

DISCUSSION PAPER 04

Stakeholder Engagement Plan for a Declared Mine Rehabilitation Plan



MLRA Discussion Paper 04: Stakeholder Engagement Plan for a Declared Mine Rehabilitation Plan

Approval for Use

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Executive Summary

The purpose of this discussion paper is to support the development of a clear, practical and fit-for-purpose Stakeholder Engagement Plan required as part of a Declared Mine Rehabilitation Plan (DMRP). It is intended to assist declared mine licensees to plan engagement that is early, coordinated and transparent, and that can be implemented over long timeframes as rehabilitation progresses and circumstances change.

This discussion paper covers key points that span across the stakeholder engagement plan, including:

- Clarifying the purpose and scope of engagement, including what is open to stakeholder influence and what is not
- Using the IAP2 Spectrum of Public Participation to define the intended level of participation and communicate engagement commitments
- Undertaking systematic stakeholder identification and analysis, including consideration of interest, influence, impacts and information needs
- Ensuring engagement approaches are proportionate, inclusive and accessible, and responsive to barriers to participation
- Planning culturally appropriate engagement with Traditional Owners, recognising enduring connections to Country and the importance of respectful, ongoing relationships
- Establishing clear processes for feedback, documentation and reporting, including “closing the loop” with stakeholders
- Focusing on consultation outcomes, not just consultation activities, including how input has influenced planning and what has been learned through engagement
- Developing milestone-based engagement schedules linked to regulatory, operational and rehabilitation triggers, and reducing duplication and consultation fatigue
- Reviewing, adapting and reporting on engagement over time to support continuous improvement and maintain stakeholder confidence

Overall, the paper aims to assist licensees and government by summarising practical factors that can strengthen engagement throughout DMRP development and implementation, and support credible, long-term rehabilitation and post-closure outcomes.

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1. Purpose

The Mine Land Rehabilitation Authority (MLRA) has prepared this discussion and guidance paper to support the development of stakeholder engagement plans required as part of the DMRP.

The paper sets out key considerations and potential approaches to stakeholder engagement in mine rehabilitation, with the aim of promoting clear, well-planned and meaningful stakeholder involvement throughout the preparation of DMRPs. The paper is intended to guide the reader through a logical sequence of steps, enabling a clear understanding of both engagement process and the rationale underpinning each stage. It is designed to assist proponents and practitioners to think systematically about who needs to be engaged, when engagement should occur, and how engagement can be undertaken in a way that is proportionate, transparent, and responsive to community interests and concerns.

2. Introduction

Stakeholder engagement is widely recognised as a foundational component of effective mine rehabilitation and closure planning. Decisions made during closure have long-term social, environmental, cultural and economic implications for communities, Traditional Owners, landholders, governments and future custodians of the land. Early and meaningful engagement enables stakeholders to contribute local knowledge, articulate values and expectations, and influence post-mining land-use outcomes¹.

Across mining jurisdictions, engagement is understood not as a discrete regulatory step but as an ongoing process that supports informed decision-making, strengthens trust and enhances the legitimacy of rehabilitation outcomes. Leading practice emphasises early and sustained involvement, transparency, and responsiveness to stakeholder concerns. The International Association for Public Participation (IAP2) framework (which is widely applied in Australia) articulates engagement as a spectrum from informing through to empowering stakeholders, with the level of engagement tailored to the nature and impact of decisions².

International guidance reinforces that early, structured and culturally appropriate engagement is essential for successful mine closure and social transition. The International Council on Mining and Metals (ICMM), under Principle 10, requires proactive and transparent engagement with affected and interested stakeholders.³ ICMM's *Integrated Mine Closure Good Practice Guide* identifies engagement as central to closure planning, noting that stakeholder involvement is “key to the success of the closure plan and social transition

¹ International Association for Public Participation (IAP2, 2018)

<https://engagementinstitute.org.au/resources/iap2-public-participation-spectrum/>

² IAP2. *Quality Assurance Standard for Community and Stakeholder Engagement*. 2015.

³ International Council on Mining and Metals (ICMM). *Mining Principles – Principle 10: Stakeholder Engagement*. 2023. <https://www.icmm.com/en-gb/our-principles/mining-principles/principle-10>.

after mining.⁴ ICMM guidance materials, including the *Handbook on Multistakeholder Approaches to Socio-Economic Transitions in Mining* and the *Stakeholder Research Toolkit*, emphasise systematic understanding of stakeholder perspectives, inclusive processes and collaboration to support resilient post-mining futures.⁵

The World Bank similarly highlights the importance of meaningful engagement with Indigenous and First Nations peoples, emphasising their rights, knowledge systems and enduring connection to land as essential to equitable and sustainable development outcomes.⁶

Together, these frameworks reinforce the importance of early, structured and transparent engagement as a core element of credible DMRPs.

⁴ ICMM. *Integrated Mine Closure Good Practice Guide* (3rd ed.). 2022.

