Wirralie Gold Mine PRCP

Response to DETSI Information Request (IR) Items

Table 1 provides the items contained in the Information Request (IR) notice issued by the Department of Environment, Tourism, Science and Innovation (DETSI) on 7 February 2024 on the progressive rehabilitation closure plan (PRCP) for Wirralie Gold Mine.

The actions required by the IR notice and the additional information requested have been reviewed and **Table 1** outlines how these items have been addressed. An updated PRCP, PRCP Schedule and spatial data have also been provided with this letter. Solomons Gold trusts that the updated PRCP addresses the IR notice sufficiently to progress the PRCP application.

Table 1: Response to DETSI Comments

<table>
<tr><th>Comment Number</th><th>DETSI Comment</th><th>Solomons Gold Response</th></tr>
<tr><td>1</td><td>Disturbance areas shown within the PRCP schedule are required to be consistent with authorised areas of disturbance including the areas identified in Schedule F Table 1 and 2 of the EA EPML00772413. A review of the application has identified the following disturbance areas that:
a. exceed that authorised under the EA:
<table>
<tr><th>Authorisation</th><th>Activity</th><th>EA (ha)</th><th>PRCP (ha)</th></tr>
<tr><td>Table 1 Schedule F</td><td>Waste Dump</td><td>22.00</td><td>31.46</td></tr>
<tr><td>Table 1 Schedule F</td><td>Runoff Dam</td><td>5.00</td><td>8.54</td></tr>
<tr><td>Table 2 Schedule F</td><td>Pit B</td><td>5.3</td><td>7.26</td></tr>
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b. are less than shown in Table 1 Schedule F of the EA:
<table>
<tr><th>Activity</th><th>Environmental authority</th><th>PRCP Schedule (ha)</th></tr>
<tr><td>Infrastructure</td><td>69.00</td><td>15.51</td></tr>
<tr><td>Exploration</td><td>19.00</td><td>10.57</td></tr>
<tr><td>Stockpile Area</td><td>14.00</td><td>6.23</td></tr>
<tr><td>Village</td><td>12.00</td><td>2.73</td></tr>
<tr><td>Borrow Pit</td><td>8.00</td><td>0.00</td></tr>
<tr><td>Processing plant</td><td>7.00</td><td>1.54</td></tr>
</table></td><td>An EA Amendment was approved and took effect on 24 March 2026. The activity areas have been updated and the PRCP has been revised to align with the EA Amendment.</td></tr>
<tr><td>2</td><td>The application has identified that exploration activities have been removed from the PRCP application and are to be rehabilitated in accordance with the ‘Code of Environmental Compliance for Exploration and Mineral Development’ (ERA Standard). Exploration activities are authorised under the EA in accordance with Schedule F – Table 1, Final land use and rehabilitation approval schedule. However, the EA does not include an exploration condition under the ERA standard. The rehabilitation of the exploration areas needs to be included in the PRCP schedule.
Where an EA authorises exploration activities but does not impose specific conditions regarding rehabilitation of areas disturbed by exploration, the department’s preferred</td><td>The PRCP and Schedule has been revised to include exploration disturbance. Existing disturbance associated with exploration (primarily seismic survey lines) have been included in the spatial package as polygons. The total area now aligns with Table F1 of the EA.
These areas, along with any exploration bores, have been assigned to RA1 with a PMLU of ‘low intensity grazing’. Additionally, specific milestone criteria have been</td></tr>
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	approach will be that the PRCP schedule propose a specific Rehabilitation Area (RA), with supporting milestones and timeframes but is not spatially bound. Consequently, exploration activities will continue to be undertaken on the resource tenure (in accordance with the EA) but specific locations (i.e. points or polygons) will not be identified on PRCP maps or spatial information. The exploration RA will be supported by a relevant milestone(s) and criteria appropriate for the exploration activities. A total disturbance area will be indicated against the exploration RA and progressive rehabilitation timeframes proposed.	included for the rehabilitation of exploration activities (see RM1.4)
3	The PRCP application does not include the following disturbance areas identified in the spatial data: a. Air strip b. Container compound and material approximately 450 m north of Pit B. c. Scrap metal and cleared area located between eastern rehabilitated WRD and ROM stockpiles. d. Multiple areas of disturbance that are not within polygons throughout the project area. e. Sediment dams.	PRCP has been updated to align with the EA Table F1. The disturbance areas listed in this item have been included in RAs.
4	The PRC plan identifies that Deep Lead Pit in RA1 is to be backfilled and PMLU revised to low intensity grazing, however Schedule F - Table 1 of EA EPML00772413 authorises a PMLU of open void for all open cut pits. Because the proposed PMLU for the Deep Lead pit has not been pre-approved additional information as set out in section 3.2 of the PRCP guideline is required to show that the PMLU is achievable and sustainable.	All open cut pits will be NUMAs. The PRCP has been updated to reflect this and to align with the EA.
5	The PRC planning part includes information on the water balance of the voids however, the plan does not include information on pit wall geotechnical and geochemical stability or proposed final slope angles of walls for each pit. Information in the void management plan including pit wall stability and slope angles for each pit is required for the creation of rehabilitation milestones that meets the SMART principles and to determine whether the PRC plan will result in NUMAs that achieve best practice management of the area and minimises risks to the environment.	Solomons propose inclusion of a void geotechnical stability assessment as a PRCP condition. The proposed condition is detailed in Section 9.5 of the PRCP. Criteria have also been included in the Schedule (MM1.1, MM1.2, MM1.5 and MM1.6).

