

Notice

Environmental Protection Act 1994

Information request

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

To: North Queensland Tungsten Pty Ltd
Level 4, 46 Colin Street
WEST PERTH WA 6005

Attention: Peter Bleakley
Email: peter.bleakley@tungstenmining.com

Your reference: A-PRCP-NEW-100951895 | EPML01188313
Our reference: C-PRCP-100951907 | 101/0013039

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

1. Application details

The application for a proposed PRC plan was received by the administering authority on 30 September 2025.

The application reference number is: A-PRCP-NEW-100951895.

Land description: Mining Lease (ML) 20535, ML20536, ML20537, ML20538, ML20566, ML20567, and ML20576.

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 12 June 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.

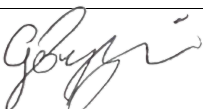
The response to this information request or a request to extend the information response period can be submitted to the administering authority by email to ESCairns@detsi.qld.gov.au

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

7 November 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
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ESCairns@detsi.qld.gov.au

Attachments

Attachment 1: Additional information required for a proposed PRCP schedule EPML01188313, North Queensland Tungsten Pty Ltd.

Attachment 2: PRCP Consultation Schedule EPML01188313 North Queensland Tungsten Pty Ltd.

Attachment 3: Bio-Condition Modified Benchmark information PDF.

Attachment 4 - Departmental template - water quality - Item 5 Option 1 & 2

Attachment 1: Additional information required for a proposed PRCP schedule EPML01188313, North Queensland Tungsten Pty Ltd.

Item	Reference	Matter	Information Request
PRCP Consultation Schedule			
1.	PRCP Schedule: General	The department's proposed amendments to the PRCP schedule are included as Attachment 2 (PRCP Consultation Schedule) to this notice. Where a criterion in the attached PRCP Consultation Schedule has not been varied, this does not imply that the criterion is accepted. Please review and revise the PRCP Consultation Schedule, taking into account the additional information request items below. Please note that this process may lead to further additions or changes to the draft PRCP Schedule at later stages of the application.	Review the proposed PRCP Consultation Schedule included in Attachment 2 and indicate your agreement or provide any comments regarding the amendments within the document itself. Agreements or comments on the schedule should be submitted as subsequent comments, while any additional concerns or feedback should be incorporated using track changes and comments within the document.
2.	Rehabilitation Milestone Criteria	The department has determined that the milestone criteria provided in the PRCP schedule do not meet SMART principles or demonstrate that a stable condition will be achieved. Please refer to the PRCP Consultation Schedule to see the departments comments referring to the milestone criteria.	Review the department's comments regarding the milestone criteria in the PRCP Consultation Schedule and revise the criteria to ensure SMART principles have been incorporated. Provide an updated PRCP Schedule that addresses the items raised via return comments in the PRCP Consultation Schedule. Any information to be provided as requested in this notice must be supported by SMART criteria to be incorporated within the PRCP Schedule and justified in the PRC plan.
3.	Water Quality and Water Management Plan	The PRCP Schedule proposes rehabilitation outcome criteria for groundwater and surface water limits as specified in Schedule D of environmental authority EPML01188313 (the EA). To ensure these limits are representative of a post-closure condition and fit for closure purpose, they must be site-specific and informed by water	Consider adopting the suggested surface water and groundwater quality limits provided in Appendix 4 and 7 in the PRCP Consultation Schedule. Alternatively, propose appropriate site-specific parameters supported by sufficient data in the format specified, provided as

		quality objectives (WQOs), relevant guidelines, and background data. Where sufficient monitoring data is unavailable, WQOs as proposed in the PRCP Consultation Schedule should be adopted. The Epic Environmental Watershed PRC Plan dated 1 September 2023 (PRC plan) is unclear when discussing water management on site, with the PRCP Schedule omitting sufficient surface water and groundwater related milestone criteria that progresses towards safe, stable and non-polluting closure outcomes of the site.	Attachment 4 (Departmental template - water quality - Item 5 Option 1 & 2). In accordance with DES 2021 (Using monitoring data to assess groundwater quality and potential environmental impacts), 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 must be used for phys-chem indicators and the 95th percentile for toxicants. b) For groundwater, the 95th percentile of baseline data can be used to determine site-specific limits for all indicators. Provide further detail regarding the development of the water management plans on site and what ongoing treatment may be required for closure, particularly in reference to the disturbance areas that have a nominated post mine land use (PMLU) of water storage. The department has nominated further surface water and groundwater milestone criteria as seen in the PRCP Consultation Schedule to consider.
4.	Revegetation Species List and Bi-Condition Benchmark	The PRCP Schedule and PRC plan requires further information on revegetation activities and objectives. This includes site preparation which details how the land preparation will increase the probability of revegetation success, the sequence revegetation activities to establish a self-sustaining vegetation community and a species list that details which native species are to be included in revegetation. Attachment 3 (Bio-Condition Modified Benchmark information PDF) is included in this notice with further detail in Appendix 2 of the	Revise the PRC plan and clearly articulate the revegetation objectives for the site that are consistent with the proposed PMLUs and include all relevant information as outlined in section 3.6.1 of the Guideline <i>Progressive rehabilitation and closure plans (ESR/2019/4964)</i> (PRCP Guideline). Complete Appendix 1 of the PRCP Consultation Schedule by providing a species list and minimum seeding rates for

