STANDING COMMITTEE ON LEGISLATION

MINING LEGISLATION AMENDMENT BILL 2015

TRANSCRIPT OF EVIDENCE
TAKEN AT KALGOORLIE
MONDAY, 11 APRIL 2016

SESSION FOUR

Members

Hon Robyn McSweeney (Chair)
Hon Ken Baston
Hon Dave Grills
Hon Robin Chapple (substituted member)
Hon Kate Doust (substituted member)

Hearing commenced at 10.31 am

Mr CRANSTON EDWARDS
Prospector and Small Miner, sworn and examined:

The CHAIR: On behalf of the committee, I would like to welcome you to the meeting. Before we begin, I must ask you to take either the oath or affirmation.

[Witness took the oath.]

The CHAIR: You will have signed a document entitled "Information for Witnesses". Have you read and understood that document?

Mr Edwards: Yes, I do entirely; thank you.

The CHAIR: These proceedings are being recorded by Hansard. A transcript of your evidence will be provided to you. To assist the committee and Hansard, please quote the full title of any document you refer to during the course of this hearing for the record and please be aware of the microphones and try to talk into them. I remind you that your transcript will become a matter for the public record. If for some reason you wish to make a confidential statement during today's proceedings, you should request that the evidence be taken in closed session. If the committee grants your request, any public and media in attendance will be excluded from the hearing. Please note that until such time as the transcript of your public evidence is finalised, it should not be made public. I advise you that publication or disclosure of the uncorrected transcript of evidence may constitute a contempt of Parliament and may mean that the material published or disclosed is not subject to parliamentary privilege.

Would you now like to make a statement to the committee?

Mr Edwards: I would like to thank the committee for attending and taking on our concerns as prospectors and also for considering my written submissions and for hearing me speak today. I do have some extra documents to lodge today, which are in support and which I did actually mention in my submissions 1, 2 and 3. I also have a document which I would like to lodge in confidence—there is a copy for all of you—because it is sensitive. I place that forward because there is an opportunity to get to the bottom of a lot of things in this inquiry, and if it does go that far, this evidence is there for you to use. So I ask your permission to place it, please.

The CHAIR: Yes.

Mr Edwards: There are four copies of that and there are four copies to read today. That is the private one and these are the four to go to you and the committee to read as I am reading it, because I have got evidence to back that up.

The CHAIR: Thank you.

Mr Edwards: And here is a digital copy as well. Did you want to pass those around? That has my statement. It will take probably about eight minutes to do my opening statement and it will actually refer to those points.

The CHAIR: It is your time.

Mr Edwards: It is my time. I have got plenty of time. I do understand that. Yes, I will take some questions after I have finished my statement, unless you want to stop me along. That is fine. I have actually got it in order so as I come to a point, you can go to 1 and 2 and 3. I think there are about six documents to back up what I am saying so you get the picture of what I am trying to say.

The CHAIR: Yes.

Mr Edwards: My submission sets out the concerns about the effect that the implementation of the amendments to the Mining Act will have on my business as a prospector and as a small-scale miner. I believe the amendments are already in effect. As stated by one consultant, many changes have already been incorporated and they will now be only rubber stamped. I have already become a victim. I mention in my submission 1 at page 10 that there should be an investigation into the practices of the DMP. I was rejected a POW-P on mining leases I am involved in because of the methods of small-scale mining proposed and last week was rejected a POW-P application on two exploration licences for excess tonnage to do work. That is on handout 2. The guidance for approvals on POWs is meant to be 30 days, but one of these has been a nine-month process. I have been seriously delayed and unable to work ground that I am paying rent and rates on. These delays have caused an underutilisation of expensive equipment and have interrupted the flow and plan of my work program, and now my only option is to put in a new application for less tonnage.

Now I go on to some examples. I have approval for five adjoining 10-hectare prospecting licences for a total of up to 50 000 tonnes on 50 hectares of ground. That is in 3. However, my application on two exploration licences consisting of over 1 500 hectares each has been rejected for excess tonnage of 100 000 tonnes each. In summary, it is okay to have 10 000 tonnes on 10-hectare tenements, which are prospecting licences, but I am refused to have 100 000 tonnes on a 1 500-hectare tenement, which is an exploration licence. The logic and the maths do not add up. How is it possible to fully explore an EL with such limited tonnage in this day and age? Effectively, the DMP will not allow me to use my techniques for exploration and are trying to pigeonhole me to do minor exploration. Alternatively, I may need to employ consultants to prepare the mining proposals necessary for extra tonnage to conduct simple prospecting activities over more ground. I have got a copy of the consultants' cost, which is in my submission 2 on page 8.