⁵ ICMM. *Handbook on Multistakeholder Approaches to Socio-Economic Transitions in Mining*. 2021; *Stakeholder Research Toolkit*. 2020

⁶ World Bank. *Environmental and Social Framework: Engagement with Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities*. 2022.

2.1. Background

2.1.1. National and International

Across mine rehabilitation and closure frameworks, stakeholder engagement is consistently identified as a core element of credible planning and long-term transition. International guidance emphasises that engagement should be initiated early, maintained over the life of the project and tailored to the needs, roles and values of different stakeholder groups. Effective practice includes clear and accessible information-sharing, transparent discussion of constraints and trade-offs, and structured feedback mechanisms.⁷

ICMM guidance positions stakeholder engagement as a foundational expectation of responsible mining practice. Principle 10 requires transparent and inclusive processes, and ICMM's suite of tools and frameworks emphasises multistakeholder approaches as essential for understanding community priorities, anticipating concerns and strengthening the quality of rehabilitation and closure decisions.⁸

These principles are reflected in national and state-based mine closure guidance within Australia. Western Australia's *Statutory Guidelines for Mine Closure Plans* require operators to document engagement undertaken to date, maintain detailed engagement records and provide strategies for ongoing engagement relevant to rehabilitation and closure.⁹ The guidelines reinforce that engagement must be deliberate, proportionate and iterative; responding to changing regional conditions, technical knowledge and stakeholder expectations.

In Victoria, the importance of stakeholder engagement is embedded within the *Mineral Resources (Sustainable Development) Act 1990* and associated regulations, which require licensees to develop and implement a stakeholder engagement plan early in the Declared Mine Rehabilitation Plan (DMRP) process. The Latrobe Valley Regional Rehabilitation Strategy (LVRRS) and DMRP Guidelines further reinforce expectations for early, coordinated and transparent engagement with Traditional Owners, local communities, government agencies, landholders and other interested parties during both development and implementation phases of rehabilitation plans.¹⁰

Together, these international, national and Victorian frameworks position stakeholder engagement as a foundational element of mine rehabilitation and closure planning, essential to the credibility, durability and long-term success of post-mining land-use outcomes.

⁷ ICMM. *Integrated Mine Closure Good Practice Guide* (3rd ed.). 2022

⁸ International Council on Mining and Metals (ICMM). *Mining Principles – Principle 10: Stakeholder Engagement*. 2023. <https://www.icmm.com/en-gb/our-principles/mining-principles/principle-10>

⁹ Department of Mines, Industry Regulation and Safety (DMIRS). *Statutory Guidelines for Mine Closure Plans*. Government of Western Australia, 2020.

¹⁰ Latrobe Valley Regional Rehabilitation Strategy (State of Victoria, 2020) <https://www.water.vic.gov.au/our-programs/long-term-water-resource-assessments-and-strategies/latrobe-valley-regional-rehabilitation-strategy>

2.1.2. Victoria and the Latrobe Valley

In Victoria, declared mine rehabilitation is governed by a legislative and policy framework that embeds stakeholder engagement as a core requirement. The *Mineral Resources (Sustainable Development) Act 1990* and the *Mineral Resources (Sustainable Development) (Mineral Industries) Regulations 2019* set the requirements for Declared Mine Rehabilitation Plans (DMRPs), including required plan content and expectations for consultation.^{11 12}

Resources Victoria's *Ministerial Guidelines for Preparation of Declared Mine Rehabilitation Plans (2025)* provide high-level direction for preparing DMRPs and emphasise early, ongoing engagement with Traditional Owners, communities, and other stakeholders.¹³

In the Latrobe Valley, the *Latrobe Valley Regional Rehabilitation Strategy (LVRRS)* provides the overarching policy context for rehabilitation of the region's declared coal mines. It highlights the need for collaboration between government, industry, community, and Traditional Owners, and reinforces the importance of engagement that is place-based, culturally informed, and responsive to community expectations, particularly given long timeframes, significant public interest, and the enduring role of local communities in post-mining futures.¹⁴

Because the Latrobe Valley has undergone extensive consultation over many years, engagement planning should focus on clarity of purpose, coordination and transparency. Clear milestones help reduce duplication, avoid consultation fatigue, and support meaningful participation by explaining what input is being sought and why at each stage.

Given the long-term and adaptive nature of rehabilitation, a DMRP is not expected to resolve all engagement matters at the time of approval. Instead, the engagement schedule should illustrate how participation will continue and evolve, including:

- activities undertaken to date
- issues where stakeholder input has informed decisions
- matters still under consideration
- future engagement opportunities aligned to upcoming milestones

Together, these elements demonstrate that engagement is intentionally planned as an ongoing, adaptive process that supports transparency, incorporates local knowledge, and remains responsive throughout the life of the DMRP.

