

16 February 2024



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Petra Stephenson
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Department of Environment Science and Innovation

By Email: ESCairns@des.qld.gov.au
CC: petra.stephenson@des.qld.gov.au

Dear Petra,

**RE: MGT Minerals EA EPVL00864413
PRC Plan and Schedule Application
Response to Information Request**

Thank you for your letter dated 14 April 2023, requesting additional information to assess the PRC Plan for MGT Minerals Pty Ltd, lodged on 2 March 2023. Please be aware, that as of 31 January 2024, MGT Minerals underwent a name change and is now operating as Huntore Australia Pty Ltd. Their ABN/ACN, locations and contact information remain the same. As EA EPVL00864413 remains in MGT Minerals' name at this time, we have not amended references to this throughout the PRC Plan documentation for the purposes of responding to the information request.

On behalf of our client, I enclose;

1. Table 1 – Response to Information Request – included with this letter
2. PRC Plan Part A (text and figures)
3. PRC Plan Part B – PRCP schedule
4. PRC Plan Part B Appendix 2
5. PRC Plan Part B Appendix 3
6. PRC Plan Part B Appendix 4.
7. PRC Plan Part B Appendix 5
8. PRC Plan Part B Appendix 6
9. PRC Plan Part B Appendix 7
10. PRC Plan Part B Appendix 8
11. PRC Plan Part B Appendix 9
12. Rehabilitation Area Plan figure
13. PMLU Plan Figure

Due to file size, Items 1 to 13 have been sent across 4 emails.

Please let me know if you have any problems receiving or accessing this information.

The updated digital data (shapefiles) has been lodged separately to spatialssubmit@des.qld.gov.au.

Note that Appendix 5 and 6 are locked documents by the authors, and so I could not insert a cover page on these documents.

Should the Department have any questions or require any further information, please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in blue ink, appearing to be 'RD' with a stylized flourish underneath.

Richard Davis

Director / Group Manager (Environmental Science and Assessment)

Ardent Group Pty Ltd

Table 1 – Response to Information Request



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Table 1 – Information Request Response Table

Item	Relevant section (proposed PRC plan and/or PRCP Guideline)	DES Matter	DES Request	Information	MGT Response
Rehabilitation Planning Part					
1	Flooding (section 3.1.5, 8.2 and figure 12 of the PRC Plan)	The Rehabilitation Planning Part and appendices do not provide information regarding erosion protection measures to ensure the TSF is not affected by flood flow either at the toe of the embankment or at the spillway. This information is required to demonstrate the remaining structures, particularly the embankment adjacent to the TSF and the reshaped old/existing TSF will remain stable during a range of flood events including probable maximum flood.	Provide a revised PRC Plan that includes information required under the heading Flooding in section 3.6.1 of the PRCP Guideline including maximum velocity and depth for a range of flood levels including PMF.		Refer to updated section 3.1.5 in the PRC Plan report. The flood modelling information provided with the 2018 EA amendment was considered sufficient for DES and the Land Court to decide if the landform was stable and therefore approve the design in 2020. This flood model included scenarios up to and including the 0.1 AEP event (i.e. 1 in 1000 year flood). MGT is therefore relying on this information, previously accepted by DES as sufficient, to address this section. In detail, the flood model for the 0.1 AEP event (i.e. 1 in 1000-year flood) predicted the flood height of 730m AHD in Males Gully, downhill from the New TSF. The design of the New TSF is for the toe of the embankment to be at 740m AHD. There is no flood scenario, that could be imagined, where the height of water in Males Gully would be a full 10m above the 1 in 1000-year flood event. For this reason, the design of the New TSF is considered to be unaffected by flood flow in Males Gully. The reshaped old TSF will not include any remaining structures that may be adversely affected by flooding. The land will be recontoured to match existing, subsoil and topsoil replaced and revegetated. The stability of the area will be the same as undisturbed areas upstream and downstream.

