

**To: Department of Jobs, Tourism, Science and Innovation
(JTSI)**

Re: Western Australia's Battery and Critical Minerals Strategy

4 December 2023

Introduction

AMEC appreciates the opportunity to provide a submission to the consultation on Western Australia's refreshed Battery and Critical Minerals Strategy. We welcome ongoing engagement as the Strategy is finalised and steps are taken to embed the actions, and track progress. AMEC invites continued collaboration between industry and Government, to ensure the State can maximise its critical minerals opportunities.

About AMEC

The Association of Mining and Exploration Companies (AMEC) is a national industry association representing over 570 member companies across Australia. Our members are mineral explorers, emerging miners, producers, and a wide range of businesses working in and for the industry. Collectively, AMEC's member companies account for over \$100 billion of the mineral exploration and mining sector's capital value.

Mineral exploration and mining make a critical contribution to Australia's economy, directly employing over 274,000 people. In 2021/22 Industry generated a record high \$413 billion in resources exports, invested \$3.86 billion in exploration expenditure to discover the mines of the future, and collectively paid over \$63 billion in royalties and taxes.

Stakeholder consultation paper 2023

General Comments

AMEC has strongly engaged with State, Territory and Commonwealth Governments on the importance of policy, incentives, and approvals, to ensure the momentum for critical minerals is captured, to support the domestic growth of a critical minerals industry. Host to all of the critical minerals sought across the world, Western Australia's role in meeting local and global demand is undeniable. However, there is plenty of work to be done, requiring sustained effort from industry and Government, to deliver on these ambitions.

Collaboration will be fundamental to achieving the objectives of WA's updated Strategy, and growing a larger, diversified critical minerals sector for the state. With a refreshed Australian critical minerals strategy released by the Commonwealth in mid-2023, including an additional \$4B in funding to support the development of the sector, each Australian State and Territory is vying for investment into their mineral assets and processing capabilities. WA's key focuses should be on strategic industrial lands, industry incentives, royalties, and efficient approvals functions.

With funding available under Commonwealth arrangements, as well as through international sources, including but not limited to the US' \$369B Inflation Reduction Act, and the EU's Critical Raw Materials opportunities, Western Australian Government support will be a strong indicator to investors of the state's steadfast commitment to grow the sector.

The first iteration of WA's Battery Taskforce was well-received by industry and other jurisdictions, and saw positive industry developments. This next iteration must drive the growth of the sector, up, down, and mid-stream, to capture value-add potential at all stages of the supply chain. We have the local capacity, expertise, and interest to meet increasing demand for Western Australian critical minerals. We now need the financial commitment and timely approvals processes to support.

Consultation Paper

AMEC recommends the WA Government defines critical minerals more broadly than the Commonwealth Government has chosen to, and include minerals with which Western Australia has a greater opportunity to mine and process (e.g. Nickel, Copper and Tin). This distinction is important given the varying lists and definitions currently being used. We note the consultation paper lists Copper and Nickel as critical minerals that are produced, despite these minerals not yet being listed as 'critical' on Australia's national list. AMEC has advocated they be included.

The consultation paper presents the state of industry as one that is well established and easy to navigate. Realistically, the critical minerals projects across WA will require greater levels of Government support as they weather commodity prices that are subject to fluctuations, test research and development processes to develop an optimal flowsheet and pathway to market, and traverse an increasingly complex and costly regulatory landscape.

Recent announcements around improved resourcing, co-ordination and streamlining are major steps towards support and a simple and easier approvals framework for industry to navigate.

Strategic industrial areas (SIAs) for example, have a great burden on the first mover to the estate. The majority of these estates are still in the early stages of development. An incentive to develop and greater support is needed to ensure they can serve their intended purpose and facilitate the growth of WA's critical minerals industry. There are lessons to be learned from the SIAs that are in development and more substantially developed than others. AMEC recommends the learnings are considered and influence next steps, to ameliorate similar concerns arising in future developments.

1.1 The primary intent of the strategy is to extract greater value from WA's resources onshore, to create skilled jobs, grow and diversify the economy and benefit regional communities. With this in mind, which value chain segments (i.e. upstream, midstream or downstream industries) should WA prioritise under the 2024-2030 strategy, and why? Does this vary for different minerals?

Western Australia should seek to maximise value from the upstream and midstream market segments where it already has a competitive advantage, while seizing opportunities to grow its downstream capacity, dependent on the commodity. With a renowned history for mining and processing to a certain degree, the upstream and midstream value chain segments and markets exist and can be further expanded to continue steadily increasing demand and output from WA.

