

Notice

Environmental Protection Act 1994

Information request

This information request is issued by the administering authority under section 140 of the Environmental Protection Act 1994 to request further information needed to assess an application for a PRCP schedule.

To: Fairhill Coking Coal Pty Ltd
T/A Futura Mining Services Pty Ltd
Level 11 52 Phillip St
SYDNEY NSW 2000
By email transmission only

Email: barbara.vanderpol@futuraresources.com.au
ben.dunlop@futuraresources.com.au

Your reference: BRID0071

Our reference: A-PRCP-NEW-100665536

Attention: Barbara van der Pol, Ben Dunlop

Further information is required to assess an application for a PRCP schedule

1. Application details

The application for a proposed PRC plan was received by the administering authority on 17 January 2025.

The application reference number is: A-PRCP-NEW-100665536

Land description: ML 700043

2. Information request

The administering authority has considered the abovementioned application and is writing to inform you that further information is required to assess the application (an information request).

The information requested is provided below in Appendix 1.

3. Actions

The abovementioned application will lapse unless you respond by giving the administering authority -

- (a) all of the information requested; or
- (b) part of the information requested together with a written notice asking the authority to proceed with the assessment of the application; or
- (c) a written notice –
 - i. stating that you do not intend to supply any of the information requested; and



- ii. asking the administering authority to proceed with the assessment of the application.

A response to the information requested must be provided by 8 September 2025 (the information response period). If you wish to extend the information response period, a request to extend the period must be made at least 10 business days before the last day of the information response period.

The response to this information request or a request to extend the information response period can be submitted to the administering authority by email to CRMining@des.qld.gov.au.

If the information provided in response to this information request is still not adequate for the administering authority to make a decision, your application may be refused as a result of section 176 of the *Environmental Protection Act 1994*, where the administering authority must have regard to any response given for an information request.

4. Human rights

A human rights assessment was carried out in relation to this decision/action and it was determined that **no human rights are engaged by this decision**.

If you require more information, please contact Business Centre Coal on the telephone number listed below.



Signature

7/03/2025

Date

Jessica Johnson
Department of the Environment, Tourism, Science
and Innovation
Delegate of the administering authority
Environmental Protection Act 1994

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

Appendix 1.

Item	Relevant section:	Matter	Information Request <i>Note: A PRC plan is made up of both components, the Rehabilitation Planning Part and the PRCP Schedule</i>
Rehabilitation Planning Part			
1	Groundwater modelling PRC plan Section 1.1.1 Appendix C Appendix D Appendix D1	Groundwater Model The groundwater modelling provided is not appropriate for the PRCP process including determining predicted final void conditions and whether final voids are a sink or source. For example: - there is no discussion of postmining void depths, after any backfilling has occurred and long term predicted groundwater inflows to the void/s; and - no water balance model is provided for predicting void water levels and how the groundwater modelling interacts with that water balance model. Without this information, the predicted final void conditions cannot be understood, including whether the void is a groundwater sink or source. Appendix D1 provides details of a 2-dimensional groundwater model developed by SLR in 2019. This model is based on a single cross section model through the mine. It is unable to simulate hydrogeological conditions in all directions around the mine. It is unable to calibrate against actual water levels in the monitoring bores around the mine. The target water levels on the straight-line model have been estimated. The model is considered inadequate for the PRCP process, and a 3-dimensional numerical groundwater model is required. Appendix D Section 7.1 uses the straight line 2-dimensional model to predict inflow to the pit, presumably during mining. This approach is considered to have significant limitations, and a 3-dimensional numerical groundwater model is required to more accurately predict groundwater inflow to the pit. Hydrology Model	Provide a PRC plan inclusive of rehabilitation planning part that includes: - detailed information provided on hydrology model development, parametrisation, calibration, and validation: and - groundwater modelling, using data from enough suitably placed groundwater bores. This should include at least 1 additional groundwater monitoring bore, located hydraulically downgradient of the void locations.