Comment Number	DETSI Comment	Solomons Gold Response
6	The hydrogeological report found in Appendix H of the PRC plan identifies water quality indicators indicative of potential impact, (e.g., see pH or TDS) in all bores except WTB 8, however no discussion has been provided to identify the source of potential contamination. Additional information is required to determine the source and extent of impacts to the groundwater that shows there will be no long-term impacts to the environment following mine closure.	An updated hydrogeological assessment has been provided as Appendix H. This was completed in March 2026 and includes a void water balance assessment indicating that all the residual voids will act as sinks long-term. Groundwater quality has been discussed in Section 8 of Appendix H.
7a)-d)	The following issues were found in the milestone criteria for water quality: a) Surface water monitoring and reporting is required to ensure the final landform is stable and non-polluting. For water quality criteria to be SMART, the location, frequency quality characteristics and limits are required such that the department can be satisfied that the land achieves a stable condition. The department considers five consecutive years of sampling data an appropriate timeframe to demonstrate that the mine has achieved a stable condition, not two years as provided in RM11. b) The PRCP identifies the environmental values of aquatic ecosystems within the receiving environment however the water quality objectives in the criteria are for stock water to suit the post mine land use. Aquatic ecosystems are a scheduled environmental value and must be considered in the department's decision- making process. Given the presence of aquatic ecosystems, water quality criteria will need to be based on the Water Quality Objectives (WQOs), aquatic ecosystem guidelines and background data for the receiving environment, in order to be satisfied that post mining, there is no environmental harm being caused by anything on or in the land. c) The PRC plan provides limited information on surface water quality and the department is seeking historical monitoring reports to assist in providing suitable site-specific criteria. d) Currently only SW4 and SW5 are nominated surface water monitoring locations to apply to the schedule. To ensure water quality objectives are	Limited surface water monitoring data is available. It is acknowledged that at least 5 consecutive years of sampling data is required to propose site-specific quality limits. As such, it is proposed to include a PRCP condition to undertake the following: **Surface Water Monitoring and Quality Limits** The holder must, by 30 April 2037, submit a report to the administering authority that: • Proposes a revised surface water monitoring network for inclusion in Surface Water Monitoring Locations table; • Proposes surface water quality limits for inclusion in Surface water quality limits table based on at least 5 years of site-specific data.