Item	Relevant section (proposed PRC plan and/or PRCP Guideline)	DES Matter	DES Request Information	MGT Response
Rehabilitation Planning Part				
			Provide information regarding how landforms will be rehabilitated to achieve a stable condition including during PMF flood events.	As demonstrated in the flood model results and as described above, there are no MGT infrastructure elements that will remain in the landscape after rehabilitation, that require flood protection. The Existing (Old) TSF will be re-contoured to achieve a landform that matches the pre disturbance gully. This landform has evolved over thousands of years to match the precipitation, flow and flooding in Males Gully. It is therefore reasonable to expect the landform to be stable under future flood scenarios, and that no additional controls are necessary.
2	Hydrogeology (section 3.1.6 and 8.1 of the PRC Plan)	The water quality data provided in the Rehabilitation Planning Part relates to dissolved data. However, stock water limits which are based off total fraction have been used to demonstrate the onsite water quality is compatible with a PMLU of grazing. Table 15 does not provide the Hydrostratigraphic Unit for bores SB1-SB5.	Update the PRC Plan to include the hydrographic units for all bores...	Table 15 of the PRC Plan has been completed to include the hydro stratigraphic units for all bores.

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Rehabilitation Planning Part				
		The rehabilitation planning part states that ongoing water quality monitoring will occur in accordance with the conditions of the EA. Additional information is required to justify if the current EA monitoring requirements which are based on an operational mine are suitable for ongoing monitoring to determine rehabilitation success, including water quality limits, location and monitoring frequency. Particularly, in the area downstream of the old TSF.	...and if applicable, include measurable criteria in the PRCP Schedule relating to ongoing surface and groundwater monitoring including: - Water quality - location of monitoring points - monitoring frequency. Include total and dissolved water quality data.	The water quality objectives and compliance limits conditioned in the EA are more stringent than the corresponding stock watering guidelines, and as such these have been selected for monitoring during the rehabilitation phase and following its completion. The PRCP schedule has been updated to include SW and GW monitoring as per the EA. Refer to Rehabilitation Milestone 7 which states: 8. Surface water quality monitored monthly during flow at, but not limited to, downstream locations specified in Table X must not exceed the limits in Table X, for a minimum of 2 consecutive years. 9. If the surface water quality exceeds criteria 8 above, the applicable reference site must be compared to the downstream site result; and quality measured at a downstream site must be equal to or less than the quality measured at the applicable reference site. 10. For a minimum of 2 consecutive years groundwater must be monitored quarterly at, but not limited to, compliance bores specified in Table X, for all quality characteristics listed in Table X. 11. Groundwater quality results must not exceed the limits in Table X, for three consecutive results. Tables 9, 10 and 12 of the PRC Plan have been updated to include total and dissolved water quality criteria.

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Rehabilitation Planning Part				
3	Landform Design (section 8.6, figure 30 and appendix 4 of the PRC Plan)	The Rehabilitation Planning Part provides conflicting information regarding the design of the toe of the tailings storage facility (TSF). Figure 30 and Appendix 4 show the external embankment and the lower embankment forming a single pond. However, Figure 10 and the Environmental Authority (EA) EPVL00864413 show a different design for this area that includes a new embankment and two ponds. The Rehabilitation Planning Part does not describe how the final landform in Figure 30 and Appendix 4 relates to the approved landform in the EA.	Provide an updated PRC Plan that reflects the TSF landform authorised by the EA. Alternatively, provide an updated PRC Plan that describes how the final landform is the same or substantially similar to the landform authorised by the EA.	During the PRC Plan process, it has been discovered that the approved area for the New TSF in the EA only reflects the Stage 1 TSF Design (embankment crest 756.7m AHD) (Golder 2018). Discussions are being held with DES to determine a pathway to amend the EA to reflect the full Stage 2 TSF disturbance area that was described in the 2018 EA amendment. In the interim MGT has amended the TSF design and disturbance area described in this PRC Plan to reflect the Stage 1 TSF design that is described in EA table A1 and disturbance area in EA Map 1. Note that this EA Map 1 needs to be replaced by the original disturbance area approved in the 2020 EA. An administrative error has seen the disturbance area in the current EA reflect the ERC disturbance area. This amendment is also the subject of current discussions with DES. The Stage 1 TSF Design was updated and described in the report by Golder, November 2021, which is included as Appendix 8 of the PRC Plan. Stage 1 crest elevation in the 2021 design is 750.0m AHD. This design update included specific design and construction details, consequence category assessment and seepage modelling. The following parts of the PRC Plan are updated to reflect the full disturbance area approved in the EA; Figure 28, Figure 30 and Figure 31.