However, much of the rhetoric around critical minerals focuses on the downstream. It should be noted there is not yet a fully integrated domestic capability within WA, and while companies progress studies and options to consider a path to vertical integration, it will be only economically feasible for certain commodities within the six-year timeframe to 2030.

Vanadium for instance, in a fair WA-state royalty system that recognises the extensive chemical processing required to produce high-purity vanadium pentoxide required for vanadium redox flow battery elements, is one critical mineral WA should maximise opportunities to downstream process, within this timeframe. A fair royalty scheme can enable the nearing-production vanadium miners to approach final investment decision (FID) with more certainty of an economically viable flowsheet. With a fair royalty scheme, vanadium miners can grow upstream opportunities to mine the vanadium ore deposits, mid-stream opportunities to process ore into a high-purity concentrate, and downstream opportunities to process the electrolyte and battery components required for VRFBs.

AMEC believes this is Western Australia's best opportunity to develop a mine to battery supply chain locally, and real consideration needs to be given to supporting this to happen.

For other commodities however, greater support would be more beneficial in the upstream and/or mid-stream elements of the value chain, where challenges prevent progressing to downstream consideration, as the company must first navigate establishing a producing mining asset as a priority. The cost and uncertainty involved in progressing downstream opportunities can present a risk, particularly for junior companies, who raise funding to progress core business works, and struggle to justify additional cashflow required to arrange downstream elements of the business, until there is cashflow or a third-party commercial interest.

1.2 With regards to downstream opportunities, to date the strategy has focused on developing battery industries in WA. Going forward, should the 2024 - 2030 strategy also consider other related downstream opportunities, such as semiconductor and permanent magnet value chains?

To capture growth opportunities ahead of the curve, it is important a forward-looking growth strategy does not inadvertently preclude a streamlined pathway to development for emerging technologies. It would be pragmatic to consider growing demand for semiconductor and magnet products, from a holistic value chain perspective, beginning with the minerals that will likely be the feedstock for these value chains, through to the end products.

However, consideration versus support and facilitation must be clearly delineated by the Government agency that is tasked with tracking and delivering this strategy, to evaluate the growth of the market, including trends and risks, and whether more or less direct support is needed. This should occur at regular intervals, in addition to on an ad hoc as needed basis, to ensure the most accurate information is being used.

Ongoing engagement with MRIWA and the Future Battery Industry CRC, two leading research and collaboration facilities engaged by Government and industry, can explore these opportunities to a greater extent. With the research acumen from a scientific perspective, and informed economic positions, a realistic position of the realities of pursuing this market could be developed.

Should the Strategy involve the development of direct funding and grant opportunities, it must be clearly outlined if there will be specific streams for specific value chain ambitions, ahead of release, subject to consultation with industry. AMEC recommends outward messaging utilising JTSI's trade connections, promoting that WA is welcoming of opportunities in downstream, midstream and upstream mineral ventures, and further detail of those opportunities being shared with industry on a regular basis to promote ongoing transparency and collaboration.

1.3 WA has a diverse range of battery and critical mineral deposits. Should the 2024 – 2030 strategy include a particular focus on developing specific minerals? Should the strategy pick winners, other than those it has already identified and listed?

Realistically, picking winners already happens. WA hosts all the critical minerals and can go to midstream on most of them, but in this timeframe, should pursue a certain range where it is practical and economically beneficial to do so. Downstream opportunities can be advanced for other commodities that are not yet as progressed, however given the significant test-work involved, timeframes must be a factor of consideration.

Priority for downstream support should be given to those projects that are navigating through rigorous state and Commonwealth approvals processes. The projects that can develop into production in this investment window will essentially set the expectation for the next range of projects going into development following them.

For example, with extensive global discussion about the importance of Rare Earth Elements (REE), there is still strong need for testing to develop effective separation, leaching and processing terms for the range of projects across WA, host to REE. Some may have commonalities by virtue of being in the same location, or having similar sediment-hosts, however, whilst there is a need for more rare earths, the final flow sheet will depend on logistics, science, and commodity prices influenced by consumer demand.

Broad support is needed from the WA Government in terms of the approvals required to progress critical minerals projects, in addition to the wide range of base mineral projects across the state. Tiered, targeted support tailored to how advanced each project and/or commodity is within WA, would be most beneficial.

