

Application form

Environmental Protection Act 1994

Submission of a progressive rehabilitation and closure plan

This is the approved form for a progressive rehabilitation and closure plan (PRC plan) under section 126C of the Environmental Protection Act 1994 for a site-specific application for a mining activity relating to a mining lease.

Only use this application form if you are required to submit a PRC plan, where:

- You are applying for a new site-specific environmental authority for a mining activity relating to a mining lease.
OR
- The administering authority has included the requirement to submit a proposed PRC plan in an information request for a new site-specific environmental authority for a mining activity relating to a mining lease.
OR
- You completed a PRC plan as part of an EIS process and are submitting the PRC plan in the approved form as required under section 126C.
OR
- You have an existing site-specific environmental authority for a mining activity relating to a mining lease and have received a transition notice from the administering authority¹ in accordance with section 754 of the *Environmental Protection Act 1994* (EP Act).
OR
- Where none of the above apply: you have an existing site-specific environmental authority for a mining activity, you do not otherwise have a PRCP schedule approved yet one is required, and any of the following applies:
 - You have failed to comply with a transition notice;
 - You did not receive a transition notice as required under the legislation;
 - The administering authority has refused your proposed PRCP schedule.

Before completing this application form it is recommended that you:

- Read the Guideline – Progressive Rehabilitation and Closure Plans (ESR/2019/4964²), which explains the information you are required to provide with this application.
- Have a pre-lodgement meeting. To request a pre-lodgement meeting, please fill out and lodge the form Application for pre-lodgement services (ESR/2015/1664).

¹ The Department of Environment, Science and Innovation is the administering authority under the *Environmental Protection Act 1994*.

² This is the publication number. The publication number can be used as a search term to find the latest version of a publication at www.qld.gov.au.

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If you require assistance in answering any part of this form, or have any questions about your application, please contact the relevant business centre. Contact details are at the end of this form (Section 10).

Privacy statement

The administering authority is collecting the information on this approved form to process your application for a PRC plan. The collection of information is authorised under Chapter 3 and Chapter 5 of the EP Act. Some of the information may be disclosed to the Department of Resources and Queensland Treasury for the purpose of processing this application or the Rehabilitation Commissioner in accordance with s444J of the EP Act the if accessing the information is necessary or convenient to be done in the performance of the Commissioner's functions.

Please note that the administering authority is required to keep this application on a register of documents open for inspection by members of the public under section 541 of the EP Act, and must permit a person to take extracts from the register pursuant to section 542 of the EP Act.

Your personal information will not be otherwise disclosed to any other parties unless authorised or required by law. For queries about privacy matters please email privacy@des.qld.gov.au or telephone 13 74 68.

Definitions of terms used in this form	
<i>(Where there is inconsistency between the definition of terms used here and the terms used in the EP Act, the terms in the EP Act apply)</i>	
Available for improvement	In relation to land in an improvement area for a non-use management area, means land in the improvement area that is not being mined, other than land to which any of the following applies– a) the land is being used for operating infrastructure or machinery for mining, including, for example, a dam or water storage facility; b) the land is identified in the PRCP schedule or the application for an environmental authority relating to the schedule as containing a probable or proved ore reserve that is to be mined within 10 years after the land would otherwise have become available for improvement; c) the land is required for the mining of a probable or proved reserve mentioned in paragraph (b).
Available for rehabilitation	For a rehabilitation area, means land in the area is not being mined, unless– a) the land is being used for operating infrastructure or machinery for mining, including, for example, a dam or water storage facility; or b) the land is identified in the PRCP schedule or the application for an environmental authority relating to the schedule as containing a probable or proved ore reserve, under section 126D(6) of the EP Act, that is to be mined within 10 years after the land would otherwise have become available for rehabilitation; or - ba) the land is required for the mining of a probable or proved reserve mentioned in paragraph (b); or c) the land contains permanent infrastructure identified in the proposed PRCP schedule as remaining on the land for a post-mining land use.
Land outcome document	For land, means the following documents relating to the land– a) an environmental authority for a resource activity on the land; b) a document made under a condition of an environmental authority

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	mentioned in paragraph (a), if– i. the document relates to the management of a void within the meaning of section 126D of the EP Act on the land, or the rehabilitation of the land; and ii. the document was received by the administering authority before the assent date; and iii. the administering authority has not, within 20 business days after the assent date, given notice to the environmental authority holder that the document is insufficient in a material particular relevant to a matter mentioned in subparagraph (i); and iv. before the assent date, the document has not been superseded; c) a document made under a condition of an environmental authority mentioned in paragraph (a), if– i. the document relates to the management of a void within the meaning of section 126D of the EP Act on the land, or the rehabilitation of the land; and ii. the environmental authority requires the document to be given to the administering authority on a stated day that is on or after the assent date, or does not state a day when the document must be given; and iii. the document is received by the administering authority within three years after the assent date; and iv. the administering authority does not, within 20 business days after receiving the document, give the environmental authority holder a notice that the document is insufficient in a material particular relevant to a matter in subparagraph (i); d) a report evaluating an EIS under the <i>State Development and Public Works Organisation Act 1971</i>, section 34D; e) an EIS assessment report; f) a written agreement between the holder of an environmental authority mentioned in paragraph (a) and the State that is in force on the assent date.
Improvement area	For a non-use management area, means an area of land in the non-use management area to which a management milestone relates.
Management milestone	For a non-use management area, means each significant event or step necessary to– a) achieve best practice management of the area; and b) minimise risks to the environment.
Non-use management area	Means an area of land the subject of a PRC plan that cannot be rehabilitated to a stable condition after all relevant activities for the PRC plan carried out on the land have ended.
Post-mining land use	For land the subject of a PRC plan, means the purpose for which the land will be used after all relevant activities for the PRC plan carried out on the land have ended.
PRC plan	For land the subject of a mining lease, means a progressive rehabilitation and closure plan for the land that consists of – a) the rehabilitation planning part of the PRC plan; and

