

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: GS COAL PTY LTD; J.C.D.
AUSTRALIA PTY LTD; J-
POWER AUSTRALIA PTY LTD

C/o
GS COAL PTY LTD
Level 44, Gateway Building,
1 Macquarie Place
SYDNEY NSW 2000 Australia
Via email transmission only

Attention: Morné van Zyl, Environment & Community Manager
Email: morne.vanzyl@glencore.com.au

Further information is required to assess an application for a proposed PRC plan

1. Application details

The application for a proposed PRC plan was received by the administering authority on 21 December 2021.

The application reference number is: EPML00634113

Land description: ML1787, ML1788, ML1881, ML1884, ML1995, ML2355, ML70334, ML70343 and ML700020.

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 provided in **Appendix 1**.

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 September 2022** (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 CRMining@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.

If you require more information, please contact the Department of Environment and Science using the contact details below.



Signature

4/03/2022

Date

Chris Wake
Department of Environment and Science
Delegate of the administering authority
Environmental Protection Act 1994

Enquiries:
Business Centre Coal
PO Box 3028, Emerald QLD 4720
Phone: (07) 4987 9320
Email: CRMining@des.qld.gov.au

Attachments

Appendix 1: Additional information required to assess the proposed PRC plan for Clermont Coal Mine

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Item	Relevant Document Section	Issue	Information Requested
Rehabilitation Planning Part			
1.1	Clermont Open Cut - PRC Plan, 3.3.5.2 Water Management; and 3.5.7.4 Long term water management.	The PRC plan states the Northern Boundary diversion will be retained as a water management area. Section 3.3.5.3 identifies the diversion as infrastructure to be retained. It is not clear if this diversion is captured as part of RA4 (Water Management Areas) as the description provided against this RA in the PRCP schedule does not include a reference to the diversion.	Provide a revised PRC plan (including an updated PRCP schedule) that clarifies which Rehabilitation Area will include the Northern Boundary diversion.
1.2	Clermont Open Cut – PRC Plan, 3.3.5.2 Water Management	The proposed PRC plan does not clearly demonstrate that West Dam, the Northern Boundary Diversion and Gowrie Creek Diversion are authorised to be retained post-mining. The department requires confirmation that West Dam (authorised under Water Licence WL38931F), is approved to remain as a permanent water structure which impounds water. Confirmation is also required that Gowrie Creek Levee and Diversion (WL189400) can remain permanently with the effect of diverting the flow of water, and Northern Boundary Diversion (WL48361F) is permitted to interfere with surface waters on a permanent basis.	Provide confirmation that the Department of Regional Development, Manufacturing and Water (DRDMW) has agreed/authorised West Dam, Gowrie Creek Levee and Diversion and the Northern Boundary Diversion to remain post-mining.
1.3	Clermont Open Cut – PRC Plan, 3.3.5.2 Water Management	The proposed PRC plan states West Dam (RA4) is to be retained as a water management area. Please provide further detail regarding what use the water within West Dam will support. The department notes that other water management structures have greater clarity with regards to the use of water contained within those structures. As per the proposed PRC plan, diversions are proposed to be retained for the conveyance of water, whereas Cement Hill is stated to have the use of stock watering. However, the planning part does not adequately describe the use of water proposed to be stored in West Dam.	Provide a revised PRC plan that describes the use for water which is stored within West Dam.
1.4	Clermont Open Cut - PRC Plan, Section 3.3.5.3 Retained Infrastructure and Section 3.5.12.1 Infrastructure to be retained.	The rehabilitation planning part states that retained infrastructure <i>may</i> include stock fencing, safety fencing, roads and any water and power infrastructure for landholder specified use. Other infrastructure to be retained includes the historic Wolfgang Homestead, the rail loop (owned by Aurizon), powerlines (controlled by 3 rd parties) and a highway (DMR controlled).	Identify all items of infrastructure or assets, including those: • associated with land that is undisturbed by mining activities; and • that form part of third-party activities; and

