

11th April 2025

Submission to the Productivity Commission Inquiry: Australia's Circular Economy

We appreciate the opportunity to make a submission to the Productivity Commission's inquiry into opportunities in Australia's circular economy.

Hunter Renewal is a community-driven initiative established in 2017 to support the Hunter Valley's transition to a diverse and resilient economy beyond coal mining. Through extensive community engagement, we have brought together residents, businesses, and organisations to amplify local voices and advocate for policy reforms that prioritise ecological restoration, community-led planning, and long-term accountability.

Our submission addresses the critical challenge of rehabilitating and repurposing mining lands, drawing on insights from our report *After the Coal Rush: The Clean Up* (attached), which reflects our community's values of regional resilience and aspirations for a sustainable future.¹

Comprehensive Rehabilitation and Closure Standards

We recommend adopting the recently updated ISO Standard for Mine Closure and Reclamation and establishing these as enforceable national standards to ensure post-mining landscapes are ecologically functional and suitable for diverse, sustainable land uses.²

While state-level regulations exist, there is no consistent national framework. By establishing enforceable national standards aligned with global best practices, Australia can ensure that post-mining landscapes contribute to economic productivity while meeting environmental and community expectations.

A recent NSW Resources Regulator report revealed significant deficiencies in rehabilitation efforts at 44 NSW mines, including neglecting soil biota assessments, relying on outdated risk frameworks, and failing to tailor revegetation efforts to specific site conditions.³ Four mines have already received official notices due to inadequate practices, highlighting the urgent need for reform. This lack of industry commitment to truly progressive rehabilitation should raise the alarm about risks to future sustainable productivity.

Community Engagement and Planning

We recommend empowering affected communities to co-design post-mining land use plans through participatory processes. Final land use decisions should reflect local aspirations rather than corporate interests.

Community engagement is essential for ensuring post-mining landscapes align with regional values and economic diversification goals. Initial surveys conducted by Hunter Renewal found that 90% of residents wanted a plan for the region's future after coal mining. However, current frameworks often overlook meaningful input from communities.

¹ Hunter Renewal (2023), *After the Coal Rush, the Clean up: a Community Blueprint to Restore the Hunter*, www.hunterrenewal.org.au.

² ISO 24419-1:2023: *Mine Closure and Reclamation – Managing Mining Legacies*.

³ NSW Government (Resources Regulator, March 2025), *Targeted Assessment Program: Revegetation to Achieve Sustainable Rehabilitation Outcomes*, www.resources.nsw.gov.au.

Incorporating community-led planning is essential for improving productivity in post-mining land use. It enhances social licence by fostering trust and reducing delays caused by disputes or resistance, while also optimising land use decisions to maximise economic potential. The Productivity Commission's interim report highlights that Australia is significantly lagging behind in adopting a circular economy, making it urgent to implement effective strategies now. Stronger recommendations are needed to embed community-led planning into regulatory frameworks, ensuring that stakeholder engagement drives innovative and productive outcomes in line with circular economy principles.

Leveraging Degraded Lands for Circular Economy Industries

We propose a strategic approach to repurposing post-mining lands that prioritises environmental integrity and supports circular economy principles. It is crucial to preserve buffer lands and already rehabilitated areas for biodiversity conservation and future ecological corridors. These areas should not be compromised for new development but instead protected to ensure long-term ecological health and resilience. Where possible, existing hard stand areas and infrastructure should be repurposed for circular economy industries, such as renewable energy or innovative manufacturing.

It is essential that miner's rehabilitation responsibilities are not waived or diluted in any way. Rehabilitation standards must be improved and upheld to ensure that mining legacies are transformed into safe, stable, and ecologically functional landscapes. Commitment to environmental stewardship is critical for maintaining public trust and supporting sustainable development goals. By balancing economic diversification with ecological restoration, we can foster regional resilience and align with circular economy principles without compromising environmental integrity and the health of future generations.

Transparency and Accountability

We recommend creating a publicly accessible national monitoring platform for post-mining land outcomes, requiring mining companies to fund long-term rehabilitation bonds and undergo independent audits.

Communities remain concerned about whether mining companies will fulfil their rehabilitation obligations after closure. Inconsistent reporting practices contribute to uncertainty about long-term environmental outcomes. A national register would increase public trust by ensuring transparent tracking of rehabilitation progress while holding industry accountable through independent audits. Improved transparency enhances productivity by reducing regulatory uncertainty for companies while providing clarity for regulators and communities. Transparent practices also strengthen industry reputation, attracting investment and fostering collaboration between stakeholders.

Transforming post-mining lands into sustainable assets is essential for achieving a circular economy that benefits both the environment and local communities. Our recommendations for comprehensive rehabilitation standards, community-led planning, economic diversification initiatives, and transparency measures not only align with circular economy principles but also enhance productivity by streamlining operations, reducing risks, and unlocking new opportunities.

For further details about our community's priorities and aspirations for the Hunter Valley's future, please refer to our attached report, *After the Coal Rush: The Clean Up*. We appreciate your consideration of this submission and welcome further discussions on this important issue.

Dan Coleman
for Hunter Renewal