



Coober Pedy Miners Association

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Leading Practice Mining Acts Review

The Coober Pedy Miners Association (CPMA) thanks you for being invited to comment on the **Leading Practice Mining Acts Review of South Australia's Mining Laws**.

The CPMA committee has discussed the review and has also participated in the "Coober Pedy drop in session" on 15 February 2017, where our views and options were discussed with the Review Team members and the Department's frontline staff responsible for compliance.

Overall the CPMA supports the PROPOSALS FOR AMENDMENTS TO THE OPAL MINING ACT as discussed from sections 3.1 on page 12 to section 4.3 on page 23 of the Discussion Paper with the following additional comments or alternatives.

- Section 3.10 Page 19 Rehabilitation of Land
 - The General Obligation To Rehabilitate is recognized as a valuable requirement outside of a precious stones field, however within a precious stones field would present significant issues for both safety and expense. In consultation with the Compliance Team the CPMA submits that Compliance Officers need a power to order the Rehabilitation of a claim in the interest of safety where ground has become dangerous. This power needs to be based on safe work practices for all parties concerned and is envisaged as an essential tool for Compliance Officers.

- Section 4.3 Page 23 Working Conditions
 - As described in the discussion point the CPMA finds the "20 hour threshold is arbitrary and can be difficult to achieve". The CPMA strongly supports this amendment, but believe that a related issue also needs to be addressed.
 - On Virgin Land an issue of claims being pegged, registered and then not worked should be considered. The Compliance Officers should have a clearly legislated power preventing this potential practice. The CPMA considers that a solution would be a legislated restriction preventing further claim Registration, where after the initial 30 day period of a claim Registration the land remains intact without works upon it. This could involve empowering the Compliance Officers to force non-compliant claim holders to work the land within the 30 day period on virgin ground.
 - The removal of the 20 hour threshold would also enable the removal of the "Vanachek Line" from the Coober Pedy Precious Stones Field.

The Coober Pedy Miners Association thanks the review team for the opportunity to participate in this review.

Yours Sincerely

Paul Reynolds
President

John Dunstan
Vice President