

Item	Relevant section (proposed PRC plan and/or PRCP Guideline)	Matter	Information Request	CSE Commentary	Response action undertaken
PRC Planning Part					
1	Rehabilitation and Management Methodology Section 3.5 of the PRC Plan. Section 3.6 of the <i>Progressive Rehabilitation and Closure Plans (ESR/2019/4964)</i> (PRCP Guideline)	Section 3.5 of the proposed PRC Plan includes some information regarding the proposed methods and techniques for rehabilitating the land to a stable condition. However, information is limited in some respects and there is also a lack of detail provided to support the timeframes proposed for achieving the rehabilitation milestones in the PRCP Schedule. Additional information is requested to support the department's assessment in this area. A more detailed explanation is required, particularly in relation to the rehabilitation methods that will be implemented to achieve the grazing post mining land use and fauna habitat with special emphasis on areas with final landform slopes over 15%. An explanation of how these methods have been planned to be implemented with reference to the PRCP Schedule milestones is also required. The Environmental Protection Regulation 2019 includes the following rehabilitation objective and performance outcomes which are relevant – PRCP Objective Rehabilitation of land to a stable condition will be achieved progressively during the life of the mine. PRCP Performance Outcomes 1. Rehabilitation Areas (RAs) are planned in a way that maximises achieving progressive rehabilitation for the post-mining land use. 2. The first rehabilitation milestone for a RA will start as soon as practicable after the land in the area becomes available for rehabilitation for section 126D(4) of the Environmental Protection Act (EP Act) by, for example, starting within 6 months after the area becomes available for rehabilitation. 3. The timeframe mentioned in section 126D(4) of the EP Act for achieving each rehabilitation milestone has regard to the risks identified in the PRC plan for the land under section 126C(1)(f) of the Act. The timeframe mentioned in section 126D(4) of the EP Act within which the land will be rehabilitated to a stable condition has regard to any timeframes agreed to during consultation with the community about the PRC Plan.	Provide a revised PRC Plan that includes the following: 1. For each proposed post-mining land use provide detailed information relating to the proposed methods and techniques for rehabilitating the land to a stable condition (for both geotechnical and erosional stability) in a way that supports the rehabilitation milestones under the proposed PRCP Schedule. 2. Based on the expected slope length, clarify the stability risks associated with achieving a stable final landform design. Based on the additional information to be provided above, revise the Risk Assessment (Section 6.0 of the proposed PRC Plan) and the PRCP Schedule. This must include additional management strategies identified above to ensure consistency with the rehabilitation milestones. The timeframes proposed in the PRCP Schedule must have regard to the risks identified and the relationship between the rehabilitation methods proposed, the relevant risks to achieving stable condition and the timeframes for achieving each rehabilitation milestone should be explained in the PRC Plan.	This is a vague request. It is unclear how the references to the Regulation are relevant to the commentary. CSE considers it has provided sufficient information relating to proposed methods and techniques as required. CSE does not want to be prescriptive with the methods used, for example large scale irrigation is now being used at Kogan mine, rather focus on outcomes as the methods will likely evolve over time with increased technology and knowledge in the industry. Specifically in relation to slope lengths, these have been nominated to achieve a stable outcome. Rehabilitation is often an inexact science, that relies on successes and failures to mould rehabilitation methodologies over time and based on experience. With regards to the reference to land with slopes >15%, CSE notes that it has significantly reduced the slope angles proposed for the final void and its adjacent batters from what is proposed in the existing planning documents. It should also be noted that no slope lengths or angles have been increased from what is already approved in existing planning documents. With regard to the risk assessment, the approach outlined clearly indicates that management strategies are outlined where risk are classified as significant or above (p 67). The milestone schedule was developed to specifically address the risks identified and, in some cases, extended to accommodate the known uncertainties associated with soils, climate etc.	Life of mine planning process included at s3.1.1.1 referencing when land becomes available. All rehabilitation methodology sub-sections reviewed. A new section 3.5.17 added and an additional table inserted (Table 20) that relates RAs by RM activities; risks and timeframe proposed.