Note: Key terminology may differ between mine closure and rehabilitation guidance documents. For clarity, please refer to the *Mineral Resources (Sustainable Development)*

¹¹ Mineral Resources (Sustainable Development) Act 1990 (Vic)

¹² Mineral Resources (Sustainable Development) (Mineral Industries) Regulations 2019 (Vic)

¹³ *Ministerial Guidelines for Preparation of Declared Mine Rehabilitation Plans* (Resources Victoria, 2025)

¹⁴ Latrobe Valley Regional Rehabilitation Strategy (State of Victoria, 2020)

<https://www.water.vic.gov.au/our-programs/long-term-water-resource-assessments-and-strategies/latrobe-valley-regional-rehabilitation-strategy>

*Act 1990 and the Mineral Resources (Sustainable Development) (Mineral Industries) Regulations 2019, and subsequently the MLRA Vocabulary.*¹⁵

2.2. Disclaimer

The information outlined in this discussion paper has been drafted by the MLRA in good faith and intends to provide some interim information for consideration by mine licensees, during the preparation of their Declared Mine Rehabilitation Plans (DMRPs), which includes a post-closure plan. This paper does not replace, preclude or overwrite any legislation or guidance material published by Resources Victoria relating to the Declared Mine Post-Closure Plan or post-closure risk assessment and is only intended as supportive guidance if and where it is deemed helpful. The use of this material is at the discretion of the mine licensees.

3. Standards and Regulatory Context

Engagement for a DMRP must also be understood within its legislative and standards context. Stakeholder engagement in mine rehabilitation sits at the intersection of statutory requirements, industry standards, community expectations, and evolving good practice.¹⁶

The following section outlines key regulatory settings and reference points that may assist licensees in situating their engagement approach within both compliance obligations and recognised good practice.

3.1. Legislative and Regulatory Requirements in Victoria

Stakeholder engagement requirements for DMRPs operate within the statutory framework established by the *Mineral Resources (Sustainable Development) Act 1990 (MRSDA)*¹⁷ and the *Mineral Resources (Sustainable Development) (Mineral Industries) Regulations 2019*¹⁸. The Ministerial Guidelines for the Preparation of Declared Mine Rehabilitation Plans (2025) provide high-level direction for licensees preparing DMRPs.

Within this legislative framework, engagement is positioned as essential for transparency, inclusive decision-making, and supporting community understanding of rehabilitation objectives. While the Guidelines¹⁹ outline minimum expectations for engagement, they do not prescribe specific tools, processes, or sequencing. This creates space for licensees to consider adopt structured approaches that reflect site-specific contexts.

¹⁵ MLRA Vocabulary, <https://www.mineland.vic.gov.au/learn/vocabulary/>

¹⁶ ICMM. *Integrated Mine Closure Good Practice Guide* (3rd ed.). 2025
<https://www.icmm.com/integrated-mine-closure>

¹⁷ Mineral Resources (Sustainable Development) Act 1990 (Vic)

¹⁸ Mineral Resources (Sustainable Development) (Mineral Industries) Regulations 2019 (Vic)

²⁰ ICMM. *Integrated Mine Closure Good Practice Guide* (3rd ed.). 2025
<https://www.icmm.com/integrated-mine-closure>

3.2. International Standards & Guidance

A number of international standards may provide useful context for conceptualising engagement in mine rehabilitation.

For example:

- **ISO 14001 (Environmental Management Systems)** emphasises stakeholder communication and continual improvement.
- **ISO 31000 (Risk Management)** highlights the importance of consultation and communication throughout risk processes.
- **ISO 37101 (Sustainable Development in Communities)** reinforces collaborative governance and community participation, which may be particularly relevant in long-term regional transitions.

In addition, the International Council on Mining and Metals (ICMM) Integrated Mine Closure Good Practice Guide (2nd Edition) similarly emphasises early, ongoing and transparent stakeholder engagement as a foundational element of effective closure planning²⁰. ICMM guidance highlights that engagement should be integrated into closure governance structures and decision-making processes, rather than treated as a parallel or standalone activity.

While these standards and guidelines are not prescriptive engagement frameworks, they reinforce principles such as transparency, accountability, responsiveness and continuous improvement; principles that align with Victorian rehabilitation expectations.

3.3. Interstate Approaches

Engagement expectations for mine rehabilitation vary across Australian jurisdictions, and some interstate approaches may provide useful insights for Victorian licensees. Notably, the Western Australian Government's 'Preparing a Mine Closure Plan' (2025) guidance includes more detailed direction on the role of stakeholder engagement throughout closure planning. These materials emphasise early involvement, ongoing dialogue, and clear documentation of how feedback is incorporated into closure decisions.

While Victorian requirements differ, interstate practice may provide examples of engagement structures, documentation templates, and evaluation methods that could be considered by licensees when shaping their DMRPs.

3.4. Integrating Standards and Regulatory Expectations

Bringing these legislative frameworks and broader standards together may assist licensees in balancing compliance and good practice. For example:

- Legislative requirements establish minimum engagement obligations.

²⁰ ICMM. *Integrated Mine Closure Good Practice Guide* (3rd ed.). 2025
<https://www.icmm.com/integrated-mine-closure>

- Recognised frameworks such as the IAP2 Spectrum (see Section 3) can assist in clarifying stakeholder roles and levels of influence.
- ISO standards reinforce the importance of communication, risk transparency and continual improvement.
- Interstate guidance may provide practical examples of documenting engagement decisions and demonstrating responsiveness.