[10.40 am]

The DMP has failed to properly consult with prospectors and small-scale miners with regard to the amendments. They have consistently deceived and misled many people and this committee with incorrect information regarding consultation. Most of the entries in their submission from pages 215 to 220 were listed as consultation meetings, but these were on other issues such as RER, MRF, LIN and POW and MP fees—which are mine proposal fees—et cetera. The first consultation for the said proposed amendments was a whole-day briefing on 21 May 2015, followed by another full day on 9 June 2015, and these two day briefings and interactions were restricted to a group from APLA. The DMP has listed as part of their consultation a meeting dated 6 August 2014. This meeting was called for by our sector. The DMP stated that various issues were discussed, including a description of the proposed amendments to the Mining Act. See handout 4. This is incorrect, as witnessed by the prospectors and the small miners who are present, including myself. The prospectors did not raise the issue because they simply did not know about the proposed amendments at that time. They were also not informed that day of the DMP's own supporting record of that meeting signed off by the director general. It shows that there was no mention of the proposed amendments being an issue or being raised at all. You can see a copy of the letter from Richard Sellers dated 22 October 2014 and the issues arising; there is a handout, 4A.

I should go on to, under RERAP—I will just explain that the RERAP is their consultation process, which abbreviates reforming environmental regulation advisory panel. They are talking about regulations not the Mining Act in my view. I have some points here which you need to know, committee. I think they are actually pertinent. We will go to RERAP meeting 7, dated 19 September 2014; it is item 5 or see handout 4B. It makes note that the DMP is yet to receive a first draft of the mining amendment bill. In RERAP meeting 8, which is item 2 on 5 December or see handout 4C, the panel itself—we are talking about the panel in the RERAP—actually queried the consultation process. It stated that the DMP will respond directly to comments in submissions on the draft amendments and, importantly, there will be no further public consultation periods. That is 4C.

In fact, in December 2014, most of our sector was still unaware that any changes to the Mining Act were afoot and here they are stating that there will be no further public consultation—see copy of the RERAP minutes 8, item 2. This itself conflicts with the DMP's indicative consultation schedule for external stakeholders, which opened the consultation period from December 2014 to January 2015. I will refer to my submission 1, page 15 or see handout 4D. You will see that quite clearly; it is a very important piece of information.

The DMP could have brought the proposed amendments to the attention of about 50 prospectors a few days later on 9 December 2014 when they ran a training workshop for eLodgement and TENGRAPH Online. This was a perfect opportunity for consultation on such an important part of the prospectors' business. It was not brought up nor mentioned. I have a copy of Mr Charlton's agenda with notes from that meeting of December 2014, which is the DMP workshop; it is the last item, 5.

I will finish with that it is quite clear that the DMP has been withholding important information to prospectors and small miners. They have not included nor satisfactorily notified all the tenement and leaseholders in any real consultation in their three-year process of drafting the Mining Legislation Amendment Bill 2015. Furthermore, the DMP has injured my business model to continue operations as I have enjoyed in the past for near-on 40 years. I seek an investigation into the conduct of the DMP and support any call for a royal commission into their conduct. Thank you for your time, panel.

The CHAIR: Thank you. I am sure the committee has questions to ask.

Hon ROBIN CHAPPLE: Obviously, our role—we must restate that—is that we are allowed to look at the policy of the Mining Legislation Amendment Bill 2015 and the issues it raises. Quite clearly, we have already heard that many of the smaller miners are concerned that there is a new level of administration going in, which is going to affect the way you do business and therein, potentially, your liabilities. Why do you think the department has gone down this pathway?

