



**Submission to the Environment,
Communications, Information Technology and
the Arts References Committee's Inquiry into
Australia's National Parks, Conservation
Reserves and Marine Protected Areas
from The Prospectors & Miners Association of
Victoria Inc.**

Monday, 20th March, 2006

The Prospectors and Miners Association of Victoria - who we are and who we represent.

The PMAV was established in 1980 to represent the smaller-scale miners and prospectors of Victoria.

The Association is managed by a voluntary committee of 10 who strongly believe in the right of individuals to have the opportunity to share in Victoria's considerable mineral wealth. We receive no government funding and rely on income from membership fees as our main financial resource.

In addition to the central committee of management, we have branches based in Maryborough, Ballarat, Drouin, Stawell, Yackandandah, Stratford and Melbourne. All branches meet on a regular basis and have monthly field trips.

The interest in the industries that we represent is growing, as is our membership. We represent some 3000 individuals with an interest in prospecting and mining in Victoria.

The PMAV was a founding member of the Bush Users Group – a coalition of both commercial and recreational public land user groups in Victoria. BUG represents the interests of some quarter of a million Victorians.

The PMAV has two positions on the Extractive and Mining Industries Advisory Board, convened by the Minister for Resources, we also have one position on the Historic Mining Places and Objects Advisory Committee. We also hold one position on the Mining and Environment Advisory Committee convened under the Victorian Mineral Resources Development Act.

We are recognised as the peak industry body for prospecting and smaller-scale miners by all areas of government and are regularly asked for input by all levels of the Victorian Government.

Given the restrictions placed on prospecting and mining by national parks and reserves, the PMAV has a keen interest in the outcome of the Senate Inquiry. We welcome this opportunity to express our concerns and to add to the information available to the Committee.



Definitions

We provide the following definitions to assist the Senate Committee:

Prospecting in Victoria means searching for minerals under an authority called a Miners Right. This is issued under the Mineral Resources Development Act and allows the holder to search for minerals on private land (subject to the landholders consent) and on some crown land. The activity is limited to the use of hand tools and is typically conducted using either a metal detector and small pick or gold pan and small shovel.

Small-scale mining in Victoria is conducted on Mining Licences of 5 hectares or less. It is typically a one or two person operation. Small-scale mining boomed in the 1980's but has since been in decline because of the influence of the green movement and since the recognition of native title. Methods vary, but in recent years almost all operations are now underground with very little surface disturbance.

Parks and Reserves in Victoria.

Victoria's park and reserve system is primarily managed by Parks Victoria on behalf of the state government.

Parks and reserves total 4.1 million hectares (17% of Victoria's total land area) or over 51% of our public land area.

This system comprises:

39 national parks

13 marine national parks

11 marine sanctuaries

3 wilderness parks

30 state parks

37 metropolitan parks

63 other parks (including coastal, regional, historic and reservoir parks)

2,700 natural features reserves and conservation reserves

8,400 Aboriginal Affairs Victoria registered Indigenous cultural heritage sites/places

2,500 (non-Indigenous) historic places.

We now have more public land inside the 'protected' category than outside it. It should be noted that public land outside the 'protected' categories is still subject to very stringent conservation controls.

Relevant legislation

Mining and prospecting in Victoria are primarily controlled by the Mineral Resources Development Act. Section 6 of the MRDA prohibits most mining, exploration and prospecting (searching) activity: Limited prospecting activity is permitted in parks subject to the provisions of Section 32D of the National Parks Act.

How Prospecting and Mining are Affected by National Parks and Conservation Reserves

Prospecting and mining are heavily regulated in all land categories, but particularly parks and reserves where these activities are often prohibited.

Mining

Mining is prohibited in all national parks in Victoria. Conservation reserves are considered 'restricted crown land' under the Mineral Resources Development Act. Our experience indicates that in reality this also translates into another prohibition on mining.

So, despite the fact that Victoria is resource rich, vast reserves of gold, oil, gas, coal and other valuable minerals are now locked away in national and state parks. We aren't even allowed to look for what is there with modern exploration techniques. We made this point in our submission to the Victorian Environment Assessment Council during their 'Investigation' into the Otways region (see appendix one).