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	b) the PRCP schedule for the PRC plan, including any conditions imposed on the schedule.
PRCP schedule	For a PRC plan, means a schedule of the plan that – a) complies with section 126D of the EP Act; and b) is approved under chapter 5, part 5, division 2 of the EP Act, with or without conditions.
Proposed PRC plan	For an application, a proposed PRC plan means a PRC plan proposed for land the subject of a mining lease that: (a) complies with Chapter 5, part 2, division 3; and (b) either – accompanies the application; or is submitted for the application after the application is made
Rehabilitation area	For land the subject of a post-mining land use, means an area of the land to which a rehabilitation milestone for the post-mining land use relates.
Rehabilitation milestone	For the rehabilitation of land, means each significant event or step necessary to rehabilitate the land to a stable condition.

The fields marked with an asterisk * are mandatory. If they are not completed then your application may be considered not properly made under section 128 of the EP Act.

Section 1 – Environmental authority details		
Does this application relate to an <u>existing</u> environmental authority for a mining activity relating to a mining lease approved through a site-specific application?*	☐ No – Provide the reference number for your environmental authority application:	AR Insert.
	☒ Yes – Provide your environmental authority number:	EPML00876713

Section 2 – Applicant details	
Details of the applicant are to be provided in this section. If there is an agent acting on behalf of the applicant, details of the agent are to be provided. An agent could be a consultant or contractor for the environmental authority holder. The person nominated as the application contact will receive correspondence relating to this application.	
NAME / COMPANY NAME*	TRADING NAME (*IF AN ORGANISATION)
TerraCom Limited	TerraCom Limited
REGISTERED BUSINESS ADDRESS / RESIDENTIAL ADDRESS (NOT A POST OFFICE BOX) *	POSTAL ADDRESS (*WHERE DIFFERENT)
Blair Athol Mine Access Road, Clermont QLD 4721	PO Box 131, Clermont QLD 4721
ABN / ACN (*IF AN ORGANISATION)	NAME OF APPLICATION CONTACT*
35 143 533 537 / 143 533 537	Andrew Koerber
EMAIL*	TELEPHONE*
akoerber@terracomresources.com	0461 298 603

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- ☒ INDICATE IF YOU WANT TO RECEIVE CORRESPONDENCE VIA EMAIL
- ☐ INDICATE IF THIS FORM IS BEING COMPLETED BY AN AGENT FOR THE ENVIRONMENTAL AUTHORITY HOLDER*
- NOTE: If an agent is nominated, please provide evidence of appointment by the authority holder/s.**

Section 3 – Website address

If this application relates to an application for a new site-specific environmental authority for a mining activity, would you like to use the details on the environmental application form?	☐ No – Provide details below.	
	☒ Yes – Go to next section.	
Provide the website address for the application notice and application documents.	Insert.	
Provide details of the contact person if technical assistance is required.	NAME Insert.	TELEPHONE Insert.
	EMAIL Insert.	

Section 4 – Non-use management areas (new environmental authority applications only)

Does this application for a proposed PRC plan include a NUMA justified under section 126D(2)(b) of the EP Act? *	☐ No – Go to next section.	
	☐ Yes	
Has a public interest evaluation been carried out by a qualified entity for the NUMA(s)? *	☐ No – Go to next section.	
	☐ Yes	
Has the proposed NUMA(s) changed since the public interest evaluation was carried out in the EIS? *	☐ No – Go to next section.	
	☐ Yes – Provide details below.	
How has the proposed NUMA(s) changed since the public interest evaluation was carried out?	Please provide details below. Insert.	

Section 5 – PRC plan structure

The PRC plan must be prepared in accordance with the structure/format shown in Appendix 1 of this application form.	
Requirement	Requirement met?
Include a cover page that complies with Appendix 1 of this application form.	☒ Yes
Include a table of contents that complies with Appendix 1 of this application form.	☒ Yes