Mr Edwards: I would answer probably the question that has been posted, or the statement that has been forwarded by the AMEC chief. Mr Bennison said that the prospectors have actually hijacked these amendments. I think it is the other way around; I think that the big end of the industry and the DMP environmental have actually hijacked the Mining Act itself. I will explain a bit further. With prospectors of our scale, there is an agreement with the DMP and the EPA—I do have a copy; it has been placed in Parliament—where they have an understanding or an agreement that up to 10 hectares of clearing and projects will stay out of the EPA. We scheduled the power of the DMP to approve our projects to go on. That is a big, key thing. Basically, for most of the miners in here, if they do a project like a POW proposal or a mining proposal, if they are not doing more than 10 hectares, then they do not go to the EPA. We, in the past, have never worked with the EPA—never. Never in my whole life have I had a document go to the EPA. I have never experienced the EPA. I think that has not been made very clear to the committee. What is happening now is that the big end of town has jumped on the bandwagon of the federal Parliament. They were talking about doing a one-stop shop for approvals. I did some study on the weekend over that. With regard to the one-stop shop, the idea was actually good in theory but it has failed. It did not get the legs; it stopped because it has actually created more problems than that they thought it would fix. I am sort of transgressing a bit, but I will go back to the 10 hectares. What is happening is the idea I have stated, and it has gone back to an inquiry. There is an Auditor General's report and I think it has been mentioned by APLA in their early submissions and others. That was the basis for the MAP, which was the ministry advisory panel. From that, they made the recommendations and then you have the RER process. The MAP made I think about 11 recommendations, from memory. Of those, they actually stressed that they wanted to reduce the regulatory burden. In my opinion, the RER group has actually failed; they have increased the regulatory burden on a sector that did not have any of this burden before. They have not taken that into account. It is obvious that the AMEC and

the chamber of mines—the bigger companies—are going to do well out of this because there is going to be less scrutineering for their sector in this new system.

[10.50 am]

I think it is less painful to have this new system in the DMP than going to the EPA. That is the issue. Now what they have done is bring in a lot of the EPA act into the Mining Act and they have added some more as well. I do understand a lot of this Mining Act. I was involved with the two days with clause by clause. I did spend about a week prior actually going through the amendments, and it was very hard. I have the first copy of the MT, which is the tabled one; I got that on 5 May. I have sort of been studying it and I have looked at it and I can see, as I was going through with Mr Gorey and Mr Roberts—the chiefs of their departments in the DMP. Once we got to some of the sections, I will give you the example when we got to proposed section 103AM under the guidelines where they can call for doing offsets and they can call for doing environmental studies of levels. You have to do studies of your neighbours for dust, or they can actually ask for any study on you at all. I said to Mr Gorey, "Our sector cannot agree to any of that at all." I said, "I know you need that to actually control the big sector but at the moment we don't have that, and that actually gives your group—your officers—the power to put any one of those points on to a prospector's approval." It gives them the power because it is the guidelines. So, they might say, "Cranston, we're not sure of the native vegetation out there; I think we should do a study first before we actually go forward with your proposal." I see you are nodding your heads there, because that is what they do a lot of with a lot of developments. As you know, these environmental studies—I have got some quotes there for you—it was actually in my submission, but you are looking from between $10 000 to $30 000 per kilometre square. With a prospecting licence, you actually have two kilometres square. I have two exploration licences which I asked to explore the whole lot under my program, because I do not know where I am going to be doing samples and the thing did get approved up to the point of tonnage, but that is actually—those two, if you look at TENGRAPH actually take up a total of over 30 square kilometres, so you can just imagine the cost imposed, and there are all different levels of actually doing an environmental study. I have talked to the consultants about it and they said there is level one, level two and the cheapest—I have actually got the barebones costs in my submission; I am not actually trying to gild the lily. I have seen mining proposals go up to $250 000 to do a mining proposal. On top of that, you have got studies. I will give you an example with the Aboriginals. In the last 10 years we have had a few different claims around here, sort of close with the Widji people, and I had one little lease and it was going to actually cost me $14 000 for 10 hectares to do a survey—a clearance—and I did not go ahead because it was just too expensive. So, that is just actually one example for me, and you can actually take that example across the board for a lot of the prospectors. All these tenement applications just stayed there because they said, "We can't afford to pay this $10 000, $20 000 or $30 000 for these surveys", and that is the same sort of cost you are going to be charged for doing the environmental. If it is not just one environmental, they might say, "Well, we don't know what animals are there." And those parrots that got burnt, you know, down —

Hon ROBIN CHAPPLE: Originally, you did not have to do that under the POW?

Mr Edwards: No, we did not.

Hon ROBIN CHAPPLE: Then the POW was the responsibility of the mines department to test whether your POW was going to have any impact and they would come back to you and sort of say whatever. Now what I am assuming the mines department is doing is putting all that regulatory burden and assessment on you and you then merely, or the department, just has to say, "Well, he's established all these guidelines, we do not actually have to do any work anymore, but if he breaches any of this, it is his responsibility." Is that what I am sort of getting at? What is actually the fundamental change?