2	Soil and Capping Material Section 3.5.7 of the PRC Plan. Section 3.6.1 of the PRCP Guideline.	Section 3.5.7 of the proposed PRC Plan contains limited information regarding the quality of available topsoil. Page 29 of the PRCP Guideline outlines that a soil assessment must be carried out. However, the information presented in Section 3.5.7 does not include all the minimum information requirements such as: ☐ The quality of topsoil; ☐ An assessment to determine the need for ameliorants and fertilisers of existing topsoil; and ☐ The relationship between soils and vegetation ecosystems for the PMLU and rehabilitation methodology.	Provide a revised PRC Plan with additional information to address the soil and capping material assessment information requirements outlined on page 29 of the PRCP Guideline. This includes: •The quality of topsoil required to complete the targeted rehabilitation methodology; •An assessment to determine the need for ameliorants (e.g., organic carbon and gypsum) and fertilisers; and •The relationship between soils and vegetation ecosystems for the PMLU and rehabilitation methodology Update the milestone criteria to specifically require topsoil quality management strategies. Expected inclusions are: •Additional milestone criterion for soil health assessment is included in the PRCP Schedule for Rehabilitation Milestone (RM) 5. •Additional milestone criteria that ensure the quality of topsoil is consistent with that required to complete the targeted rehabilitation methodology. •Additional milestone criteria that include the management strategy for the topsoil deficit.	S3.5.7 clearly identifies and accepts that the soils on site are deficient in a range of parameters and outlines the approach to be taken by CSE to address this. How much information does the Guideline state is sufficient to demonstrate that the soils are poor and require ameliorants? 3rd dot point - vague requirement of the guideline. Any assessment will simply state that the existing vegetation ecosystems have evolved by virtue of the soils, subsoils and climate existing on site, and modified by land uses developed over the last two centuries. CSE has added ameliorants to all rehabilitation undertaken over the last 3 years which includes a combination of gypsum, feedlot manure, organic mulch as well as fertiliser dependent on the area and soil lab analysis results at the time. Each area may vary and the ameliorants will be amended as required - we do not want to be overly prescriptive on the methods used as long as the area meets the success criteria.	Added text to section 3.5.7 outlining the findings of the Landloch report and emphasising that soil testing will be done prior to each rehabilitation event and tailored and appropriate/practicable mitigation measures taken on the advice of interpretation of soils data by an SQP. This addresses the strategy for topsoil management. RM5 milestone criteria amended to reflect the strategy. Landloch 2017 added to tech reports appendix. Note in response to AIR that a soil balance is included (what volume of topsoil is available v what volume of topsoil is needed, if the above is not already included in the PRCP) - SR included as table 11
3	Risk Assessment Section 3.6 and Appendix D of the PRC Plan. Section 3.7 of the PRCP Guideline.	A risk assessment is provided in Section 3.6 of the proposed PRC Plan. The provided risk assessment is incomplete as it does not appear to consider all sources of risks such as those attributed to the Eastern Branch Creek (EBC) diversion and levees. The risk assessment is also limited as it does not contain all the information requirements outlined in the PRCP Guideline (Section 3.7). These includes risk treatment steps such as: 1) Performances measures and constraints; and 2) Reporting and monitoring requirements as well as timing and scheduling. Further information is also required in relation to the risks associated with achieving stable landforms as the risk assessment presented Appendix D does not appear to include all risks associated with RM7 and RM8. These milestones are required to be included in the risk assessment as they relate to achieving a stable condition for all proposed PMLUs. The identified 'Risk Scenario/Threat title listed in Appendix D of the proposed PRC Plan is not consistent with the potential risks identified in the planning part of the PRC Plan. For example, Section 3.5.7 of the proposed PRC Plan outlines that 'Topsoil and subsoil testing across the Project site have universally confirmed that available soil resources are deficient in organic carbon and phosphorus, are generally moderately saline and are sodic to varying degrees'. Furthermore, Section 3.5.7 and Table 11 of the proposed PRC Plan also outline that 'an additional volume of 19,110 m3 of growth medium (ash material and/or biosolids) will need to be sourced elsewhere'. However, Appendix D does not address this risk and proposed management actions.	