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Section 6 – PRC plan Checklist *			
The PRC plan must meet the information requirements stated in section 3 of the Guideline – Progressive Rehabilitation and Closure Plans (ESR/2019/4964), and sections 126C and 126D of the EP Act (note there is a limited exception for transitional PRC plans). All PRC plan requirements are mandatory. For each requirement, insert a reference to the section of the PRC plan which satisfies the requirement. Justification must be provided for any requirement for which the response is Not Applicable (NA). If more space is required, please attach a separate sheet.			
PRC plan Requirement	Requirement met? (Yes / NA)	PRC Plan Section No.	Justification
Rehabilitation planning part of the PRC plan The rehabilitation planning part of the PRC plan must include the information required under section 126C the EP Act, including information requirements described in the Guideline – Progressive Rehabilitation and Closure Plans (ESR/2019/4964) in accordance with section 126C(1)(j) of the EP Act.			
Project description <i>Note: For existing mines transitioning to the PRC plan framework, pre-disturbance information collected as part of an EIS process or original environmental authority application should be included. If this information is unable to be provided, or cannot be developed because of the mine's life stage, this should be clearly explained in this section of the rehabilitation planning part of the PRC plan.</i>			
Describe the following:			
each resource tenure, including the area of each tenure, to which the application relates;	Yes	3.1.2.1	Insert.
the relevant activities to which the application relates;	Yes	3.1.2.1 and 3.1.2.3	Insert.
the likely duration of the relevant activities	Yes	3.1.2.4	Insert.

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Include a detailed description, including maps, of how and where the relevant activities are to be carried out.	Yes	3.1.2.2, 3.1.4.1 and Appendix A	Insert.
Consultation			
Include details of the consultation undertaken by the applicant in developing the proposed PRC plan.	Yes	3.2.1	Insert.
Include details of how the applicant will undertake ongoing consultation in relation to the rehabilitation to be carried out under the plan.	Yes	3.2.2	Insert.
Post-mining land use			
State the extent to which each proposed post-mining land use identified in the proposed PRCP schedule for the plan is consistent with the outcome of consultation with the community in developing the PRC plan.	Yes	3.3.3	Insert.
State the extent to which each proposed post-mining land use identified in the proposed PRCP schedule for the plan is consistent with any strategies or plans for the land of a local government, the State or the Commonwealth.	Yes	3.3.4	Insert.
Non-use management area <i>Note for Transitional PRC plans: The holder is not required to comply with a requirements under section 126C(1)(g) or (h) or 126D(2) or (3) for the proposed PRCP schedule for the plan in relation to land if a land outcome document identifies the outcome for the land as the same, or substantially similar to, the outcome for the land if it were a non-use management area.</i>			
State the extent to which each proposed non-use management area identified in the PRCP schedule for the plan is consistent with the outcome of consultation with the community in developing the PRC plan.	Yes	3.4.3	Insert.

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State the extent to which each non-use management area identified in the PRCP schedule for the plan is consistent with any strategies or plans for the land of a local government, the State or the Commonwealth.	Yes	3.4.4	Insert.
For each proposed non-use management area, state the reasons the applicant considers the area cannot be rehabilitated to a stable condition because of a matter mentioned in section 126D(2).	NA	3.4.2	NUMA is pre-approved.
For each matter mentioned in the requirement above, include copies of reports or other evidence relied on by the proponent for each proposed non-use management area.	NA	3.4.2	NUMA is pre-approved.
Rehabilitation and management methodology <i>Note: Section 3.5 of the Guideline – Progressive Rehabilitation and Closure Plans (ESR/2019/4964) outlines the range of information that must be included as appendices to the rehabilitation planning part of the PRC plan.</i>			
For each post-mining land use, state the applicant's proposed methods or techniques for rehabilitating the land to a stable condition in a way that supports the rehabilitation milestones under the proposed PRCP schedule.	Yes	3.1.4.1, 3.5.1, 3.5.3, 3.5.5 and 3.5.6	Insert.
For each non-use management area, state the applicant's proposed methodology for achieving best practice management of the area to support the management milestones under the proposed PRCP schedule for the area.	Yes	3.5.1 and 3.5.3	Insert.
Risk assessment			
Identify the risks of a stable condition for land described as a post-mining land use not being achieved, and how the applicant intends to manage or minimise the risks.	Yes	3.6 and Appendix R	Insert.

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PRCP Guideline			
Include any other information prescribed by the administering authority in the Guideline – Progressive Rehabilitation and Closure Plans (ESR/2019/4964).	Yes	3.0	Insert.
Include the spatial information required in the Guideline – Progressive Rehabilitation and Closure Plans (ESR/2019/4964). See Attachment 1 of this form for details on how spatial information must be submitted.	Yes	-	Spatial information has been submitted as a digital file in accordance with Attachment 1 of this form.
Other information			
Include the other information the administering authority reasonably considers necessary to decide whether to approve the PRCP schedule.	Yes	Appendix A	Insert.
PRCP Schedule The proposed PRCP schedule must comply with section 126D of the EP Act, and be written in accordance with the Guideline – Progressive Rehabilitation and Closure Plans (ESR/2019/4964). The administering authority will assess the proposed PRCP schedule in conjunction with the rehabilitation planning part of the PRC plan and other application documents, and decide whether to approve the proposed PRCP schedule, with or without conditions, or refuse the proposed PRCP schedule.			
Include a PRCP schedule prepared using the PRCP schedule template (ESR/2019/5103 ³).	Yes	-	Schedule has been prepared using the correct template and included in this submission.
Include maps showing all of the land mentioned in the PRCP schedule, as it relates to being progressively rehabilitated.	Yes	Appendix A	Insert.

³ This is the publication number. The publication number can be used as a search term to find the latest version of a publication at www.qld.gov.au.