Mr Edwards: The fundamental change is we have this regulation and layer of environmental stuff which we have never, ever encountered ever before in our whole life. We have actually been dumped into the big end of town, which had been done automatically over time. I can give you an example. This has already been done to the guys who want to do mining underground. This was actually snuck through. When the small miners were asleep at the wheel, they actually let this through. So, at the moment if you want to go underground and actually do an underground shaft like we have been doing for over 100 years—it was mentioned there is a guy here today who will probably actually cover this topic because he has done a few of them, and I have actually done a couple of shafts—there is no level to do it for the prospecting level; you are actually called up into the new safety division.

It was raised by Mr Potts at the minister's meeting two years ago when he came up here. He said he has actually spent up to $250 000 actually getting things right and up to scratch; that was an old shaft owned by the family out at Mount Monger. He said it is ridiculous and he has got to have all the mine safety crew and emergency crew, and he has to try to link things with the neighbour. The neighbour—Daisy Milano—has said, "Come on, mate, you should do your own thing." So he put it to the minister, Mr Marmion, and said, "It's cost me $250 000." He said, "Well, if you can't afford it, you should go and form a group; get about 10 or 12 in a syndicate and do it." I said, "You know, the prospectors don't work like that." The thing is he got tackled on that by the prospectors after that, but that is an example that has already happened to us, right. To go underground mining and you are in that big sector, so you are not seeing any of that shaft work happening. So, that is absolutely just about dead.

That is an example of what will happen to the alluvial and the near-surface mining now. If you actually dump us into that group and you cannot compete, it is actually barrier entry with the costs and level and it is finished. I will be—I am not gilding the lily—this paperwork has got that bad for me now that my wife has got to do a lot; she has got to stay in town a lot just to cover this paperwork.

Hon ROBIN CHAPPLE: I thought they said they were actually making it easier.

Mr Edwards: No, they are not making it easier. At the moment, I will tell you they have actually been doing a pre-run of this system and they are already actually testing it on us right now. If you go back to document 1, this was a spiel that has been getting around the internet. It was actually mentioned by the AMEC chief, Mr Simon Bennison, that the winners out of this will be the consultants. This says, "Many of the changes have already been incorporated and the above will only be a rubber stamp." So, basically, what they are saying is this is actually talking about the mining amendment bill and that that it is already in, they are already doing it and it is just a rubber stamp.

The CHAIR: They did not know about our committee, did they?

Mr Edwards: Yes, I know, but they have actually been doing a practice run. They have got the processes in place and that is why I am having problems with my refusals. I have never had any refusals on my programs of work in my life.

Hon ROBIN CHAPPLE: Well, your reputation is—I think you were a nominee for a Golden Gecko Award.

Mr Edwards: Yes, I have done some work on the Golden Mile back 10 years ago—no, it was actually 20 years ago, in the 1990s. An old rubbish dump got tidied up and the environmental people went and had a look and they actually gave the company—KCGM—an award for it and I said that is fine; they took the credit, but I did the work. That is a side issue. With regard to environmental, we are putting our name to it. If we muck up, we are finished, because we have to do another proposal and we have to live here. It is the same as the guy that actually works with the DEC here. He cannot be over the top and overzealous with the environmental stuff; he is the

manager of the DPaW. He understands the prospectors. We get a lot of sense out of this guy for DPaW here. He actually helps us along. Because I have had tenements on DPaW ground, which is the old pastoral stations that have been acquired by the government. There are about 45 or more in the state now. So, that is one issue. The other issue you should bear in mind is the mines department has actually been spruiking the LIN. The LIN, you know, it is going to be good for you.

[11.00 am]

Hon ROBIN CHAPPLE: Sorry, LIN?

Mr Edwards: It is low-impact notification.

Hon ROBIN CHAPPLE: Got it.