The new interest in thermal rocks as a source of renewable energy is evidence that geological knowledge is never going to be complete and mineral explorers must be permitted to explore and at least let the government and the community assess the value of any mineral deposit they find.

The value of land in national parks is currently set at infinity with no other possible economic or community uses or values allowed to be considered.

Prospecting

Prospecting is permitted in those national and state parks listed in Section 32D of the Victorian National Parks Act. If a park is listed in Section 32D then prospecting may be permitted subject to the management planning process. This typically means it is restricted to small parts of the park and, of more recent times, additional restrictions to normal Miners Right activities are imposed. There is no science used to determine where prospecting may be conducted in these parks, only ideology. It is typical that prospecting is allowed on one side of a track and not the other.

There are numerous parks that are not listed in Section 32D that are of interest to prospectors. Management plans for parks are supposed to be reviewed every 10 years, but unfortunately this does not include a review of its Section 32D status. We have been trying for years to have the state government consider reviewing this but to date have failed.

The system for conservation reserves is more complex. Prospecting is allowed in some, but not others. For the past 15 years we have been trying to obtain a list of reserves that we are either entitled to access or banned from accessing. The government and bureaucrats have put this request in the 'too hard basket'.

PMAV Policy on National Parks and Conservation Reserves.

The Association supports the conservation of an adequately funded network of representative parks. We are against the current proliferation of parks that are being declared with little consideration of the impact on the broader community or their economic viability.

The process used by the Victorian Government to create national parks is fundamentally flawed. With clear bias towards the 'lock-up' approach, we do not believe the current process is in the long-term best interest of the people or environment of Victoria. Only the short-term political benefit to the government is being considered.

Creation Processes

While we could have spent weeks, perhaps months, preparing a submission about the flawed process for creating national parks in Victoria we obviously could not afford the time. Instead, we are providing a case study on our involvement in the process of the creation of a series of parks and reserves in the goldfields area (the Environment Conservation Council's Box and Ironbark Forests and Woodlands Investigation) to give an idea of the corrupt way these matters are handled. Corrupt may be a strong word, but we believe it is appropriate, given the fact that the State Government promised to consult with the community and to listen. The 'community' devoted a huge amount of time and money to this consultation, but was basically ignored. The Government had a pre-determined agenda to create these parks and create the parks they did. The story behind the ECC's Box Ironbark Investigation is complex, we ask the Committee note that the information below provides only a snapshot of the complete story.

Case Study

Box Ironbark - The Parks We Had to Have.

For a number of years the Victorian National Parks Association had been agitating for national parks across the goldfields. Making various emotive statements that there would be wholesale extinctions of plants and animals unless all public land in the Box Ironbark region was locked away from resource users and put into national parks. They used their tax-exempt status to campaign for these parks by producing glossy brochures and postcards to convince the public and politicians of the need for parks. It worked!

In 1997 the Liberal state government gave terms of reference to the Land Conservation Council (later Environment Conservation Council) to investigate public land use in the 'Box and Ironbark' region of Victoria. In 1999 a state election saw a change of government.



The Investigation continued under Labor.

The PMAV was recognised as a major stakeholder in this Investigation as it covered most of the major goldfields. We spent an enormous amount of our resources to ensure our involvement was as detailed and complete as possible. This was largely a waste of time and money and we believe that we were only given minimal consideration.

It became clear early in the process that there was a pre-determined outcome. There would be a series of parks, nothing was going to stop this.

While the ECC claimed to consult with those affected, it was obvious that their idea of 'consultation' was to bring us in for meetings and send us away with a condescending pat on the head while ignoring anything we had said. It was patronisation, not consultation.

We suggested a more creative land management system be considered, such as those arising from the Regional Forest Agreement process, given Victoria already had a seriously under-funded park network. They weren't interested.

