

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 amendment application for a site-specific environmental authority.

To: TNC Mining Pty Ltd
Great Australia Mine, Round Oak Road
CLONCURRY QLD 4824

Attention: Nathan Goodwin
Email: nathan.goodwin@truenorthcopper.com.au

Your reference: A-PRCP-NEW-100785938 | P-EA-100331581
Our reference: C-PRCP-100785953 | 101/0041283

Further information is required to assess an amendment application for environmental authority

1. Application details

The amendment application for a proposed PRC plan was received by the administering authority on 27 June 2025.

The application reference number is: A-PRCP-NEW-100785938.

Land description: Mining lease (ML) 100111.

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 specified in Attachment 1, attached to this notice.

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 6 March 2026 (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.

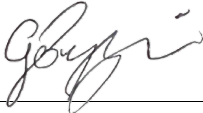
The response to this information request or a request to extend the information response period can be submitted to the administering authority by email to ESCairns@des.qld.gov.au

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, and it was determined that the decision is compatible with human rights.

If you require more information, please contact Minerals Business Centre on the details listed below.



Signature

5 September 2025

Date

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

Enquiries:
Minerals Business Centre
PO Box 7230, Cairns QLD 4870
Phone: (07) 4222 5352
Email: ESCairns@detsi.qld.gov.au

Attachments

Attachment 1: Additional information required for an application for a proposed PRCP schedule P-EA-100331581, TNC Mining Pty Ltd (Wynberg).

Attachment 2: Proposed Draft PRCP Schedule P-EA-100331581, TNC Mining Pty Ltd (Wynberg).

Attachment 3: Item 3 BioCondition Modified Benchmark

Attachment 4: Item 5 Departmental template, water quality – Options 1 and 2

Attachment 1: Additional information required for an application for a proposed PRCP schedule P-EA-100331581, TNC Mining Pty Ltd (Wynberg).

Item	Reference	Matter	Information Request
PRCP Schedule			
1	PRCP Schedule: General	The PRCP assessment process is an iterative process whereby ongoing awareness and understanding of the site's rehabilitation needs will lead to additions and variations to the draft PRCP schedule. Amendments proposed by the administering authority to draft the PRCP schedule is provided as an attachment to this information request notice to assist you in developing SMART criteria. Note, where the administering authority has not varied a criterion of the draft PRCP schedule, it is not intended to infer this criterion is accepted. Please review and amend the draft PRCP schedule in consideration of the additional information request items below. <i>Overall amendments proposed:</i> The administering authority proposed the inclusion of an additional rehabilitation area (RA) relating to levees, with a post-mine land use (PMLU) of Flood Protection Landform. Criteria for management milestones also don't achieve SMART principles. Additional criteria have been proposed by the administering authority, with more specific surface requirement and geotechnical criteria required to demonstrate that the landform is	Review the proposed amendments to the draft schedule and advise of agreement or comment otherwise to the amendments. The draft schedule in response to this information request is able to be provided in the word document format rather than the excel spreadsheet. It is the administering authority's preferred approach that where the proposed amendments are agreed, that track changes of these amendments is accepted. Any agreement to any comments on the schedule is to be provided as subsequent comments. Any additional amendments or concerns are to be provided in track changes and/or comments.

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		geotechnically stable. <i>Further specific requests are below.</i>	
2	General rehabilitation practices	<u>A final landform design</u> The final landform design provided in section 6.1 of the PRC plan does not comply with the requirements of section 3.6.1 and 3.6.3 of the PRCP Guideline, for example: The information in section 6.1 states that detailed design of the final landform is yet to be completed and is currently conceptual in nature.	Provide a final landform design that meets the criteria within section 3.6.1 and 3.6.3 of the PRCP Guideline or consider adopting the proposed PRCP schedule conditions 15 and 16 and relevant milestone criteria.
3	BioCondition Benchmarks	An appendix which refers to BioCondition benchmarks is required. The criteria proposed must: (a) Provide a benchmark to measure areas requiring revegetation to demonstrate that the area is on a trajectory to achieving stable condition. (b) Provide a benchmark to measure the achievement of revegetation for each regional ecosystem. In addition, criteria should be included to ensure non-native seed has not been used for the revegetation (except for sterile cover crops).	Provide a revised Schedule which includes BioCondition benchmarks for the relevant regional ecosystems which are the target PMLU outcome. Refer to the attached modified BioCondition benchmark framework and draft PRCP schedule to develop BioCondition benchmarks.
4	PRCP Consultation Schedule	With consideration of the PRCP Consultation Schedule provided in Attachment 2 of this Notice, the	Review the suggested monitoring locations provided in Appendices 5 and 6 and update the

