

Minerals Business Centre

PO Box 7230

Cairns QLD 4870

EPML00349813 PRC Plan NPM Actions

To whom it may concern,

In response to your letter dated 14/11/2024, please see the following table that outlines the actions completed.

Action(s)	
Provide a proposed PRC plan that includes 'Groundwater levels and properties' as required by section 3.1 of the PRCP Guideline.	Groundwater level and quality properties and discussing included in Section 7.1.3 discussion and table of average and range included in section 7.1.3. Graphs showing historical water level added in S7.1.3.
Provide a proposed PRC plan that includes a Community Consultation Plan and Register pursuant to section 3.5 of the PRCP Guideline.	Available consultation records included in Section 3.1.3, and documents included in appendix
Provide an updated Rehabilitation Planning Part that includes specific details of engagement for the following: <u>Completed consultation</u> - Community engagement records beginning 2005, or earlier - Consultation relating to the Environmental Studies Report - Engagement relating to the success of rehabilitation - The retention of fire trail - The final landform and proposed PMLU's of Fire trail and Native Ecosystem.	Section 3.2 – Consultation Plan updated to include further description of the objectives of the community consultation plan as well as format and frequency of the proposed consultation.

Action(s)	
The consultation register should also include an appendix of all emails, letters, meeting notes and other correspondence between Sibelco and relevant stakeholders, to support the summary provided in Table 13. Consultation register of the PRC plan. <u>Future consultation</u> • A description of the objectives for the community consultation plan • Proposed consultation frequency • Specific details and samples of the information to be provided during community consultation (Table 12 – Stakeholder and community engagement) Details of how feedback/comments will be considered.	
<u>A soil and capping material assessment</u> Provide a soil material assessment that complies with section 3.6.1 of the PRCP guideline and includes: • details on the quantity of material required for all rehabilitation activities reasonably considered required until closure • details on the quality and quantity of available resources (such as topsoil, clay material and competent rock) required to complete the rehabilitation • details on the location (i.e. with respect to haul distance) and accessibility of material (i.e. is the material located on the tenure or are other approvals required?) • an assessment to determine the need for ameliorants and	<u>Section 7.3.1 – Updated to accurately reflect current topsoil requirements, availability, quality and suitability for rehabilitation within the Glass project.</u>

Action(s)	
fertilisers • details on the relationship between soils and vegetation ecosystems for the PMLU and rehabilitation methodology.	
<u>A final landform design</u> The final landform design must be based on the proposed PMLUs and demonstrate that the land will be safe and structurally stable. The final landform design must include the requirements detailed in section 3.6.1 and 3.6.3 of the PRCP guideline specifically: • Structure location, footprint, and height • Assessment of lining and seepage control • Differentiation between water- retaining and water-shedding designs • Identification of appropriate rehabilitation materials • Detailed slope profile and erosion assessments. Additionally, consideration of wind erosion should be addressed.	Details included in Section 7.5 for: • final landform location, Ha and min/max level of the constructed landform. • lining and/or seepage controls – not being required • discussion on water shedding / water retaining nature of sand • Discussion on material available for rehabilitation – sand and its suitability for rehabilitation. • discussion on wind erosion – dune aspect and wind fencing to minimize wind erosion.

Action(s)	
Provide a void closure plan that complies with section 3.6.3 of the PRCP guideline. Provide further detail in relation to the voids' potential to hold water and how this could affect the rehabilitation efforts and support PMLU determination of native ecosystem, given this. Update the PRC plan to correctly reference relevant documents and appendices.	Included further discussion in section 7.11 regarding • Depression size and discussion on minimizing size included in section 7.11 • The groundwater model and interactions between groundwater and the surface. • The rehabilitation of the 2 depressions.
<u>Infrastructure to be decommissioned</u> Include details of all infrastructure that will be decommissioned and the methods for decommissioning. <u>Evidence of agreement</u> Provide an updated Rehabilitation Planning Part that includes clear and contemporary information and a landholder agreement that is consistent with the PRCP schedule and PRC plan and meets the requirements of section 3.6.5 of the PRCP guideline. The agreement should itemise and provide maps of infrastructure that will be retained by the landholder <u>Infrastructure that will remain post rehabilitation and ongoing maintenance requirements</u> Provide details of rehabilitation and maintenance requirements for infrastructure to be retained. Update Table 26 of the PRC plan to remove the reference relating to the Landholder's responsibility.	7.14.1 – updated current list of remaining infrastructure and included discussion on existing landholder agreement 7.14.2 – Updated to include decommissioning and removal of workshop / bore 2 and piezo in 7064. As well as decommissioning and removal process of infrastructure still to be removed. 7.14.3 – Included retained infrastructure maintenance requirements