We were initially pleased that an 'expertise based' advisory group was created but appalled with the way membership of this group was decided. An individual was appointed to this group to bring expertise on prospecting, his appointment was not supported by the PMAV, as his expertise was not representative of the broader prospecting community. This person runs a business taking people out on prospecting tours and had a vested interest in limiting the access for individuals wishing to prospect and a bias towards commercially based activities. We expressed our concern to the ECC that the information they would be receiving on prospecting might not be the complete story – this was ignored. There was no-one at all on the advisory group with any knowledge about smaller-scale mining. In fact there were individuals on the group who had a bias against this activity, this became obvious as the results of the process unfolded.

In December 1997, the ECC published an Issues Report. This report was supposed to provide factual information on which the public could base its submissions. Instead it provided a biased and factually incorrect view on any productive activity – including an absurd claim that anyone swinging a metal detector could damage the emerging heads of orchids. This is nonsense and the ECC later seemed embarrassed when this was mentioned – however the public thought it to be a fact and based their submissions on this (and a mountain of other misleading and deceptive 'facts').

We made a submission to the Issues Report but were again ignored – this became clear with the release of the Draft Report. We made a 350-page submission to this report (a copy can be made available for viewing if required). This submission provided the real facts on a number of matters relating to prospecting and mining.

The most memorable thing about the Draft Report was the mistakes. These included mathematical errors of as much as one million dollars and calculations of areas covered by particular vegetation classes wrong by 10,000 hectares. We



provided the ECC with a list comprising five full pages of mistakes made in the Draft Report and asked that the Report be withdrawn, corrected and reissued – this wasn't done.

The PMAV hosted a meeting of 80 people in Dunolly to allow the ECC to explain to the prospecting and mining community the rationale behind their conclusions. Some of the erroneous information was part of a power-point presentation given by Eda Ritchie of the ECC. When questioned about this flawed information she responded – it doesn't matter. Which brought howls of protest – people wanted the facts, not a flawed version of them. The ECC went on to give this same flawed power-point presentation at later meetings in other towns.

The public prepared submissions on this considerably flawed information, information that promised widespread job creation and positive environmental and economic gain. The true figures painted a much bleaker picture!

The main economic benefit claimed in the Draft Report was a \$2 million 'non-use benefit' that the people of Victoria will receive from having a warm and fuzzy feeling that the parks exist even if they never visit them! We made the point that this 'value' is highly subjective, easily fudged and can never be recovered in the market place. There was no consideration given to the fact that prospectors also get a similar benefit from knowing that they are permitted to prospect – even if they don't visit the area - but no value was given to that on the balance sheet.

Again in the draft report, we were exposed to the same bias as the Issues Report. Emotive, twisted language was used to infer to the reader that miners, prospectors, timber cutters, eucalyptus harvesters, etc were raping and pillaging the countryside. Despite this, on 23rd March 2001, over 3000 people attended a public rally and march in Bendigo to protest against the creation of the parks and the activities of the ECC.

The Final Report contained few surprises, except the park network was now going to be much bigger. The Draft Report had recommended a Regional Park for Castlemaine that brought few restrictions, the Final Report gave it a 'National Heritage Park'. Bendigo's proposed Regional Park had become a National Park and Heathcote – which was to have remained as state forest - now becoming a huge National Park. At no time were the public given any opportunity to comment on whether or not they wanted these parks and the widespread restrictions the parks brought with them.

Politics Defeats Science Every Time

The ECC claimed that there were no known goldfields in the new Box Ironbark parks and then went on to describe in detail the extensive mining heritage sites within the parks. Obviously we have no confidence in the ECC (now defunct) or its replacement – the Victorian Environment Assessment Council - whose work has already lead to a massive new park in the Otways and are currently 'investigating' land use along the Murray and in the Goolengook area of East Gippsland. These 'investigations' always have the intention of creating new parks



– never have they said ‘there are enough parks’ or ‘let’s turn some land back into a category that allows responsible productive use’.

There is never any proof provided by the council or their kind that the existing range of land uses is not sustainable. Nor is there any question of whether the public wants, needs or can afford to have land changed to national park. It is all politics. Decisions are based on which direction will engender the greatest political support, or at least which of the noisy groups can be silenced in their criticism of government.