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Section 7 – Non-use management areas (transitional applications only)	
Does this application for a proposed PRC plan include a NUMA? *	☐ No – Go to next section.
	☒ Yes
Does the relevant environmental authority or any other land outcome document identify an outcome for the land that is the same, or substantially similar, to the outcome for the land if it were a NUMA under a PRCP schedule?	☐ No – Go to next section.
	☒ Yes
Does the environmental authority or any other land outcome document state sufficient detail to identify either the location or the area of the land to which the outcome relates?	☐ No – Provide details below.
	☒ Yes – Provide the document name(s) in Section 8.
If the area is not identified – how will the total area of the land to which the outcome relates be minimised? *	Insert.
If the location is not identified – how will the environmental authority holder ensure the location of the land to which the outcome relates minimises risks to the environment? *	Insert.
Section 8 – Transitional PRC plan requirements (transitional applications only)	
In accordance with transitional provisions in the EP Act, an applicant with an existing environmental authority is able to transition aspects of the PRCP schedule from existing land outcome documents. Indicate below any information that is being transitioned from a land outcome document.	

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PMLU/NUMA	Rehabilitation /Improvement area	Milestone Reference	Identify which of the below is being transitioned from a land outcome document		Land outcome document	Page No.
			Land outcome	Milestone criteria		
NUMA	IA1	MM1, MM2, MM3 and MM4	☒	☐	Environmental Authority EPML00876713	Condition F17
Light cattle grazing	RA1, RA2, RA3, RA4, RA5, RA6, RA7, RA8, RA9 and RA10	RM1, RM2, RM3, RM4, RM5, RM6, RM7 and RM8	☒	☐	Environmental Authority EPML00876713	Condition F5
Insert.	Insert.	Insert.	☐	☐	Insert.	Insert.
Insert.	Insert.	Insert.	☐	☐	Insert.	Insert.
Insert.	Insert.	Insert.	☐	☐	Insert.	Insert.
Each land outcome document must be submitted with this approved form						
☒ All land outcome documents identified above have been attached to this approved form.						

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Section 9 – Declaration*		
Note: If you have not told the truth in this application you may be prosecuted.		
I declare that: - I am the holder of the environmental authority, or authorised signatory for the holder of the environmental authority. - The information I have provided is true and correct to the best of my knowledge. - I understand that it is an offence under section 480 of the <i>Environmental Protection Act 1994</i> to give to the administering authority or an authorised person a document containing information that I know, or ought reasonably to know, is false or misleading in a material particular. - I understand that under section 480A of the <i>Environmental Protection Act 1994</i> that, if I am required to give a document to the administering authority or an authorised person, it is an offence to give a document that I know or ought reasonably to know, contains incomplete information in a material particular. - I understand that failure to provide sufficient information may result in the application being refused. I understand that an incomplete application may be invalid. Invalid applications will be returned without processing and will only be processed if resubmitted with all invalidating issues addressed. - I understand that all information supplied on or with this application form may be disclosed publicly in accordance with the <i>Right to Information Act 2009</i> and the <i>Evidence Act 1977</i>. - I will comply with all conditions and milestones of my approved PRCP schedule as well as any relevant provisions in the <i>Environmental Protection Act 1994</i>. - I understand that I am responsible for managing the environmental impacts of these activities, and that approval of this application is not an endorsement by the administering authority of the effectiveness of management practices proposed or implemented.		
Where an agreement is in place between all holders of the environmental authority, one holder can sign on behalf of the other joint holders. Please tick the checkbox below.		
☒ I HAVE AUTHORITY TO SIGN THIS FORM ON BEHALF OF ALL THE JOINT HOLDERS OF THE ENVIRONMENTAL AUTHORITY.		
Applicant's signature		
APPLICANT'S NAME Danny McCarthy	POSITION Managing Director	COMPANY / ORGANISATION TerraCom Limited
APPLICANT'S SIGNATURE 		DATE 17/05/2024 Select.
Joint holder(s) signature if applicable		
NAME, POSITION AND COMPANY NAME Insert.	SIGNATURE	DATE Select.
NAME, POSITION AND COMPANY NAME Insert.	SIGNATURE	DATE Select.

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OR ☐ I HAVE ATTACHED A DOCUMENT THAT PROVIDES THE REQUIRED INFORMATION FOR ALL JOINT HOLDERS.

Where the environmental authority holder is a company, this form must be signed by an authorised person for that company. Where there is more than one holder of the environmental authority, this declaration is to be signed by all holders, unless there is an agreement between all holders that one can sign on behalf of the other(s).

If you are signing on behalf of the environmental authority holder(s) you must provide a letter of authorisation.

Section 10 - Submission

Please submit your completed application form and supporting material to the Department of Environment, Science and Innovation office that services the industry applicable to your environmental authority.

A list of business centres can be found at www.des.qld.gov.au using the words 'business centres' as a search term.

Enquiries: Minerals Business Centre
PO Box 7230
Cairns QLD 4870
Phone: 07 4222 5352
Fax: 07 4222 5070
Email: ESCairns@des.qld.gov.au

Coal Business Centre
PO Box 3028
Emerald QLD 4720
Phone: 07 4987 9320
Email: CRMining@des.qld.gov.au

The latest version of this publication and other publications referenced in this document can be found at www.qld.gov.au using the relevant publication number (ESR/2019/4957 for this form) or title as a search term.

