



Parliamentary inquiry into ‘Factors shaping social licence and economic development outcomes in critical minerals projects across Australia’

To: House of Representatives Standing Committee on Primary Industries

Submission by The Alliance for Responsible Mining Regulation (ARMR)

Submitted: 19 February 2026

The Alliance for Responsible Mining Regulation (ARMR) is a coalition of community groups and individuals interested in improving the regulation of mining and quarry industry in the State of Victoria, Australia.

ARMR Vision Statement

ARMR supports financially viable and responsible mining with adequate regulation that is enforced in a timely and effective manner but will oppose proposals that threaten to destroy productive agricultural land, water resources, or negatively impact environmental and human health or that fail to obtain social licence.

Until such time as it can be proven to ARMR's satisfaction that the responsible authorities are regulating existing mines effectively ARMR will strongly oppose any new proposals in Victoria.

Introduction

ARMR is concerned at the predominance of 6 Labor MPs on this Parliamentary Committee, 3 Liberal/National coalition MPs, and 1 Central Alliance. This invites public perceptions that the Committee's findings will inevitably be biased towards predetermined outcomes because Labor MPs must toe the party line.

Recommendations

Effective community engagement¹ is an inclusive, cooperative and collaborative process involving all stakeholders - government representatives, residents and the mining company, where:

- Community's genuine concerns are incorporated into decision-making accepted by all stakeholders
- Affected residents are taken through the options and costs associated with each mining proposal

¹ "Community engagement is the collaborative process of involving residents and stakeholders in decision-making and actions that affect their well-being, aiming to build relationships, share knowledge, and create positive, lasting change for a better quality of life." [Online search 14/1/2026]

- Citizens be enabled to participate fully in the approvals process through free and sufficient access to independent expert evidence
- The proponent is accountable to the community
- Approvals will meet international best practice standards, not mitigated “as far as practicable”
- State government approvals satisfy national standards of environmental and social best practice
- The proponent is legally bound to provide factual evidence based on peer-reviewed science to show the true worth of their projects
- All scientific data is supplied in a timely manner during all stages of the project's development and operation
- Approvals will be based on criteria such as cumulative bioregional environmental and human health impacts of multiple mines; protection of water, soils, biodiversity, ecosystems, and protection of food producing farmland
- Proponents will provide peer-reviewed evidence that mines will be economically viable
- Approvals are conditional on the proponent having financial assets upfront
- Bonds will reflect the full costs of rehabilitation, be paid upfront in full or in yearly downpayments, and held in trust until successful rehabilitation is demonstrated based on independent expert evidence.
- The levels of risk are fully explained so communities can decide if they are willing to accept these risks.
- Projects with no social licence will be refused.
- Affected communities and farmers will have Right of Veto
- ‘Go Zones” for mining will be declared where there is social licence based on full, proper and fair community acceptance, and where there are clear and genuine shared community benefits for all.
- Trailing liabilities legislation will apply to ALL mines, not just the Latrobe Valley Declared Mines
- Departments of Agriculture and Environment and Water will be referral agencies.

A framework to grow Australia’s critical minerals sector - Terms of Reference

1. The effectiveness of engagement practices with local communities, Traditional Owners, and other stakeholders

Community Engagement in Victoria

Community engagement should be a collaborative and constructive process between the proponent and residents and stakeholders that builds relationships and shares knowledge to reassure people that new projects will not negatively affect their health and well-being, livelihoods, but lead to lasting change for a better quality of life.

The frantic rush to find minerals for renewables infrastructure is a major social disruption to the lives of country Victorians, both in the short term and long term. It also cements the increasing divide between country and urban Australians. In the urban political sphere, country people are derided as uneducated “slow talkers” whose opinions, lives and human rights simply don’t count.²

What particularly galls impacted communities is the lack of fair and proper consultation. The reality is that both the government, the mining company and its consultants adopt a top-down

² Senator Jane Hume, Federal LNP, summed it up when she said on Sunrise regarding joining the Nationals: “I would have to talk slower and talk about the regions more often down in Cockies’ corner.”

approach which minimises and dismisses community input. Public forums pit mining company consultants against the community.