Item	Relevant section (proposed PRC plan and/or PRCP Guideline)	DES Matter	DES Request Information	MGT Response
Rehabilitation Planning Part				
		Figure 5 of Appendix 5 Shows the proposed final landform for the Summerhill pit that includes batters of 48 – 57 degrees with small benches to achieve geotechnical stability. It is not clear that this landform will be able to sustain the nominated PMLU of grazing.	Provide an updated PRC Plan that includes further information demonstrating how the proposed landforms will achieve a stable condition including supporting the PMLU of grazing or justifies how the landform remains suitable for the broader grazing land use.	The design of Summerhill Pit, rehabilitation landform and rehabilitation plan was proposed by MGT and approved by DES in an EA amendment on 22 July 2022. This design was considered suitable by DES within the last 12 months and so we are concerned that the design is now being questioned. Since the lodgement of the PRC Plan, additional assessment by MGT has seen the Summerhill Pit removed from the MGT Mine Plan. As such, MGT does not consider it fair or reasonable to spend additional time or resources on a geotechnical study of this landform. Should the mine plan be amended at some future time, then appropriate geotechnical work can be undertaken to demonstrate the design is safe and stable for the post mining land use. This requirement has been included as a Milestone Criteria under RM3 in Table 24. The suitability of this landform for the PMLU of grazing has been further elaborated in 8.6.
		Similarly, the external embankment slope of the TSF is proposed 1V to 2.5H and will be rock mulched. It is unclear how this part of the landform will be suitable	(From above)	The outer embankment of the new TSF requires rock mulching for erosion protection and stability. This portion will not support grazing, however the majority of the rehabilitated TSF landform will. The suitability of this landform for the PMLU of grazing has been further elaborated in section 8.6.

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Rehabilitation Planning Part				
		for the proposed PMLU of grazing.		

4	Water Management (section 8.8 and appendix 6, section 13.7.2 of the PRC Plan)	Section 13.7.2 of Appendix 6 indicates that the TSF will cause seepage to the groundwater both during operation and once tailings have been consolidated. Condition E7 of the EA states contaminants must not be released to groundwater. Further, condition G28 of the EA requires a liner to prevent seepage.	Provide an updated Rehabilitation Planning Part that includes detailed information regarding the TSF demonstrating the structure will be/is lined in accordance with the requirements of the EA and the landform will achieve a stable condition including being non-polluting.	MGT was directed by DES in April 2021 to provide an updated Tailings Dam Design that demonstrated that a liner was part of the design and consequently modelling of seepage to demonstrate that the relevant EA conditions would be met. Initially this direction was via draft EPO notice issued, which was then formalised in a letter of undertaking from MGT to DES on 21 April 2021. This design report (prepared by Golder) was provided by MGT to DES on 10 November 2021 to satisfy the written requirement to provide such information. DES provided feedback on the design (including the seepage modelling) and the design report was updated to address the items raised. The amended report was provided to DES on 12 November 2021, who then provided additional feedback on 22 November 2021. This final design report was provided to DES on 14 December 2021. This design report (Golder 21465876-009-R-Rev 2, 29 November 2021) is included in Appendix 7 of the PRC Plan. No further feedback or correspondence from DES was received, which MGT took to indicate that the design (including the results of the seepage assessment) was accepted by DES as satisfying the Formal Undertaking and also the EA requirements. In addition, this design report was also lodged to support an EA amendment application on 7 December 2021. This design report was accepted, and the EA amendment approved on 21 January 2022. It is of concern to MGT if the DES is not satisfied with a design that was provided and accepted by DES less than 2 years ago. <u>Seepage assessment</u> With regards to the seepage assessment provided in section 12 and 13 of the Golder Design Report it should be noted that; 1. Section 17.7.2 of the Design Report did NOT say that seepage will affect groundwater, it stated a seepage flux modelled at the base of the deposited tailings.
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				2. A HDPE liner, permeability 10^{-12} is to be installed on the TSF embankment internal wall to the full height of the embankment and in the base of the TSF at the location maximum pore water pressure (as per the design report). 3. The HDPE liner is keyed into fresh bedrock as per Figure 17 in the Design Report 4. Extensive site-specific assessment of the geology has resulted in the following relevant hydraulic parameters for the seepage model. <table><tr><th>Material Type</th><th>Saturated Hydraulic Conductivity (m/s)</th></tr><tr><td>Tailings – as deposited</td><td>4×10^{-7}</td></tr><tr><td>Tailings - consolidated</td><td>1×10^{-9}</td></tr><tr><td>HDPE Liner</td><td>1×10^{-12}</td></tr><tr><td>Weathered Arenite</td><td>1.2×10^{-6}</td></tr><tr><td>Fresh Arenite</td><td>2.9×10^{-8}</td></tr></table> 5. Groundwater within the fresh arenite below the TSF footprint is at least 20m below the ground surface (based on extensive drilling in the area by MGT, for example MB13 drilling results). 6. With reference to the model section Figure 20 in the Design Report, any seepage from the base of the consolidated tailings will flow downhill within the thin weathered arenite zone. This is because the weathered zone permeability is higher than the fresh arenite (by at least two orders of magnitude). Water will flow along the easiest path, downhill, within the weathered arenite. 7. At the point where seepage in the weathered arenite encounters the installed HDPE Liner (hydraulic conductivity 1×10^{-12}) keyed into fresh arenite, the seepage will be contained within the lined part of the tailings dam. 8. For additional seepage management, should any seepage continue downhill in the weathered material, it will encounter the HDPE liner that is keyed into fresh arenite at the base of the TSF embankment. This will contain any seepage to the tailings dam. 9. Note that because of the scale of Figure 20, the keying in of the HDPE liner is not illustrated, but it is clearly described in the design report.	Material Type	Saturated Hydraulic Conductivity (m/s)	Tailings – as deposited	4×10^{-7}	Tailings - consolidated	1×10^{-9}	HDPE Liner	1×10^{-12}	Weathered Arenite	1.2×10^{-6}	Fresh Arenite	2.9×10^{-8}
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Rehabilitation Planning Part				
				10. As a further safeguard, should seepage move beyond the above two HDPE liner locations, within the weathered arenite, seepage detection and recovery bores have been installed by MGT around the base of the embankment perimeter. These bores have been installed and baseline monitoring (pre tailings) commenced over 12 months ago. 11. The liner and seepage detection system described above both of the above satisfy EA condition G28. Based on the Golder Design Report as accepted by DES, included with the PRC Plan, and the above additional explanation it is concluded that the EA condition E7 (<i>must not release contaminants to groundwater</i>) has been met by this design.