		The PRCP and Appendix C – Water Management Assessment (ATC Williams, 2023) do not specify a dedicated hydrology model. Appendix C (Section 3.1) states that design inflows were derived using ARR 2019 methods, but no reference is made to a specific rainfall-runoff model. There must be detailed information provided on hydrology model development, parametrisation, calibration, and validation. It is required to demonstrate model credibility.	
2	Ground Water Dependent Ecosystems (GDE's) PRC Plan Section 1.1.21.	The proposed PRC plan identifies GDEs that may be impacted post-mining but does not provide modelling evidence to show the final landform and groundwater drawdown won't adversely impact the GDEs. The groundwater monitoring network requires an additional monitoring bore, located hydraulically downgradient of the mine voids	Provide a PRC plan inclusive of modelling, from enough suitably placed groundwater bores, to demonstrate there will be no adverse impact on GDEs from the final landform.
3	Surface water monitoring PRC plan Section 1.1.9. Surface Water Quality	<u>Monitoring Locations</u> The nominated upstream monitoring location is not upstream of the influence of disturbance from the mining activity. Upstream monitoring location/s should be revised to ensure that they are able to detect change influenced by upstream activities. <u>Monitoring Criteria and Limits</u> Some of the proposed monitoring criteria are not fit for purpose, for example: • RM7.6 proposes surface water run-off limits that do not include toxicants (Environmental Protection (Water) Policy 2009; Mackenzie River Sub-basin Environmental Values and Water Quality Objectives); and • Table 12. Surface water quality trigger values, proposes 'release limits' Background data can be used to determine site-specific limits. For surface water, the 80th percentile of data for upstream/reference sites should be used for phys-chem indicators and the 95th percentile for toxicants. The surface water monitoring and reporting for the PRCP should be done to ensure that the final landform is stable and non-polluting not to ensure compliance with the EA.	Provide a PRC plan inclusive of: - appropriate surface water rehabilitation and closure monitoring locations, monitoring frequency, quality characteristics and limits that are fit for purpose and capable of identifying contamination from all disturbed areas; and - an updated monitoring program that includes limits that are fit for purpose (closure not operation), and able to demonstrate a stable and non-polluting condition has been achieved.
4	Flooding PRCP Section 3.2 Drainage. Appendix C – Water management	The PRCP Guideline requires information regarding the effect of flood flow through the site for the post mining land use, including the influence of flood depth and velocity on the final landform. The flood modelling provided with the PRC plan has not been carried out on the final landform; and does not include flood velocities.	Provide an updated Rehabilitation Planning Part inclusive of flood modelling that meets requirements of the PRCP Guideline, and includes:

	assessment, 2018 ATC Williams (ATC Williams 2018)	The ATC Williams 2018 report advises that the design of the final landform was not available at the time of the flood assessment. The flood modelling in the PRC plan, <i>Figure 20 (Disturbance footprint and the 0.1% AEP – Post -mining)</i>, appears to show the open cut depression and dump areas as higher than the flood water, with flood water backing up on the western side of the landform. However, the cross sections in <i>Figure 22 (3D Final landform Cross Sections)</i>, appear to show that the floodwater would flow into the backfilled voids depression from the western side (noting that the figures against the level lines are not legible in the cross sections). Hydraulic Model The Appendix C – Water Management Assessment (ATC Williams, 2023) does not provide evidence of model calibration, validation, or any sensitivity/uncertainty analysis. This is a gap given the PRCP Guideline (ESR/2019/4964, Section 3.4) expects floodplain modelling to be robust and reflect the range of potential conditions. The flood model must include: • Calibration against historical flood events, where available. • Sensitivity testing on key parameters e.g., Manning's roughness. Flood Modelling Assessment: climate change The flood modelling does not demonstrate consideration of climate change in flood estimation. The Environmental Protection Regulation 2019 (EP Regulation), Section 41C, mandates the use of Australian Rainfall and Runoff 2019, which incorporates climate change considerations through increased rainfall intensities and changes to flood estimation. The climate change effect must be incorporated in flood estimation aligned with ARR 2019 guidelines. Flow Ponding and Landform Stability PRCP Figures 14 and 15 (Fairhill Coal Project PRCP, 2025) show ponding behind the WRD and final pit under 0.1% AEP and PMF flood events. • Ponding in these areas may create: ○ Increased hydraulic pressure on landform slopes.	a) calibration against historical flood events, where available. b) sensitivity testing on key parameters e.g., Manning's roughness. c) flood depth and velocity for a variety of flood flow events for the final landform and justify how this will form a stable condition. d) clarifies interaction with watercourses by assessing hydrological connectivity. e) Integrates Climate change in flood modelling. The rehabilitation planning should ensure that in the final landform: f) there are no voids in 0.1% AEP flood plain even partially; and g) there are adequate drainage pathways to prevent ponding behind WRD/Pit; and h) surface water measures ensure positive drainage away from waste structures; and i) there are adequate Geotechnical Stability Measures in place e.g. bench WRD slopes and adjust landform angles.
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5	Final landform - Open Cut Depression PRC Plan Section 4.4. Statutory Constraints to be Imposed; and PRC plan Section 6.2. Landform Design; and Appendix M Mine closure plan	Features in Floodplains and Water Ingress PRCP Figure 11 (Fairhill Coal Project PRCP, 2025) shows water ingress into the pit and WRD under the 0.1% AEP flood event from Cooroora Creek and Sandy Creek. The PRCP (Section 4.4.1) states: "The final pit depression will have negligible overlap, and the landform will be designed to be higher than the peak water level of 0.1% AEP as modelled." However, PRCP Figure 19 (Fairhill Coal Project PRCP, 2025) demonstrates partial overlap between the open cut depression, WRD and the 0.1% AEP flood extent. This contradicts PRCP Guideline ESR/2019/4964 (Section 3.4) and EP Act (Section 126D(3)), which require that: • No void is situated wholly or partly within the 0.1% AEP floodplain.	Provided a PRC plan inclusive of flood modelling that is based on the final landform and demonstrates the following: a) final depressions are situated wholly or partly within the 0.1% AEP floodplain are minimised; and b) all landforms within a floodplain will be rehabilitated to a stable condition (i.e. long-term stability will not be adversely flood-impacted). c) Details of any engineered barriers (e.g., flood protection bunds, backfilling strategies) that