This was demonstrated when we took a group of Liberal politicians around the goldfields on a two-day fact-finding mission during the Investigation. We joined with other bush-users to give them a demonstration of our activities and the impacts. We showed how people prospect and went to a couple of rehabilitated mine-sites. They all asked questions and seemed interested and approving of our activities. They later spoke in sparkling terms in Parliament of their trip and all the activities they had seen and the hardworking ‘salt of the earth’ people they had met. All this was duly recorded in Hansard. Yet when it came to voting on these parks, they forgot all about the trip and became dark green zealots all voting to lock these same people and their traditional activities out of the parks. We had prepared a reminder of their trip, just prior to the parliamentary debate. We now know that some had significant difficulties dealing with their consciences.

The state government obviously was feeling the pressure and continued to distance itself from any possibility of direct contact with those affected. This was particularly the case with the Environment Minister who appointed Senator John Button to head an implementation committee to work through the issues with stakeholders. Senator Button’s group allowed only the submission of one A4 page of information from each affected group plus one short appointment as consultation. A copy of our submission is attached (appendix 2). Outside after our appointment, Senator Button said he had been misled by the ECC.

Victoria’s prospecting and mining community were therefore lumbered with a new system of parks to restrict their activities. Only thanks to intense last-minute lobbying by the PMAV were we able to gain some small concessions for the prospectors to allow some limited access to areas of traditional activity. Unfortunately, we were not able to do the same for the miners.

Due Democratic Process – *Hardly!*

The passage of the legislation to create the Box and Ironbark parks deserves some mention. Victoria’s Parliament normally sits on Tuesday, Wednesday and Thursday. When legislation passes through the Lower House there is a period of time, usually two weeks, allowed for the Upper House members to consider the legislation before it is debated. With the BIB legislation there was no delay – the legislation was passed by the Lower House on a Thursday and a special sitting of the Upper House was called for the Friday to steam-roll it through. Members of the National Party - who had been the most supportive of bush users during this time – complained bitterly that they did not have a chance to consult or consider,



and that their files were back in their electoral offices. This fell on deaf ears and the legislation was passed by the upper house late on Friday afternoon.

This was the last sitting day of that Parliament as shortly afterwards an election was called. Both the ALP and the Liberals were able to claim green credentials. After all, they had been party to the creation of these new parks.

There was no science saying the parks were necessary, no true consideration of the environmental, social or economic impact, just supposed green credentials to take to the electorate.

More and More Parks

Around the same time as the state government created the Box Ironbark Parks (late 2002) they also proclaimed a large network of Marine National Parks. Since then they have created a huge new park in the Otways region. Current 'Investigations' are occurring into the Red Gum and Goolengook areas. We have made submissions to each 'Investigation' into parks by the ECC/VEAC. Our submission to the Red Gum is attached (appendix 3) and clearly demonstrates our lack of confidence in the process.

Who is Watching the Bureaucrats?

In 2000 the Victorian government released a glossy report 'State of the Parks'. This two-part beautifully presented report detailed the condition of each of our parks with information on feral animal and weed infestation, the flora and fauna contained in each park and specific park management concerns.

An updated report was supposed to be released in 2003 and every three or four years after that. Three years after it was due, we are yet to see the second edition and wonder what the government is trying to hide.

We submit that the creation of a representative advisory board, made up of people with experience in public land management and use, should be convened that realistically reviews the performance of park management to see if this performance is environmentally, economically and socially responsible.

This board should also have the power to make recommendations on a variety of issues in relation to park management, including the ability to recommend the reintroduction of productive use where it is not contra to the park aims.

The National Parks Advisory Committee is currently supposed to advise the Victorian Conservation Minister on matters relating to national parks. Instead this Committee has become a paid lobbying platform for green groups to push their own agenda. It has no balance and appears to be a closed shop as, despite many individuals offering themselves for consideration for positions on the Committee, the same people keep being re-appointed.

Their Annual Report angers the author of this submission each year with its bias, lack of balance and dark green agenda.

We have written to the Environment Minister expressing these concerns but failed to make any change.