2. Are there matters outside the scope of the Australian Critical Minerals Strategy focus areas that should be considered for WA in defining the priority action areas of WA's 2024 – 2030 strategy?

Recognition must be given to the higher operating costs in Australia, due to our rigorous environmental, social and governance standards. Consideration should be given to competitiveness and investment attraction despite higher costs, and economic uncertainty. Critical mineral projects will require substantial processing, research and development, and test work, differing from traditional minerals, which are extracted from the ground and essentially ready for market. These investments, coupled with inflated operating costs and regulatory burden, carry a higher risk than traditional metals, requiring significant financing.

Alignment with key trade and investment partners should be a focus of this strategy, to capitalise on funding and incentives that can stimulate the development of our mineral prospects. The WA strategy should delve into more detail about how WA companies can benefit from these relationships, and the role the State will play in liaising with the Commonwealth, and international counterparts, to maximise opportunities for WA critical minerals projects.

This strategy can set the direction and path for WA's 'next lithium', the next success story where WA has the chance to be ahead of the demand curve and significantly benefit from the growth of a domestic sector. However, it needs to do more than list existing achievements, and clearly outline how Government will actively facilitate timely approvals, access to development-ready land, and incentivise development in WA.

An effective and competitive royalty framework for critical minerals should feature in the strategy, as royalties are one of the state-controlled financial mechanisms which heavily influence the economic viability of a project. Queensland for instance, has significantly invested in developing a critical minerals sector, with over \$2B of funding announced, including 5-years of free rent for mineral tenements other than coal, and funding for a critical mineral common user infrastructure facility, and critical minerals hubs. The WA Government must also be competitive, domestically and internationally.

Due consideration must be given to the strategic positioning of strategic industrial estates, to develop critical minerals precincts across WA. SIAs that are in use have experienced delays, extensive costs and are not yet operating as effectively as they should. AMEC is hopeful the delivery of this Strategy will change that. A clear understanding of the readiness of each SIA and the pockets of land within it, is a clear first step. An updated overview of port access and infrastructure corridors including existing and planned capacities, timeframes, and development plans for the transport and processing of critical minerals and other likely uses, must be considered in parallel to rapidly progressing climate change and emissions requirements. A clear understanding of power and water supplies must also be included, with forward-looking thinking to reduce costs, as battery and critical mineral projects will require extensive processing, using larger amounts of these utilities.

WA is competitive on its mineral excellence alone. However, to excel the development of a critical minerals industry, primary focus must be given to supporting the growth of the sector in SIAs, a competitive royalty and investment framework, timely approvals, and strong trade alliances.

3. What are the most important actions required to support WA's battery and critical mineral sector?

A competitive royalty framework for battery and critical minerals is needed, which will require Treasury analysis, modelling, and reform, in heavy consultation with industry. AMEC has led calls for a Vanadium royalty reform, and as projects approach the final investment decision stage, it is important they can be developed and this industry grown in WA. The success of this emerging industry in WA, is in part, dependent on an equitable royalty rate.

Lithium experienced similar challenges, and others will follow suit. Future-proofing is required, via recognition of the significant processing critical minerals require, and that the state's three-tier ad

valorem royalty framework must be altered to support the development of a critical minerals sector in WA.

Strategic industrial areas (SIAs) should be prioritised using the ‘traffic light’ method, whereby SIAs are given a green, red or orange light, dependent on availability and development-readiness. This should be informed by Government’s recent review of its SIAs, in addition to industry consultation to understand operating practicalities and opportunities for enhancement based on lessons learned.

A strategic overview and traffic light system of SIAs should include existing and outstanding clearances and permits including environmental (state and Commonwealth), heritage, headworks for development, and planning requirements. It should also outline the expected investment required to make each SIA (or area proposed within the SIA) feasible.

When considering SIAs holistically, an omission to date continues to be port access and transport connectivity, waste storage and disposal, and utilities (power, water) and the extensive engagement required with Government Trading Enterprises (eg Water Corporation, Western Power, Synergy). The current status quo sees these processes left to the proponent to engage rather than inter-Government agency collaboration under the ‘whole of Government agenda’, a practice that can be addressed through a refresh of this Strategy, to the benefit of the sector and the state.

Prior to the allocation of an SIA, or concurrent to development progressing, Government should play an active coordination and facilitation role in securing Aboriginal Cultural Heritage clearances for the SIA, EPBC clearances, establishing and maintaining communications infrastructure, securing waste connectivity and services, establishing heavy duty slip lanes for road safety, and arranging Western Power’s connection of powerlines to the SIA.

