



RDJ ADVISORY

Tax and Advocate

Issue #37 | October 2026

Tax and Legal Insight

Environmental Compliance as an RKAB Approval Requirement

Reclamation Guarantees, Regulatory
Readiness, and Mining Governance

MINING | ENVIRONMENTAL COMPLIANCE | REGULATORY GOVERNANCE

*Based on the environmental protection evaluation
criteria presented in the Directorate General of Mineral
and Coal technical briefing dated 13 October 2026.*

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Key Regulatory Developments



Advisory Note

The Directorate General of Mineral and Coal's technical briefing dated 13 October 2026 highlights that environmental protection is part of the RKAB evaluation framework, including the assessment of reclamation guarantee compliance.

Key Developments

1



Reclamation Guarantee Evidence

Proof of placement of reclamation guarantees is part of the RKAB evaluation criteria.

2



Stage-Based Evaluation

The environmental review applies across relevant mining stages, including exploration and operation production in accordance with the applicable framework.

3



Prior-Year Compliance

For operation production, the evaluation may include proof of reclamation guarantee placement for year N-1 under the applicable rules.

4



System and Document Alignment

Submitted documents should be consistent with the data recorded in the Ministry of Energy and Mineral Resources system.



Why This Matters



Environmental compliance can affect RKAB approval readiness.



Documentation quality supports regulatory certainty.



Governance and operational continuity are increasingly interconnected.



RDJ Advisory Perspective

For mining companies, environmental protection is not only a technical or ESG matter. It is also part of regulatory preparedness, internal governance, and business continuity planning.

Sources: Directorate General of Mineral and Coal Technical Briefing, 13 October 2026; Minister of Energy and Mineral Resources Regulation No. 17/2025 as amended by Regulation No. 6/2026; Decree of the Minister of Energy and Mineral Resources No. 341.K/MB.01/MEM.B/2025.

Closing

The latest technical guidance from the Ministry of Energy and Mineral Resources reinforces that reclamation-related environmental compliance is relevant not only for operational stewardship, but also for regulatory evaluation and RKAB readiness.

Governance Questions

- ✓ Has the company verified its reclamation guarantee status?
- ✓ Are supporting documents aligned with current system records?
- ✓ Does the RKAB submission reflect environmental compliance readiness?
- ✓ Have internal legal, technical, and finance teams coordinated the submission package?

Key Takeaway

Environmental compliance is increasingly part of mining approval readiness, not merely a post-approval obligation.

This publication is provided for general information purposes only and does not constitute legal, tax, regulatory, environmental, or other professional advice. Readers should seek appropriate professional advice based on their specific facts and circumstances.

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