Up in Smoke

Victoria's wildfires over the last few years have been concentrated in national parks. In 2003 three million hectares of Victoria, NSW and the ACT went up in smoke. The lack of upkeep leaving dangerously high fuel loads on the forest floor, just waiting for a lightning strike or spark to create an inferno. Just this year we have seen the Grampians National Park subject to a huge fire, yet the national park myth lives on. Bushfire in the Australian landscape is natural. These wildfires which we are now seeing every year, are not.

It is law in Victoria that if you wish to have a campfire in a park you must do so in a designated fireplace – which is reasonable. What is not reasonable is that it is illegal to pick up and burn any of the fuel lying on the park floor – you must bring your own firewood in from outside the park. While the obvious point is that fuel reduction, even at this small scale is helpful, what about the importation of insect or fungal pests brought in with firewood? We have expressed this concern to Parks Victoria but it falls on deaf ears.

Most of the new BIB Parks are located adjacent to population centres and yet the policy to allow excessive fuel loads to continue to build has not been reconsidered with this in mind. Victoria was lucky in the 2003 fires that few population centres were affected – but who can forget the Canberra tragedy? It is absurd that this is being ignored by the park managers who continue to put the people of areas such as Castlemaine and Bendigo under threat of incineration.

Parks Victoria is enforcing buffer zones around the edges of these new parks. These buffer zones are not inside the park, they are outside. They have imposed wide no-development areas on private landholders in areas such as Castlemaine. It would be interesting to calculate the value of this land, which has been literally stolen from owners who have not been paid any compensation to create these buffers.

Do Parks Actually Work?

We have constantly and determinedly made the point that national parks often fail in their primary objective - the protection of the natural environment. There is no evidence that parks actually work. All we hear is that a species is in decline and must be protected by its habitat becoming a national park. No consideration is given to the fact that much of the flora and fauna in our parks has been incinerated at extreme temperature over recent years. It is arguable that fuel reduction through productive activities such as mining, grazing and timber harvesting would have contributed more protection. The recent removal of cattle grazing from the Alpine National Park and the subsequent increase in fuel loads demonstrates this clearly.

Native flora and fauna is not only at risk from fires. Consideration must be given to the fact that many feral animals dine on our native fauna each day and weeds continue to infest our so called pristine parks.

It would be timely for the Committee to consider an investigation into Australia's park network to ascertain if the current management systems are actually meeting the community's environmental, social and economic expectations.

There has been no proof offered that the current park management systems have lead to an increase in the population or halted the decline of any 'threatened' species whatsoever.

Someone Must Take Responsibility

When parks are created there is always much fanfare. Yet when the parks fail to meet their objectives – either environmentally, socially or economically – there is no accountability. There is never a review; no one wants to consider if perhaps this could be done in a better way.

During the Box Ironbark Investigation, much was made of the belief that jobs in tourism would replace any lost in the timber, mining or eucalyptus distilling industries. Claims were continually made that tourists would flock to the region once the new national parks were created.

Official tourism figures for the goldfields region indicate that in 2004-05 domestic overnight visitor numbers were down by 15.2% and interstate overnight visitors down a huge 41.2%.

The jobs in the resource industries have gone – but it would seem so have jobs in the tourism industry. Far from an increase, there has now been a documented decrease.

Yet no-one takes responsibility. No-one is willing to say that perhaps the wrong decision was made and that something needs to be done to correct it.

The politicians don't want to know, the bureaucrats who so zealously prepared the paperwork aren't interested, the ECC (now VEAC) are focusing on where to put the next park and the green groups continue to campaign for more and more areas to be locked away from productive use. Those who do have to deal with the consequences are people such as prospectors and miners who wish to use the areas and the small-towns whose economies and social opportunities are stifled – not to mention the growing fire risk. Another victim who is generally unaware of the impact is the Victorian taxpayer whose hospital system could be better funded if money wasn't being wasted on glossy brochures promoting unnecessary parks to non-existent tourists.

It is a common mis-conception amongst the public that the federal (national) government manages national parks. We often need to explain the concept that these areas are considered nationally significant but are still managed by the states. Perhaps the public's belief would make a better reality?



