Tonkin+Taylor

Storage to Liability: Managing long term risk

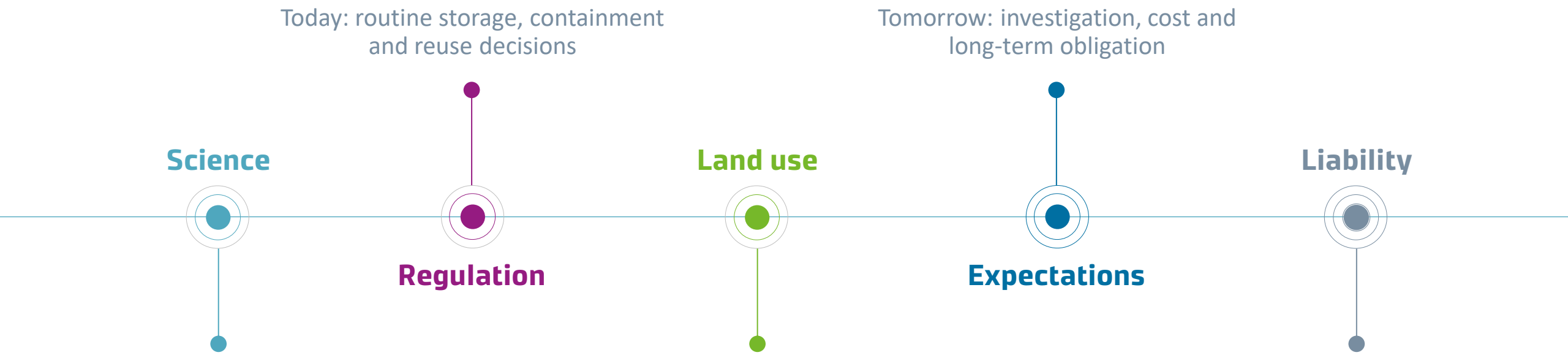
AusIMM Conference

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Photo by Dominik Vanyi on Unsplash.

Environmental liability is not static



A stockpile is not just a stockpile

Runoff and water quality

Contaminated stormwater can reach receiving environments.

Fire risk

Stockpiles are hard to extinguish and hard to contain.

Regulated since 2021

The NES for Storing Tyres Outdoors sets thresholds, conditions and consent triggers. Written for stockpiles near homes rather than mine sites — but it applies wherever tyres are stored outdoors.

Removal cost

Today’s operational pressure becomes tomorrow’s liability.