		PRCP Consultation Schedule. The Bio-Condition benchmarks enable criteria which: a) Establish a benchmark for measuring areas requiring revegetation, demonstrating that the area is progressing towards achieving a stable condition; and, b) Establish a benchmark for evaluating the success of revegetation for each regional ecosystem.	the selected revegetation species. These species should be representative of the bio-condition table (where relevant), reference sites and identified regional ecosystems (RE). Justify the selection by identifying key RE and flora species, including pasture plants and tree and shrub species to be achieved. Additionally, revise the PRCP Consultation Schedule to incorporate Bio-Condition benchmarks for the REs aligned with the relevant target PMLU. Use the modified Bio-Condition benchmark framework to develop suitable benchmarks and update milestone criteria and Appendix 2 of the PRCP Consultation Schedule accordingly.
5.	Final Site Design Map and Reference Map	The department identified Figures 1 and 2 of Appendix A of the PRC plan appear to be the final site design and reference maps. The final site design map requires revision as this map must depict the proposed PMLUs for each mine feature and surrounding undisturbed areas and the tenure boundaries. This can be provided as two maps. The reference map must also include the tenure boundaries.	Provide an updated final site design map and reference map that address the matter raised in the adjacent column. Ensure information provided aligns with section 4 of the PRCP Guideline.
6.	Groundwater Monitoring Network	The location descriptions and hydrogeological units of groundwater monitoring points must be specified. As per Appendix 6 in the PRCP Consultation Schedule, the department recommends adding groundwater monitoring bores to adequately monitor potential impacts during closure.	Provide the additional detail of the monitoring points for groundwater in Appendix 6 of the PRCP Consultation Schedule. This must include an assessment detailing the rationale and justification for selecting the locations, demonstrating their suitability for the intended monitoring objectives. This assessment should also account for the site-specific conditions and the monitoring requirements to be applied.

7.	Production Mine Life	The PRC plan states rehabilitation timing has been based on the projects MLs expiry date of 2033, therefore rehabilitation of rehabilitation area (RA) 1 to RA5 will commence in 2023 which has surpassed. The PRC plan and schedule rehabilitation timing must be consistent with the project's mine life with dates to be updated and reflective of the proposed commencement of rehabilitation.	Revise the PRC plan and PRCP schedule to include appropriate rehabilitation commencement dates based on the project's mine life. Please note, each rehabilitation milestone (RM) commencement date needs to flow directly on from the end of the previous RM for each RA.
Rehabilitation Planning Part (PRC Plan)			
8.	Disturbance Areas	Clarification is required relating to all mine disturbance footprints proposed for the project to demonstrate all mine features have been accounted for in the PRC plan and PRCP schedule.	In response to this item, update the PRC plan and PRCP Schedule with a tabularised list of the authorised disturbance areas (in hectares) for each mine feature. Cross reference this table with the PMLUs as proposed in the PRC Plan. Include mapping that clearly displays the data from the above requested table and provide a comparison map between the authorised disturbance map in the EA to the PRCP disturbance and rehabilitation map/s. Please note, the EA and PRCP footprints must align.
9.	Rehabilitation Timing	The PRCP Schedule provided does not appropriately implement when each RM is to be achieved. For example, RA1 continuously and simultaneously proposes RM1 to occur throughout the entire rehabilitation period. No justification is provided for the proposed timing, and it is not appropriate for all RMs to be applied to all areas at each milestone date in the PRCP schedule.	Update the milestone timeframes in RA tables in the PRCP Schedule, confirming the areas to be brought into each timeframe with each corresponding RM. The proposed timeframe to be implemented must be justified in the PRC plan.
10.	Landholder Agreement -	It is unclear from the images provided, including the landholder agreement, which tracks are proposed to be retained. Furthermore,	Provide an updated landholder agreement which explicitly details which tracks and infrastructure are to be retained. Detail what infrastructure is currently on tenure and confirm landholder ownership. Confirm if any of the