Summary

It is clear that the PMAV has serious concerns about national parks and their impact, not only on our members and their activities, but also on the Victorian public at large.

National parks are over-protected. We now have the tools to manage activities on a case by case basis without imposing blanket exclusions.

It is a fact that both mining and prospecting are more regulated now than at any time in history and yet processes continue to lock these activities out of areas of high interest. This just does not make sense.

The same applies to the timber industry. Australia now has a \$2 billion trade deficit in timber products because of our obsession with all things green. The results of exporting our environmental impact to countries without regulation was recently demonstrated by the devastating landslides in the Philippines. These landslides are thought to be caused by illegal logging.

It is time that money was spent on proper management and not on glossy brochures telling Victorians why they can't access their public land.

The Next Step

- ◆ A Senate Inquiry to ascertain if the current park system is meeting the environmental, social and economic expectations of the community.
- ◆ An investigation into other management systems to see if we can 'do it better'.
- ◆ Development of a standard set of objectives and measurable parameters for parks and conservation reserves.

Suggested Additional Sources for the Committee

Recent publications that we commend to the Committee are:

- The Uses & Values of National Parks – published by the Institute of Public Affairs – see attached pdf.
- Flamin' Parks – the Neighbours from Hell published by the Bush Users Group - Victoria – see attached pdf.
- A Case of Burning Neglect published by the Eureka Project – see attached pdf.
- Living Next Door to a National Park – published by the Licola Community – see attached Word document.

We again thank the Committee for this opportunity to bring the above to their attention. As this submission was prepared by a volunteer in her spare time, there are likely to be items that require further clarification. We would be more than happy to provide further information if requested.

Submission prepared by:

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About the author

Rita has spent much of the last 18 years as a campaigner for the prospectors and miners of Victoria. She has been on the PMAV executive for that time, as state president in recent years.

A mother to two teenage children and manager of a family owned business. For ten years she owned and operated various small-scale mining operations in the central Victorian goldfields, now her interest in mining is largely limited to recreational prospecting.

She holds a position on the ministerial advisory board – the Extractive and Mining Industry Advisory Board and has a position on the Public Land Stewardship Stakeholder Reference Group.

Rita played a major role in the establishment of the Bush Users Group (Victoria) and was the founding vice-president. She continues today as their secretary.

She is also on the board of the Australian Environment Foundation.

Rita is also a member of the Institute of Public Affairs and Timber Communities Australia.

We have included the above profile to demonstrate that the author has vast experience in dealing with the frustrations attached to public land management issues.

Appendices:

1. Submission to the VEAC during their Otways Investigation
2. Submission to the Box Ironbark Implementation Panel
3. Submission to the VEAC during their Red-Gum Investigation



Appendix 1.



Media Release -

From the Prospectors & Miners Association of Victoria

Saturday 24th July
(for immediate release)

Fantastic New Mineral Discovered

News leaked to the media today indicates that there has been a major mineral discovery that will have far reaching affects across the globe.

The new mineral – as yet unnamed – has new and previously unknown qualities including the ability to absorb air-borne carbon when used as a road-making material. This will mean that all greenhouse gases from engine exhausts will be negated, as they will be absorbed by the road surface.

While research is in its early stages this new miracle mineral has been used in advanced cancer patients to fight malignant tumours. Rumours indicate that the new mineral can slow or possibly stop tumour growth – with some claiming that the tumours are actually decreasing in size.

Various mining companies are eagerly searching for ground to lease so that exploration can begin in Australia for this miracle rock as it has only been found in small areas of Iraq and Afghanistan to date.

Similar geology is thought to exist in the Otway Basin of Victoria, extending into the Otway Ranges. With interest growing in the area, there has been a predictable outcry from green groups who believe that - irrespective of the benefits to mankind or the broader environment - the habitat of the Otway Black Snail is sacred and cannot be disturbed by mineral explorers. Besides, if industry can find a way of reversing the effects of global warming the green groups would lose much of their funding and membership, as work has not yet been completed on their next doomsday campaign concept.

However, the Snail appears safe. In its recent recommendations to Government the Victorian Environmental Assessment Council has stated it believes that mineral exploration and mining should be excluded from most of the area, as it will become a national park.