Appendix 1–PRC plan structure

Appendix 1 describes the formatting/structural requirements for a completed PRC plan. This includes the information required in a PRC plan cover page and table of contents, and the structure of a PRC plan.

A PRC plan must include the following sections in the order listed:

1. **Cover page:** This section must include the following information:
 - Title of the project
 - Document title
 - Version number
 - Document ID number
 - Date of submission
 - Tenure number(s)
 - Environmental authority holder name
 - Environmental authority holder contact details.
2. **Table of contents:** This section must include the following information:
 - Sections of PRC plan
 - Sub-sections of PRC plan
 - Figures, tables and maps (as applicable).
3. **Rehabilitation planning part**
 - 3.1. **Project planning:** This section will include baseline information, site location details, a description of the project and information on rehabilitation/improvement planning.
 - 3.2. **Community consultation:** This section will include information on stakeholder consultation including a community consultation register and community consultation plan. The community consultation register must include consultation dates, identification of each community member, description of consultation type (workshop, quarterly meetings, etc.), information provided to the community, issues raised/discussed by the community, how issues have been considered, decisions/outcomes of engagement, and commitments made by the applicant. The community consultation plan must include the objectives for community consultation, how the community will be engaged, proposed consultation frequency, what information will be released for community consultation, and how feedback/comments will be considered.
 - 3.3. **Post-mining land use:** This section will include the assessment of PMLU options, methodology for determining PMLU options, and details of each nominated PMLU. It must be consistent with the outcome of consultation with the community in developing the plan, and any strategies or plans for the land of a local government, the State or the Commonwealth.
 - 3.4. **Non-use management areas (if applicable):** This section will include the justification for the NUMA and details of each nominated NUMA. In providing justification for the NUMA, it must:
 - state the reasons the applicant considers the area cannot be rehabilitated to a stable condition
 - include copies of reports or other evidence relied on by the applicant for each proposed non-use management area
 - state the extent to which the proposed non-use management area is consistent with the outcome of consultation with the community in developing the plan, and
 - state the extent to which the non-use management area is consistent with any strategies or plans for the land of a local government, the State or the Commonwealth.
 - The detail of each nominated NUMA must include information demonstrating that the proposed footprint of each NUMA is as small as practicable, an assessment of the NUMA location options, a description of the proposed location of each NUMA and the environmental values of the

surrounding environment, and evidence showing how the proposed location will prevent or minimise environmental harm.

3.5. Rehabilitation management methodology: This section will include information describing how the proposed rehabilitation and management methodology have been developed and will be implemented. For each proposed post-mining land use for land, state the proposed methods or techniques for rehabilitating the land to a stable condition in a way that supports the rehabilitation milestones under the proposed PRCP schedule. This should include details of the general rehabilitation practices, tailings storage facilities, voids, underground mining and built infrastructure. For each proposed NUMA, state the proposed methodology for achieving best practice management of the area to support the management milestones under the proposed PRCP schedule for the area.

3.6. Risk assessment: This section will include a risk assessment that identifies the risk of a stable condition for land not being achieved and a risk treatment plan outlining how the applicant will manage or minimise the risk. All proposed NUMAs should also have a completed risk assessment. If rehabilitation trials are planned, this is also where relevant details must be given.

3.7. Monitoring and maintenance: This section will include a monitoring and maintenance program that identifies and describes the monitoring systems that will be undertaken to demonstrate a milestone and milestone criteria have been achieved. It must include timing of when each rehabilitation or management milestone is to be achieved and be accompanied by maps outlining the relevant land.

4. **Appendices and attachments:** The completed PRCP schedule and any relevant required reports/plans are to be included in this section. The Progressive Rehabilitation and Closure Plan Schedule template (ESR/2019/5103) should be included.

Attachment 1—Spatial data requirements for PRC plan

Attachment 1 provides guidance on the required content of spatial information (shapefiles) for the submission of a PRC plan. This attachment should be read in conjunction with the department's guideline: Spatial Information Submission (ESR/2018/4337). To obtain a copy of the guideline, the spreadsheet containing the schema (in Table 2) and a shapefile template for PCR plans are available on the Queensland Government's website at www.qld.gov.au, using the search term "submission of spatial information". The following sections provide information about the required fields and attributes for datasets.

Required files—Table 1

The applicant must submit shapefiles detailing the following:

- the location and maximum extent of disturbance footprint for the mine life
- the PMLU and NUMAs for the area within the resource tenure(s)
- the rehabilitation and improvement areas within the resource tenure(s)
- any sensitive receptors
- extent of a floodplain
- existing rehabilitation (if the PRC plan is for an existing environmental authority).

A minimum of one (1) shapefile must be submitted for a PRC plan, detailing the above-listed information, as outlined within Table 1. Each file must be named in accordance with the requirements outlined within the department's guideline: Spatial Information Submission (ESR/2018/4337).

Where the PRC plan relates to a site where a NUMA or floodplain are not present, this should be stated in the spatial information submission email to which the relevant spatial files are attached.