Provide a revised risk assessment and supporting information in the proposed PRC Plan that: 1. Includes a completed risk assessment to ensure alignment to the PRCP Guideline information requirements. 2. Include a risk assessment of all process steps including but not limited to levees and EBC diversion. 3. Ensure risks identified and addressed are consistent with actual and/or potential risks identified in the PRC Plan (e.g., dispersive and carbon limited topsoil and subsoil). 4. Assess the risks associated with achieving a stable landform (e.g., final landforms that exceed slopes of 15% and groundwater daylighting in the residual void). 5. Incorporate risk management strategies and methodologies identified in the PRC Plan.	- levees/diversion were implicitly, but not explicitly included within the RA at item TD0201 - Reporting and monitoring requirements only necessary if the risk ranking is sufficient to warrant management activities, and then only if those management activities warrant monitoring and reporting additional to that undertaken as a normal part of operations - RM7/8; this assertion is incorrect - addressed under the "Stable" and "Sustainable" sub-headings for each RA assessed. - erodible topsoils and subsoils are identified as a major casual factor for the range of risk scenarios assessed, as distinct from being a risk scenario (they are not considered a risk scenario as they are an existing characteristic of the site). They were also a causal factor of the scenario assessed as being 'significant; with the management actions outlined for this scenario in S3.6.4.	1) Please note that AS/ISO31000 section 6.4 does not require all risks evaluated to be subject to treatment. Section 3.6.3 of the PRCP highlights the process and notes that risks classified as 'significant' or above are subject to mitigation and management measures. 2) RA (Appendix D) updated to specifically address levees and diversion channel (TD0102, TD0301, TD0601 added and TD0201 modified). 3) Please note that RA items A0301, B0301, C0301 and E0301 specifically address growth media risks 4) Addressed at A0102 and B0201 5) Section 3.6.4 identifies risks requiring treatment which are then addressed at 3.5.7

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4	Monitoring and Measurement Appendix E of the PRC Plan. Section 3.8 of the PRCP Guideline.	A Monitoring and Maintenance Program is provided in Appendix E of the proposed PRC Plan. The PRCP Guideline (Section 3.8) states that the rehabilitation planning part must contain a monitoring and maintenance program that identifies and describes the monitoring systems that will be carried out to demonstrate if milestone and milestone criteria have been achieved. Further site-specific detail is required to describe the timing and proposed methodology of monitoring in addition to the identification of suitable reference/analogue sites. The proposed Monitoring and Maintenance Program did not contain sufficient site-specific information relating to stable landform milestone criteria. Proposed monitoring and maintenance activities associated with the EBC diversion and levees also appear to be absent. The rehabilitation milestones outlined in the Monitoring and Maintenance Program (9 RM's) was also identified to be inconsistent with the PRC Planning Part and the PRCP Schedule (8 RM's).	Provide a revised PRC Plan with additional information in the Monitoring and Maintenance Program, consistent with the information requirements outlined in Section 3.8 of the PRCP Guideline. This must include: 1. A clear site-specific Monitoring and Maintenance Program that would be repeatable based on the information provided. 2. Detailed site-specific monitoring and measurement methodologies which are supported by collection of statistically valid data and quantitative analysis. 3. Detailed specificity of the monitoring proposed to be undertaken, the methodology (with references) to ensure repeatable monitoring, the attributes to be monitored and the timeframes for which this monitoring is to be undertaken. 4. Detail of how QA/QC techniques will be incorporated into the monitoring methodology. 5. Specific details of proposed corrective actions if monitoring data indicates milestone criteria are not being met. A revised Monitoring and Maintenance Program is also required to ensure consistency with the proposed PRC Plan and Schedule. This must include correction of the error associated with the inclusion of RM1 (Area becomes available for rehabilitation).	The MMP is considered to meet the cited section of the PRCP Guideline. Additional information can be provided with respect to the timing of the location of analogue/reference sites (these to be established at the first round for rehabilitation monitoring), and the levees and diversions can be added as explicit sites for monitoring. Refer Item 9 below re erosion criteria. There was an oversight in the MMP not being updated with the finalised milestone criteria.	MMP updated in relation to analogue/reference sites, milestone criteria and the diversion and levees.