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		department considers that additional surface water and groundwater monitoring locations are necessary to adequately capture potential contaminant sources. Suggested monitoring locations have been outlined in Appendices 5 and 6 for your consideration.	proposed surface and groundwater monitoring plan accordingly. Alternate monitoring locations may also be proposed. The revised monitoring plan should clearly identify the proposed locations, their rationale, and how they will address potential contaminant risks.
5	Water Quality Limits	The PRCP schedule outlines rehabilitation outcome criteria for surface water and groundwater limits, as specified in Schedule E of the EA, to demonstrate achievement of a stable condition aligned with the post-mining land use. To ensure these limits are effective, they must be fit for purpose (i.e., focused on closure rather than operation), site-specific, and informed by water quality objectives (WQOs), relevant guidelines, and background data. Where insufficient monitoring data exists to support site-specific limits, WQOs have been adopted, as shown in the attached PRCP consultation schedule. However, the PRCP NPM response does not provide sufficient groundwater quality data to establish appropriate values for the following dissolved quality characteristics: • Arsenic • Zinc	Propose appropriate site-specific parameters supported by sufficient data in the format specified (attached). Background data can be used to determine site-specific limits as follows: (a) 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. For groundwater, the 95th percentile of baseline data can be used to determine site-specific limits for all indicators. See DES 2021 Groundwater Guideline <u>Using monitoring data to assess groundwater quality and potential environmental values</u> Propose groundwater quality limits for Arsenic (dissolved) and Zinc (dissolved). The proposed limits must be supported by raw water quality data.

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			Alternately, consider adopting the proposed surface and groundwater limits in the attached PRCP consultation schedule (Appendix 2).
6	Groundwater Monitoring Program	Further clarification is required regarding the current groundwater monitoring bore WYNGMB04A, which is located within the proposed disturbance area for the Project. Specifically, it is unclear whether this bore will remain accessible for monitoring purposes post mining.	Provide clarification whether WYNGWMB04A will remain accessible for monitoring purposes post mining.
7	Non-use Management Areas	With consideration for the Draft PRCP Schedule provided in Attachment 2 of this Notice, provide a geotechnical setback distance for Improvement Area (IA) 1 associated with Pits 1, 2, 4/5 and 6.	Provide a geotechnical setback distance for Pits 1, 2, 4/5 and 6 in IA1.
8	Attachment 2 – PRCP Consultation Schedule (PRCP3)	With reference to condition PRCP3 in Attachment 2 of this Notice, the department does not support the proposed changes to the date nominated for 'available for rehabilitation'. This condition has been included to ensure that in the event land becomes available for rehabilitation earlier than the nominated dates in the PRCP schedule, that progressive rehabilitation commences as soon as practicable.	Disturbed land is considered available for rehabilitation if the land is not being mined and will be required to be rehabilitated unless it meets the requirements of section 126D(5) of the EP Act. Refer to condition PRCP3 in Attachment 2 of this Notice. Alternatively, provide evidence demonstrating how a 1-year timeframe aligns with the requirements of the EP Act and best practice standards.
9	Attachment 2 – PRCP Consultation Schedule (PRCP5)	With reference to condition PRCP5 in Attachment 2 of this Notice, the department does not support the removal of PRCP5. This condition has been included to monitor known and emerging issues at the site prior to surrender. Its purpose is to ensure that adaptive	Refer to condition PRCP5 in Attachment 2 of this Notice. Alternatively, provide robust evidence to substantiate the removal of PRCP5, demonstrating how known and emerging issues will be effectively managed to achieve stable,