Action(s)	
Provide advice on the status of the testing that was proposed to be carried out to determine the extent of residual contamination.	Sibelco has commenced a Preliminary Site Investigation (PSI) to determine potential areas of concern and develop a plan to test and assess those areas. This is pending finalisation of the maintenance workshop plan.
Provide updated maps that have been prepared in accordance with the spatial submission guideline. Update the PRC plan to correctly reference relevant documents and appendices.	Final Site Design Map has been updated to remove the name of the landowner. flood assessment overlay (inset) map has been updated to include the location of tenure. The maps have been updated with different colouring. Please note: The Final Site Design Map and the Reference Map were prepared in accordance with the examples provided in Appendix 2, of the Statutory Guideline Progressive Rehabilitation and Closure Plan, which do not include grid coordinates or central coordinates within each polygon. SAPL notes that there are approved PRCP's on the register such as PRCP_EPML00982013_V1 and PRCP_EPML00319713_V1 that do not contain grid coordinates or central coordinates within each polygon for these maps. However, the maps have been amended to include grid coordinates and central coordinates for each polygon. PRCP document referencing has been amended.

Action(s)	
the PRC plan to correct the statement that “...<i>the access tracks will be the Landholder’s responsibility after the ML expires</i>”. Revise the PRC plan to detail all infrastructure and its status (i.e. removed from site/landholder retainment). This information must be consistent with the spatial information provided for each RA. This information must also be consistent with the EA. Ensure the relevant activities are consistent with the relevant activities identified pursuant to section 3.1 of the PRCP guideline. Update the PRCP schedule to: • Detail all infrastructure requiring removal (i.e. decommission boreholes/cap bores). This information must be consistent with the spatial information provided for each RA. • Include milestones relevant to account for relevant landform works required to achieve a stable condition for the land. • Include any rehabilitation/ongoing maintenance requirements. • Include rehabilitation for where landholder retention has not yet been confirmed. Provide advice on the infrastructure is not specifically listed in the EA and which domain it is attributed to within the EA.	Risk assessment updated to remove landholder responsibility and include current landholder responsibility until the lease is surrendered. The PRCP and schedule has been updated to more accurately reflect the current status of RA2, as such the Plan and Schedule now include Rehabilitation Areas RA2a, Rab and RA2c Note: maintenance of erosion is considered part of maintenance and monitoring of already rehabilitated land as noted in the risk assessment.
Provide advice on the inconsistency and provide updated spatial information in accordance with the guideline – ‘Spatial Information Submission’ (ESR/2018/43372).	The discrepancies regarding the area of rehabilitation have been rectified, and the spatial files for this PRCP align with the spatial files for the recently approved ERC and the current Annual Return for the EA. Attachment 1 of the PRCP application form lists the following as required for the spatial information submission • the location and maximum extent of disturbance footprint for the mine life

Action(s)	
	- 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). Mine voids are not listed as a required line item for the PRCP spatial information submission. The mined voids have been rehabilitated to native ecosystem under an existing EA and have therefore been included into the existing rehabilitation category. The relevant activities that are to be carried out are monitoring and maintenance of the existing rehabilitation, the same activities that are associated with all other existing rehabilitation. The water extraction bores are located within the maximum extent of disturbance footprint and are generally stored as point files, due to the minute area of disturbance and have previously been submitted as part of the ERC spatial submission for point files. The PRCP spatial file submission asks for polygon shapefiles only, however, polygon features using a 0.5m buffer have been created around the water extraction bores and included in the spatial re-submission.
Identify and take relevant actions to rectify the EA in consultation with the administering authority if an amendment to the EA to include an accurate mine area is required.	Originally the project and tenure for the EA (previously owned and operated by ACI operations PTY LTD under EA.M2884,) comprised of ML1124 at 247.1Ha, ML7064 at 52.9Ha and ML1132 at 485.6 Ha – totaling 785.6Ha (see <i>Section 2 Description of Mining Tenures and Table 1 Mining Lease Details</i> from 2002 EMOS). The EMOS states that approvals had been given to mine 210ha of ML1124, 38Ha of ML7064 and 380Ha of ML1132, totaling a maximum disturbance footprint of 628Ha. 628Ha is the total of the individual disturbance types listed in <i>Schedule F- Table 1 (Final land use and rehabilitation approval schedule)</i>. After two partial relinquishments of ML1124 and ML7064 and complete relinquishment of ML1132, the total maximum extent of disturbance within the remaining EA area is just 96.7Ha. Updating Schedule F - table 1 appears to have been an oversight at each of the above mentioned relinquishments and Sibelco notes that all disturbance types in Table 1 will need to be reviewed and updated where required. The ‘mine area’ is the Rehabilitated area and the attribute data in the spatial file has been amended accordingly.

Kind Regards

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

Stephen Kendall
SSE – North Stradbroke Island
Sibelco Australia Pty Ltd