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	Clermont Open Cut Rehabilitation Management Plan, Section 6.2 Rehabilitation Objectives by Domain Section 3.2 Post-mining land use, PRCP Guideline (Version 2.00)	The PRCP Guideline explains that the definition of a PMLU is not intended to include third party activities or assets that continue to exist once mining activities have ceased. Some examples are provided on page 20 of the guideline. Further, the RMP indicates that some of these areas are undisturbed (e.g. Wolfgang Homestead) and will not require progressive rehabilitation. The PRCP Guideline also explains that permanent infrastructure may be considered as part of the PMLU where it is consistent with the land use. Some examples are provided on page 21 of the guideline.	that will continue to exist once mining activities have ceased. Further, determine if specific infrastructure items must be included in the proposed PRCP schedule as a Rehabilitation Area with a proposed PMLU of Retained Infrastructure. Where an item or items are consistent with another land use, they can be incorporated into other relevant Rehabilitation Areas. Provide a revised PRC plan (including an updated PRCP schedule) that address any resultant changes.
1.5	Clermont Open Cut – PRC plan, Section 3.4 Non-use Management Areas. Section 3.3 Non-use management areas, PRCP Guideline (Version 2.00)	The proposed PRC Plan does not state the extent to which the NUMA is consistent with: (i) the outcomes of consultation with the community in developing the plan; and (ii) any strategies or plans for the land of a local government, the State or the Commonwealth. This information is required under section 126C(1)(d) of the <i>Environmental Protection Act 1994</i> (EP Act) and is not exempt under the transitional provisions of section 754(3).	Provide a revised PRC plan to include additional information which explicitly addresses the information requirements of section 126C(1)(d) of the EP Act.
1.6	Clermont Open Cut - PRC Plan, Section 3.5.3 Soil and Capping Material Assessment	Table 27 – <i>Soil Material Balance</i> states that sufficient volumes of topsoil material are available to complete rehabilitation. It is unclear if the material balance provided in Table 27 is based on a constant application depth of 100mm, and consequently does not identify if there will sufficient material available should the rehabilitation methodology require a greater depth of topsoil application. Table 26 – <i>Soil Recovery Class: Rehabilitation Use Hierarchy</i> identifies Basaltic Weathered Rock Material suitable for providing a rocky surface cover that resists erosion and supports vegetation. The Rehabilitation Planning Part does not identify if there are areas where this class of material will be used as growth media and if sufficient quantities will be available.	Provide a revised PRC plan which clarifies – - what application rate Table 27 is based on; and - whether the Basaltic Weather Rock material will be utilised as a growth media and if sufficient quantities of this material will be available.
1.7	Clermont Open Cut - PRC Plan, 3.5.6 Cover Design.	The proposed PRC Plan states that a cover system is not required at Clermont Coal Mine. However, the plan also states that mineral waste which may be	Provide a revised PRC plan that addresses the information requirements of the PRCP