Item	Relevant section (proposed PRC plan and/or PRCP Guideline)	DES Matter	DES Request Information	MGT Response
Rehabilitation Planning Part				
		The TSF design shown in Appendix 4 may result in water ponding between the toe of the tailings embankment and the outer embankment. Should water pond in this location it appears there is the potential to cause inundation of the tailings above the liner. The inundation of tailings could result in the leaching of contaminants from the tailings into the water ponded between the embankments. Consequently, it is possible this water will not be suitable for stock consumption.	Provide an updated Rehabilitation Planning Part that clearly indicates whether the TSF landform will retain water and how the landform will be rehabilitated to achieve a stable condition.	This is a detailed design issue. It would never be intended for water to pond at the base of a tailings dam in an uncontrolled manner. The TSF design described in the amended PRC Plan now includes the settling pond at the downhill side of the TSF embankment. Figure 28 has been updated to illustrate the backfilling of the settling pond to create a free draining upper surface, during rehabilitation.

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Rehabilitation Planning Part				
		Section 7.3 states that drainage diversions will be permanently established. The Rehabilitation Planning Part does not provide information regarding the location, function or design of the proposed drainage diversions. Diversions will be necessary to prevent surface water flow impacting rehabilitated areas (such as the TSF and Summerhill Pit) so a stable condition will be achieved.	Provide an updated Rehabilitation Planning Part that includes information regarding surface water flow on the rehabilitated site including the location of diversions and drainage infrastructure that will remain in the final landform.	The drainage diversion around new TSF is part of the design, established during construction and maintained throughout the life of mine and retained during rehabilitation. No drainage diversion is planned around Summerhill Pit as it is located at the top of a slope. Dalcouth Pit is planned to be backfilled above surface level, so no drainage diversion is necessary around this area. The locations of retained surface water management infrastructure are shown in Figure 35 and described in section 8.8.6.
		It is noted that a milestone criterion of “drainage meets design criteria” has been included the schedule but the design criteria and the basis for them has not been provided.	Provide milestone criteria that reflect the drainage design criteria to be implemented to ensure the landforms achieve a stable condition.	Design criteria subject to engineering design, which will be developed prior to commencement of rehabilitation works. Additional milestone criteria included in RM3 to reflect this.

