

1. Rehabilitation/reference milestones (RMs)

It is recommended revisions are made to sections 3.5.9 (Rehabilitation milestone activities applicable to retained infrastructure (RA1)), 3.5.10 (Rehabilitation milestone activities applicable to water management structures (RA2)) and 3.5.11 (Rehabilitation milestone activities applicable to In-pit spoil (RA3), tailings dams (RA4) etc) of the rehabilitation planning part to ensure each section is:

- Updated with the proposed revised rehabilitation milestones (RMs);
- Includes all proposed revised RMs applicable to each proposed rehabilitation area (RA), so the discussion is specific to the risk being managed, required works and associated RMs for each RA; and
- And provides an explanation on why the selection, sequence and timing for each RMs are applicable for the RA including a description of risks involved and a clear link to the final landform design in section 3.5.4 (Final landform design) of the submitted PRC planning part.

Milestones reviewed and amended. Refer updated Table 14 and corrected text at sections 3.5.9-3.5.14

These details will be informative to:

- Provide clarity on which RMs involve landform development activities/works as opposed to determining if landform development requirements have been achieved; or
- Provide an understanding of why the proposed RM1.2 (Rehabilitated – Absence of contaminants) is relevant for RA1 (Retained infrastructure), RA2 (Water Management Structures) and RA9 (North Mine Disturbance); or
- Provide details on the rework/repairs involved in RA9 (North Mine Disturbance) and what is the intended final landform design for the proposed area of 48.4ha, since RA9 (North Mine Disturbance) is not discussed in the submitted rehabilitation planning part including the final landform design in section 3.5.2.

Milestones reviewed and amended. Refer updated Table 14 and corrected text at sections 3.5.9-3.5.14

To ensure the selection and subsequent sequencing of RMs in RAs is appropriate, it is suggested RAs are reviewed to ensure the correct hectares has been allocated against each RM. For example: **Reviewed and Table 11 updated.**

- During previous discussions it was mentioned that clearing or similar land disturbance will be necessary to remove any natural regeneration within the 15.1ha area in RA8 identified as 'available land' in the Oakleigh East area (refer to Table 11 Summary of current rehabilitation status (ha) of the rehabilitation planning part). If so, will RM1.3 (Rehabilitated – Landform surface preparation) be applicable for RA8?
- Since RA5 involves repairs to fix the north highwall as described in section 3.5.4.2 (Oakleigh East/North highwall area) of the rehabilitation planning part, will RM1.3 (Rehabilitated – Landform surface preparation) be applicable?

Milestones reviewed and amended. Refer updated Table 14 and corrected text at sections 3.5.9-3.5.14

Additional comments raised separately by Michael Davis via telephone on 24 May 2022: Map showing void/backfilled areas and milestone criteria to include subsidence/settlement.

There is no known evidence to date that suggests that settlement in backfilled mine pits is a risk – particularly where pits are backfilled by normal dump development works (i.e. significant compaction is established to have occurred). As indicated in the PRCP, cattle grazing has been occurring for some years across the site, and a grazing trial has demonstrated the sustainability of that PMLU. While there is no identified cracking or settlement, the PMLUs proposed are not sensitive to this as an issue. We have however included a contingent milestone that can be triggered if required.

2. Milestone criteria

Following a brief perusal of the revised proposed schedule, the following comments are offered to assist with clarifying the intent of some criteria.

- With regards to the criterion proposed for RM3.1 (Achievement of target PMLU - Grazing PMLU) which states “relevant land capability class III / VI achieved”: is this criterion indicating land class will be either Class III or Class VIII, or is it intended to indicate a range from Class III to Class VIII? **Refer note to Table 10 to clarify**
- References to documents, for example ‘*the RMM Plan*’, should be sufficiently descriptive to ensure the relevant plan is identifiable. **References to RMM Plan updated.**
- Does Table 15 in the rehabilitation planning part accurately reflect the proportion of land associated with each slope gradient in the final landform? The addition of a column to Table 15 is recommended to locate slope gradients within individual RAs. This information would facilitate demonstration that final landforms will achieve the relevant PMLU and assists an assessment of the criteria regarding slope gradients proposed at RM2.1 (Stable – Landform development). **Slope assessment information included at Table 15 and Section 3.5.4; but note that this assessment cannot be used for comparative purposes with the EA as noted.**
- The proposed RM3.2 (Achievement of target PMLU – Native Ecosystem PMLU) refers to a criterion on contamination, but a similar criterion is not contained in proposed RM3 milestones for the other PMLUs. For example, a criterion regarding contamination is not contained in RM3.1 (Achievement of target PMLU – Grazing PMLU). **Amended to remove as not required. Table 12 updated.**

How does the criterion regarding contamination in RM3.2 relate to proposed RM1.2 (Rehabilitated – Absence of contaminants)? Are there risks associated with including this criterion at RM3.2 if the proposed assessment of contamination identifies outstanding remediation works which require disturbance of the existing rehabilitation? **Amended to remove as not required.**

3. Final site design and reference maps

Figure B2 (Final site design) and Figure B1 (Reference Map) of Appendix B of the submitted PRC planning part are identified as the figures to be included in the schedule. Figure B1 and B2 could be improved by including the Landsat image of the site, as is done in Figure 14 (New Oakleigh Mine rehabilitation status (2021)) of the rehabilitation planning part. Additionally, it is suggested that the land described as Conservation area on Figure B2 for undisturbed land is instead called Stirling Road Reserve or Conservation area - Stirling Road Reserve to show it is an externally recognised/designated conservation area. **Updated and imagery included (noting that we have been advised to remove imagery from the reference and final site design figures for other submissions)**

4. Rehabilitation monitoring and maintenance plan

Table A.1 has been included in Appendix A of the Rehabilitation monitoring and maintenance plan. It is noted that the monitoring program identifies a methodology for proposed RM1.2 (Rehabilitated – Absence of contaminants) to only involve visual inspection. Will achievement of the proposed criterion ‘where required or applicable, contamination is remediated or removed’ likely involve activities such as sampling, investigation of contamination and verification that a site is able to support a post-mining land use? It is anticipated that the required actions would need to be determined by appropriately qualified person. **Updated as per item 1 above.**