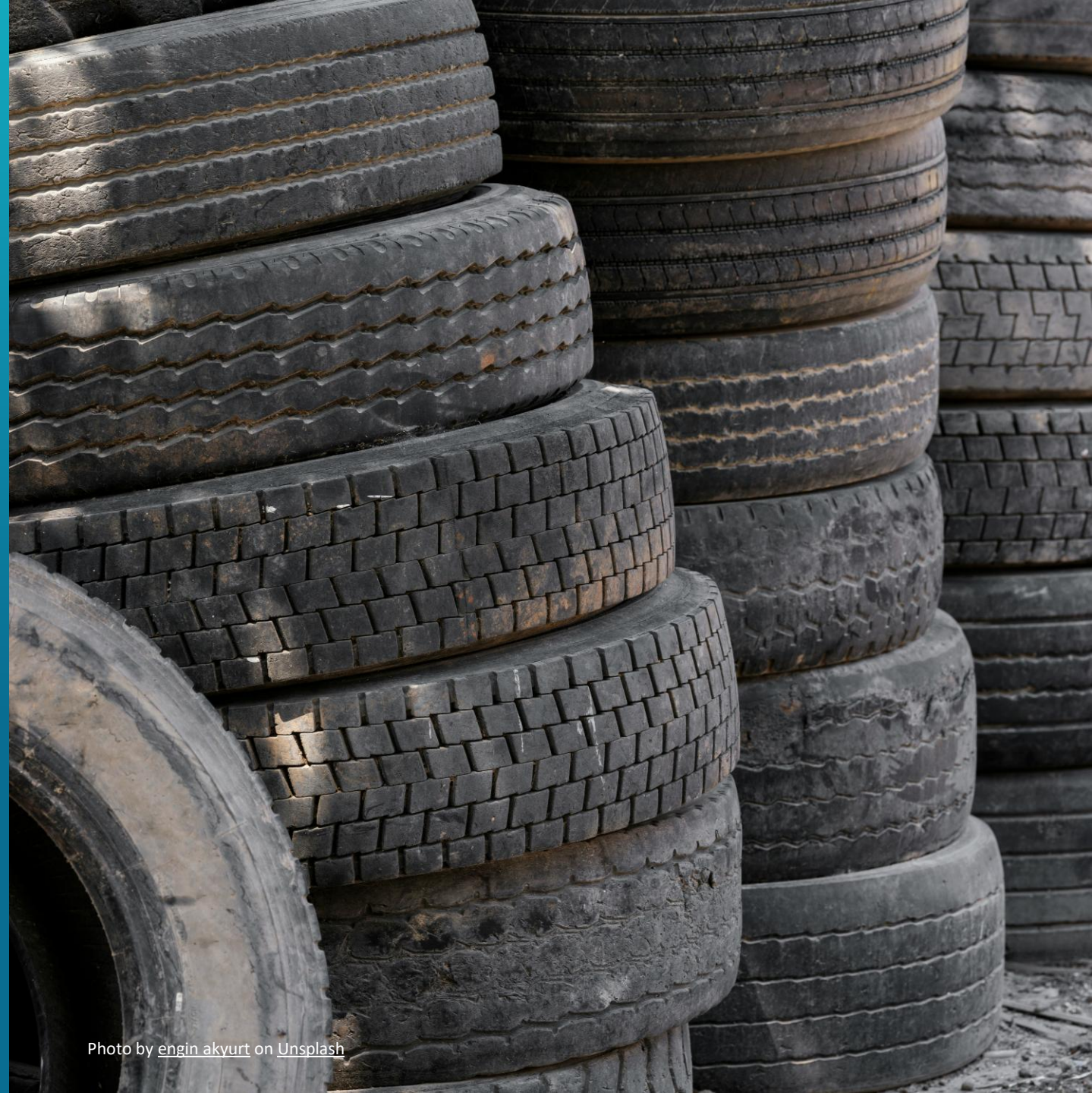


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Uncertainty is a liability

The standards of the day

Tailings storage, waste rock dumps, landfills and disposal areas were built to the practice the whole industry worked to at the time, consultants and regulators included, but poorly documented for those who came later.

Triggered by change

Under the NES for Assessing and Managing Contaminants in Soil to Protect Human Health, these become live issues when land needs to be either subdivided, developed, disturbed or change use.

Know your legacy

Good records and targeted investigation sharpen your closure provision; poor records add cost, time and risk.