Government undertaking these tasks instead of the first-mover in an SIA will significantly reduce the burden on the first-mover, and support the industrial park ambition. It is recognised the level of support that can be provided will vary, and greater support should be given to projects with lead agency and major project status, to ensure a clear pathway to operations, without inadvertently risking financial deadlines. However, a clear outline of plans for SIAs, including access arrangements for near-term proponents, is required.

It is currently unclear what role the Green Approvals Unit will play in facilitating this strategy, and clarity is welcomed. This team should be coordinating project approvals for the mine and processing facilities, not just the processing elements. They can fast-track these processes from a whole of government lens, to the benefit of the state. Lengthy, delayed approvals processes and increasing red tape bring additional costs, to an already inflated operating environment. As global competition for investment into critical minerals continues to increase, WA must leverage its renowned history and provide a streamlined path to operations as a competitive advantage, via this unit which has been embedded into JTSI, to facilitate the rapid growth of the critical minerals sector.

3.1 Critical mineral processing hubs

- **What factors need be considered to establish investment-ready industrial precincts?**
- **How can industry participate?**
- **Where in WA would a critical mineral processing hub be best located?**

If a critical mineral processing hub is intended to be established within one of WA's strategic industrial estates, as outlined above, the clearances, permits and plug-and-play ready fittings are required, from the State and Commonwealth Governments, prior to proponents being offered a chance to establish within the precinct.

There must also be a clear delineation of Government's intended land uses within precincts, to ensure multi-land use and coexistence can be maintained where possible, but sufficient room for current and future capacity is catered for. Consideration should be given to a competitive tender process, how industry proponents can express their interest in locating within a precinct, and how Government plans to address the varying levels of readiness and usability across the existing SIAs.

Access to a ports for export, and viable transport options to meet current and future demand, will render some potential SIAs out of contention. To capture the critical minerals opportunity, there may need to be some readjusted SIA planning, to ensure capacity and growth potential exists in the SIAs offered to critical mineral proponents, as once established, demand will continue to grow.

AMEC understands impetus for a Goldfields or mid-west hub, and ongoing discussion around Oakajee. However, the timeframes need to be realistic and consider market opportunities and financing decisions that are contingent on export and processing capacities within this strategy's timeframe, rather than in the 15-to-20 year, longer-term pipeline. If there is sufficient demand, secondary locations and facilities can be planned for and established as satellites.

AMEC welcomes consistent feedback and engagement as the planning and implementation of hubs and the broader strategy is undertaken, to ensure industry can contribute and effectively shape WA's critical minerals future.

3.2 Research commercialisation

- **What value is there in establishing a Western Australian Battery and Critical Minerals research commercialisation institute?**
- **How could such an institute best address barriers to industry development?**
- **What type of research equipment or activities will be most beneficial at an institute?**

A research commercialisation institute relevant to critical and battery minerals in Western Australia could shape pragmatic Government policy positions, taking into consideration the investment cycles and trends that will impact our ability to supply critical minerals. This research institute already exists, in the form of the Minerals Research Institute of Western Australia (MRIWA), but its functions can be expanded to meet pressing timeframes.

MRIWA is already established, with legislative frameworks and valuable projects underway, guiding research and development focussed on critical minerals processing and development. While critical minerals are different, there are sufficient similarities with other mineral processing developments that a new research institute would create duplicated efforts and inefficiencies in allocating resources between projects. MRIWA has strong industry ties, and an enhanced function can see it meet the intent of this section.

A commercial understanding of the drivers that influence decision making and financial cycles relevant to the mineral exploration industry would greatly benefit policy-makers and regulators. Approvals processes and regulatory functions serve an important purpose in maintaining rigorous standards, however have long-term direct and indirect impacts on minerals projects and their commercial viability. An informed understanding of royalties is recommended to attract the investment required to explore downstream options for example, and could be considered under the scope of the institute, with a view to ensuring WA remains a competitive jurisdiction.

Collaboration with other state agencies would be beneficial to the whole of Government agenda. Extending the use and accessibility of precompetitive data compiled by the Geological Survey of WA, ensuring it is up to date, and consistently refreshed to incorporate technological enhancements, will garner the greatest commercial return to the state. MRIWA should also closely collaborate with environmental regulators, to ensure that scientific knowledge from the minerals sector informs Government planning and decision-making related to climate change and environmental expectations.