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		management actions are implemented to achieve a stable condition, including the establishment of self-sustaining vegetation and water quality that demonstrates a clear trend towards a non-polluting outcome.	self-sustaining conditions and non-polluting water quality outcomes.
10	Attachment 2 – PRCP Consultation Schedule (PRCP8)	With reference to condition PRCP8 in Attachment 2 of this Notice, the department does not support the removal of PRCP8(b). This condition represents the minimum information required to demonstrate appropriate monitoring of rehabilitation milestones, providing a clear and enforceable framework from a compliance perspective. While the proponent may choose to undertake additional monitoring beyond these requirements, PRCP8(b) is essential to maintain regulatory oversight and accountability.	Refer to condition PRCP8(b) in Attachment 2 of this Notice. Alternatively, provide further evidence to substantiate the removal of this proposed PRCP condition.
11	Attachment 2 – Draft PRCP Schedule (PRCP11)	With reference to condition PRCP11 in Attachment 2 of this Notice, the department does not support the removal of PRCP11. This condition has been included to ensure that all relevant published materials are thoroughly considered when preparing and certifying technical aspects of the AQP designs, specifications, certifications, assessments and related documents.	Refer to condition PRCP11 in Attachment 2 of this Notice. Alternatively, provide justification to support its removal, demonstrating how the consideration and certification of all relevant published materials will be ensured in the absence of this condition.
12	Attachment 2 – Draft PRCP Schedule (PRCP14)	With reference to condition PRCP14 in Attachment 2 of this Notice, the department does not support the removal of PRCP14(b), which pertains to groundwater-dependent ecosystems (GDEs). It remains unclear how potential impacts to GDEs were addressed or approved during the Project approval	Refer to condition PRCP14 in Attachment 2 of this Notice. Alternatively, provide robust evidence to justify the removal of PRCP14(b), ensuring that potential impacts to GDEs have been adequately addressed.

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		process, as EA P-EA-100331581 does not specifically reference GDEs. Moreover, this condition is directly related to closure outcomes, rather than operational activities. It is critical to ensure that GDEs are not adversely affected following the closure of the Project.	
13	Attachment 2 – Draft PRCP Schedule (PRCP17)	A durability assessment has been included within condition PRCP17 of Attachment 2 of this Notice for landforms identified by the department as high-risk, where either conceptual landform designs or no designs have been provided. Conditions relating to the durability assessment are deemed necessary or desirable to ensure that the final landform design is robust, well-developed, and informed by known material properties. This includes consideration of failure modes, monitoring requirements, and appropriate risk management strategies. The amended PRCP identifies that 15.38% of 91 waste samples exhibit potentially acid-forming (PAF) traits. However, section 6.6.4 of the report suggests that over 5% of total waste is likely to be PAF. Arsenic has been identified as a concern due to the potential for soluble salt leaching, and flood modelling highlights interactions between the floodplain and the WRD. Flood modelling also suggests the potential for interactions between 0.1% AEP and PMF flood events	Consider the durability assessment conditions outlined in Attachment 2 of this Notice. Alternatively, provide final landform designs for high-risk structures (e.g., WRDs) that are well-developed, based on known material properties, and meet the criteria outlined in the PRCP Guideline.