Mr Edwards: LIN is not actually in the amendments as such. You cannot find the word "LIN". It has actually been reversed. It is called notification of low-impact activity, so it is NIL or NOL or something. But I have been involved with that. I have turned up to some of their negotiations and I have actually seen some of their ideas that might be coming through the regulations and, for example, any ground that has got ESA on it, which farmers know is classed as environmentally sensitive areas, which can be enlarged. We might end up with the woodlands turned into an ESA—the whole lot. I mean, if you have got an ESA, you cannot put a LIN. If it is on any ground that is owned by DPaW that is in the document—reserves and such—you cannot put LIN. So, there are going to be a lot of exemptions so that LIN will get smaller and smaller. Prospectors our size cannot rely on the LIN. We will take it on face value and we will run with it and have a look. It might be useful, but we cannot say we are going to give this a rubber stamp because there is a LIN there. You just cannot.

Hon ROBIN CHAPPLE: That would affect under the old system as well as the new system.

The CHAIR: No. Tell me if I have got this right. Under the old system there was 10 hectares. Now, under this new system what they have brought in underneath that, they say is "subject to the conditions referred to in section 103AE"—that is the low-impact statement. So, before you could have 10 hectares, the environment protection was not involved or anything —

Mr Edwards: That is exactly right.

The CHAIR: You just have to tick a few boxes now because of this clause underneath the 10 hectares. You have to put in a low-impact statement and the EPA sort of comes into it—is that right?

Mr Edwards: Yes, well, the EPA does not get involved. With this new proposal, the EPA is out of it. They are going to be out of a job before the mining industry. They will probably move into the mines department.

The CHAIR: So the mines department takes that over.

Mr Edwards: That is right, they are taking it over.

The CHAIR: So they say it is easier, but you are saying it is because —

Mr Edwards: It definitely will not be easier; it is obvious. You do not have to be a brain surgeon to work out that you bring in all these scientists, they are actually going to put the microscope on every proposal you put forward. They are going to put the microscope on you.

The CHAIR: There is one thing here you said that I need an explanation on. You said that the logic and the maths do not meet up and you say, "They will not allow me to use my techniques for exploration." Are your techniques different to what you have been doing or different to other people?

Mr Edwards: My technique, I am actually looking at some exploration licences. I will give you an example for that one there. It has been explored, it has been drilled, it has been soil sampled. It is

only about 30 kilometres out of town. There is not even an ore body, nothing on it, so we need a different technique to be applied. With nuggetty gold or reef gold it may be down underneath overburden. There is a lot of red clay out there, so I need a technique to get through the red clay and I have a large excavator, about 100 tonnes. You have probably seen the photos with Dan Machin in the bucket. I take him on site; that is another story we will probably have a joke about today, if you have time. My technique is to take off the overburden and that is what a lot of prospectors have to do because all the stuff that is close to the surface, within a metre or two metres possibly, has actually been gone over pretty thoroughly. I can dig down to about five or six metres with my excavator and open it up. I suppose it is just like a big drilling sump or a little pit. It is all safe; I can walk down, I can put my sample stuff in it. I need to do my trenching and little pits. In the end, when you add it up, one bucket is actually 6.3 cubic metres; Dan Machin proposed that we have 20 cubic metres as low impact. That is two and a half buckets with my excavator, so they are trying to put me in that little box. I said, "Dan, how did you come up with that 20 cubic metres?" He said he was actually sitting in the room and thought, "Well, that is a couple of metres that way, that way, and we worked out that that should be big enough for a prospector to work in." That is the absolute truth; I actually have some witnesses here who will account for that. He has actually backed away from that, but that is the truth.

This is the mentality of the people we are dealing with at the DMP. Over the years I have been involved with this. We have had to educate new staff. They come out and we show them our operations and what we do. We had a lady called Janine, she was actually head of the DMP environmental and she said, "Cranston, I have a new young girl, can we come out to your site so you can explain what you do, to educate her?" I said okay. We do that, and over the years when we have had problems with bonds and things—I think you might have been on that bus trip, Robin—we have had to educate the people that it is not a risk, the work we do. Once we take them out and explain what we do, they see what we do. With those thresholds at the moment, we can only open up two hectares at a time, so you cannot wreck the environment because that has to be put back for your next two hectares. It has its own environmental management system, EMS. The EMS is already inbuilt in the two hectares, so you can only disturb two hectares and put it back then move to your next two, so that is —

Hon ROBIN CHAPPLE: So why does a major mining corporation not have to fill in their holes?