PRCP Schedule					
1	RA2	The PRC Planning Part details the flooding risks and subsequent mitigation provided by the levees and EBC diversion. It is understood that these levees and the creek diversion are to be retained as permanent structures and as such will require designation of a PMLU and milestone criteria to facilitate a safe and stable landform. Within the PRCP Planning Part, it was not clear if the EBC diversion and levees are included in RA2 - water management infrastructure and if the PMLU identified as "water storage and fauna habitat" is applicable to these domains.	Provide a revised PRC Plan and/or Schedule that clarifies the RA and PMLU for the diversion and levee domain. If necessary, include relevant information within the PRCP Schedule to indicate the specific milestone criteria applicable to this domain. Provide a reference map/s in accordance with Section 4 step 2 of the PRCP guideline	S 3.5.11.2 (Levees) and 3.5.11.3 EBC Diversion Channel are sub-headings to 3.5.11 (Water Management infrastructure), and should be able to be interpreted as components of Water Management Infrastructure. The text can be refined to ensure the appropriate PMLU is attributed to these sub-components of Water Management Infrastructure.	PRCP text amended to ensure the appropriate PMLU is attributed to the sub-components of Water Management Infrastructure. Specifically: - Table 9 edited so that the RA2 description includes levees and diversions (clarifies the RA) - S3.5.11.3 edited to state that diversion will be retained as part of the final landform (clarifies the PMLU) - Section 3.5.11.2 edited (clarifies the PMLU) - Figure 13 Final site design provided (reference map in accordance with section 4 of the guideline)
2	RA8	The PRC Planning Part and the "Relevant Activities" field in the PRCP Schedule (RA8) indicates that RM2 and RM5 are applicable. However, within the PRCP Schedule there is no corresponding cumulative areas proposed for RM2 and RM5.	Provide a revised PRCP Schedule that includes the proposed cumulative area to be achieved for all the relevant rehabilitation milestones.	CSE accepts this as an oversight.	Milestone schedule updated
3	RM4	RM4 contains criteria related to a minimum geotechnical Factor of Safety (FoS) to be achieved. Whilst the PRC Planning Part discusses adequacy of the FoS to the OPAC and IPAC batters, there is no discussion on the adequacy of the FoS to other high- risk slopes, specifically the residual high wall to be retained following cessation of mining. The PRCP Schedule indicates that RM4 is applicable to all RA's, except for RA8. However, the geotechnical risks may not be applicable to all domains.	Provide a revised PRC Plan that justifies the nominated FoS and specifies the landforms that this criterion is applicable to.	This commentary suggests that CSEs actions in voluntarily reducing slope ranges to values substantially less than that already approved within the EA and to FOS values of an acceptable range could be perceived to be inadequate. CSE refutes this. For the topography of the Project site, CSE does not consider a geotechnical assessment is relevant to exploration activity rehabilitation. CSE is not aware of any scenario where exploration activities and access tracks would require a geotechnical assessment to be undertaken.	Section 3.5.12 amended to state that the proposed residual void slopes (low and highwall), have been 'designed' at significantly less than that required by the EA; and would be subject to a final geotech assessment confirming tier stability as the key completion criteria (based on recent discussions with Sherwood Engineering as to preferred approach away from specific FoSs Specifically: - updated Table 8 RM4 CC to align with the above statement - updated Table 8 to remove RA2 and RA3 from the Applicable Rehab Areas column for RM4 (to address the concern raised that RM4 is not applicable to all RAs). Also updated Table 10 and the schedule to reflect that RM4 does not apply to these RAs. - updated MMP Table 4 to align with PRCP. - updated MMP Table 1, to include all RAs.