Comment Number	DETSI Comment	Solomons Gold Response
	achieved, additional monitoring points are required both upstream and downstream of the project.	
7e)-f)	e) Limited groundwater data has been provided. The department is seeking historical groundwater data and bore construction details of previous monitoring bores. f) The PRC plan identifies that all groundwater bores have been impacted except for WTB 8 which is a beep bore and may not be suitable for closure. Additional bores will be required outside of the zone of the current mining influence to determine whether the final landform achieves a stable condition.	Limited groundwater monitoring data is available. It is acknowledged that at least 5 consecutive years of sampling data is required to propose site-specific quality limits. It is proposed to include a PRCP condition to undertake the following: **Groundwater Monitoring and Quality Limits** The holder must, by 30 April 2037, submit a report to the administering authority that: • Proposes a revised groundwater monitoring network for inclusion in Groundwater monitoring locations table; • Proposes groundwater quality limits for inclusion in Groundwater quality limits table based on at least 5 years of site-specific data.
8	There is inconsistency of information in the PRC Plan and schedule including rehabilitation areas and milestone criteria, for example (but not limited to):	The PRC Plan and schedule have been revised. Detailed responses are provided below:
8a.	The rehabilitation milestone does not have milestone criteria using the SMART principles.	Milestone criteria have been revised.
8b.	RA1 – There are inconsistencies in the disturbance area for the deep lead pit identified in the PRCP schedule as 18.09 ha and the spatial data shows 1.833 ha.	The Deep Lead Pit has now been designated a NUMA (IA1), in line with the EA. The disturbance area of NUMAs in the PRCP and spatial package now align with EA Table F1.

Comment Number	DETSI Comment	Solomons Gold Response
8c.	RA2, RA3 – There are inconsistencies between the PRCP plan, schedule and spatial data for the rehabilitation areas to be included and disturbance areas in RA2 and RA3 relating to the waste rock dumps, ROM, ROM stockpiles and topsoil stockpiles. The total area for RA2 in the PRCP schedule shows 40.54 ha however, only 4.85 ha has been accounted for in the cumulative area of the schedule.	PRCP and spatial package now align with EA Table F1. Rehabilitation Areas (RAs) have been revised and now cover the full extent of disturbance as authorised by the EA. WRDs are now under RA3, ROM pad and processing plant is now RA2, and topsoil stockpiles are RA1.
8d.	RA4 – The rehabilitation has been separated into two rehabilitation timeframes commencing in 2026 and 2042 however no details have been provided on the areas to be rehabilitated in each timeframe and the schedule table appears to have been put together incorrectly.	The schedule has been revised to resolve timing inconsistencies and uncertainties.
8e.	RA5 and RA6 – These water structures are to be used to capture runoff from rehabilitation activities however, rehabilitation activities for these RAs commence before the achievement of surface requirements for the surrounding RA. Rehabilitation timeframes of these RAs needs to consider the relevant timeframes of the surrounding RAs.	The schedule has been revised to resolve timing inconsistencies and uncertainties. RA5 now includes the Runoff Dam. Other water structures will be decommissioned and rehabilitated.
8f.	RA7 – The PRC plan identifies that the tailings dam is to be rehabilitated in two stages, the eastern and western catchment areas however the PRCP schedule shows consecutive milestones for the whole RA and does not include two stages. Further, the PRC plan identifies that a sediment dam will be used to capture runoff from the TSF second stage rehabilitation, however it is unclear when the rehabilitation of this dam will occur.	The schedule has been revised to resolve timing inconsistencies and uncertainties. The TSF is now under RA4 and will be rehabilitated in one stage, beginning once operations have ceased. Timing for this has been included in the revised schedule.
8g.	RM9 – Identifies that vegetation will achieve a vegetation coverage as a percentage of an analogue site however, no analogue sites are identified in the PRCP schedule.	PRCP and Schedule criteria has been updated to remove reference to analogue sites. Vegetation coverage is now based on required cover to achieve adequate erosion minimisation as determined by erosion modelling (included with the PRCP as Appendix L).