Table 1: Shapefile checklist

File	Spatial information requirement	Schema	Example file name (e.g. using submission date of 30 June 2020)
1	PRC plan – polygon	Table 2	EPPR00372556_PRC_PY_30062020

Where:

- PRCP = PRC plan
- PY = polygon (geometry)

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Table 2: Schema for PRC plan

Field Name	Type	Length	Definition	Domain Values ⁴	Domain Value Description	Mandatory/ Optional
FID	Object ID	N/A	The unique identifier for the spatial feature.			Mandatory
SHAPE	Geometry	N/A	Allowed Geometry: Polygon			Mandatory
PERMIT_REF	TEXT	50	The alpha-numeric environmental authority number relevant to the spatial information (if this PRC plan does not relate to an existing environmental authority, please provide the relevant application number instead).			Mandatory
PROCESS	TEXT	4	The relevant process spatial data is being submitted for	PRCP	Progressive rehabilitation and closure plan	Mandatory
SITE_NAME	TEXT	254	Site name relating to the environmental authority.			Mandatory
SITE_ID	TEXT	20	This field contains a unique identifier for the spatial feature, which has been generated by the applicant.			Mandatory
FEATURE	TEXT	10	This field contains the land use feature on site which this polygon or point is describing. Select the relevant option of either post-mining land use, rehabilitation area, non-use management area, improvement area, maximum disturbance footprint, sensitive receptor, existing rehabilitation or floodplain using the codes specified.	PMLU	Post-mining land use	Mandatory
				REHAB_AREA	Rehabilitation area	Mandatory
				NUMA	Non-use management area	Mandatory if the PRCP schedule proposes or changes a non-use management area
				IMPRV_AREA	Improvement area	Mandatory if the PRCP schedule proposes or changes a non-use management area
				FOOTPRINT	Maximum disturbance footprint over mine life	Mandatory
				SR	Sensitive receptor	Mandatory

⁴ If blank, populate based on Attribute type and definition.

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Field Name	Type	Length	Definition	Domain Values ⁴	Domain Value Description	Mandatory/ Optional
				EX_REH	Existing rehabilitation	Mandatory if the application is for an existing environmental authority and there is existing rehabilitation undertaken
				FLDP	Floodplain	Mandatory if there is a floodplain located within the environmental authority boundary
FEAT_DESC	TEXT	254	Feature description		This field provides a description of the feature identified in 'FEATURE'.	Mandatory
PMLU_TYPE	TEXT	10	This field provides a description of the post mining land use type.	GRAZ	Grazing	Mandatory for each PMLU.
				NAT_ECO	Native ecosystem	
				WTR_ST	Water storage	
				REC	Recreation	
				HB_ECS	Habitat and ecosystem services	
				AGRI	Agriculture	
				FOR	Forestry	
				CROP	Cropping	
				PERM_INFRA	Permanent infrastructure	
				IND	Industrial	
				LNDFL	Landfill	
				Oth	Other	
DATE_	DATE	dd/mm/yyyy	Date of submission. This field identifies the date the spatial information was submitted.			Mandatory
SOURCE	TEXT	5	This field identifies the source of the spatial information and the capture	DIG	Digitising (Tracing over Ortho Imagery)	Mandatory

Application form
Submission of a progressive rehabilitation and closure plan

Field Name	Type	Length	Definition	Domain Values ⁴	Domain Value Description	Mandatory/ Optional
			methodology for the spatial information provided.	GPSD	GPS Differential Survey	
				GPSND	GPS Non Differential Survey	
				RTK	Real-Time Kinematic (RTK) Survey	
				UK	Un Known	
AREA_HA	DOUBLE	N/A	This field indicates the area in Hectares. (Polygon only)			Mandatory if GEOMETRY = polygon.
COMMENTS	TEXT	254	A free text field has been provided to include any additional information the proponent wishes to provide in relation to the data.			Mandatory if PMLU_TYPE = Oth



30 September 2025

Dr. Alison Cummings
Delegate of the administering authority
Department of Environment, Tourism, Science and Innovation
PO Box 3028
Emerald, QLD 4720

Re: | Response to not properly made application notice issued under section 128 of the Environmental Protection Act 1994 — A-PRCP-NEW-100663795

Dear Alison,

1.0 Introduction

Orion Mining Pty Limited (Orion) made a *Progressive Closure and Rehabilitation Plan* (PRC Plan) application (the application) to the Department of Environment, Science and Innovation (now known as the Department of Environment, Tourism, Science and Innovation (DETSI)) on 17 May 2024 (application reference number A-PRCP-NEW-100663795). On 31 May 2024, DETSI issued *Not properly made application Notice* issued under section 128 of the *Environment Protection Act 1994* (EP Act) (the notice) because the application is missing information required under 126C(1)(d) and Section 126(C)(1)(j) of the EP Act, including 'other information' DETSI considers necessary to decide whether to approve the PRC plan (the original decision).

In addition to the PRC Plan application, an amendment application for a site-specific environmental authority (EA) was received by the administering authority on 10 July 2023. An information request was initially issued by DETSI on 25 September 2023 under section 140 of the Environmental Protection Act 1994 for further information to assess the amendment application, which was addressed in May 2024. Subsequently, an additional information request was issued on 12 August 2024, which was addressed in 28 March 2025.