Many rural regional communities and individuals statewide are being swamped with multiple applications for licences to mine critical minerals. These mines require Environment Effects assessments due to their significant impacts. Under the EE Act 1978 (Vic), engagement of farmers and other citizens have only 28 days to wade through 5000 pages plus of proponents' reports and write submissions, often during 24/7 harvesting and holiday periods, including Christmas.

Country people are completely overwhelmed by the pressure. They are stressed, angry, afraid, depressed, utterly exhausted and even suicidal. Victoria's mining law (MRSDA 1990) legalises the eviction of farmers from their homes and the ruination of inter-generational family businesses. Compensation payable under the law may make up for some financial losses but does not account for psychological effects.

Farming communities already have the highest national suicide rate. These mines are making things even worse. This is especially so for the farmers who will lose their homes, livelihoods and quality of life when the mining companies take over their farms for 20 years or more.

For farmers and communities, *engagement* is entirely negative, adversarial, disrespectful, and fraudulent.

Case studies

To date the Minister of Resources has approved the Donald, Avonbank, and Goschen minerals sands projects, with Wim 100, Wim 150 and Fingerboards projects awaiting her decision.

Gippsland Critical Minerals – Glenaladale East Gippsland

In 2019, the Victorian government exempted 4000 ha of Glenaladale's economically-significant horticulture from mining and mineral exploration.

Gippsland Critical Minerals (GCM) Fingerboards mineral sands' project is sited 150 metres from this area and on or near sheep and cattle farms.

This is not a flat landscape but one that undulates with steep gullies and natural springs. Victoria's last unregulated river, the Mitchell, and the Perry River with its iconic Chain of Ponds (on which the Victorian government has spent millions on restoration works) flow directly to the Ramsar Gippsland Lakes. It is also an area of significant GunaiKunai cultural heritage.

GCM has **never** operated a minerals sands mine, or any mine, in such a sensitive environmental and topographical location.

In November 2021, the EES ministerial assessment found that the Fingerboards project should be refused because its environmental impacts were "*unacceptable*". But, in October 2025, Resources Victoria approved three Retention Licences so it could be reassessed.

The Minister for Planning has now decided that an environment effects statement (EES) is required due to its "*potential for significant environmental effects*".³ The community now faces another EES process.

Donald mineral sands mine - Astron Ltd (ATR.ASX)

Donald EES approved in 2008. Mine is not yet operational 17 years on.

³ Reasons for Decision under Environment Effects Act 1978 (referral number 2026-r01)

Avonbank mineral sands mine - WIM Resource

WIM Resource's Avonbank mine (Horsham) was approved in November 2024. Its engagement with affected farmers was non-existent. A WIM Resource employee was charged with misleading local people about the mine's impacts and falsifying submissions.⁴

Goschen mineral sands mine – VHM.ASX

Goschen, approved December 2024, is situated on some of the best cropping land in Victoria. Resources Victoria is currently assessing a pre-feasibility study for a common use REE processing facility at this site. Along with the mine, this facility would introduce a highly-toxic industrial process into the middle of some of the most productive cereal cropping in Australia, which, under the Victoria Planning Provisions, is designated Farming Zone:

- To provide for the use of land for agriculture.
- To encourage the retention of productive agricultural land.
- To ensure that non-agricultural uses, including dwellings, do not adversely affect the use of land for agriculture, to protect agriculture from inappropriate and conflicting uses and developments.⁵

Social licence is Critical for the Resources Sector

Four key metrics of social licence⁶ are:

1. Economic legitimacy - Does the project provide an economic benefit to the community, such as jobs or opening new trade opportunities?
2. Socio-political legitimacy - Does the project improve quality of life for the community, such as removing congestion or improving safety?
3. Institutional trust - Does the community trust the Government and/or the proponent to deliver the project in a way that is respectful to the community?
4. Interactional trust - Has the community had positive or negative experiences engaging with the project? Analysing the results of these metrics results in a social licence score out of five.

ARMR has gathered enough independent scientific and Ground Truth evidence to know that mining in Victoria is a threat to our environment, agricultural productivity, social capital, human health and wellbeing. The answer to questions 1 to 3 above is NO. The answer to question 4: there is no interactional trust.

Following the Albanese government's Critical Minerals Strategy 2023–2030, Victoria's Critical Minerals Roadmap: Resources for Net Zero's was released in 2024.

In her introduction, Lily D'Ambrosio, Victoria's Minister for Resources states:

"We will aim to drive early engagement and certainty for communities, by integrating land-use, environmental and community values".