		All landforms within a floodplain must be rehabilitated to a stable condition. If any depressions remain within the 0.1% AEP floodplain, consideration should be given to how the landform could be re-engineered to avoid 0.1% AEP flood.	are required to ensure that the landform remains safe and self-sustaining or consider adjustments in the final landform.
6	Final Landform – Open Cut Depression PRC plan: Section 4.4.1. Voids in floodplains Section 6.2- Landform Design Section 6.2.1 Overview (landform design)	Residual Void vs Depression Classification: The EA does not approve any residual voids to remain in the final landform. The PRCP identifies features described as landform depressions intended to achieve grazing PMLU, but no supporting evidence has been provided regarding the water quality, water level fluctuation, or how it will support grazing as required under Section 3.3 of the PRCP Guideline. Appendix M appears identify 2 final landform depressions, potentially up to 40m deep (if the vertical axis on cross section 'D-D' is in metres). However, the location and dimensions of the features is not clear in the PRC plan. The PRC plan also describes the post-mining landform depression as a structure that intercepts and retains water from the upstream catchment. There is no information provided about suitability of the landform depressions as storages for livestock drinking water (that would support the proposed grazing PMLU) including: - location(s) of safe access for livestock - long term water quality, how deep the depressions will be There is no information about the water to be retained within the landform depressions e.g. long-term modelling of water quality. depth, surface areas, water source (e.g. groundwater, rainfall, overland flows), what areas will fill and how (rainfall, overland flows). Based on the information provided, and in consideration of the absence of specific detail around the function and longevity of the final depression within the landform, the department is concerned that the features proposed will resemble and function in the same manner as a residual void at the end of mining, which is not approved to be retained as part of the final landform design. The PRC plan does not include sufficient detail to support residual voids to be approved within the final landform, or to ensure appropriate criteria are applied in the Schedule.	Provide a PRC plan that - Include modelling of the function of the final depression that demonstrates this feature is not a residual void and that it will not interact with groundwater post mining. - Provides all the design parameters for the final depressions and demonstrates these design parameters are suitable for retaining the feature and supporting a PMLU of grazing. - Models whether the depressions in the final landform are intended to capture and retain water on a long term basis (3 months). - If modelling indicates that water presence will be temporary, demonstrates that any ephemeral presence of water will not compromise the stability of the grazing PMLU.