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	3.6.1 General rehabilitation practices, Cover design, PRCP Guideline (Version 2.00)	expected to generate AMD, NMD or saline drainage is encapsulated within benign material in the site's waste rock dumps (WRDs). Section 3.5.4.4 describes how reactive waste is classified and managed. In particular, specific details regarding the design principles governing how this material is placed in waste rock dumps are provided. The requirement in the PRCP Guideline to provide details of an appropriate cover system to manage mined and waste material is intended to include such information as provided in Section 3.5.4.4 of the proposed PRC plan and Section 8.2 of the Rehabilitation Management Plan. Further consideration of the requirements in the PRCP Guideline is recommended to ensure all the information requirements are met. It is also recommended that a reference to section 3.5.4.4 is provided as part of the discussion in section 3.5.6 of the proposed PRC plan.	Guideline, section 3.6.1 concerning cover design.
1.8	Clermont Open Cut - PRC Plan, 3.5.7.4 Long term water management. Section 3.2 Post-mining land use, Section 3.5.6 Built infrastructure, PRCP Guideline (Version 2.00)	The proposed PRC plan states "All existing dams on site, other than West Dam, will be decommissioned during rehabilitation activities." The milestone criteria for RM7 provides for the retainment of regulated structures, specifically dams, with the agreement of the land holder. The PMLU schedule for RA4 does not include RM7. However, RM7 is proposed as a milestone for RA1 and RA5. If West Dam is the only dam (and also Regulated Structure) to be retained, the purpose of RM7 criterion (b) against RA1 and RA5 in the PRCP schedule is unclear. The PRCP Guideline states that infrastructure (such as buildings, roads, dams, and power lines) may be accepted as part of a PMLU where the relevant land holder has agreed through a signed land holder statement declaring that they will accept responsibility for the infrastructure once mining has ceased. Section 3.6.5 of the PRCP Guideline requires evidence of agreement for any infrastructure that will have ownership transferred.	Provide a revised PRC plan that confirms – - if West Dam is the only regulated structure to be retained; - if no other regulated structures will be retained, whether RM7 (b) remains relevant against RA1 and RA5 in the schedule; and - whether RM7 (b) is more appropriately proposed against other Rehabilitation Areas such as RA4; and Provide evidence of the signed formal agreement/s with underlying landholders necessary to retain any structure/s proposed to be retained.
1.9	Clermont Open Cut – PRC Plan, 3.5.7.4 Long-term Water Management Requirements	The proposed PRC plan indicates that slopes on the Northern Boundary Diversion are geotechnically safe and stable, but ongoing degradation, weathering and erosion will occur in the future. The discussion continues to state that works to flatten slopes or install rock armouring will be counterproductive. Further information is required to demonstrate the batters of the diversion will achieve a stable condition. This may include quantifying the rate of	Provide a revised PRC plan that demonstrates how the batters on the Northern Boundary Diversion will achieve a stable condition once rehabilitation activities are complete.

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		weathering/erosion on these batters, quantifying the risks associated with no further intervention to inhibit erosion and how the final batters will successfully achieve the proposed post mine land use.	
1.10	Clermont Open Cut - PRC Plan, Section 3.5.8.6 Revegetation Process and Site Preparation Strategies Clermont Open Cut Rehabilitation Management Plan, Section 8 Rehabilitation Design Principles	The Rehabilitation Planning Part states that topsoil application rate is to range between 100 and 300 millimetres (mm). The Rehabilitation Management Plan states that the required topsoil thickness for each area will be determined by the Rehabilitation Superintendent, with reference to the Topsoil Management Guideline. Currently, the Rehabilitation planning part provides no explanation regarding when the rehabilitation methodology will require a depth of topsoil >100mm. This information is recommended to demonstrate that the application rates will support achievement of the relevant post mine land uses.	Provide a revised PRC plan with additional information to explain when the various topsoil application depths apply and how these depths support achievement of the relevant post mine land uses.
1.11	Clermont Open Cut - Rehabilitation Management Plan, Section 8.2.3 Coal Tailings and Processing Wastes	Provide additional information as required by Section 3.6.1 General Rehabilitation Practices: Hydrogeology of the PRCP Guideline. Section 8.2.3 of the RMP mentions that “Current data and previously completed investigations indicate adequate buffering is occurring in-situ as monitoring bores show acid drainage is within acceptable ranges”. As the Tertiary Basalt Aquifer is considered the most significant aquifer and the monitoring bores indicate acid drainage may be occurring, additional information is needed to ensure this is addressed sufficiently in the planning part.	Provide a revised PRC plan that includes: - the time period the buffer capacity will last and whether it will be sufficient to buffer the encapsulated PAF material; - the time period it would take for the encapsulated PAF material to completely oxidise; - completed contaminated fate transport modelling from the groundwater modelling; - a source, pathway, receptor model for the acid drainage measured in the monitoring bores; and - mitigation measures to minimise seepage impacting on groundwater aquifers and include this in the rehabilitation planning part.