Following the provision of the information requested by DETSI the EA amendment was approved and came into effect on 11 June 2025. Subsequently the information required to address the not properly made (NPM) notice for the PRC plan was tabled. This memo tables the responses to the information request for the PRC plan and how each of the request for information items were addressed.

Table 1 Information request responses

Reason for the application not being properly made	DETSI comments	Actions	
Requirements for a new site-specific EA application OR for a transitional PRC plan where the proposed Post Mining Land Use (PMLU) has not been previously addressed in a Land Outcome Document (s126C(1)(j) of the EP Act).	The current EA does not specify PLMUs for the land. The EA requires a Rehabilitation Management Plan (RMP), Management Plan Mine Closure (CMP) and a Residual Void Management Plan (RVMP), however the administrating authority deemed these plans insufficient as LODs in 2020. As there are no outcomes specified in the EA (LOD), the information requirements under section 3.2 of the Guideline must be met in accordance with s126C(1)(j) of the EP Act. The relevant information requirements have not been addressed.	Provide information that meets the requirements of section 126D(1)(j) of the EP Act, specifically: • Consideration of PMLU options • Identification of State and Commonwealth legislation relevant to the land use of the surrounding area • Evidence based comparison and justification for each proposed MLU against alternative options • Identification of any statutory constraints that may need to be imposed to prevent or limit the likelihood of an inappropriate land use in the future	An options analysis was undertaken to support the associated EA amendment and to meet the requirements of s126C(1)(j) of the <i>Environmental Protection Act 1994</i> and Section 3.2 of the PRCP guideline. This analysis assessed a range of potential PMLUs against relevant environmental, social, and land use planning criteria. The results of this analysis identified light grazing pasture as the most suitable PMLU. This result is consistent with the pre-mining land use, landholder expectations, surrounding land use, and the recommendations of State Land and State Forest departments. The PRC plan has been updated to include a summary of the options analysis in Section 3.3.5, with the full assessment provided in Appendix S. Accordingly, appropriate updates to the RMP (Appendix O), CMP (Appendix W) and RVMP (Appendix N) have been made by SGME.
A flood plain model report developed by an appropriately qualified person (PRC plan Guideline – Section 3.4)	The transitional PRC plan does not include a flood plain model report. Section 3.4 of the PRC plan guideline states that if there are no land outcomes identified in a land outcome document, the applicant is required to carry out floodplain modelling in accordance with this section of the guideline. The EA does not stipulate land outcomes (e.g. Non-use management areas (NUMAs)) and also does not include a figure that depicts the location of the residual void. As such a model is required.	Provide a flood plain model report in accordance with Section 3.4 of the PRCP Guideline. The model is required to include scenarios with and without flood protection landforms (e.g. diversion drains).	Hydrobalance has updated a previous version of the site floodplain model to be consistent with current land forms, EA amendments and PRC plan modifications. TerraCom provided to Hydrobalance a final landform DEM that was used in this latest modelling phase, which included both scenarios with and without flood protection landforms. The updated flood modelling report (Appendix V) by HydroBalance concluded that the final landform can sustain a 0.1% AEP design flood event and PMF.