Given the importance of this new mineral discovery, major mining companies are expected to move their administration to areas that contain the wonder mineral and where access is permitted, which will leave many people in Melbourne facing a decision to either lose their jobs or relocate.

The State Government is expected to accept VEAC's recommendations, which will no doubt verify their green credentials for the next state election.

More important information on the next page



The above is the PMAV's submission to VEAC's Inquiry in the Angahook – Otway Region.

We are simply showing the absurdity of current land-use decision making. It is a fact that unless we are allowed to look for minerals we will never know what is there.

We hear all the time about potential miracle herbal remedies in rainforests – but just consider what may be hidden in the rocks!

Additionally there are known valuable mineral deposits in the area that will be sterilised by the creation of the proposed national park. No science has been put forward to justify the exclusion of prospectors, explorers or miners from the area – this exclusion is based on ideology and political expediency.

The Prospectors and Miners Association believes that the current park network in the Otway region is sufficient and should not be extended. An upgrade of the Angahook State Park would be enough to meet the Terms of Reference for the Investigation.

We cannot afford adequate upkeep of existing parks – to put more demands on an already inadequate budget is sheer lunacy. VEAC should recommend that the Government reintroduce and encourage sustainable resource industries in the Otway region – particularly logging and mining.

Prospecting and fossicking should be permitted across the region – it may just be a prospector who discovers the miracle mineral!

We strongly oppose the creation of any more national parks, widely known as 'the Neighbours From Hell'.

The Prospectors and Miners Association is proud to be affiliated with the Bush Users Group.

Submission prepared by:

Rita Bentley President, Prospectors & Miners Association of Victoria Inc.



Main points for the Box Ironbark Implementation Panel

Reg No: A0000422H
December, 2001

The ECC has failed to deliver any proof that the current level of prospecting and mining is not sustainable. No evidence has been provided that either activity causes any long-term damage to the environment or biodiversity. Therefore there is no justification for further limitations. There is in fact every reason to review current restrictions with a view to lifting them.

The creation of Special Management Zones – similar to those created by the Regional Forest Agreement process – can and must be used to satisfy the JANIS criteria. This would improve management, generally allow current sustainable activities to continue and satisfy the bureaucrats. Adequate funding for adequate management is what is required – changing a label does nothing.

Parks at Heathcote, Bendigo and Castlemaine were not mooted in the Draft Report and therefore no-one has had the opportunity to comment on their appropriateness or otherwise – so much for working with the public! Eg, it was proposed that prospecting be permitted in the proposed Greytown State Park in the Draft. The park has now been made a national park, doubled in size and we are banished from all of it. Have the local communities been asked whether or not they want a park?

If the recommendations are adopted it will be at a huge, real, social and economic cost to the people of country Victoria

The main 'economic benefit' claimed by the ECC is a phony \$2 million 'benefit' that the people of Victoria will receive from having a warm and fuzzy feeling that the parks exist even if they never visit them! This 'value' is highly subjective, easily fudged and can never be recovered in the market place. Consider that prospectors also get a similar benefit from knowing that they are permitted to prospect – even if they don't visit the area, no value has been given to that on the balance sheet.

The \$400,000 additional cost allowed for managing the additional parks and reserves is a joke. Government must investigate the real costs of additional management and look at the real costs to Victoria before any recommendations are accepted.

Prospecting is an environmentally benign activity that should be permitted throughout the region, except in extremely limited areas where it can be demonstrated that it is not appropriate.

Prospectors have complied with ever increasing regulation and restriction on their activities and yet this is never recognised – all we are ever faced with are more restrictions. This is blatantly unfair and will not be tolerated any longer.

We believe that prospecting should not be any further restricted and that the Panel must recommend an immediate review of current restrictions – most of which are unnecessary and unjust.

The ECC provided no proof that prospecting was causing any harm, if there is proof then we would be pleased to see it.

Prospectors will ignore any further unnecessary and unjust restrictions on our activities and Government will be powerless to do anything about it.