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PRCP Schedule			
2.1	General	The relevant activities part of the schedule is intended to describe the relevant mining activities (type of disturbance) that occurred in each Rehabilitation Area (RA) rather than the rehabilitation activities to be carried out which are described by the rehabilitation milestones. Refer to the PRCP Guideline, Appendix 2 for an example of what information is intended against this section of the schedule.	Provide a revised PRC Plan (including PRCP schedule) with updated information in the “relevant activities” section of the schedule.
2.2	Worksheet: RA1	Commencement of first milestone - the date provided is 31/12/2022 which is the same as the first ‘Milestone completed by date’. Please confirm if RA1 includes the low wall part of the CM void.	Provide a revised PRC Plan (including PRCP schedule) that: • amends dates in the PRCP schedule; and • confirms if the low wall of the CM Void is part of RA1.
2.3	Worksheet: RA2	The PRCP schedule appears to indicate the first milestone will be RM8, however RM8 is listed twice in this table. It is assumed that this is a typographical error and the first milestone should be RM3.	Provide an updated PRC Plan (including PRCP schedule) to reflect the corrected milestone reference.
2.4	Worksheet: RA3	The date identified for commencement of the first milestone appears in a non-date format. It is assumed this is a typographical or cell formatting error.	Provide an updated PRC Plan (including PRCP schedule) to reflect the corrected date.
2.5	Worksheet: RA4	To be read in conjunction with Item 1.1 of this Information Request - Please confirm if the Northern Boundary Diversion and gravel extraction areas at Cement Hill are included in this Rehabilitation Area. The total rehabilitation area size (123.89ha) is less than that allocated against the final milestone (143.66ha). The final rehabilitation milestone is listed as RM11, however this milestone is not proposed in the PRCP schedule.	Provide a revised PRC Plan (including PRCP schedule) that: • confirms if RA4 includes the Northern Boundary Diversion and gravel extraction areas at Cement Hill; and • consistently indicates the size of the total rehabilitation area; and • deletes or clarifies the reference to RM11.
2.6	Worksheet: RA5	The PRC plan does not currently provide a clear explanation of the area associated with RA5, or which sub-areas require new or additional rehabilitation activities. Appendix 4.11, Section 5.3 explains that selected areas of the Train Load-out Area will be reworked to repair areas of erosion. Section 11.5 of the	Provide a revised PRC Plan (including PRCP schedule) that: • clearly identifies which areas in RA5 require additional rehabilitation activities;

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		Rehabilitation Management Plan states that 113ha of the legacy rehabilitation area can be considered as having completed rehabilitation but requires ongoing monitoring. The total rehabilitation area size for RA5 is stated as being 123.89ha, however the area provided against a number of milestones is 139.27ha. Also, considering the information provided in the RMP, it appears that while there is 113ha of historic rehabilitation considered to be complete, there is 139.27ha of other land that enters the progressive schedule at RM1 and moves through a number of other milestones. The schedule also indicates that RA5 is not available for rehabilitation until 2032, but no explanation regarding this timeframe is provided in the PRC plan.	- consistently refers to the areas (ha) associated with progressive rehabilitation; and - explains the timing associated when land is available for rehabilitation.
2.7	Worksheet: RA6	To be read in conjunction with Item 1.4 of this Information Request - RA6 – <i>Retained Infrastructure</i> does not include identification and remediation of contaminated land before handover to post-mining land holder (i.e. RM3).	Consider if RM3 is relevant. Provide an updated PRC Plan (including PRCP schedule) accordingly.
2.8	Worksheet: RA7 Clermont Open Cut - PRC Plan, Section 3.3.5.4 Nature Conservation. Section 4.1 Steps for developing a PRCP schedule, Step 1 Final site design, PRCP Guideline (Version 2.00)	The PRC plan identifies that on-lease Nature Refuge and Voluntary Declaration areas are present to protect King Bluegrass and Belyando Cobbler's Peg communities. It is also stated that each area has its own management plan and monitoring requirements under approval conditions that do not form part of the PRC plan. The PRCP Guideline requires the Final Site Design to indicate the proposed outcome for all areas on relevant tenures. However, where land is undisturbed and does not require progressive rehabilitation, such areas do not meet the definition of a Rehabilitation Area* and consequently are not required to be incorporated into the schedule of progressive rehabilitation. *Rehabilitation Area is defined in Section 8 Glossary of the PRCP Guideline.	Consider whether RA7 Nature Conservation Area meets the definition of a Rehabilitation Area and whether it is required to be included as part of the PRCP schedule. Provide an updated PRC Plan (including PRCP schedule) accordingly.
2.9	Worksheet: RA8	The total rehabilitation area size and cumulative area available (123.89ha) is greater than that allocated against the relevant milestones (3.95ha).	Provide an updated PRC Plan (including PRCP schedule) to reflect the corrected area.