Reason for the application not being properly made	DETSI comments	Actions	
Non-use management areas (NUMAs) (PRC plan Guideline – Section 3.3)	Condition F4 of the EA requires all areas disturbed by mining activities must be rehabilitation in a manner that ensures it is: safe for humans and wildlife; stable; able to sustain vegetation; and is non-polluting. The transitional PRC plan does not meet the requirements for a transitional PRC plan where a NUMA is proposed and has not been identified in a LOD, in accordance with sections 126C(1)(g) and (h) and (j) or 126D(2) of the EP Act.	Ensure the PRC plan that provides for all areas disturbed by mining activities to be rehabilitated in a manner consistent with Condition F4 of the EA, or provide the information that meets the requirements of sections 126C(1)(g) and (h) and (j) or 126D(2) of the EP Act, specifically: - For each proposed NUMA (s126C(1)(g) and (h) of the EP Act) - State the reasons the applicant considers the area cannot be rehabilitated to a stable condition because of a matter mentioned in s126D(2) - Include copies of reports or other evidence relied on by the applicant for each proposed NUMA. - Reason – greater risk of environmental harm (s126C(1)(j) of the EP Act) - If the proposed PRCP schedule identifies a NUMA under section 126D(2)(a) – a report that satisfies requirements (a)-(e) in Section 3.3 of the PRCP Guideline. - Reason – public interest (s126C(1)(j) of the EP Act) - If the proposed PRCP schedule identified a NUMA under section 126D(2)(b) – a report that satisfies requirements (a)-(d), (f) and (g) in Section 3.3 of the PRCP Guideline	The PRC plan has been updated to strengthen justification for the nomination of the final void as a non-use management area (NUMA), consistent with section 126D(2)(b) of the <i>Environmental Protection Act 1994</i>. Section 3.4.2.1 details that the void will form a permanent lake post-closure, as demonstrated by the site-specific water balance model (Appendix D). Thus, as a permanent lake the area cannot support a safe or sustainable PMLU. Geotechnical assessment (Appendix I) and a supplementary stability memo (Appendix T) confirm that long-term stability is only achieved with engineered spoil buttressing and that a 30 m exclusion zone is required for public safety. These measures have been incorporated into the final landform design (Appendix H), which reflects the void as a residual feature of the landscape. Residual risk and safety management measures have been identified in Sections 3.4.2.3 and 3.4.2.4, including bunding and long-term access restrictions. Completion criteria have been updated to align with the final landform design and technical assessments. The NUMA nomination is therefore supported by the relevant studies and consistent with the PRC plan guideline.
Underground mining (s126C(1)(e) and (i) and (j) of the EP Act)	The transitional PRCP does not include the required information for the underground workings. Although there are no current or scheduled underground mining, there are historic underground mine workings that were backfilled with spoil in the early 2000s. Investigations consistent with the requirements listed in s126C(1)(e) and (i) and (j) of the EP Act, have not been provided in the PRCP.	Provide a PRC plan that meets the provides the required information for underground mining operations (s126C(1)(e) and (i) and (j) of the EP Act), in accordance with section 3.6.4 of the PRCP Guideline. Provide a PRC plan that provides additional information consistent with Schedule 8A – Table 1 of the EP Reg, which includes: - Information demonstrating the proposed footprint of each NUMA is as small as practicable. - An assessment of the NUMA location options, having regard to the constraint of the resource location, with an analysis of the potential environmental harm and sensitivity of the surrounding environment of each option. - A description of the proposed location of each NUMA and the environmental values of the surrounding environment. - Evidence showing how the proposed location will prevent or minimise environmental harm.	TerraCom confirmed that the underground workings were mined through by the open cut operation and no-long exist in their remnant form. These underground workings were backfilled in the early 2000's by Rio Tinto. Information of these workings is limited to a few reports due to age, complexity and change in ownership. It is assumed from information available that no further works are necessary for underground workings, and that they have been rehabilitated (underground workings backfilled) or further disturbed through open-cut mining. TerraCom has provided spatial data to confirm the extent of underground mine workings. This spatial data confirms that open cut mining has worked the extent of the previous underground mining area through open-cut mining operations. The PRC plan has been updated to clarify this and an additional map has been added to confirm this. This map is provided as Figure 22 in the updated PRC plan. Considering this, underground workings have been neither designated a PMLU or NUMA.

Reason for the application not being properly made	DETSI comments	Actions
NUMAs (Schedule 8A – Table 1 of the Environmental Protection Regulation 2019 (EP Reg))	The transitional PRC plan does not provide sufficient information to address Schedule 8A Table 1 of the EP Reg, final site design assessment for the proposed NUMA, to address section 126C(1)(j) of the EP Act.	The PRC plan has been updated to provide additional justification for nominating the final void as a non-use management area. The location and shape of the void reflect historical mining activities and cannot be reasonably modified. Backfilling or reshaping has not been pursued due to the absence of surplus spoil material, geotechnical constraints, and prohibitive cost. The void is predicted to form a permanent lake with salinity levels exceeding 90,000 µS/cm over time, which is unsuitable for beneficial PMLU. These limitations have been explicitly discussed in Section 3.4.2.1 of the updated PRC plan.
NUMAs (2126D(2)(a) or (b) of the EP Act)	The transitional PRC plan, including the PRC plan schedule, proposes NUMAs which are not preapproved in the EA. The transitional PRC plan does not meet the requirements of section 126D(2) of the EP Act.	Submit a PRC plan that provides for all land to be rehabilitated to a stable condition, or provide justification that meets the requirements of section 126D(2) of the EP Act, including: - The PRC plan schedule may only state that land is a NUMA if carrying out rehabilitation of land would cause greater risk of environmental harm than not carrying out the rehabilitation; or both of the following would apply – - The risk of environmental harm as a result of not carrying out rehabilitation of the land is confined to the area of the relevant recourse tenure, and - The applicant considers, having regard to each public interest consideration, that is in the public interest for the land not to be rehabilitated to a stable condition. - Despite s126D(2) of the EP Act, if the land the subject of the proposed PRC plan schedule will contain a void situated wholly or partly in a flood plain, the schedule must provide for rehabilitation of the land to a stable condition (i.e., be assigned a PMLU) The PRC plan and PRC plan schedule have been updated to provide additional justification for nominating the final void as a NUMA in accordance with section 126D(2)(a) of the EP Act. Section 3.4.2.1 outlines that rehabilitation of the void would cause greater environmental harm due to the need for large-scale backfilling and disturbance to adjacent landforms, with limited environmental benefit. Site-specific water balance modelling predicts the permanent accumulation of salinity within the void if left unfilled, while geotechnical and landform constraints make rehabilitation unsafe and impractical. The residual risks are confined to the existing mining tenure and do not pose broader environmental risks. Management of the void as a residual risk feature is therefore consistent with the public interest. The most recent flood modelling and final landform design confirms that the void is not located in a mapped floodplain.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M Forbes', with a stylized, cursive script.

Matt Forbes
Principal Geoscientist
mforbes@sgme.au

Spatial information

GIS data associated with this application is available upon request to the Department of Environment and Science.

Information on how to make a request is available at:

<https://www.qld.gov.au/environment/pollution/licences-permits/public-register>