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		with Pit 4/5 and Pit 6. These interactions raise concerns about flooding impacts extending beyond the NUMA extent, potentially affecting areas required to achieve PMLUs and areas outside the mining lease boundary. As such, it is considered that both the WRD and the flood protection landforms proposed by the department to be included for Pit 4/5 and Pit 6 are high-risk landforms. It is considered that a durability assessment for high risk landforms is a key component in demonstrating that a stable condition can be achieved and maintained.	
14	Attachment 2 – PRCP Consultation Schedule (PRCP18)	With reference to PRCP18 in Attachment 2 of this Notice, the department does not support its removal. The condition is critical to ensuring that the landform closure design report for high-risk landforms is fit for purpose, prepared in accordance with professional standards, and capable of delivering a stable landform in a post-closure context if constructed as specified.	Refer to condition PRCP18 in Attachment 2 of this Notice. Alternatively, provide detailed justification to support its removal – including evidence demonstrating how the objectives of ensuring high-risk landforms are stable, fit for purpose, and prepared in accordance with professional standards – will be achieved without this condition.
15	Attachment 2 – PRCP Consultation Schedule (PRCP20)	With reference to PRCP20 in Attachment 2 of this Notice, the department does not support its removal. This condition is essential to ensure that the landform closure design report, including the durability assessment, is regularly maintained and updated as needed to guarantee that the relevant structures achieve and sustain a stable condition over the long	Refer to condition PRCP20 in Attachment 2 of this Notice. Alternatively, provide detailed justification to support its removal, including evidence demonstrating how the ongoing maintenance and updating of the landform closure design report – including the durability assessment – will be managed to achieve and sustain a stable condition for the relevant

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		term.	structures over the long term.
16	Attachment 2 – PRCP Consultation Schedule (PRCP23)	With reference to PRCP23 in Attachment 2 of this Notice, the department does not support its removal. This condition is critical to ensuring that the flood protection landform design plan and report for any flood protection features are fit for purpose, prepared in accordance with professional standards, and aligned with the findings of the associated assessment.	Refer to condition PRCP23 in Attachment 2 of this Notice. Alternatively, provide detailed justification to support its removal – including evidence demonstrating how the flood protection landform design plan and report will be ensured to be fit for purpose, prepared in accordance with professional standards, and aligned with the findings of the associated assessment.
Figures			
17	Final Site Design	As noted in item 1 above, the administering authority has proposed the inclusion of an additional PMLU, specifically a Flood Protection Landform associated with levees. Furthermore, amendments to PMLU naming have been suggested to align with Table G1 of the EA. If TNC agrees to these proposed changes, the final site design depicted in Figure 19 of the revised PRCP will need to be updated accordingly.	Provide a revised final site design which is inclusive of all proposed PMLUs for the Project.
18	Reference Map	As noted in item 1 above, the administering authority has proposed amendments to the draft PRCP, resulting in changes to the proposed RAs. If TNC agrees to the proposed updates, the reference map shown in Figure 20 of the revised PRCP will need to be updated accordingly.	Provide a revised reference map which is inclusive of all proposed rehabilitation and improvement areas.
19	Surface water and groundwater monitoring	The administering authority has proposed the inclusion of additional surface water and groundwater monitoring locations to appropriately capture potential	Provide a new figure 3, 4 and 5 for inclusion in the PRCP schedule.

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	locations figure	impacts from mining activities. A figure is sought for inclusion in the schedule which identifies the nominated surface water and groundwater monitoring locations (Figure 3, 4, and 5).	
Milestone Criteria			
20	Attachment 2 – PRCP Consultation Schedule	During the review of the initial draft PRCP schedule, TNC proposed removing the reference to the milestone criteria stating, “<i>an independent AQP has certified the achievement of RM#-RM#.</i>” The department is open to considering the removal of this reference where the associated rehabilitation activity is deemed low risk.	To support any proposed changes, provide further information identifying which rehabilitation activities are considered low risk and therefore would not require certification by an independent AQP to confirm that the nominated milestone criteria have been achieved.
Rehabilitation Planning Part			
21	<i>Environmental Protection Regulation 2019</i> , Chater 4, Part 4	The current flood modelling does not account for climate change, as required under section 41C of the <i>Environmental Protection Regulation 2019</i> (EP Reg). Specifically, flood estimates must adhere to the Australian Rainfall and Runoff (ARR) 2019 guidelines, which incorporate climate change considerations, as detailed in ARR 2019 Book 1 (<i>Scope and Philosophy</i>). Consequently, the credibility of the flood model and its ability to address future flood risks remain unsubstantiated.	Provide updated flood modelling which is consistent with the Australian Rainfall and Runoff Guidelines and incorporates climate change considerations.
22	PRCP Guideline, Section 3.6.1	Pit 6 lies fully within, and Pit 4/5 partly within, the 0.1% AEP floodplain. As outlined in section 3.6.1 of the PRCP Guideline, flood modelling must consider the	Provide PMF flooding assessment for Pit 4/5 and Pit 6.