These standards and frameworks do not replace statutory requirements. Rather, they provide context and reference points that may support thoughtful engagement design, documentation, and evaluation over the life of a DMRP.

4. Frameworks for constructing a stakeholder engagement program and plan

A range of established frameworks can support the development of a clear and structured stakeholder engagement program and plan. These frameworks assist in clarifying the role of stakeholders in decision-making, defining levels of participation, and designing engagement approaches that are proportionate and transparent.

The following sections outline key tools that may assist licensees in structuring engagement for DMRP development and implementation.

4.1. IAP2 Spectrum of Public Participation

The IAP2 Spectrum of Public Participation provides a structured and widely recognised framework for designing stakeholder engagement processes. It clarifies the intended level of stakeholder influence in decision-making and helps ensure that engagement approaches are aligned with the purpose of the activity.²¹

The spectrum identifies five levels of participation:

- **Inform** – Providing balanced and objective information to assist stakeholders in understanding the problem, alternatives, opportunities or solutions.
- **Consult** – Obtaining feedback on analysis, alternatives or decisions.
- **Involve** – Working directly with stakeholders to ensure their concerns and aspirations are consistently understood and considered.
- **Collaborate** – Partnering with stakeholders in each aspect of the decision, including development of alternatives and identification of preferred solutions.
- **Empower** – Placing final decision-making in the hands of stakeholders.

In the context of a Declared Mine Rehabilitation Plan (DMRP), not every part of the plan will sit at the same level of the IAP2 Spectrum. Some elements, such as statutory requirements, safety standards, or matters governed by legislation, are not open to stakeholder decision-making. Other elements, such as aspects of landform design, rehabilitation sequencing, or future land use considerations, may allow for greater stakeholder input.

Legal requirements, safety obligations and what is technically achievable will determine how much influence stakeholders can have. Being clear upfront about what is open to influence and what is not supports transparency, manages expectations and makes it clear what engagement is actually for.

²¹ International Association for Public Participation (IAP2, 2018)
<https://engagementinstitute.org.au/resources/iap2-public-participation-spectrum/>

The IAP2 framework should be used deliberately, not symbolically. Engagement planning should clearly articulate:

- The objective of engagement
- The level of influence stakeholders will have
- The decision points to which engagement relates
- How stakeholder input will be considered and reported

This clarity supports trust and reduces the risk of perceived tokenism.

Consistent with this guidance, stakeholder engagement for DMRPs should:

- Begin early in plan development
- Be proportionate to the scale and complexity of the rehabilitation proposal
- Clearly identify stakeholder roles and influence
- Demonstrate how engagement outcomes inform plan evolution

4.2. Considering Stakeholder Interest and Influence

In addition to defining the level of participation, engagement planning should consider the level of stakeholder interest and the degree of influence or input stakeholders may reasonably have in relation to specific aspects of the DMRP.

Not all stakeholders will require the same level of engagement. A structured approach helps ensure effort is directed appropriately and transparently.

A simple matrix can assist in clarifying this.

Stakeholder Interest Level	Typical Characteristics	Appropriate Level of Engagement (IAP2)	Level of Input / Control
High interest, high impact	Directly affected landholders, Traditional Owners, local communities, regulators	Involve / Collaborate (sometimes Consult)	Significant input into design considerations; may influence options development but not statutory approval
High interest, lower direct impact	Community groups, advocacy groups, local businesses	Consult / Involve	Input into specific issues; feedback considered in refinement of proposals
Moderate interest	Broader regional stakeholders	Inform / Consult	Limited input; primarily feedback on defined elements

Stakeholder Interest Level	Typical Characteristics	Appropriate Level of Engagement (IAP2)	Level of Input / Control
Low interest	General public with minimal direct impact	Inform	Awareness and transparency; no decision-making control

This matrix is illustrative only and may be adapted to reflect site-specific circumstances. It should not be applied prescriptively. It is a planning tool to support proportionality and clarity.

Importantly:

- Traditional Owner engagement should be guided by rights-based approaches and relevant agreements, not solely by interest/influence matrices.
- Regulatory authorities maintain statutory decision-making responsibilities regardless of stakeholder interest levels.
- The level of stakeholder “control” must be clearly defined to avoid misunderstanding. Engagement does not transfer statutory responsibility unless expressly provided for in legislation.

4.3. Transparency of Influence

Where higher levels of engagement (e.g. Involve or Collaborate) are proposed, the plan should clearly articulate:

- What elements of the DMRP are open to influence
- What elements are constrained by technical, safety or regulatory requirements
- How trade-offs will be communicated
- How outcomes of engagement will be documented and reported

This ensures alignment with both IAP2 principles and ICMM’s emphasis on accountability and demonstrable responsiveness.

