and AusIMM's further contributions to the development of abandoned mines policy in Queensland, please contact our Senior Manager for Government Relations, Harry Turner, at hturner@ausimm.com. Of note, we welcome further engagement regarding planned policy-development forums to be held at our Life of Mine and Mine Waste and Tailing Conference taking place in Brisbane from 29 – 30 July this year.

We look forward to continuing to work with you to shape best practice, build industry capability and support the delivery of the QRIDP for the benefit of the Queensland community.

Our thanks and best regards

Yours sincerely,



Stephen Durkin FAusIMM CEO, AusIMM

AusIMM response to Draft Abandoned Mine Re-Commercialisation Principles

AusIMM is the peak body representing 15,000 professionals working across the global resources sector, active in more than 110 countries and working in disciplines ranging from engineering and geology through to environmental science, social performance and management.

We exist to advance the resources sector through the expertise and leadership of our professional community, and work with all levels of government to shape policy and contribute to well-informed public and industry dialogue.

AusIMM commends the Queensland Government for its commitment to delivering enduring social, environmental and economic value through the proactive management of post-mining land. Ultimately, our view is that achieving productive post-mining land uses is a shared responsibility for industry, government, local communities and partners beyond the mining industry to pursue together.

While re-commercialisation is only one of a range of possible 'future states' for abandoned mines, we support the Principles as a means of providing clarity on the Government's approach to investing, enabling and managing risks in this rapidly developing area of practice.

Case studies from within Queensland, across Australia and in major mining regions around the world show that a principled, integrated and coordinated response from government is essential not only to manage risks but also to realise the significant potential value that exist for mine recommercialisation.

AusIMM's recommendations in relation to abandoned mine re-commercialisation cover four areas: the imperative for a clear overarching policy and regulatory framework regarding post-mining land use, the importance of pursuing a place-based approach, the need to align re-commercialisation with the government's broader policies and public investment approach, and the fundamental role of a skilled, expert professional workforce to deliver positive outcomes.

We provide our specific insights and recommendations below.

A clear, coherent and coordinated framework for post-mining land use in Queensland

Post-mining land use enlivens a complex series of environmental, economic and community interests, each of which give rise to discrete risks, liabilities and opportunities that play out at the site, local and regional levels. Mine site re-commercialisation is a field of practice in which the technically and economically viable range of possibilities continue to develop at pace, and we can reasonably expect the industry to continue innovating in the years to come.

An integrative approach across the mining lifecycle is required, accounting for multiple and diverse post-mining land uses, distinct environmental, ecological and heritage values and the breadth of community perspectives regarding the development of legacy mine sites.

Defining an integrative approach

Crucially, a genuinely integrative approach to mine closure must include consideration of how to deliver an effective social transition for and with impacted stakeholders. This is fundamental to provide a positive legacy for mining, and involves:

- Community participation in planning.
- Assessment of social risks and mitigations.
- An agreed vision for post-mining land use.

- Transparent engagement and stakeholder involvement.
- Proactive management and a focus on social benefits.

Planning for effective social transition, including where re-commercialisation is envisaged, therefore involves:

- Establishing the social context and developing a stakeholder knowledge base, accounting for the full composition of the community and retaining scope to adjust plans as expectations change and evolve. As outlined below, local and regional dependencies are of critical importance here.
- Designing a responsive stakeholder engagement plan.
- Developing plans that account for financial liabilities and support self-sufficiency for ongoing post-mining activities, particularly in the context of re-commercialisation.
- An adequate level of closure governance, reflected in corporate policies and standards, and overseen by appropriate arms-length and regular reviews.

AusIMM recommend these factors be incorporated into the draft Principles.

Navigating the regulatory landscape

The existing regulatory framework for abandoned mine re-commercialisation is complex, involving various agencies and legislation governing mining tenures, land use, environmental approvals, heritage protection, and safety and health. This complexity extends to liabilities, which encompass both 'legacy' risks from past mining and new risks arising from re-commercialisation activities, often with unclear distinctions.

A fit-for-purpose policy framework is required to deal with all aspects of post-mining land use and abandoned mines management, of which re-commercialisation is but one (albeit significant) part. While the Principles are valuable, further clarity could be provided through:

- A clear statement of the Government's overarching policy objectives and regulatory approach to abandoned mines and post-mining land use in Queensland. Such a statement should signpost priorities on a regional basis, and in a manner that reflects the Government's broader social, environmental, heritage, mining, energy and economic development priorities.
- An appropriate tenure for mine rehabilitation and other post-mine land uses, including secondary mining, energy generation and storage, tourism and other activities.
- Establishment within the Abandoned Mines Land Program of an appropriate coordinating function for post-mining land use proposals, including re-commercialisation.
- Implementation of a regular auditing and reporting regime for re-commercialisation and other re-purposing projects, to ensure outcomes are achieved, risks are appropriately managed, and both 'legacy' and 'newly created' liabilities are allocated equitably between government and project proponents. Our initial view is that the Queensland Mine Rehabilitation Commissioner can play a useful role in this respect.