Instead, both the Mining Resource (Sustainable Development) Act 1990 Amendment Bill and Planning Scheme Amendment VC242 to the Victoria Planning Provisions were passed ***without any community consultation or engagement.***

⁴ Gillian Aeria, ABC News, *WIM Resource accused of misleading public to garner support for Avonbank mine*, Friday, 22 December 2023

⁵ www.planning.vic.gov.au Planning Schemes, Clause 35.07 Farming Zone

⁶ phillipsgroup, Brisbane

VC242 removes all community rights to appeal planning decisions related to mining. And, in some cases, projects will be approved without any community consultation whatsoever.

During the second reading of the MRSDA 1990 amendment Bill, Lily D'Ambrosio, Minister for Energy and Resources, stated: "*Social licence is critical for the resources sector*", adding that "*Victoria is a closely-settled state*".

Victoria is the smallest mainland state (area 227,444 km²). Rural/regional economies are based on agriculture, and tourism enterprises that capitalise on the scenic landscape, rivers, lakes, beaches, national and state parks. The detriment to agriculture and the environment and the close proximity of mines to regional cities, towns and hamlets are strong reasons why critical minerals projects have no social licence.

The Victorian government has approved these mines in full knowledge their impacts are unavoidable, some of which are reliably foreseen to cause cataclysmic events.⁷

2. How critical minerals projects contribute strategically to regional and national economic development.

Our governments are enabling what is a highly speculative and risky critical mineral industry without full and proper regard for its profound and largely irreversible social, economic, and environmental consequences. Australian Critical Minerals Strategy 2023-2030, p21/64, aims to promote Australia's ESG credentials "*to maintain social license*" and "*ensure the clean energy transition is socially and environmentally responsible*". But the proposal to: "*Work with all levels of government to streamline environmental approvals*" is a strategic oxymoron.

The Victorian government cannot prove that mining is compatible with existing land uses, especially residential, agricultural, tourism and recreation, because it is not. Mines devalue properties and destroy the viability of high value agriculture, lauded by both Federal and State governments for its critical contribution to our national food security and export revenue.^{8,7}

The Critical Minerals Strategy is at odds with the Albanese government's *Feeding Australia: A National Food Security Strategy* (draft) that:

*"Australia is committed to safeguarding and enhancing our food secure status in a changing and resource constrained world and maintaining its position as a reliable and secure source of food for both domestic and international needs."*⁹

Existing critical minerals mining has proven to destroy rural communities. The companies, mostly foreign-owned or part foreign-owned, take the profits overseas, leaving behind unrehabilitated mine sites contaminated with carcinogenic toxins, rivers and groundwater polluted with flocculants, acid leachate, Chemicals of Concern (CoCs), wildlife habitat bulldozed, barren farms riddled with subsidence and salinity where there were fertile crops. Townships become ghost towns of empty shops and closed businesses. Social capital depleted.

Critical minerals projects in country Victoria are detrimental to its strategic rural-regional development. Mineral sands rare earths mining (as opposed to hard rock mining) requires the excavation of hundreds of thousands of tonnes of soil for a relatively minuscule quantity of low-value rare earths. Consequently, its potential to be economically viable, as the MRSDA 1990 (Vic) requires, is statistically near zero. Many will never be operational. Their contribution to national economic development: nothing.

⁷ Such as the collapse of one or more TSFs at Fosterville Gold Mine.

⁸ Examples: January 26, 2024 <https://www.timpallas.com.au/media-releases/regional-victorias-record-jobs-growth-leadsnation/>

⁹ National Food Security Strategy: Discussion Paper, Commonwealth of Australia 2025, p7/24

Were minerals sands mines economically viable, they would not need taxpayer-funded subsidies. These handouts only support directors' salaries and encourage gullible and naïve members of the public to buy their shares. Australian companies cannot compete with China's low labour costs and rare earths price controls. The Albanese and Allan Labor government's dream that critical minerals will be an economic saviour of our languishing economy is ill-informed, misconceived and futile.

3. Opportunities to strengthen workforce participation, skills development, and employment pathways, particularly in remote and Indigenous communities

According to the *Quarterly Employment Change (August 2025 – November 2025)*, Victoria's agricultural workforce is the second largest in Australia, representing about **26.3%** of the national sector. Horticulture makes up “~21%” of the state's agricultural production jobs; dairy and beef cattle farming “~19%” and “~16%” of jobs respectively; sheep and grains farming account for roughly 28% of the workforce together.