		If the water capture within final depressions is intended to be temporary and ephemeral, further detail is required to demonstrate the stability of the PMLU including: - length of time water is modelled to remain in the depressions; - discussion of impacts associated with receding water, such as, impacts to underlying soil characteristics, development of bare areas with dispersive soils.	
7	Revegetation - reference / analogue sites PRCP Sections: 5. <i>Rehabilitation Goals, Table 11. Rehabilitation objectives, indicators and completion criteria</i> 8. <i>Risk assessment, and Table 19. Risk assessment for the Fairhill Coal Project for the post closure phase;</i> 9 <i>monitoring, and Table 20. Monitoring and maintenance schedule for Fairhill Coal Project;</i> and - PRCP Schedule milestone criteria e.g. e.g. RM6.3 vegetation type and density, RM6.5 presence of weeds and pest species,	It is noted that the Planning Part talks about using reference sites and Rehabilitation Milestones in the schedule refer to reference sites. However, important details of analogue/reference sites not provided e.g.: location and description, measured parameters, suitability of sites for measurement of milestone achievement etc. Without specific details being provided, the criteria are not specific or measurable, for example RM6.5 states “the presence of weeds and pest species is no greater than the prevalence on the reference sites”. However, the Rehabilitation Planning Part does not include details of the condition of the reference sites including weed presence, therefore, the criteria are not measurable.	Provide an updated Rehabilitation Planning Part that: - identifies the location and attributes of the reference sites and rehabilitation sites (vegetation types and density, weed presence, erosion soil loss rates etc); and - details the suitability of the reference sites and rehabilitation sites for developing rehabilitation milestone criteria for the proposed PMLU; and - details the evidence supporting the rehabilitation milestones and criteria in the PRCP Schedule.

	RM6.6 ground cover, RM7.3 erosion rates, RM7.9 vegetation cover types and density, RM 8.6 erosion.		
8	Final Landform Design PRC Plan Section 6.2. Landform Design; and Appendix M Mine closure plan	Final Landform Inconsistency The final landform design is not clear from information provided in the PRC plan and supporting information. There is inconsistency between the final landform cross-sections in Appendix M – Mine Closure Plan and Figure 22 of the PRCP: - Appendix M presents two depressions, but these are not clearly shown in the flood maps or consistently documented across PRCP figures. - The cross-sections in the PRCP (Figure 22, Page 73) are difficult to interpret due to unclear axis labels and resolution issues, making it unclear if the final landform complies with the EA's 25% slope requirement. - Some figures in Appendix M indicate a possible flood levee west of the pit, but this is not discussed in the PRCP rehabilitation criteria or final landform stability. The PRC plan is required to clearly demonstrate all the design parameters of the final landform, to ensure that the landform is safe, stable, non polluting and able to sustain the PMLU. Without further design specifications, the PCRCP Schedule cannot be developed to include appropriate, measurable criteria that will ensure achievement of the PMLU.	(a) Provide a PRC plan inclusive of a final landform design for the final landform, in accordance with PRCP Guideline requirements (b) Provide high-resolution final landform plans, including: - Contours at appropriate intervals. - Cross-sections with clear height labels. - Explicit depiction of all depressions/voids, ponded areas, and drainage paths. (c) Confirm if a flood protection levee is part of the final design and, if so, how: - Its function aligns with long-term landform stability. It meets EP Regulation 2019 requirements for final landform stability.
9	Final landform design – Land outcome document (LOD) PRC plan section 6.2. Landform Design; and Appendix M Mine Closure Plan	Inconsistent slope design Slopes in the final landform appear to exceed the pre-approved slope angle criteria in accordance with the EA and are not consistent with achieving a (sustainable) grazing PMLU. The current EA permits a maximum post-mining slope of 25% in the following areas: open cut depressions, in-pit dumping, and overburden dump.	Provide a PRC plan that is inclusive - of a final landform design with a maximum slope (%) that is consistent with the slope criteria approved in the EA. - or alternatively, if it is Futura's intent to seek approval of a