Mr Edwards: Because that is under a mining proposal and —

Hon ROBIN CHAPPLE: Sorry, I was being a bit cynical. You guys —

Mr Edwards: I can do the same; I could go for a mining proposal, but I have looked at mining proposals and they are actually too difficult. For my skills, it is actually too difficult and too onerous. Even with a small mining proposal now, you are looking at something about that thick and then you have to do a mine closure plan as well, looking for a plan to close. If I was running the DMP, I would be looking for a plan to expand the mine, not to close it. You would say, "Robin, what are you going to do with your mine in the next 20 years? Are you going to expand it? What are you going to do with your exploration?" To me they are going the wrong way around; they are actually looking at how you are going to close it. Then, as part of the mine closure plan, they want it to be of a level that is actually higher than it was before you started. I am not sure you can go much higher than pastoralism here, if they want it to be a vegetable garden or a market garden out there.

Hon ROBIN CHAPPLE: Okay.

The CHAIR: I will give the last question to my colleague.

Hon STEPHEN DAWSON: Thank you, chair, I appreciate your indulgence. Because I am not a member of the committee today, I do not get to ask questions, but I appreciate you allowing me.

Cranston, in one of your submissions—submission 2, I think it was—you talked about the need to have a small miner section inserted in the act. Could you tell us how that would work and also what the definition of "small miner" would be in your view?

Mr Edwards: If this is going to go ahead as it is, it is actually unworkable for our sector, so it has to go back to the drawing board. As you said, I did suggest that we need to put in a section, and to me it has to be in the head powers of the Mining Act, where it is safe and cannot be overruled. Basically, what I am saying is that when you put things into the head powers of the Mining Act and you go and write regulations, those regulations cannot overpower what is set in the Mining Act. If you put things in the head powers of the act, which describes the way we have been operating for the last 100 years, the DMP is aware of how we operate. We should not have to draw this up—we are not lawyers; we are laypeople. I would like to see things put into the head powers of the Mining Act to actually protect us. For instance, you might see that in my submission I said that the iron ore industry has its state agreements. They, at the moment, do not have to abide by the Mining Act; they have their own agreements. Under state agreements, they do not have to do even pay into the MRF. They are exempted and they have their own set of rules outside the Mining Act. I just put that on the table for the committee and others to think that if it gets too difficult to work in this act because they have made it too complex and too onerous, by putting in thresholds, you are just making more levels where they are going to put their microscope. We need to keep it simple; go back to basics. It is actually proven. Everything is working and you will probably see in my submission 1 or 2 that have the low-impact mining —

The CHAIR: I am not being rude, but we only have a couple of minutes left.

[11.10 am]

Mr Edwards: Okay, that was probably mark II of the early days, because I was around when we did not have this and you would actually write to the registrar and the mining engineer with your methods of what you are going to do, about two paragraphs, and they would give you an answer back, okay, and off you go. Then the DMP got their own environmental section started so this all evolved. Everything is evolving but I think they need to pause a bit and have a look. Getting back to your question, under the basis of LIMO, which is an abbreviation for low-impact mining operations, that has actually worked quite well. That worked for probably nearly 20 years. It only closed since we have seen Mr Gorey and his team come in. That has been put away and they do not mention the word "mining", and now they have put in a mining proposal, which is much more onerous. We need to go back to things that are simple, like Mr Aubrey Lynch. They want to go mining, and you need to be simple with these tick boxes, not writing stories and getting consultants. To achieve that, Stephen, with regard to your question, you have to keep it simple. We do not need all these big, legal documents. Again, I read up those submissions; we actually have 100-page guidance documents that are going to come along with the regulations. I read in your submissions that the mining amendments at the moment, that is only a framework, like the skeleton of a house, and the regulations are going to build the cladding and all the doors and furniture inside. We do not know what it is going to look like. I would actually bet my bottom dollar that everyone is going to have a heart attack when they see the regulations, if we ever do get to see the regulations. We have been asking for the regulations. My concern is that they should be both together as a package, up-front, and saying, "This is what we're trying to achieve", and actually put it to the industry and our sector. I think even AMEC and the others now have their concerns, because of all these 100-page guideline documents that are going to be law for them, and they must refer to them and abide by them. Those documents will actually apply to our sector, so how can Mr Lynch and all us guys actually abide by those documents? We cannot.

The CHAIR: I have been in Parliament for 15 years and it is one of my bugbears. I have yet to see regulations being done with the actual bill; it just does not happen. Thank you for attending today. A transcript of this hearing will be forwarded to you for correction. If you believe that any

correction should be made because of typographical or transcription errors, please indicate these corrections on the transcript. Thank you.

Hearing concluded at 11.13 am

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