5. Key components of developing a Stakeholder Engagement Plan

The DMRP must include a stakeholder engagement plan that clearly sets out how engagement will be undertaken during both the development and implementation of the DMRP. The stakeholder engagement plan should demonstrate that engagement has been deliberately planned, appropriately resourced, and integrated into rehabilitation decision-making over time.²²

²² Mineral Resources (Sustainable Development) Act 1990 (Vic)

The stakeholder engagement plan should be proportionate to the scale, complexity, and potential impacts of the declared mine, recognising the long timeframes associated with mine rehabilitation and post-closure management.²³ Engagement should not be treated as a one-off activity, but as an ongoing process that evolves as rehabilitation progresses, new information becomes available, and responsibilities transition.

At a minimum, the stakeholder engagement plan should address the following components:

- *Scope of engagement and influence on decision-making*
- Identification of regulatory and policy requirements
- Stakeholder identification and analysis
- Engagement approaches and methodologies
- Feedback, documentation and reporting
- Key topics for engagement
- Engagement timing and milestones
- Review and adaptation

The following sections will provide additional details based on the above dot points.

5.1. Scope of engagement and influence on decision-making

The plan should clearly describe the scope of engagement, including:

- Which aspects of rehabilitation planning and implementation are open to stakeholder input
- Where there are known constraints on decision-making (for example, legislative, safety, technical, or environmental constraints)
- How stakeholder input will be considered in decision-making
- What is out of scope of the engagement plan

Clearly articulating scope supports transparency, manages expectations, and helps stakeholders understand how their participation may influence outcomes.

5.2. Identification of regulatory and policy requirements

The identification of the relevant legislative, regulatory, and policy requirements assists in shaping engagement obligations in the context of the DMRP. This includes requirements under the Mineral Resources (Sustainable Development) Act 1990²⁴ and associated Regulations, as well as the Ministerial Guidelines for Preparation of Declared Mine Rehabilitation Plans (2025)²⁵ and any relevant regional or state policy frameworks.

²³ ICMM. *Integrated Mine Closure Good Practice Guide* (3rd ed.). 2025

<https://www.icmm.com/integrated-mine-closure>

²⁴ Mineral Resources (Sustainable Development) Act 1990 (Vic)

²⁵ *Ministerial Guidelines for Preparation of Declared Mine Rehabilitation Plans* (Resources Victoria, 2025)

Identifying these requirements provides clarity about mandatory engagement activities and demonstrates how the engagement plan aligns with statutory expectations. Where engagement activities intersect with other regulatory processes or approvals, these interactions should also be acknowledged to support coordinated and efficient engagement.

5.3. Stakeholder identification and analysis

The stakeholder engagement plan should provide a clear and systematic identification and analysis of all stakeholders relevant to the declared mine and its rehabilitation outcomes. This includes, but is not limited to:

- Traditional Owners and Registered Aboriginal Parties
- Local communities and community groups
- Landholders and neighbouring land users
- Local, state, and Commonwealth government agencies
- Industry, business, and workforce representatives
- Non-government organisations and advocacy groups
- Other interested or affected parties

The plan should explain why each stakeholder group has been identified and outline relevant factors such as their level of interest, potential influence, likely impacts, and information needs. This analysis should guide the selection of appropriate engagement approaches and ensures that engagement efforts are targeted and proportionate.

Engagement planning must reflect a considered approach to community representation and the diversity of perspectives, recognising that communities are not homogenous. It should aim to reach a broad and representative range of participants rather than relying on a small number of familiar voices.

Engagement with Traditional Owners should be explicitly addressed and undertaken in a culturally appropriate manner, recognising enduring connections to Country and the importance of respectful, ongoing relationships.

To support clarity and consistency, stakeholder identification and analysis may be documented in tabular form. A structured table can assist in demonstrating why particular stakeholders have been identified, how their level of interest and influence has been assessed, and how this analysis informs the selection of engagement approaches. The level of detail should be proportionate to the scale and complexity of the declared mine.

Example: Stakeholder Identification and Analysis Table

Stakeholder Group	Why Identified	Level of Interest	Level of Influence	Likely Impacts / Areas of Interest	Proposed Engagement Approach
Traditional Owners	Cultural and land-use interests	High	High	Cultural heritage, landform design, post-mining land use	Involve / Collaborate
Adjacent Landholders	Direct interface with site	High	Medium	Stability, water, access	Consult / Involve
Local Community Groups	Regional interest	Medium	Low–Medium	Future land use, amenity	Consult
Regulators	Statutory decision-making role	High	High	Approval and compliance	Formal consultation

5.4. Engagement approaches and methodologies

The stakeholder engagement plan should clearly outline the approaches and methodologies that will be used with different stakeholder groups throughout the DMRP. Engagement methods must be selected based on the purpose of engagement, the characteristics and needs of each stakeholder group, and the level of influence, interest, or impact they may have.

A range of methods may be appropriate over the life of the DMRP, from information sharing and consultation through to more interactive, collaborative, or participatory approaches. The plan should explain why each method has been chosen and how it supports the stated engagement objectives. Engagement activities should align with recognised principles such as those of the International Association for Public Participation (IAP2), ensuring that approaches are proportionate, transparent, and fit for purpose.