Item	Relevant section (proposed PRC plan and/or PRCP Guideline)	DES Matter	DES Request Information	MGT Response
Rehabilitation Planning Part				
5	Cover system (section 8.7 of the PRC Plan)	The Rehabilitation Planning Part indicates that some waste rock material will remain within the WRD footprint area and a cover system has been proposed. The cover system proposes a minimum of 0.15m of topsoil over compacted rock. Similarly, the proposed cover system for the TSF includes 0.15m of topsoil over 0.4m capillary break layer. In both cases, no subsoil is proposed to be applied between the rock and the topsoil. Consequently, limited vegetation cover is likely on both landforms without deeper growth media. This is likely to hinder the establishment,	Provide an updated Rehabilitation Planning Part that includes: • Further information demonstrating the proposed minimum depth of topsoil is sufficient to achieve a stable condition and sustain the PMLU. • Further information regarding the management, treatment and specification for each type of cover material to ensure the landform will achieve a stable condition.	Section 3.1.7 of the PRC Plan has been updated with further information from the 2018 topsoil assessment. The reported outcome of the topsoil assessment was that the existing median soil depth is 0.15m. Therefore, the proposed topsoil thickness is considered sufficient to re-establish the existing vegetation and land use. Updated sections 3.1.7, 7.1, 7.3, 8.7 and 10. Corresponding section of PRCP schedule updated. The PRCP Schedule has been updated to include additional criteria relating to the capping/cover system.

Item	Relevant section (proposed PRC plan and/or PRCP Guideline)	DES Matter	DES Request	Information	MGT Response
Rehabilitation Planning Part					
		and sustaining, of the proposed grazing PMLU. It is noted that clay subsoil on site is sodic and is proposed to be used for the compacted clay layer of the TSF cover system. Criteria including the assessment of subsoil and the application of ameliorants according to AQP recommendations are likely to be required to ensure the material is suitable. A specific compaction rate is not provided in the Rehabilitation Planning Part or in the PRCP schedule. Further, a nominal minimum and maximum size fraction has not been provided for the capillary break layer. Without			

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Rehabilitation Planning Part				
		sufficient sized rock to ensure capillary break is achieved, it is possible contaminants and salts may rise through the cover system and impact vegetation sustainability.		
6	Revegetation (section 8.9 of the PRC Plan)	This section provides information regarding the proposed species for revegetation. However, it is unclear how the proposed species will be appropriate for the existing TSF and reflect the PMLU for the rehabilitation area. Further it is unclear how the criteria consider the potential for inundation and ponding in the existing TSF. Section 8.9.1 indicates that analogue sites are recommended for the assessment of the	Provide an updated PRC Plan that includes: - further information regarding how the existing TSF will be rehabilitated, - how the species proposed will sustain the PMLU regardless of the level of inundation, and	The rehabilitation of the existing TSF includes <i>return to former flow regime</i>. Figure 3 in Appendix 5 demonstrates that the existing TSF will be free-draining and therefore no ponding will occur. No inundation will occur as per above. As per above.

Item	Relevant section (proposed PRC plan and/or PRCP Guideline)	DES Matter	DES Request Information	MGT Response
Rehabilitation Planning Part				
		success of rehabilitation activities. However, there is no information describing the location and suitability of these analogue sites. If analogue sites are to be used as a measure for rehabilitation success in the milestone criteria of the PRCP Schedule detailed information is required in the rehabilitation planning part regarding the suitability of these locations.	criteria for the existing TSF that consider the potential for inundation and include relevant species. If analogue sites are proposed to be used as a measure for rehabilitation success provide an update PRC Plan which identify the specific sites and include location data, description and justification of the suitability of the site.	Analogue sites may be required for the assessment of the success of the rehabilitation activities. Milestone RM5-1 provides for the revegetation strategy to be reviewed by an AQP for suitability, including selection of suitable analogue sites and corresponding monitoring sites if recommended.
7	Built infrastructure (Section 8.13 of the PRC plan)	Section 8.13 states that third party infrastructure exists on the site (powerline and communication tower). Section 3.2 of the PRCP Guideline states that it is not the intention of the	Provide an updated PRC Plan that clarifies third party infrastructure at the Project and remove these from the rehabilitation area if applicable.	The PRC Plan has been updated (section 8.13 and Figures 30 and 31) to clarify that third party infrastructure is not part of the PRC Plan.