In 2024 and 2025, mining jobs comprised approximately **1.4% to 1.5%** of the total Australian workforce, depending on the specific measurement (total jobs vs. filled jobs).¹⁰

In 2024, Victoria's 15,200 mining jobs approx. declined 6.8% or 1100 fewer jobs (seasonally adjusted). Compare: Agriculture, Forestry and Fishing's 84,700 jobs, increasing 4.2%, or 3,400 extra jobs approx.

Gippsland Critical Minerals says its Fingerboards mineral sands mine would create 200 to 300 jobs. No account is taken for the potential loss of 2000 jobs which could be lost were the adjacent horticultural businesses to lose their certification due to radioactive silica dust contaminating the vegetables.

Given agriculture's long-standing strong and increasing contribution to Victoria's economy, to champion a damaging industry like mining does not pass the pub test.

4. The role of state, territory, and local governments in supporting socially and economically sustainable development

Agriculture is the epitome of sustainable development being inter-generational and profitable. In comparison, mineral sands mining is a short-term venture leaving enduring social and environmental destruction. Our governments' fervid support for them is incomprehensible, irrational, and awful public policy.

Options for improved coordination between jurisdictions and the Commonwealth

In the interests of consistency and uniformity, one National Standard governing all mine approvals would improve jurisdictional coordination, comparable to the new EPBC Act's National Environmental Standard. Approvals should also be assessed on a bioregional basis not on the effects of a single mine to ensure cumulative impacts are factored in.

5. Any other related matters that may assist the Committee

Rehabilitation

No mine site has ever been successfully rehabilitated anywhere in Australia. The MRSDA 1990 (Vic) requires that the mine site be restored to its original agricultural productivity. However, once soil biota is killed, fertility cannot be recreated. Rehabilitation cannot or will not be done.

¹⁰ ABS Statistics

Victoria's VAGO 2020 report: *Rehabilitating Mines* found that Earth Resources Regulation (now Resources Regulation Victoria) was not effectively regulating rehabilitation. Poor oversight, including outdated cost estimates, inadequate rehabilitation plans, inadequate bonds exposed the state to significant financial risk and continues to do so. VAGO was also concerned that the regulator's dual roles of regulating and promoting mining was a conflict of interest. Despite VAGO's recommendation, in 2026, these deficiencies still exist.

Net community benefit

An approach exploited by mining companies to gain social licence to operate is the promise of community benefits, such as small donations to sporting clubs, often hungry for money. However, communities hosting mines are least likely to gain benefits during a mine's operation, especially so after post-closure or when the mine is bankrupt or abandoned.

Fast-tracking approvals exacerbates the threats mines have on farming, tourism and other industries that underpin local and State economies and the social capital of local communities. It will not facilitate sustainable development, social cohesion, and environmental conservation.

The impacts of contamination and depletion of our surface and groundwater resources by mining and mineral processing will increase if mining law fails to safeguard environmental and human health.

A moral question arises: Is it fair and just to force rural communities to accept the high level of environmental and health risks of hazardous industrial mining processes, including a REE refinery, which our governments want to locate in the middle of their high-value cropping and horticultural enterprises?

Conclusion

Mining is a social issue that affects communities both in the short and long term.

Absent authentic community engagement there is NO social licence for critical minerals mining in Victoria.

Democratic good governance rests on the government's duty to develop public policy and law anchored in the principles of transparency, accountability, inclusiveness, fairness and integrity.

The purpose of effective community engagement is to earn social licence for new mines. This is not happening. There is NO social licence.

Yet our governments forge ahead with their Strategies and Roadmaps, wilfully shunning citizen's rights to fair and proper consent reinforced by increasingly repressive laws to force rural and regional people to comply with their agenda. These actions are a significant shift away from Australia's democratic values.

The truth is: "community engagement" is a complete sham. The critical minerals "rush" engulfing farming communities is a story of disempowerment and erosion of trust in our governments. Their willingness to disenfranchise rural farming communities, their failure to uphold the principles of procedural fairness and due process, upon which Australia's democracy is founded, is a reprehensible breach of the Rule of Law.