		The report provided as <i>Appendix M Mine Closure Plan</i> (report entitled “<i>Fairhill Coal Project Appendix C5 Mine Closure Plan</i>, Version 4), identifies in section 5.2 <i>Landform design and rehabilitation schedule</i> and in <i>Figure 7 Final landform</i>, that slopes in the final landform will be up to 30%. The PRC plan and schedule should propose a land outcome including criteria that are consistent with those identified in a land outcome document, in this case, the EA, in order to retain the transitional provisions. If it is the intent of the PRC plan to propose landform criteria different to those that are pre-approved, further information is requested to demonstrate how the landform criteria will achieve the same PMLU. Slope suitability for PMLU The PRC plan proposes slopes that exceed the criteria for agricultural land suitability assessment (LSA) of grazing. It should be noted that advice published by the Queensland Mine Rehabilitation Commissioner (QMRC), identifies class 3 slopes as being less than 20%, refer to Rehabilitated mined land suitability for beef cattle grazing in the Bowen Basin: Technical Paper, Table 10. Criteria used to differentiate subclass limitations for slope gradient. Further, the QMRC publications indicate that to achieve an acceptable grazing land use, land class should be assessed as class ≤3. On this basis, the PRC plan should demonstrate that consideration has been given to any limitations of the landform to support the PMLU of grazing, at the nominated slope angles (both 30% and 25%). The PRC plan should provide detailed discussion on whether other PMLU's have been considered that may be more achievable at either a 25% or 30% slope.	landform slope that is not supported by the rehabilitation criteria in the EA, provide all required supporting information to demonstrate the revised slope angle can achieve a PMLU of grazing. c) demonstrate that the proposed slope angle, whether at 25% or 30% will support the PMLU of grazing in consideration of published advice by the QMRC. This should consider alternative PMLU's which may be more readily achieved at the desired slope angles.
11	Landform design - erosion. PRCP section 6.2.4 <i>Achieving sustainable rates of soil loss (erosion).</i>	The PRCP does not provide a site-specific erosion assessment to demonstrate appropriate landform design and acceptable erosion rates over time. The design criteria for Tertiary and Permian slopes needs to be demonstrated by for example, modelling (e.g. WEPP) using site-specific measured input parameters. The PRCP Guideline Section 3.6.1 requires the final landform design to be based on the proposed PMLU and to demonstrate that the land will be safe and structurally stable. This should include consideration of soil types, including any pre-disposition to dispersive, erosion etc.	Provide an updated Rehabilitation Planning Part that addresses the requirements of section 3.6.1 of the PRCP guideline including: a) erosion assessments to determine landform heights, gradients, profiles, and material placement. b) slope profile design considering the interactions between soil erodibility, rainfall erosivity, landform height, gradient and vegetation cover to identify

			acceptable erosion rates over a long-term average.
12	Cover design PRC plan Section 6.3 and Appendix L - Cover design	The cover design provided in the Rehabilitation Planning Part does not address the requirements as per section 3.6.1 of the PRC plan guideline. The conceptual cover design proposed appears to be a “store-release” design for low-risk wastes. While this may be the case, the actual volumes of waste materials capable of posing an environmental risk have not been quantified or the level of AMD that may be produced. Therefore, the proposed cover design cannot be approved without more detailed understanding of the volumes of waste materials and potential to create environmental harm. This harm is not limited to AMD but should also address concerns of salinity and dispersion of the spoil materials (page 77 of PRCP). These concerns should not be restricted to for example capillary rise of salts but also to surface water runoff salinity in terms of impacts to receiving waters and soil types at runoff deposition locations. For example, if the runoff water is Na-rich will this impact the downstream soil chemistry by increasing exchangeable Na, hence ESP and ultimately dispersion index.	Provide an updated Rehabilitation Planning Part that addresses the requirements of section 3.6.1 of the PRCP guideline for cover design, including consideration of: a) volume of waste/spoil to be managed; b) Waste/spoil characteristics and potential for acid, saline or neutral metalliferous drainage; c) Potential impacts of surface water run-off, including direct and indirect impacts to receiving waters or on soil chemistry; d) Capillary rise and potential effects on soil properties/vegetation cover.
13	Mine Waste Characterisation PRC plan Section 6.4. Mine Waste Geochemistry and Appendix E Overburden and Potential Coal Reject Characterisation Report by Northern Resource Consultants (NRC, 2018).	It has not been demonstrated that the mine waste characterisation is applicable to the site. The PRC plan states that geochemical characterisation is based on analyses undertaken on nearby sites is used as an assessment of drainage quality. While this may be true, the conclusions should be based on a statistical comparison confirming that the materials on Fairhill site are not statistically different from those of the surrounding geology/mines. Alternately, verification by an external AQP can be used to confirm the geology and associated waste characteristics. The geochemical characterisation was performed on an additional 27 samples – it is unknown if this sampling number is sufficient to describe the geology spatial and depth heterogeneity. This would be supported if the geology at Fairhill and the surrounding mines are the same and the geochemical characteristics are also the same (confirmed statistically or by an external AQP).	Provide a PRC plan inclusive of waste characterisation carried out in accordance with section 6.1 of the PRCP guideline and is demonstrated to be applicable to the site.