Engagement with Traditional Owners must be explicitly addressed and undertaken in a culturally appropriate and respectful manner. This includes recognising ongoing connections to Country, cultural values, and the importance of self-determination in decision-making processes.

All engagement methodologies should be accessible, inclusive, and responsive to stakeholder needs, considering factors such as location, timing, communication formats, and potential barriers to participation

5.5. Feedback, Documentation and Reporting

The stakeholder engagement plan must set out clear processes for how stakeholder input will be sought, recorded, considered, and responded to. This includes documenting engagement activities, capturing issues and feedback, and tracking how stakeholder input has influenced rehabilitation planning and implementation.

The plan should also outline how engagement outcomes will be communicated back to stakeholders. This includes explaining decisions, demonstrating how feedback has been incorporated, or clarifying why certain input has not been adopted. In addition to influencing decisions, engagement outcomes may also include strengthened relationships, shared understanding, and increased trust.

A transparent feedback loop is essential to support accountability and maintain stakeholder confidence over time.

5.6. Key topics for engagement

The stakeholder engagement plan should identify the key topics that will be the focus of engagement across the life of the DMRP. These typically include, but are not limited to:

- Rehabilitation objectives and success criteria
- Post-mining land use options
- Closure criteria, completion processes, and residual risk
- Risk identification, management, and uncertainties
- Sequencing and timing of rehabilitation works
- Monitoring, reporting, and adaptive management
- Post-closure management arrangements

Identifying these topics in advance supports structured, purposeful engagement and helps ensure stakeholders understand when and how they can contribute to key decisions.

5.7. Engagement Timing and Milestones

The stakeholder engagement plan must include a milestone-based schedule that clearly outlines when engagement activities will occur and how they align with key stages of rehabilitation planning, implementation, and post-closure management. The schedule should demonstrate early commencement of engagement, its continuation throughout the life of the DMRP, and its capacity to adapt as circumstances change.

Engagement milestones should be organised across different planning horizons:

- Short-term (next 12 months): detailed and operational
- Medium-term (up to five years): indicative
- Long-term (through closure and post-closure): high-level

Milestones should be linked to relevant triggers, including:

- statutory documentation, approval processes, and regulatory decision points
- operational and rehabilitation activities (e.g., cessation of mining, major earthworks, pit lake filling)
- completion of technical studies influencing stakeholder interest areas
- transitions in rehabilitation sequencing, land use planning, or post-closure arrangements

In regions with a history of extensive consultation, such as the Latrobe Valley, engagement planning should emphasise clarity of purpose, coordination, and transparency to minimise duplication and reduce consultation fatigue. Where appropriate, activities should be structured as ongoing engagement programs rather than one-off events, particularly for complex or high-interest issues.

Given the long-term and evolving nature of mine rehabilitation, the engagement schedule is not expected to resolve all matters at the time of DMRP approval. Instead, it should illustrate how engagement will continue and mature over time, including:

- engagement undertaken to date
- matters where stakeholder input has informed decisions
- matters still under consideration
- future opportunities for engagement aligned with upcoming milestones

Together, these elements demonstrate that engagement is intentionally planned as an ongoing, adaptive process that supports transparency, incorporates local knowledge, and remains responsive throughout the life of the DMRP.

5.8. Review and adaptation

Given the long timeframes associated with declared mine rehabilitation, the stakeholder engagement plan should acknowledge the need for regular review and adaptation. This includes outlining how engagement approaches will be evaluated over time and how the plan will be updated in response to changing conditions, new information, or feedback from stakeholders.

Demonstrating a commitment to continuous improvement supports credible, long-term engagement and reflects the evolving nature of rehabilitation and post-closure planning.

5.9. Governance, Resourcing and Responsibilities

The stakeholder engagement plan should outline how engagement will be governed and delivered in practice. This includes identifying roles and responsibilities, internal coordination arrangements, decision-making pathways, and how continuity will be maintained over long timeframes.

Clear governance and resourcing arrangements provide confidence that engagement commitments are achievable, appropriately supported, and sustainable across the life of the DMRP.

5.10. Measuring Effectiveness and Continuous Improvement

The stakeholder engagement plan should describe how the effectiveness of engagement will be assessed and how approaches will be refined over time.

This may include considering whether engagement objectives have been met, whether participation has been inclusive and representative, whether stakeholders feel informed and heard, and whether engagement has contributed to improved rehabilitation decisions or more durable post-closure outcomes.

Demonstrating a commitment to review and continuous improvement reinforces that engagement is an active management process rather than a procedural requirement.

6. Updating and reporting on progression

Stakeholder engagement for a DMRP should be treated as a living and adaptive process, rather than a fixed set of activities. Given the long timeframes associated with mine rehabilitation and post-closure management, the stakeholder engagement plan should clearly state how it will be reviewed, updated, and reported on over time.

The stakeholder engagement plan should be reviewed regularly to ensure it remains current, relevant, and responsive to changing circumstances. This includes recognising that stakeholder groups, interests, and community dynamics may evolve over time, and that engagement approaches may need to be adjusted accordingly. The plan should describe how reviews will occur and how updates will be documented and communicated.