Emerging science changes the risk

Aqueous film-forming foams

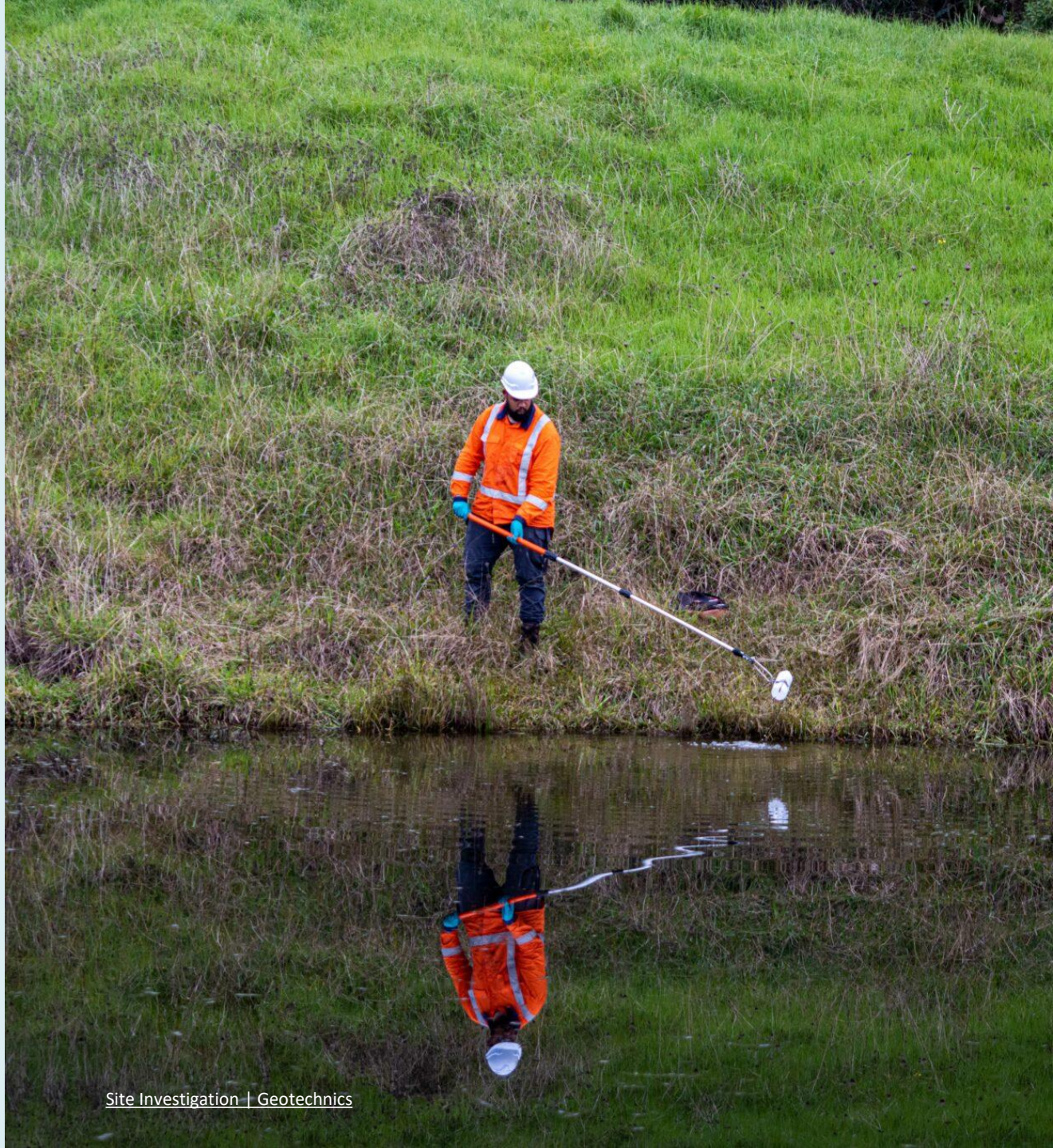
AFFF was used for fire training and response because it worked; the long-term consequences were not understood at the time.

Persistent and mobile

PFAS does not stay where it was used — it moves through soil, groundwater, surface water and wastewater streams.

Beneficial reuse needs evidence

Biosolids used for rehabilitation carry PFAS from the wastewater stream, and criteria for land application are being set now. Reuse still requires source control, testing and documentation.



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Act before the liability materialises

Know what it would cost

Build a current and historical inventory — quantities, locations, timeframes, controls — then price it. The output is a number for the closure provision, not a report.