	Retained Infrastructure	it is unclear what infrastructure is present on tenure and held by the landholder and/or proposed to be utilised during operation.	present infrastructure is proposed to be utilised for mining related activities. Information to be provided must include all relevant information outlined in section 3.2 and 3.6.5 of the PRCP Guideline.
11.	Reports	The PRC plan describes supporting reports which date between 2006 and 2016. It is unclear if these reports represent the approved site design and meet best practice environmental standards. The PRC plan also references several reports which have not been submitted in support of the application.	Provide a revised PRC plan that includes all relevant reports mentioned in the PRC plan. For example, reports that reflect the final site design and/or include relevant rehabilitation information. The reports must be accompanied by an assessment of validity, given their age, and any findings from the reports must be clearly referenced within the PRC plan.
12.	Selected PMLUs	The PRC plan does not provide sufficient information on the nominated PMLUs including an evidence-based comparison and justification for each proposed PMLU against alternative options. For example: a) Proposed PMLU of low intensity grazing on the WRDs (RA3) may not be appropriate for the proposed landform. It is identified the proposed landform design includes steep unvegetated batters, defined in Appendix B as precluding grazing. Further, there remains a risk of cover system failure and exposing potentially acid forming material (PAF) within the WRD via cattle transversing the area which has not been addressed. The department has strong reservations with regard to approving grazing outcomes on waste storage facilities with installed cover systems given the increased potential for failure to achieve a stable condition.	In accordance with section 3.2 of the PRCP Guideline, provide an evidence-based comparison and justification for each proposed PMLU against alternative options. This must include additional information describing the proposed water storage PMLU as well as information to demonstrate how the pits and WRDs will support and are suitable to sustain the proposed PMLU.

		a) A PMLU of water storage is nominated for the disturbance areas identified as pits, however the PRC plan provides no detail about the purpose of the water storage or use of the water stored in the pits.	
13.	Waste Characterisation	The department has identified conflicting information regarding characterisation of the waste material on site. For example: a) Section 7.1.4 of the PRC plan states 'In summary, waste rock (black and white) is considered to be PAF material overall, and the mineralised waste is considered to be non-acid forming (NAF) material overall. It is expected that there is no waste within the Project that is entirely geochemically benign, and therefore all pit wastes will require management'. Appendix C also confirms this position. b) Appendix B identifies that the waste rock is NAF and mineralised waste is PAF. The information provided in the PRC plan must be representative of the current understanding of the site and operations and include consistent information.	Revise section 7.1.4 of the PRC plan and provide sufficient waste characterisation information in line with information requirements outlined in section 3.6 of the PRCP Guideline. This must include but is not limited to: a) Accurate characterisation of waste material including description of tests undertaken. b) Identification of contaminants of concern. c) Description and justification of sampling regime. d) Volume of waste material and waste type to be expected on site. e) Management and mitigation measures to be implemented to manage environmental risks and achieve proposed rehabilitation methods and objectives.
14.	Geochemical Assessment and Cover Design/Trials	No cover system design has been proposed for WRDs containing dried process residue and PAF material, noting that section 7.1.6 of the PRC plan states cover trials will be undertaken in accordance with EA conditions to inform the cover system. Section 7.1.4 of the PRC plan also states that 'approximately 8.1 million tonnes of PAF overburden will be produced annually'. The PRCP Guideline requires that where waste has the potential for acid mine drainage,	Reproduce and provide the geochemistry reports referenced ensuring to confirm their validity as per information request item 12. The reports are expected to be inclusive of the waste characterisation of all processing and mining waste geology as well as include an analysis of the mining waste geology as per the standard static and kinetic testing. These reports must provide further information to be included in the PRC plan