		Table 3 provides limited information on the sampling of the 27 samples. The associated lithology/geology should also be provided to demonstrate specific geochemistry for individual materials. Section 6 Assessment of saline drainage states a soil:solution ratio of 1:5 was used as a guide to saline drainage. Section 2.1 states a ratio of 1:2 as per the AMIRA ARD Test Handbook. The use of 1:5 would both dilute the elemental concentration relative to 1:2 (or a saturated paste extract) and may cause dissolution of some precipitates. This point regarding soil:solution ratio and use as an indicator of saline drainage requires some minor revision for clarity. The study concluded that “Based on the above-mentioned assessments, it is very unlikely that there will be any runoff or seepage that will adversely impact the surrounding receiving environment. During the next stages of development and mining, further investigations should take place.” This is not a valid conclusion for the long term and can only be confirmed with site-specific sampling and analysis of extracted materials that will be remain onsite in final landforms. This further implies the proposed cover system design cannot be confirmed until the environmental risk of all final landforms has been assessed.	
14	Revegetation PRC plan Section 6.10 Revegetation	The Rehabilitation Planning Part does not provide sufficient detail about revegetation to demonstrate how a stable PMLU of grazing will be achieved. Section 6.10 of the PRC plan provides a general overview of rehabilitation objectives, flora species that might be used and generic soil amelioration methods. However, it does not clearly articulate specific revegetation objectives that are consistent with the PMLU, and rehabilitation milestones identified in the PRCP schedule. There is no description of works required to establish and manage the revegetation, including site preparation, specific ameliorants required and timing/scheduling of the works. For example: Section 6.10.2. <i>Key Flora Species</i> states “Species used in pasture revegetation will be 3P grasses (i.e., grasses that are perennial, productive, and palatable). These species are also suitable for the soil types that will be used as part of topsoil cover. The species selection includes a mixture of native and cover crop grasses and native tree species for shade”. However, a final species list has not been included.	Provide a PRC plan that is inclusive of revegetation in accordance with requirements of s.3.6.1 of the PRCP Guideline, proposing activities that will establish self-sustaining vegetation communities appropriate to the grazing PMLU, including for example, identification of: a) the plant/seed mixes that will be used, seed density application rate and timing of seeding, works for establishing the vegetation. b) protection (fencing out of stock, monitoring and maintenance criteria. c) criteria for self-sustaining final vegetation cover (species,

			density, % cover, weed presence and erosion criteria etc).
PRCP Schedule			
15	Milestone criteria generally	A significant number of the criteria proposed in the schedule do not meet SMART principles and do not include many aspects required to demonstrate a stable condition has been achieved. Unless specific details are provided about what is being measured and what must be achieved, the criteria aren't measurable.	Revise each criterion to ensure they meet SMART principles, meaning they are: • Specific—it is clear what must be done. • Measurable—it must be possible to know when it has been achieved. • Achievable—it is capable of being achieved. • Reasonable/relevant—there is a clear connection between the milestone and the desired outcomes. The requirement is reasonable. • Time Specific—it is clear when the milestone will be completed. have been incorporated. Note. The department is seeking to establish measurable criteria and recommends that you review already approved PRCP Schedules to see examples. Approved PRC plans are available from the Public Register via the following link progressive rehabilitation and closure plan information.
16	RM5.1, RM6.1	Vegetation species and seeding rates have not been included. Therefore, the criteria are not specific or measurable. RM5.1 currently states "Pasture species mix sown at appropriate rate". RM6.1 currently states "Vegetation type and density are of species suited to the site's characteristics including soil type, topography and climate".	Provide an updated PRCP Schedule including:

			• SMART Criteria for vegetation species and seeding rates, appropriate to the grazing PMLU. • SMART Criteria for vegetation type and density, appropriate to the grazing PMLU.
17	RM7.3	SMART erosion criteria have not been provided. Erosion criteria are required to demonstrate that land is stable and non-polluting. The requirement to have similar erosion rates on the post-mining landform similar to that of reference sites cannot be measured, as no reference site details (including the details of erosion present) are provided.	Provide an updated PRCP Schedule to include SMART erosion criteria. This should include details of types of erosion (rill, gully, sheet etc), how this will be measured, and acceptable levels (severity) of erosion (to ensure long term stability of the landform).
18	RM7.8	Groundwater monitoring criteria is lacking details on locations, frequency, CoC and limits. Therefore, the criteria are not measurable. That is, the criterion currently states “No significant decline in groundwater quality has occurred relative to historic (background) groundwater quality”.	Provide an updated PRCP Schedule with SMART groundwater criteria. This should include groundwater monitoring locations, monitoring frequency, quality characteristics and limits.