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8h.	MM3 – includes completion criteria that has the pit water achieving a water quality that complies with the ANZECC/ARMCANZ (2000) guidelines for livestock drinking water. The pit water is identified in the PRC plan as having a pH of less than 3 however, no criteria has been included for treatment of the water to achieve desired water quality.	The PRCP and Schedule have been updated to align with the EA, including: • Pits as NUMAs • Pits act as groundwater sinks (see PRCP Section 6.9.2) Therefore, it is now not intended for water quality in the pits to achieve livestock drinking water quality.
9	Section 3.8.4 identifies that the runoff dam is to be retained for stock water supply however, the PRCP schedule provides a PMLU of water supply. The PRCP schedule requires that the purpose of use for water storages be included in the PMLU (e.g. water storage facility for livestock) to ensure the creation of milestones and criteria that follow the SMART principle.	The PRCP and Schedule have been revised to align with PMLUs as pre-approved in the Land Outcome Documents (LODs). This includes the PMLU for the runoff dam which now has a PMLU of 'Water Storage' as RA5. Milestone criteria have been included in the Schedule for the 'Water Storage' PMLU in RM7.
10	The reference map and final site design map for the PRCP schedule has inconsistent information and does not meet the PRCP guideline requirements. Figure 30 has RAs shown not consistent with the PRCP schedule and Figure 31 shows PMLUs that are not consistent with the PRCP schedule.	Figures, including the Final Site Design (Fig 9-1) and Rehabilitation and Improvement Areas (Fig 9-2), have been revised and are now consistent with updates to the PRCP and Schedule.
11	The PRC plan includes information on the erodibility of the topsoils associated with the project however an analysis of the future stability (e.g., landform evolution modelling) using the referenced slopes that considers soil erodibility has not been conducted and is required to demonstrate that landform heights, gradients, profiles, planned vegetation coverage of greater than 70 % of analogue sites (Table 32) and placement of material will ensure long-term stability of the final landform.	The PRCP has been updated with additional erosion modelling (section 6.5) including a WEPP erosion assessment (as Appendix L). Criteria have been included to ensure certification by an AQP that the land has achieved stable condition (RM8.4).
12	The PRCP schedule includes final milestone criteria for erosion includes gullies that are between 1.0 m and 0.3 m and have become 'partly stabilised or stabilised'. This criterion does not meet the requirements of the PRCP guidelines in that this does not demonstrate that the landform has achieved a stable state. The desired depth for and	Milestones in the PRCP schedule have been revised regarding criteria for erosion.

Comment Number	DETSI Comment	Solomons Gold Response
	erosion is less than 0.3 m and justification is required on the proposed extent of erosion.	
13	The rehabilitation plan identifies that the Deep Lead Pit is to be backfilled to the surrounding landform however no details have been provided on the removal of water from the pit, backfilling methodology or final slope angles. This information is required to address quality assurance and quality control requirements and to provide milestones that meet the SMART principles.	The Deep Lead Pit has now been designated a NUMA (IA1), in line with the EA. The disturbance area of NUMAs in the PRCP and spatial package now align with EA Table F1.
14	RA2 includes the former waste rock dumps (WRDs) that are identified as 'having been rehabilitated with varying success by previous mine owners'. The area for these WRDs has not been included in RA2 and no details have been provided on the achievement of each milestone criteria. If these WRDs are to be included in the PRCP schedule, and commencing at an advanced RM, evidence needs to be provided to demonstrate achievement of previous relevant RMs.	The PRCP and Schedule have been revised to include rehabilitation for all areas of the WRDs. There is limited information available regarding the commencement and completion of existing rehabilitation. For the purposes of the PRCP it is assumed that these areas may require further rehabilitation work and therefore, all the relevant rehabilitation milestones will apply.
15	All activities and areas of disturbance are required to be included within a defined RA that includes rehabilitation milestones (RM) which describes the rehabilitation outcome and timeframes. Please note that disturbance areas to be retained by the landholder under a landholder agreement, need to be included in a RA with milestone criteria that identifies that the activities will achieve a stable condition.	The PRCP, Schedule and spatial submission have been revised to include all areas of disturbance. Rehabilitation now reflects the requirements of the EA (Table F1)
16	The spatial imagery identifies that the active waste rock dump (WRD) 3 is encroaching into the area that is shown as part of the rehabilitated WRD. The schedule needs to include the extent of each activity that will occur at the end of mine life.	The PRCP and schedule have been revised to include rehabilitation for all areas of the WRDs as there is insufficient monitoring data to ascertain the progress or success of previous rehabilitation. It is assumed that all WRDs will require application of all relevant RMs.