Think in pathways

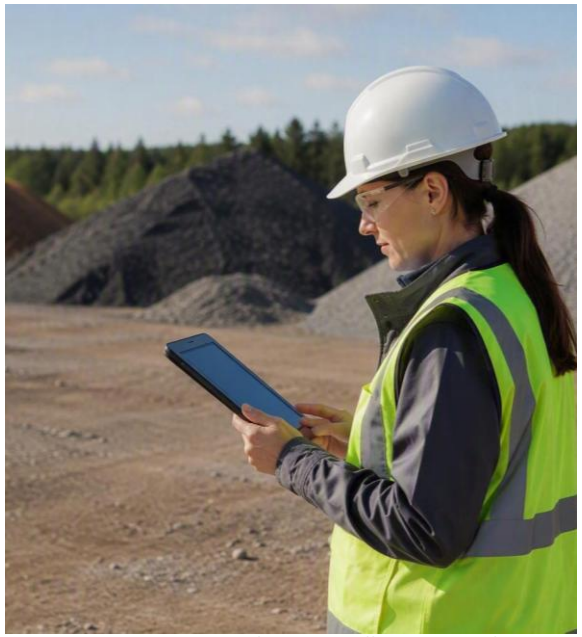
Ask where contaminants could move and who or what could be exposed.

Watch the horizon

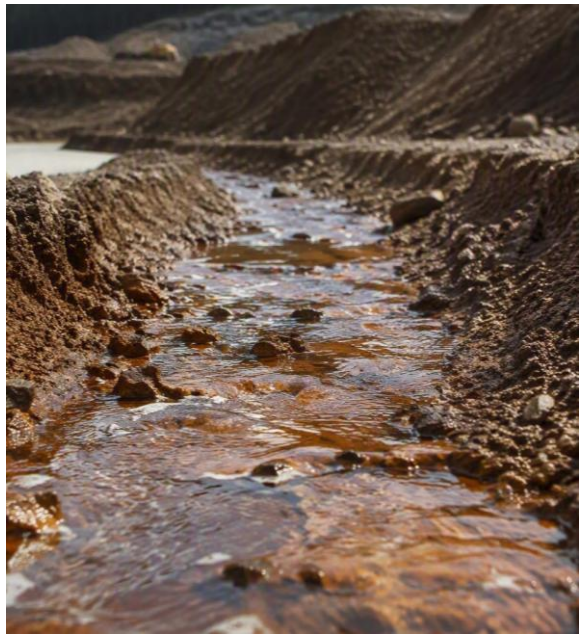
Liability emerges when new standards are applied to old decisions. Early awareness widens your options.

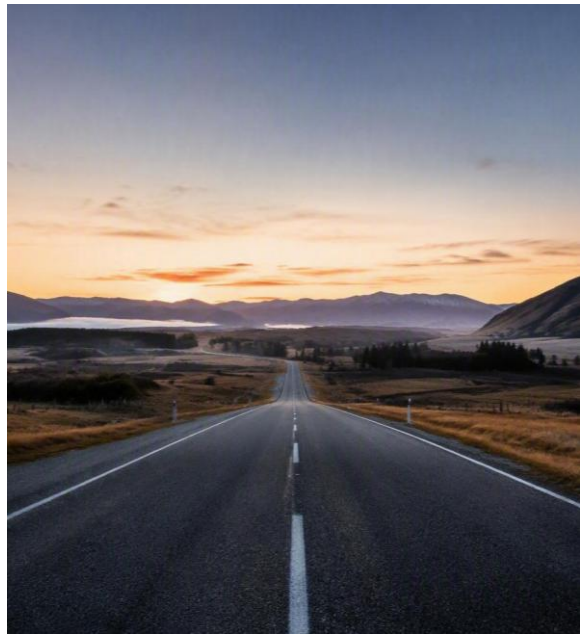
Document decisions

Record the basis for what was done. Planned work is scoped and budgeted; the same issue found by a consent condition or an incident is not.



AI-generated image — illustrative only.







Writing it down

Yes, it becomes discoverable. That tension is real.

The record already exists in the ground.

An unknown problem costs more than a known one — in a transaction, a provision or a consent.

What is defined can be scoped, staged and budgeted.



AI-generated image — illustrative only.

The better question

How will this decision look in 10, 20 or 30 years?

Long-term liability builds over years, not overnight. The signs may be there early.

Pick one issue. Find out what it would cost to close.

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Thank you

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