

26 June 2023

The Officer in Charge,
Tasmanian Planning Commission,
GPO Box 1691,
HOBART TAS 7001

P.O. Box 393
Burnie Tas 7320
Phone: 03 6419 4122
Mobile: 0409 124 710
Email: ceo@tmec.com.au
Website: www.tmec.com.au

Via email: tpc@planning.tas.gov.au

Dear Sir or Madam,

RE: Tasmanian Planning Policies Review

The Tasmanian Minerals, Manufacturing and Energy Council (TMEC) welcomes the opportunity afforded it to provide comment on the draft Tasmanian Planning Policies (draft TPPs) as exhibited on the Tasmanian Planning Commission's website.

At this stage there has been no indication any of our suggestions have materialised or had an influence on the previous proposal. We remain optimistic for sensible considerations to be incorporated.

TMEC represents the state's minerals, manufacturing and energy industries and provides leadership, effective issues management and cooperative action on behalf of its members. Our mission is to promote the development of sustainable exploration, mining, industrial processing and manufacturing sectors which add value to the Tasmanian people and communities.

TMEC's membership base represents an important wealth creating sector within the Tasmanian economy. Minerals exports alone account for 65% of Tasmania's commercial exports and is the foundation stone of many regional communities with 5,600 direct jobs.

TMEC welcomes the opportunity to provide input on the draft TPPs. All the TPPs in various ways and extents impact the TMEC membership base. TMEC recognises the TPPs as filling a gap in the planning scheme that will provide strategic direction to the SPPs and Regional Land Use Strategies to achieve outcomes that will benefit the Tasmanian community as a whole. TMEC is supportive of the development of this important planning instrument.

The Principles and Policy Context section of each TPP appear to set the tone for this strategic direction, and the statements made in this section will provide important guidance to planners and policy makers. In Sustainable Economic Development, section 4.0.1 provides good context about Tasmania's agriculture, natural tourist attractions, and renewable energy. But its mineral wealth, the sector's importance to the economy and importance to the green energy transition is absent. In fact, there is no mention of minerals at all there. TMEC suggests that 4.0.1 be expanded to include a statement on Tasmania's mineral resource and development importance, such as:

As one of the most mineralised places on the planet, Tasmania has remarkable geological diversity and an abundance of rich and high-grade mineral deposits¹. Many untapped opportunities remain for exploration, extraction

¹ https://www.stategrowth.tas.gov.au/ocg/investment_opportunities/sector_opportunities/Mining_and_mineral_processing

and downstream processing of Tasmania's mineral resource¹. Minerals exports account for the majority of Tasmania's commercial exports, the sector provides the economic foundation stone of many regional communities, and the sector's royalties and fees provide substantial funding of the essential services that benefit all Tasmanians. Many of Tasmania's minerals are required for the transition to renewable energy.

In a similar way, and as Agriculture's Objective includes support for its long-term viability, the Objective section of Extractive Industry (4.2.2) might benefit from additional context and direction. TMEC suggests as statement to the effect of:

To promote a strong and highly productive extractive industry sector by identifying and protecting existing and potential extractive industry resources and supporting infrastructure, to facilitate economic growth and long-term viability of the sector.

In the Biodiversity section of Environmental Values at 2.2.3 4, the TPP states all the requirements in developing land in and around waterways. Condition (f) requires that significant views and landscape values are maintained or enhanced. While "waterway" does not appear in the glossary, if it applies down as far as Class 4 streams, any development within view of a creek might be captured in this requirement. Given the general and subjective nature of this requirement, compliance appears difficult in many cases. Perhaps "significant" and "waterway" should be defined to avoid unintended consequences.

The establishment of the TPP's is another vital step in bringing more "positive predictability" into the process where applicants behind a development can reasonably address all of the elements which the assessors of planning applications will take into account.

The Canadian Fraser Institute Annual Survey of Mining Companies establish a relative global ranking across fifteen policy factors and three composite indices, across 84 jurisdictions to assess the relative attractiveness for investors. The 2021 results ranked Tasmania as having the eighth most promising future mineral deposits globally but ranked in the bottom half of all jurisdictions for perception of policies, duplication of regulation and uncertainty of environmental regulations.

A well-considered approach to the TPP's, particularly given the glaring omissions in the draft, can potentially see Tasmania's relative attractiveness to improve, which helps underpin further economic and social benefits for Tasmanians for generations to come.

TMEC appreciates being able to participate in this consultation step, and requests that consultation be also undertaken when the Implementation Guidelines are drafted, and during the identifying and mapping Strategy stages, particularly 2.4.3 1 (Landscape Values), 4.2.3 1 (Extractive Industry) and 4.4.3 1 (Renewable Energy).

Thank you for the opportunity to provide comment on the draft Tasmanian Planning Policies. Please don't hesitate to contact us if you require further information.

Yours sincerely,



Ray Mostogl
Chief Executive Officer