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Item	Relevant Document Section	Issue	Recommendation
2.10	Worksheet: Improvement Area 1 (IA1)	The date identified as 'Commencement of first milestone' is 31/12/2026 which is earlier than the 'Date the area is available' of 31/12/28. It is generally anticipated that the date the area is available for improvement is the same as the commencement of the first milestone.	Provide an updated PRC Plan (including PRCP schedule) to reflect the corrected date/s.
2.11	Clermont Open Cut – PRC Plan, Section 3.3.5 Description of each nominated PMLU, and proposed PRCP Schedule Clermont Open Cut – Application form – 'Submission of a progressive rehabilitation and closure plan' (ESR/2019/4957), section 8 – Transitional PRC plan requirements	The Rehabilitation Milestones (RMs) presented against the Rehabilitation Areas (RAs) in the proposed PRCP schedule do not appear to be consistent with the information provided in Table 21 – <i>PMLUs and their milestones</i> . Inconsistencies include, but may not be necessarily limited to: - the PMLU schedule for RA1 (WRDs) omits RMs 1 and 3; - the PMLU schedule for RA2 (CM Tailings) lists RM8 twice and omits RMs 1 and 3; - Table 21 omits RM8 despite being included as a milestone in the PMLU schedule for RA2; - The PMLU schedule for RA4 (Water Management Areas) omits RM9; - The PMLU schedule for R5 (TLO historic rehabilitation) omits RM3; - Table 21 does not list RM2 against RA7 (Nature conservation areas) despite being included in the corresponding PMLU schedule; and - The PMLU schedule for RA8 (West dam landform) omits RM3. Inconsistencies are also present in section 8 of the approved form submitted with the application. E.g. The application form includes RM11 and RM12 which do not appear to be wholly consistent with the proposed planning part or schedule.	Provide an updated proposed PRC plan, corresponding schedule and application form which are consistent. Justification is requested where an RM is not applicable to an RA.
2.12	Rehabilitation Milestone 2 (RM2)	To be read in conjunction with Item 1.4 of this Information Request - The PRCP Schedule currently proposes that RM2 is relevant only for RA6 (Retained Infrastructure). RA6 may not be required in the schedule but there may be instances where RM2 criterion (a) should be applied to other Rehabilitation Areas. Alternatively, it may be more appropriate to delete RM2 and insert criterion (a) against one of the other RMs (for example at RM10).	Consider the matter raised and where necessary, provide an amended PRC plan (include PRCP schedule).
2.13	RM4	RM4 (a) refers to the site's Mineral Waste Management Plan (MWMP) for encapsulation of hazardous material, but this document has not been provided as part of the PRCP application.	Ensure that the details of all methods and management procedures for encapsulation of material are included within the proposed PRC plan, or include the MWMP as an attachment to the proposed PRC plan.