International guidance consistently emphasises the importance of adaptive engagement. For example, the International Council on Mining and Metals highlights that effective stakeholder engagement requires ongoing evaluation and refinement as projects transition through different phases, particularly during closure and social transition.²⁶

Reporting on engagement progression should focus not only on activities undertaken, but also on engagement outcomes. Reporting should clearly outline what engagement has occurred, the key themes or issues raised, how stakeholder input has informed rehabilitation planning or implementation, and how outcomes have been communicated back to participants. Where engagement has not resulted in changes to proposed approaches, the reasons for this should be transparently explained.

As part of routine reporting, the next 12 months of planned engagement activities should be clearly identified, drawing from the milestone-based engagement schedule. This forward-looking view supports transparency, enables coordination with other engagement processes, and helps stakeholders understand upcoming opportunities for participation. Including this information within biannual or annual reporting provides a clear and consistent mechanism for tracking engagement progression over time.

Reporting should also reflect on the effectiveness of engagement, including whether engagement objectives are being met, whether participation is representative and inclusive, and whether engagement is contributing to improved understanding, trust, or decision-making. This may include qualitative reflections, rather than quantitative measures alone, recognising that relationship-building and shared understanding are important outcomes of engagement in their own right.

Together, regular review and transparent reporting help demonstrate that stakeholder engagement under a DMRP is being actively managed, is responsive to change, and is supporting credible, long-term rehabilitation and post-closure outcomes.

²⁶ ICMM. *Integrated Mine Closure Good Practice Guide* (3rd ed.). 2025
<https://www.icmm.com/integrated-mine-closure>

7. Summary of this Discussion Paper

This discussion paper provides practical guidance to support the preparation of a Stakeholder Engagement Plan as part of a Declared Mine Rehabilitation Plan (DMRP). It sets out clear expectations and structured approaches to assist licensees in designing engagement that is deliberate, proportionate and embedded within rehabilitation planning and decision-making over time.

Effective stakeholder engagement is fundamental to credible mine rehabilitation. This paper reinforces the importance of commencing engagement early, sustaining it throughout the life of the DMRP, and aligning it with both legislative requirements and recognised good practice. It outlines the core elements of a robust engagement plan, including defining purpose and scope, identifying and analysing stakeholders, selecting fit-for-purpose engagement methods, documenting feedback and outcomes, and establishing milestone-based schedules that provide clarity and accountability.

The guidance emphasises transparency about what is open to influence, culturally appropriate engagement with Traditional Owners, inclusive participation, and a clear focus on consultation outcomes, not just consultation activities. It also highlights the importance of adaptive management and ongoing reporting to demonstrate that engagement is actively governed, responsive to change, and capable of supporting durable, long-term rehabilitation outcomes.

8. References

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- ICMM. *Integrated Mine Closure Good Practice Guide* (3rd ed.). 2025
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- MLRA Vocabulary, <https://www.mineland.vic.gov.au/learn/vocabulary/>

Appendix A: Stakeholder Identification and Analysis Template

This template may be used to support systematic identification and analysis of stakeholders relevant to a Declared Mine Rehabilitation Plan (DMRP). The level of detail should be proportionate to the scale, complexity and potential impacts of the declared mine. The table is illustrative only and may be adapted to reflect site-specific circumstances.

Stakeholder Group	Why Identified	Level of Interest (Low/Medium/High)	Level of Influence (Low/Medium/High)	Likely Impacts / Areas of Interest	Proposed IAP2 Level	Proposed Engagement Approach	Preferred Channels	Key Risks / Issues	Engagement Frequency

Guidance for Completing the Template

- **Stakeholder Group:** Identify specific groups (e.g. adjacent landholders, local community groups, industry representatives).
- **Why Identified:** Briefly explain the rationale for inclusion.
- **Level of Interest:** Assess the degree to which the stakeholder is likely to be concerned with or affected by rehabilitation outcomes.
- **Level of Influence:** Consider the stakeholder's capacity to influence planning, approvals or public discourse.
- **Likely Impacts / Areas of Interest:** Identify topics of relevance (e.g. landform stability, water, cultural heritage, post-mining land use).
- **Proposed IAP2 Level:** Inform, Consult, Involve, Collaborate or Empower.
- **Proposed Engagement Approach:** Workshops, briefings, advisory groups, written consultation, meetings, online engagement, etc.
- **Preferred Channels:** Email, community meetings, on-Country engagement, newsletters, website updates, etc.
- **Key Risks / Issues:** Consultation fatigue, trust concerns, misinformation, technical uncertainty, timing sensitivities.
- **Engagement Frequency:** Ongoing, quarterly, milestone-based, annual, or event-triggered.

Appendix B: Engagement Planning Process Diagram

Stakeholder engagement for a Declared Mine Rehabilitation Plan (DMRP) should follow a deliberate and structured cycle. The process below illustrates a simple, repeatable approach that supports transparency, proportionality and continuous improvement.