An expanded MRIWA function to increase research capacity for critical minerals can attract research expertise to WA, particularly in the metallurgy field, coupled with financial acumen, a combined skillset that is currently lacking in part due to its niche. With consistently reducing enrolments in geology and metallurgy courses, ensuring these important skillsets are promoted within WA must be prioritised. Given the relative nascence of most of the critical minerals sought, experts will be needed as we continue to search for new ways to extract and process critical minerals, into 2030 and beyond.

Leveraging MRIWA as the research institute for minerals in WA could bolster existing resources and increase the ability of regulatory decision making to duly consider operating realities. AMEC welcomes further discussion on the prioritisation of progressing this recommendation against other competing priorities within this strategy, and how they will be resourced.

3.3 Access to capital and financial incentives

- **How can the WA Government address access to capital challenges to support the sector?**
- **What initiatives should the WA Government consider?**

WA Government funding to leverage private capital raisings to finance mineral exploration and project development for critical minerals projects via competitive grant and co-funded initiatives, similar to the Exploration Incentive Scheme (EIS), is recommended. The oversubscribed EIS has unlocked exploration in under-explored parts of the state, and continues to deliver strong returns, with promising discoveries encouraging further developments. A similar program for critical minerals can ensure funding that has already been allocated for the EIS is retained, but support for critical minerals is bolstered in addition.

Government can also amend its tax policy, namely stamp duty provisions that investors into critical and battery mineral projects will be liable for. A stamp duty exemption into critical and battery mineral projects could reduce the barrier to entry for favoured investment partners, and unlock a new wave of investment required to establish this burgeoning industry.

In addition to direct funding, Government can provide certainty to projects, by way of timeframes for approval processes, and stable costs. Consistent, clear, cost-effective processes that have been well consulted on, implemented and resourced, will provide certainty to investors and project developers, to invest into WA.

3.4 Investment attraction and partnerships

• Where should the WA Government target efforts to develop further international partnerships to unlock funding, offtake and technical expertise for the sector?

Following the United States' Inflation Reduction Act (IRA) with US \$370B in funding to decarbonise, prioritising strategic relationships with the US to enable Australian companies to access funding under that arrangement, must be a priority of the WA and Commonwealth Governments.

Actively building and maintaining strategic relationships with federal counterparts in Canberra is imperative to ensuring WA is well represented at these discussions, by industry and Government, particularly to inform the Australia-US critical minerals Compact discussions.

The funding under the IRA will be transformational if available to Australian companies. It is currently incentivising companies to locate downstream processing in the US, but as the program evolves, domestic production capacity within WA should expand too, under a preferred trade partner regime.

Offtake with other key trade nations must also be sought, and can be supported by the WA Government. Private companies currently seek these investments themselves now, and liaise with Austrade where possible. A more homogenous process is welcome, with active input from the WA Government as its Invest and Trade capacity continues to expand. Diversifying investment interests has been a focus of the Commonwealth with FIRB reforms, however, there has been limited investment from other nations, to the scale of investment which will be required to establish a robust critical minerals industry in WA. To attract and secure funding from other trade partners, growing investment partnerships with the European Union, South Korea, Japan, India and other nations who will actively invest into our minerals sector, must be a focus.

3.5 Mining and Exploration

• What government support is needed to further support and expedite identification and development of new battery and critical minerals resources, including through reprocessing of tailings or waste streams?

• What barriers need to be addressed?

The critical minerals industry is being developed as it is being discovered, with some commodities and uses more advanced than others, but for the large part, all still requiring substantial investment into exploration, research and development, and commercialisation. Building investor confidence to the scale that is necessary to spur developments in this sector as well as in traditional metals, is an area Governments can actively influence.

More greenfield exploration is needed. Incentive schemes as recommended above, similar and in addition to WA's EIS, are strongly recommended. Collaboration with industry to explore uses for repurposed tailings, led by Government (MRIWA), with suitably intellectual proprietary terms. Further

research, with a commercially-informed perspective, led by MRIWA as discussed in 3.2, can also increase confidence and a pathway to development. These initiatives all seek to provide more clarity and certainty to developing and/or expanding projects, and will serve as a Western Australian competitive advantage. Junior explorers and miners typically do not have the cash reserves required to undertake these efforts singularly. Government support is needed to provide a single-source of truth where possible, and can streamline a path to development.