Item	Relevant section (proposed PRC plan and/or PRCP Guideline)	DES Matter	DES Request Information	MGT Response
Rehabilitation Planning Part				
		definition of PMLU to include third-party activities or assets that continue to exist once mining activities have ceased, such as third party pipeline easements, power easements or overlapping tenures for other EAs.		
8	Risk Assessment (section 9 of the PRC plan)	The risk assessment discusses the consequence of the PMLU not being achieved but does not discuss the consequences of the rehabilitation milestones not being achieved particularly due to the short timeframes within the PRCP schedule. For example, what are the consequences of a weather event impacting the ability to undertake the milestone within the specified timeframe.	Provide an updated risk assessment in the PRC Plan that includes an analysis of risks that may impact the ability to achieve the rehabilitation milestones within the specified timeframes.	The timeframes proposed for rehabilitation are not unreasonably short given the relatively small rehabilitation areas, location and the revegetation works proposed. Considering the final landform design and water management structures proposed, along with the natural topography, the rehabilitation areas should not be subject to flood impact. Prolonged wet weather and drought impacts have been considered with respect to delays in revegetation success, and section 9 has been updated accordingly.

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Rehabilitation Planning Part				
		The PRCP guideline states that the purpose of the risk assessment is analysis of the potential consequences, cascade and cumulative effects. The objective is to create a comprehensive list of risks based on events, which may impede, enhance, delay or accelerate the rehabilitation of land to a stable condition. The Schedule 8A part 3 of the Environmental Protection Regulation 2019 states that the time frame mentioned in section 126D (4) of the EP Act for achieving each rehabilitation milestone has regard to the risks identified in the PRC plan.		
PRCP Schedule				

Item	Relevant section (proposed PRC plan and/or PRCP Guideline)	DES Matter	DES Information Request	MGT Response
Rehabilitation Planning Part				
9	Criteria generally	To provide ease of interpretation it is preferable to have unique identifiers for each criterion. Many criteria are not SMART, such as: - Criteria that refer to analogue sites without providing the location and condition of the analogue sites - Erosion classification criteria in RM7 where there is no definition of severe or extreme. Where detail is provided in the rehabilitation planning part that is key to achieving a stable	Provide an updated PRCP Schedule that includes: - individual identifier for each criterion in the milestone to allow ease of reference. - Updated criteria that are SMART. - Information provided in the Rehabilitation Planning Part that is key to achieving a stable condition. - Criteria that reflect the land achieving a stable condition and supporting the PMLU without	The PRCP Schedule has been updated to include: - individual identifiers for each criterion - SMART criteria - Reference milestones from the PRCP guideline, where appropriate An additional rehabilitation milestone (now RM2) has been added to include assessment and remediation of contaminated land. The revegetation milestone (RM5) has been amended to include criteria that provide for the revegetation strategy to be reviewed by an AQP and a Revegetation Plan to be prepared, including the selection of appropriate analogue and monitoring sites. As a result of the changes to the mine plan (removal of the Summerhill Pit), the revegetation works required may change significantly and as a result, MGT does not consider it fair or reasonable to spend additional time or resources conducting an assessment of revegetation works including this area.

Item	Relevant section (proposed PRC plan and/or PRCP Guideline)	DES Matter	DES Request Information	MGT Response
Rehabilitation Planning Part				
		condition (e.g. seed mix and rate) include the detail either in the criteria or as an attachment to the milestone criteria. It is recommended the reference milestones identified in the PRCP guideline are used instead, particularly achieving surface requirements and the inclusion of a milestone relating to remediation of contaminated land.	referring to analogue sites (e.g. 80% groundcover). Rehabilitation Milestones that reflect the reference milestones included in the PRCP Guideline.	
10	RM1	This milestone should include criteria relating to the removal of any pipelines associated with the mining activity.	Provide an updated PRCP Schedule that includes the removal of pipelines associated with the mining activity.	The PRCP Schedule has been amended to include removal of the pipelines. The PRC Plan has been updated (section 8.8.6 and Figures 35) to clarify these items.
11	RM2	This milestone does not include criteria regarding the implementation of a cover system for the WRD footprint or the TSF. The implementation of a	Provide an updated PRCP Schedule that includes: Installation of a cover system and objectives of the cover	The PRCP Schedule has been updated to include these criteria.