		neutral mine drainage or saline mine drainage, an appropriate cover system must be designed. The PRC plan must provide more detailed information on the waste geochemistry and associated environmental risks. This information must then inform and assist in the development of a best practice cover system for the WRDs. This information is also critical to inform the rehabilitation trials as proposed. Referenced reports in the PRC Plan (Appendix B, section 3.6) have not been provided. Please note the department has identified these reports are from 2008 and may be outdated.	in support of the site's geochemistry, associated environmental risk, and best practice WRD cover design to be implemented. Ensure information in accordance with section 3.6.1 and 3.7.1 of the PRCP Guideline is provided. In consideration of the above requested information, also revise the PRC plan to include a comprehensive description of the seepage collection systems, pathways, the expected composition, seepage modelling and estimated seepage volumes from the WRDs. Provide an analysis of how the cover design minimises seepage and ensure that the design is informed by both rehabilitation trials and geochemical reports, in line with best practice standards.
15.	Final Landform Design	Conflicting information appears to have been provided in section 7.1.5 of the PRC plan as this section identifies that the final landform design of the site is not available. However, Figure 15 identifies a final landform design. Appendix F appears to identify the most recent WRD and pit slope design, however other supporting reports also include designs which differ from that proposed in Appendix F. It is unclear which design is proposed for the purposes of the PRCP. Furthermore, there is no erosion assessment of the proposed final landform and, as stated above, the final landform is not clearly articulated.	Provide the final landform design which must include all relevant information as described in section 3.6.1 of the PRCP Guideline. A technical assessment must be provided and must demonstrate that the proposed landform designs will not erode at an unacceptable rate and are expected to remain erosionally stable. Consideration must be given to the risk of exposing PAF or otherwise potentially harmful waste material encapsulated in the WRD landform.
16.	Pit Design	There is lack of information in section 7.1.10 of the PRC plan to demonstrate and provide confidence that the pits will achieve a	Revise section 7.1.10 of the PRC plan in accordance with section 3.6.3 of the PRCP guideline. The information

		safe and stable condition and can sustain the PMLU. The department requires further supporting information and any relevant reports to demonstrate and provide confidence that the pits will achieve a safe and stable condition. Information to be provided must demonstrate that there is no risk to the receiving environment and the land can achieve and sustain the PMLU.	must clearly define the total estimated pit footprint and outline strategies to minimise the final void area. This should be supported by comprehensive pit void modelling, including a 3D Void Design Plan and geotechnical stability reports. These reports must assess the long-term stability of pit walls, considering erosion, weathering, and the impacts of significant hydrological events. Further, the final pit design must be verified by an appropriately qualified person, confirming the final slope angles for high walls, low walls, and end walls of each void. Key aspects of void hydrology, including the long-term water balance, stratification within the voids, groundwater connections and overflow risks must be evaluated to ensure that the final void design is environmentally sound and integrates effectively within surrounding water systems.
17.	Rehabilitation Material	Limited information has been provided regarding rehabilitation material required for the site with Appendix E of the PRC plan stating the soil and land suitability assessment requires revision. Section 7.1.3 of the PRC plan indicates topsoil resources for rehabilitation are expected to be very limited and proposes the use of NAF spoil material as a primary growth medium. The statement is not supported by any material balance to estimate the expected topsoil deficit, nor is there any data provided to demonstrate the suitability of the spoil material as a primary growth medium. It is also suggested that growth media may not be applied at all in some locations, with no information to demonstrate how vegetation will be established and sustained without any growth medium.	In accordance with section 3.6.1 of the PRCP Guideline, provide a revised PRC plan which details: a) Rehabilitation materials balance detailing volumes of materials required versus available for use in rehabilitation. This must include the quality and quantity of available resources on site to be used in each RA, ensuring to advise how NAF material will be utilised and how PAF material is expected to be encapsulated. b) Sufficient information to demonstrate how any deficit will be addressed.

			c) Assessment to determine the need for ameliorants and fertilisers for use in rehabilitation activities. This must detail the relationship between soils and vegetation ecosystems to support the proposed PMLUs. d) Detailed characterisation of waste rock materials proposed to be used as primary growth media, including assessment of physical and chemical properties that may constrain establishment of target vegetation, and proposed strategies to manage those constraints. e) Detailed proposed rehabilitation methodology and performance criteria to rehabilitate all disturbed areas to a state that supports and achieves the proposed PMLU.
18.	Regulated Structures	RA2 and RA4 include regulated structures with a PMLU of 'water storage'. All regulated structures must comply with the <i>Manual for assessing consequence categories and hydraulic performance of structures (ESR/2016/1933)</i> and applicable technical guidelines as specified under the relevant EA conditions. No design information is presented for the regulated structures to support the application.	Revise the PRC plan and: a) Provide the Consequence Category Assessment (CCA) for the regulated structures where relevant; and b) Demonstrate that the design and flood performance of all regulated structures comply with <i>ESR/2016/1933</i> and applicable standards and is verified by an appropriately qualified person/s.
19.	Community Consultation Register	Insufficient information has been provided in the PRC plan to demonstrate how the proposed PMLU's are consistent with the outcomes of community consultation or with any local, state, or	Revise the community consultation plan in accordance with section 3.5 of the PRCP guideline. Demonstrate a community consultation plan is in effect and the

