

Hi

I would like to provide the following comments in relation to the Licence Documentation public consultation:

- 1/ overall i believe that this is a very positive development and brings DER more in line with DMP's mining environmental approvals process;
- 2/ the Guideline for Applications needs to include an example or examples of acceptable landholder agreements or at least clearly state the minimum requirements of such agreements;
- 3/ there does not appear to be any recognition in the risk assessment in relation to isolated or discrete sensitive land-uses in relation to the proposed level of modelling and potentially monitoring. This is potentially prejudicial in rural areas, especially where the proponent (or proponent employee / family) is also the sensitive land-user; and
- 4/ further to the above point, the licence documentation doesn't take into account (at least in the way this consultation is worded) how risk and hence level of modelling will be determined for those proponents in rural areas, especially if the person determining that risk (as the assessor) is not conversant with that particular rural area and its demography. I do not mean to imply that this would apply to all prescribed activities but more to those that are more agriculturally, extractive industry and potentially waste related. furthermore, there should be the opportunity for DER to provide basic models for use by such proponents or for those proponents who have low risk determined activities, but are still required to provide modelling. The possibility is for DER to prevent local proponents from being able to undertake prescribed activities in favour only of "big" industry.

Regards

David Bills

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