AMEC recommends when reviewing barriers, a holistic overview of bottlenecks and backlogs is undertaken across the key regulatory agencies the minerals sector engages with, namely DEMIRS, DWER, EPA, DBCA, DPLH, and JTSI. A review from the earliest stages of mineral exploration to production will identify overlap between state and federal processes, that come at significant cost. When streamlined, these expenses can be more appropriately invested into project development.

3.6 Skills and Training

• Where should the emphasis be among vocational training, university courses and skilled migration as sources of talent to build capacity in the battery and critical minerals

sector?

• What are the immediate training needs not currently addressed in the curriculum? Please identify these.

At a university level, there needs to be greater focus on geology, metallurgy, chemical engineering, mining engineering, and project management courses, to ensure there is a steady pipeline of graduates entering our workforce to meet critical mineral demand.

At a vocational level, drillers continue to remain a shortage, hampered by the ANZSCO system that is currently being reviewed. Drivers, operators, and frontline workers to undertake often remote fly-in-fly-out work will continue to generate jobs within this sector, that provide trade qualifications, but compete with other similar industries for talent.

From a migration perspective, the skilled migration caps have hampered our ability to attract and retain migrant workers to bolster our local resources. Once those workers do come to WA, there needs to be affordable housing available. The risk to small business to employ and/or sponsor foreign workers with a view to permanence is becoming increasingly complex and costly, and is now often a barrier to participation for many in the industry. This means the low unemployment rates will continue, and inflation pressures remain.

Across the mineral exploration to development chain, there is a need for workers in this sector. Government can engage with industry, and reform processes to simplify access to skilled labour, whilst reducing cost burdens.

3.7 Social licence to operate

• How can WA capitalise on its existing advantages to create economic opportunities for all Australians, and ensure benefits flow to regional communities and First Nations Peoples?

Western Australia's mineral exploration and mining sector has a long history of engagement, relationship building, and benefit sharing with the communities in which projects are located, First Nations People, and the broader Western Australian community.

As projects progress through the development pipeline, the ability to invest in the local community and support the flow of benefits to regional communities and First Nations People increases. The WA Government can support this effort by timely approvals processes, to ensure the benefits generated as the project scales up, can be shared.

It is also important to acknowledge the rising cost of doing business, and the importance of undertaking heritage clearances and associated activities. Ongoing engagement with industry can ensure that policy levers are agile and responsive to changes prior to bottlenecks emerging or cost barriers prohibiting development, to ensure these benefits continue to flow.

3.8 Approvals

- **Please identify any specific opportunities to further streamline regulatory processes to support WA's battery and critical minerals sector.**

AMEC welcomed the Paul Vogel review of WA's environmental regulation, and strongly supports the announcements by the Premier to streamline processes. We also strongly support the delivery of the Eligible Mining Activity (EMA) reforms, to facilitate low impact notification, and the addressing of validity of tenure issues currently being worked on by DEMIRS, DWER and the EPA.

A clear understanding of the actual time and resourcing taken to facilitate approvals across all the key regulatory agencies in WA is needed, in order to foster improvements. AMEC recommends an exercise which will track the time taken for a developing critical minerals project through rudimentary approvals, alongside one which tracks the time for processing. With increasing expectations on industry, particularly in the climate, environment and heritage areas, the complexity has significantly increased and is not yet captured in target timeframes of regulators.

Additionally, as recommended above, AMEC recommends that the Green Approvals Unit should be the 'lead agency' for critical minerals projects in WA, and this Unit's remit expands beyond just lithium mining. Clarity is sought on the scale of the project required to qualify for facilitation via this agency.

3.9 Stakeholder engagement

- **How can industry, governments, investment groups, communities, research centres and other stakeholders strengthen collaboration and broadened information sharing?**

Industry collects extensive amounts of information through surveys, studies, baseline analyses, and ongoing desktop and fieldwork. This data is invaluable, and subject to sunset clauses, would be greatly beneficial to other prospective proponents, and Government agencies.

Information gathered from the EIS for instance, post-sunset clause, can be made publicly available online, to ensure the precompetitive data is readily accessible. This data should extend beyond geological data, to include hydrobiological, ecological, environmental, and climate data. Data repositories that are Government-owned should be accessible and host to these datasets. This data should not be commercially sensitive, but can add to the cumulative knowledge of our regions.

Final Comment

AMEC appreciates the ongoing engagement we have had with JTISI, and the broader WA Government team responsible for drafting this updated strategy. We welcome further opportunities to contribute to ensuring WA is a competitive minerals jurisdiction, and captures global interest for our critical minerals offerings.

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