In the absence of such a framework, it is unclear precisely how the draft Principles would interact with and inform regulatory and investment decisions taken by the Government.

A regionally determined approach that accounts for society, environment and the economy

AusIMM calls for a regionally determined approach to post-mining land use, reflecting the site-specific nature of re-commercialisation opportunities, and the diversity of social, environmental, industrial, infrastructure and other considerations that will determine the nature and viability of future proposals.

Local and international experience shows that a place-based approach encourages proponents to pursue projects that deliver a clear net benefit to the broader region and also encourages industry to develop rehabilitation plans that accommodate a range of potential post-mining land uses.

Consider, for example, the following case studies:

- Large-scale forest restoration in the Appalachian coalfields, made possible only after significant coordination between state and federal agencies in the United States to manage regulatory using special purpose 'Good Samaritan' legislation.
- Establishment of a Global Centre for Rail Excellence in New South Wales, a state-led facility with joint funding and ownership from the Welsh and UK governments that has successfully 'crowded in' a range of industry and university projects.
- The North Duisburg Landscape Park in Germany, which operates as a post-industrial tourism asset on the site of an historic mine and ironworks.
- The Kidston Clean Energy Hub in Far-North Queensland, details of which will of course be familiar to the Department.

In practice, implementing this approach to post-mine land use will require Government to:

- Undertake strategic post mining land use planning on a regional basis, including (for example) in the Bowen Basin, Northwest Minerals Province and North-West Cape.
- Define key social, economic and environmental drivers at the site and regional levels, to provide a clear signal for recommercialisation project proponents.
- Complete baseline environmental, social and governance assessments for the state's most significant sites, accounting for a range of current and future post-mining opportunities.

We recommend that such an approach also be reflected in the language of the draft Principles.

The nature and scope of Government support for recommercialisation projects

The Governments role in abandoned mines management and post-mining land use is significant in several key respects. The Government is responsible for regulating health, safety and environmental risks, for planning and coordinating project proposals, and potentially for acting as a project proponent.

The Government may also be the consumer or end-user of goods produced at a post-mining site, for example where a mine is re-purposed for energy generation or storage. In many cases, the Government may be the default legal custodian of abandoned or 'disclaimed' mines under various state and federal legislation.

Given the broad and direct nature of the state's interest in abandoned mines management, AusIMM recommends that:

- Government prioritise opportunities to act as the direct consumer of outputs from re-commercialised abandoned mines, including (for example) via offtake agreements for energy storage projects, or consuming recycled and remined material for local infrastructure projects.

- Direct public investment in recommercialisation projects only take place where proposals align with government priorities, represent value for money and are 'investment ready' within the meaning of the Queensland Government's broader industry development strategy.

AusIMM recommends that these factors be incorporated into the draft Principles.

Building capability, sharing best practice and developing a skilled professional workforce

AusIMM invite the Queensland Government to participate in the initiatives we are delivering to define best practice, share knowledge and lift industry capability in relation to post-mining land use.

Our fundamental view is that unlocking the value inherent in the state's legacy mine sites depends on access to a highly developed, and increasingly diverse, range of technical and professional skillsets. These include resource assessment, land stabilization, tailings management, minerals (re)processing, community engagement and environment and environmental monitoring.

The AusIMM Integrated Mine Closure Course is an example of how we are drawing on the levers available to us as the sector's peak professional association to advance best practice in all aspects of mine closure. The course is delivered by (and designed for) specialists in the disciplines involved in mine closure, including planners, engineers, environmental and social managers and technical services professionals.

AusIMM's Life of Mine and Mine Waste and Tailing Conference in Brisbane from 29 to 30 July 2025 will also share best practice in areas including mine rehabilitation and post-mining land use. As part of the event, we plan to host a consultation forum to identify opportunities and priority actions for government, industry and the research sector to make best use of post-mining land, including through site re-commercialisation. The scope of this forum will include legislative and regulatory frameworks, along with relevant technical and professional standards and priorities for research and development.

AusIMM would welcome further engagement with the Queensland Government as we plan and deliver our stakeholder engagement program for the Life of Mine and Mine Waste and Tailings Conference, noting the direct relevance to abandoned mines policy in the state.