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		Probable Maximum Flood (PMF) where flooding is a relevant factor. The application, however, does not include PMF flood modelling results. Given the significant flood risks identified for lower-frequency events, and the location of Pit 6 and Pits 4/5 within a flood plain, PMF modelling is essential to ensure a comprehensive and accurate risk profile assessment.	
23	Appendix K, <i>Draft Levee Concept Design Flood Impact Assessment</i> , 11 July 2019, ATC Williams	In accordance with the Manual for Assessing Consequence Categories (the Manual, ESR/2016/1933), a levee that prevents the ingress of clean floodwater is considered regulated if the pit is encroached by a flood event more frequent than or equal to the 0.1% AEP. Table 7 of the Manual requires that all regulated levees provide at least 1:1000 AEP immunity. Both the Manual and the Guideline <i>Structures which are dams or levees constructed as part of environmentally relevant activities</i> (ESR/2016/1934), require levees to be assessed for consequence. Furthermore, the PRCP Guideline requires that the PMF be considered when assessing the flood risk profile.	Provide a consequence category assessment (CCA) for approved levees, Pit 4/5 and Pit 6 under PMF.
24	Appendix K, <i>Draft Levee Concept Design Flood Impact Assessment</i> , 11 July 2019, ATC Williams	Notwithstanding item 13 above as it relates to the durability assessment, the CCA has been conducted for the 0.1% AEP flood event, with the levee classified as having a 'Low' consequence rating in Table 9 of	Provide an updated CCA that includes the following: • Consideration of the effects of climate

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		Appendix K. However, the long-term reliability of the modelling remains unverified, as the effects of climate change have not been incorporated into the 0.1% AEP flood estimate (per IR Item 21). Additionally, the CCA tables in Appendix K contain inconsistencies and potential errors. For instance, Table 10 for Pit 6 incorrectly references Pits 4/5 in the “Overtopping” and “Dam Break” scenarios. There is also insufficient evidence to substantiate claims of water quality “dilution” during flood events. No water balance modelling has been provided to demonstrate that overtopping will not occur. While water levels in the voids are expected to stabilise below ground level, the risks associated with flood ingress and the potential consequences of overtopping have not been adequately addressed. It is important to note that relying on dilution via overtopping as a management strategy is not appropriate. Overtopping poses a significant risk and should not be considered a mitigation measure. Over time, water quality in Pit 6 and Pits 4/5 is predicted to deteriorate, with potential increases in salinity and mobilisation of metals. This raises significant concerns about the long-term suitability of these areas for grazing or aquatic life, which remains uncertain.	change; and • Revision of inconsistencies within Appendix K; and • Water balance modelling to demonstrate that overtopping of pits will not occur. Please note that if TNC proceeds with adopting the proposed flood protection landform as the PMLU, elements of this information request item may no longer be required.
25	PRCP Section 6.6.4	Section 2.1.1 of the PRCP planning part identifies that “ <i>after the first pit is mined, it is intended to dump</i>	Provide an updated rehabilitation planning part that describes waste management for the

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		<i>waste from subsequent pits into preceding ones...</i>". Section 6.6.4 of the PRCP planning part identifies that potentially acid forming (PAF) material is proposed to be either encapsulated within the waste rock dump (WRD) or placed in voids below groundwater table. The EA P-EA-100331581 does not authorise for the placement of waste rock within voids. Furthermore, the EA designates the voids as NUMAs, not as WRDs that would likely require capping upon closure.	Project which is consistent with the approvals of the EA.
26	Rehabilitation Planning Part	Changes to the Rehabilitation Planning Part may be required as a result of the information request items detailed above.	Provide an updated Rehabilitation Planning Part as necessary to provide consistency.

Attachment 2: PRCP Consultation Schedule P-EA-100331581, TNC Mining Pty Ltd (Wynberg).

Attachment 3: Item 3 BioCondition Modified Benchmark

Attachment 4: Item 5 Departmental template, water quality – Options 1 and 2