Small-scale miners disturb minimal areas of vegetation. We always rehabilitate our sites, we never leave open pits and vegetation is always re-established. There is no need to increase regulation of this sector to the point that it ceases to exist – this is what the ECC proposes!

Recent years have seen ever increasing regulation of mining; this has caused a major decline in activity. Many of these miners will never get a job doing anything else – this is all they have known. Many have significant investments in plant and machinery, if the possibility of continuing their mining activity is further restricted they must be compensated. This would be the last resort – they would rather continue mining.



The ECC provided no proof that small-scale mining was not sustainable at current levels. If there were proof then we would be pleased to see it, if we are not told what the problems are then how can we address them?

There have been instances of illegal mining by small scale operators, generally those who have become frustrated and have no faith in 'the system'. We guarantee that the amount of illegal mining will increase unless small miners are treated fairly.

General There has been a lot of emotive claptrap circulating about the state of the environment in the box ironbark region. The VNPA and the ECC would have Victorians believe that it will disappear tomorrow unless it becomes parks and reserves. Any problem is part of history – the current vegetation levels are not decreasing. There is limited timber cutting and even more limited clearance by miners. The 'wave of extinctions' forecast by the VNPA and the 'continuing pattern of loss' talked about by the Conservation Minister are pure fantasy, they are not real.

Any minor problems can be fixed by an improved, and properly funded, management regime. It is not necessary to put people out of work or limit their recreation to address these problems. The proposed parks are purely political. If Government believes country Victoria will reward them at the ballot boxes for introducing these parks they are wrong.

It is impossible to increase the extent of vegetation cover on public land – the only areas that are cleared are used for public purposes such as golf courses, schools or cemeteries. Taxpayers money would be better spent on encouraging revegetation of cleared private land rather than locking activities out of sustainably productive public land.

The only way that we will accept the boundaries of the parks and reserves is if current activities are allowed to continue – unless there is definite scientific proof that they are not sustainable and management plans, prepared in a transparent process, be in place prior to the declaration of any new parks or reserves and the smaller scale sector be exempt from any of the 'mining principles' that do not already apply.

For further information please contact Rita Bentley or Marshall Parde. Write to GPO Box 1706P Melbourne Vic 3001.



Appendix 3



Submission to VEAC's Riverine Red Gum Forests Investigation

By the Prospectors & Miners Association of Victoria Inc.

GPO Box 1706, Melbourne Vic 3001

(Reg No: A0000422H)

I wish to preface this submission by acknowledging that we know it will not make one iota of difference to the outcome of the VEAC 'Investigation'. It is an undeniable fact that the outcome is already determined and the whole public consultation process is again a sham. The Victorian National Parks Association is demanding a new national park and that is what VEAC will give them!

In view of the above, this submission will be brief and focus only on those areas of interest to the prospecting and mining community. Other groups can waste their time regarding the social, environmental and economic issues.

The PMAV believes that VEAC **must** conduct a full and comprehensive assessment of the mineral potential of the study area and publish the results, so that the public and government can make informed decisions on the benefits or costs of various land use options.

This assessment should be at least at a level as that conducted during the Regional Forest Agreement process. The RFA processes produced a separate, detailed document detailing the mineral potential of areas it covered. As an example, the Gippsland RFA Mineral Assessment Report contained 191 pages and yet the predecessor of VEAC, the ECC, was content to hide the known mineral wealth of one of the world's greatest goldfields within 9 vague, non-factual pages of its Box Ironbark Final Report.

We therefore challenge VEAC to adequately investigate the mineral potential of the study area and to thoroughly detail the economic and social cost involved in locking areas away from mineral development in yet more non-productive national parks.

Additionally, as with all science, our knowledge of geology is continually evolving. Who knows what minerals will be of use to this and future generations in years to come? The Terms of Reference do not limit VEAC to recommending the creation of national parks. It should take this opportunity to consider the benefits of the current multiple use of the area by a variety of public land users. This would then permit the minerals industry to continue exploration for new and valuable minerals, which would be to the benefit of all Victorians.

Submission prepared by:

Rita Bentley, President, Prospectors & Miners Association of Victoria Inc.