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Item	Relevant Document Section	Issue	Recommendation
2.14	RM9 4.1 Steps for developing a PRCP schedule, Step 4. Develop relevant milestones, PRCP Guideline (Version 2.00)	Table 39 - <i>Monitoring of Milestone Criteria</i> of the PRC plan outlines a schedule for monitoring, reporting and review for each of the Rehabilitation Milestones. This is appropriate. As proposed, RM9 (Monitoring and verification of rehabilitation in final landform) does not meet the intent of a Rehabilitation Milestone. A Rehabilitation Milestone is required to specify an outcome (i.e. a significant step or event) necessary to rehabilitate the land to a stable condition. The action of monitoring rehabilitated areas does not in itself constitute a milestone. Monitoring is necessarily undertaken to demonstrate achievement of a Rehabilitation Milestone. A list of common milestones, referred to as Reference Milestones, are presented in Appendix 3 of the PRCP Guideline. It is assumed that the more appropriate Rehabilitation Milestone for your proposed schedule would be Reference Milestone 'Achievement of surface requirements'. The rehabilitation milestone must also be supported by milestone criteria to demonstrate achievement of the milestone. It is recommended the proposed criteria are refined to align with the amended RM9. It may also be more appropriate that criterion (b) be moved to RM10. It is also noted that where areas are subject to RM9, generally only one (1) calendar year is provided for the milestone to be achieved. It is unclear whether this timeframe is achievable and it may be that several seasons of monitoring and maintenance may be required before RM9 could be considered achieved.	Consider the matter raised. Provide a revised PRC Plan (including PRCP schedule) that: • amends RM9 as recommended; • proposed Milestone Criteria sufficient to support the amended Rehabilitation Milestone; and • where necessary, increases the period of time allocated for achievement of the Rehabilitation Milestone.
2.15	Milestone Criteria 4.1 Steps for developing a PRCP schedule, Step 5. Develop site-specific milestone criteria, PRCP Guideline (Version 2.00)	On a number of occasions, the milestone criteria could be improved to better achieve SMART principles. It is recommended that specific design/management parameters are drawn from documents such as the RMP and listed as criteria, or alternatively specific references to sections or tables of documents (including the document name, version and date) are provided. Some examples are presented here - • RM4 – Criterion (a) broadly refers to a number of plans and design intents. Key design principles, including measurable criteria are presented throughout the PRC plan. For example, Tables 30 – 31, reference to de-watering of Megacell 2 in section 3.5.7.4, description of materials handling for reactive waste in section 3.5.4.4. Please note, criteria regarding encapsulation may be better suited to a new RM specific to achieving a cover design (refer to Appendix 3, PRCP Guideline).	Consider the matters raised. Provide an updated PRC Plan (including PRCP schedule) to reflect changes to proposed criteria.

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Item	Relevant Document Section	Issue	Recommendation
		• RM5 – Criteria could provide further stipulation of the depth of ripping of surface layer prior to seeding. Additionally, minimum depth for topsoil application should be included here. Specifications for locations to have rock mulch applied could also be included. • RM6 – Criteria should specify the rate of seed application per hectare and greater detail regarding the seed mix to be used for rehabilitation of water management areas. • RM8 – Criteria should refer to where the design of encapsulation is sourced (i.e. the proposed PRC plan and its appendices, or another document agreed with the department). Sufficient clarity must be present in criteria for RM8 and RM4 to distinguish between achievement of tailings encapsulation and cover system specifications. • RM10 – as proposed, the criteria will not sufficiently demonstrate that the PMLU has been achieved. As previously mentioned, specific and measurable parameters should be drawn from the relevant document. For example the properties necessary to support light grazing/native vegetation (e.g. soil chemical and physical properties [EC, plant available water capacity, rockiness, etc.], proportion of weed/pest species, and productivity/carrying capacity of land). Where documents are referred to milestone criteria specific references to sections or tables of documents (including the document name, version and date) must be provided. • Management Milestones – a number of rehabilitation activities relevant to the residual void are provided in Appendix 4.7 Void Closure Methodology, Table 8-1. It is recommended that consideration is given to including some of these actions as milestone criteria. The PRCP Guideline (Section 4.1, Step 5) provides further explanation regarding the development of milestone criteria and how the final milestone must demonstrate sufficient improvement of the NUMA.	