		commonwealth government plans or strategies. Table 7 of the PRC plan describes 'future' consultation with the relevant community and stakeholders, confirming the plan to date has not been completed with the community consultation plan (Table 8) also not describing the proposed consultation frequency.	community, public and stakeholders have been consulted including updates from any further consultation that may have taken place since the lapsed PRCP application. Provide a revised PRC plan and include information to demonstrate the extent to which each PMLU for the land is consistent with: a) The outcome of consultation with the community in developing the plan. b) Any strategies or plans for the land of a local government, the State or the Commonwealth.
20.	Hydrogeology	Limited and conflicting information is provided in section 7.1.1 of the PRC plan. The reports referenced to support the hydrogeology assessment contain conflicting information as they are either not based on the approved final site design, are based on operational status of the mine as opposed to closure, are in a 'draft stage' or were not submitted in support of the application.	Revise section 7.1.1 of the PRC plan and provide all hydrogeology information for the site in line with requirements described in section 3.6.1 of the PRCP Guideline.
21.	Water Management	Limited and conflicting information is provided regarding water management across the site. Section 7.1.7 of the PRC plan focuses on operational water management and does not adequately discuss water management for the PMLUs. The PRC plan states that 'no contaminants are identified that pose a risk to environmental values as a result of the project'. This is contradicted by further information which states some water structures will have elevated physiochemical parameters. Consideration has also not been given to water quality degradation potentially resulting from contact with PAF material and subsequent release from the	In accordance with section 3.6.1 of the PRCP Guideline, revise section 7.1.7 of the PRC plan. Ensure supporting water management information identifies: a) Which report/s reflect the current approved final site design and omits reports which are based on the operational phase of the project. b) The total number, location and footprint of the approved water structures for the project, including if and which dams are to be retained,

		landform. Further, there is limited information demonstrating water storages are a valid PMLU for the dams and pits.	noting this must be supported by a contemporary landholder agreement. c) The potential contaminants that pose a risk or could affect environmental values of the receiving environment and the water quality, including the source pathway and fate of contaminants and proposed corrective actions. d) The locations of all seepage interception systems and clarify the management and rehabilitation of these systems. e) The predicted water quality for all the water storages proposed to remain at closure and demonstration the water quality supports the intended final purpose. f) If and why on-going water management will be needed and discuss how proposed strategies contribute towards closure. g) Information demonstrating the residual voids will behave as a sink. This must include a water balance study including an assessment of pit surface and groundwater interactions.
22.	Flooding	Section 2.1.5.3 and 7.1.2 of the PRC plan includes conflicting information regarding the flood susceptibility and influence across the site and it is unclear if an assessment has been undertaken. For example, the PRC plan states:	In accordance with section 3.6.1 of the PRCP Guideline, provide a flood assessment and confirm the flood susceptibility and influence of the site. Where flooding is a consideration, develop hydrologic and hydraulic models (including probable maximum flood) and prepare and submit a flood-risk profile.

		a) 'There is no indication whether or not the proposed development lies within a 1% annual exceedances probability area'. b) 'The Project area has not undergone historical flooding and is not likely to experience a one percent AEP flood event'. Spatial information confirms that ML20567 intersects the Mitchell River floodplain and mapped waterways, however, the PRC plan does not address this interaction. Almost all mining leases and proposed disturbance areas contain, or are influenced by, ephemeral creeks draining to the Mitchell and Palmer Rivers. Flooding and erosion risk are therefore potential issues requiring assessment.	
23.	Risk Assessment	Section 8 and Table 14 of the PRC plan identifies the risks associated with the rehabilitation of the project. The department has determined that not all the risks associated with the land not achieving a stable condition have been addressed.	In accordance with section 3.7 of the PRCP Guideline, revise the PRC Plan and identify all risks associated with all land not achieving a stable condition and how it will be managed or minimised. These risks must include but are not limited to cover design failure and potential seepage, risk regarding residual voids and potential impacts, and risks associated with not achieving proposed milestone dates.
24.	Authorised Disturbance	The spatial information submitted requires further consideration and refinement. There are several repetitions of each domain within the spatial data making it difficult to understand and interrogate. It appears that the spatial data submitted does not align with the map of authorisation in the EA.	In accordance with section 3.1 of the PRCP Guideline, revise the spatial data to provide clarity on the mining domains total disturbance areas and proposed RAs which aligns with the EA. Clarify the below areas: a) The camp (labelled accommodation village in the spatial) is not consistent with the specified

			location and disturbance footprint authorised in the EA. b) The haul roads are greater than the EA authorisation. c) The effluent irrigation area is proposed to be constructed where the camp area is. d) The spatial has not accounted for access roads within ML20566, as specified in Schedule I – Figure J of the EA.
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