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Rehabilitation Planning Part				
		cover system that achieves the objectives stated in the Rehabilitation Planning Part is necessary to achieve a stable condition. Consider including the installation of monitoring in the cover system particularly on the TSF to demonstrate the cover system is achieving the objectives stated in the Rehabilitation Planning Part.	• A minimum compaction rate for the reduced permeability layer for the TSF. • AQP certification that the cover system has been constructed according to design.	
12	RM3	The criterion regarding the application of ameliorants is not specific or measurable. It is recommended criteria be added that reflect the testing of topsoil and spoil as proposed in section 8.4.1 and that recommended ameliorant type and application rate required	Provide an updated PRCP Schedule that includes criteria that ensures the topsoil is suitable as a growth medium to support achieving a stable condition.	The PRCP Schedule has been updated to include assessment of the placed growth medium and fertiliser/ameliorant recommendations as recommended by an AQP.

Item	Relevant section (proposed PRC plan and/or PRCP Guideline)	DES Matter	DES Request Information	MGT Response
Rehabilitation Planning Part				
		to improve vegetation establishment be applied.		
13	RM4	The Rehabilitation Planning Part provides a list of species and seeding rates proposed to be used in revegetation but the list and rates are not included in the criteria. Information regarding where stock exclusion fencing will be installed and when it will be removed must be detailed in the rehabilitation planning part and reflected in specific criteria.	Include criteria that: - reflect the species and seeding rates proposed in the Rehabilitation Planning Part. - detail the location and timing of the installation and removal of stock exclusion fencing to achieve a stable condition.	The PRCP Schedule has been updated to include the nominated revegetation species list, installation and removal of stock exclusion fencing.
14	RM5 and RM6	The first criterion states 95% of landform achieves design outcomes without referring to specific designs or how 95% will be measured. The necessary information to support the criterion is not provided in the	Provide an updated PRC Plan that includes landform criteria that relate to specific designs, meet SMART principles and are supported by information in the Rehabilitation Planning Part.	PRCP Schedule has been updated to include additional criteria on landform development and reshaping, including assessment against the construction designs provided in Appendix 5 of the PRC Plan. Refer section 8.6 of PRCP

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Rehabilitation Planning Part				
		Rehabilitation Planning Part. It is recommended that these milestones be combined and reference milestones identified in the PRCP guideline are used instead.		
15	RM7	Criteria proposed can be improved/expanded to address additional aspects required to demonstrate a stable condition has been achieved. For example: • specified pasture species that are palatable, perennial and productive to be established. • specified strike rates and establishment of vegetation.	Provide an updated PRCP Schedule that includes revised criteria that meet SMART principles and demonstrate the land has achieved a stable condition.	The PRCP Schedule has been revised to include additional criteria with respect to stability and revegetation implementation and monitoring. Currently consider that the level of detail provided is appropriate for the scale of the project and consistent with the requirements of the guideline.

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Rehabilitation Planning Part				
		• indicators of natural recruitment occurring. • maintaining the specified species mix for the PMLU. • concentration of weed species. • definition of erosion rates and maximum depths of rills and gullies. • slopes have been certified as being geotechnically stable with a minimum specified Factor of Safety. • absence of bare topsoil or subsoil. • parameters and values for		

Item	Relevant section (proposed PRC plan and/or PRCP Guideline)	DES Matter	DES Request	Information	MGT Response
Rehabilitation Planning Part					
		surface and ground water quality that demonstrate the water is non-polluting (for water discharging to the environment) and suitable for the PMLU (for stock watering). • carrying capacity for grazing or land suitability criteria. • indicators used to demonstrate the post-mine land suitability classification has been achieved. • performance criteria demonstrating			

Item	Relevant section (proposed PRC plan and/or PRCP Guideline)	DES Matter	DES Request	Information	MGT Response
Rehabilitation Planning Part					
		the cover system continues to achieve the design objectives. • the absence of ponding on the TSF surface. • the absence of seepage from the TSF. • diversion drains are performing design requirements and are stable.			