Engagement Planning and Delivery Cycle

Step 1 – Identify Stakeholders

Identify all relevant stakeholders, including Traditional Owners, communities, landholders, regulators and other interested or affected parties.

Step 2 – Analyse Stakeholders

Assess interest, influence, likely impacts, information needs and engagement risks.

Step 3 – Define Scope of Engagement

Clarify what aspects of rehabilitation are open to influence and what is constrained by legislative, technical or safety requirements.

Step 4 – Select Engagement Methods

Determine appropriate approaches aligned to the purpose of engagement and the intended IAP2 level.

Step 5 – Deliver Engagement Activities

Undertake engagement activities in accordance with the plan and milestone schedule.

Step 6 – Record and Document

Capture feedback, issues raised, commitments made, and key themes.

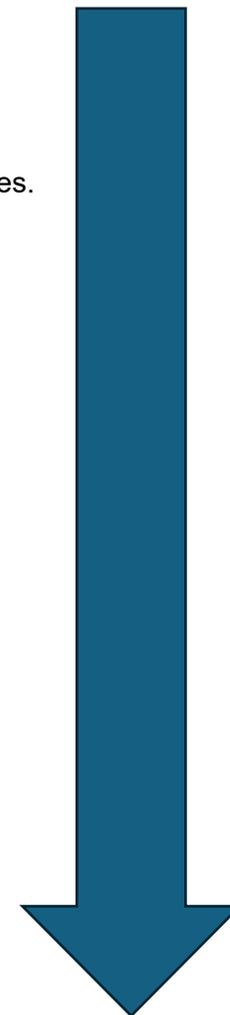
Step 7 – Report and Close the Loop

Communicate what was heard, how feedback influenced planning, what did not change and why.

Step 8 – Review and Adapt

Evaluate effectiveness, reflect on lessons learned, and update the engagement plan as circumstances evolve.

The cycle then recommences as rehabilitation progresses and new milestones, technical studies or regulatory triggers arise.



Appendix C: “Closing the Loop” Reporting Template

Effective stakeholder engagement requires transparent reporting of not only what activities were undertaken, but how stakeholder input influenced rehabilitation planning and decision-making.

This template may be used to document engagement outcomes and demonstrate responsiveness under a Declared Mine Rehabilitation Plan (DMRP).

Engagement Activity Summary

Engagement Activity Title:

Date(s) Undertaken:

Related DMRP Milestone / Topic:

1. Activity Undertaken

Briefly describe the engagement activity, including:

- Purpose of the engagement
- Level of engagement (Inform / Consult / Involve / Collaborate / Empower)
- Format (e.g. workshop, meeting, advisory group, online consultation, written submission)

Summary:

2. Who Participated

Identify stakeholder groups and participation details.

- Stakeholder groups represented:
-

- Approximate number of participants:
-

- Any notable representation considerations (e.g. Traditional Owners, landholders, community groups, regulators):

3. Key Themes / Issues Raised

Summarise the main issues, concerns, questions, or suggestions raised during engagement.

- ---
- ---
- ---

4. What Changed (or didn't) and Why

Clearly document how stakeholder input influenced decisions.

Changes made as a result of engagement:

- ---
- ---

Where no change was made, explanation provided:

- ---
- ---

(Include reference to technical, legislative or safety constraints where relevant.)

5. Next Steps

Outline agreed actions, further studies, future engagement activities, or monitoring commitments.

- ---
- ---

6. How We Reported Back

Explain how outcomes were communicated to participants.

- Method of reporting (e.g. summary report, website update, direct email, meeting):
-

- Date communicated:
-
-

Notes

- This template supports transparency and accountability in engagement reporting.
- Reporting should focus on outcomes as well as activities.
- Documentation should be retained as part of the DMRP engagement record.

Appendix D: Glossary of Legislative Terms Relevant to Stakeholder Engagement in DMRPs

Term	Definition
Consultation	A process of public or stakeholder engagement. It consists of five levels of engagement: inform, consult, involve, collaborate and empower. Each of the five levels is defined by a different level of participation.
Community engagement plan	A plan for consulting with the community that demonstrates that the licence holder will use appropriate and effective measures to consult with the community throughout the period of the licence and is prepared in accordance with the regulations and any guidelines issued by the Minister.
Declared Mine Rehabilitation Plan (DMRP)	The closure plan prepared by declared mine licensees in Victoria, in accordance with the Mineral Resources (Sustainable Development) Act and supporting regulations. DMRPs are required to include proposed closure criteria and a post-closure plan to gain statutory approvals.
Declared Mine	A mine or quarry in Victoria declared by the Minister to have geotechnical or hydrogeological factors that pose a significant risk to public safety, the environment or infrastructure.
Engagement	A planned process of communicating with communities and stakeholders with a specific purpose.
Declared Mine Licensee	The holder or the former holder of a licence that covers declared mine land.

For full definitions and additional terms relevant to declared mine rehabilitation and engagement, see the MLRA Vocabulary: <https://www.mineland.vic.gov.au/learn/vocabulary/>