4	RM4	RM4 relates to landform development (reshaping and reprofiling) however does not contain criteria relating to backfilling of the void. Throughout the PRC Planning Part (e.g., Section 3.5.12.2), it is stated that to mitigate potential for groundwater intrusion into the final void, the final floor level will be backfilled to 280mAHD. Given the importance of the backfill activity to sustain the nominated PMLU, and mitigate against a void containing permanent water, milestone criteria based on the SMART principles (Section 4, Step 5 of the PRCP Guideline) are required to be proposed within the relevant RM. It is not clear from the monitoring and maintenance regime if the groundwater level in proximity to the void will be characterised to provide evidence that groundwater will not have a pathway to the base of the residual void.	Provide a revised PRCP Schedule that includes: 1. Milestone criteria to facilitate backfilling of the pit to avoid groundwater ingress. 2. Commitments in the Monitoring and Maintenance Plan that groundwater monitoring will occur in proximity to the void to ensure that the hydrogeological model predictions can be validated.	CSE accepts this as an oversight, noting that the PRCP and milestone schedule is premised on a LOM plan included within the PRCP.	Added completion criteria dot point to Table 8 RM4 stating that the lowest point of final void floor will be approximately 280 m AHD
5	RM4	The PRC Planning Part (page 57) references that the design criteria for the IPAC and OPAC provide a 3m cover on top of the ash and the corresponding Figure 20 indicates that the cover design extends to the batters. As the PRCP references the IPAC and OPAC batters as RA 7, consideration should be given for including cover design milestone criteria that is demonstrative that light grazing PMLU can be achieved.	Provide a revised PRCP Schedule that includes milestone criteria related to the cover design proposed for the IPAC and OPAC batters.	CSE considers there is sufficient clarity in the document in relation to the applicability of the IPAC and OPAC areas. Figure 20 was only provided to provide a conceptual indication of the landform design relevant to the IPAC and OPAC batters.	Deleted Figure 20 and in-text reference on p.58

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6	RM5	Whilst it may be appropriate to reference trial work in completion criteria, carrying out rehabilitation trials is not considered a milestone itself as the trials should occur prior to land becoming available for rehabilitation. The PRC Planning Part does not provide sufficient detail of the proposed topdressing trials in accordance with Section 3.7.1 of the PRCP Guideline. Whilst the achievement of a specific pH in soil may be required, there is no justification provided in the PRC Planning Part as to why the soil pH is targeted at between 5.5-9.0. Section 3.5.7 of the proposed PRC Plan references historic amelioration trials, however there is no discussion on the chemical properties of the ameliorants that provides confidence that any chemical deficiencies of available topsoil can be overcome. Given the risk of soil sodicity leading to dispersion and erosion and considering that further work is required to develop the amelioration strategy, consideration should be given for include criteria confirming that the soil health is suitable to allow for the proceeding milestone to occur. The PRCP Guideline (page 64) states that “An assessment of soil health and suitability has been completed by an appropriately qualified person to confirm soil is suitable for target vegetation establishment.”	Provide a revised PRC Plan that: 1. Justifies the proposed criteria associated with RM5. 2. Describe the rehabilitation trials that will be undertaken, in accordance with the requirements of Section 3.7.1 of the PRCP Guideline to support the milestone criteria that, “<i>topdressing material based on current state of trial work spread over reshaped surfaces</i>”. 3. Includes additional criteria associated with the verification that the placed soils are of a suitable quality to ensure progression of subsequent rehabilitation milestones.	As outlined at Item 1, rehabilitation is often an inexact science, and one that relies on successes and failures to mould rehabilitation methodologies over time and based on experience. All rehabilitation events undertaken will inform future rehabilitation activities. There is no absolute prescription of rehabilitation that takes into account the wide range of relevant factors that rehabilitation activities will be subject to. Similarly research trials over time will vary by the results obtained from earlier trials and experience.	As per Item 2 (row 4 above), s3.5.14.2 amended to explicitly indicate that as each rehabilitation event is planned, soil testing is undertaken and ameliorant requirements are determined and addressed. Added text to s3.5.4 justifying pH value range (Hazelton and Murphy 2016) and vegetation cover for protecting against erosion. Amended s3.5.7 in relation to soil ameliorants, referencing the Landloch report. This is to address the key risk i.e. provide quick vegetation establishment to reduce the risk of increased erosion where natural rainfall fails to produce adequate ground cover.
7	RM6	The criteria presented for RM6 doesn't align with the SMART principles, outlined in Section 4.1, Step 4 of the PRCP Guideline.	Provide a revised PRCP Schedule that provides milestone criteria associated with revegetation that meets the SMART principles.	CSE considers that some milestones - RM6 - is an example, where the undertaking of the activity itself is grounds for completion of the activity. While, as in this case, information should be recorded and monitored (for the purpose of informing future monitoring events), the completion criteria nominated provide supporting information that a repeat event need or need not occur.	Reviewed and updated all milestone criteria based on DES advice
8	RM7	A vegetation ground cover of >50% is proposed for the PMLUs, however there is no justification within the PRCP Planning Part which details how this coverage will result in a stable and sustainable final landform. As the dominate PMLU to be attained is grazing, supported by a seed mix comprised mainly of grass species, without the justification for the ground cover for both flat surfaces and slopes, the proposed 50% ground cover is not considered sufficient to demonstrate that the land can sustain the light grazing PMLU. The Department is aware of studies conducted in the Bowen Basin that have determined a minimum ground cover to provide erosion control, however it is not understood how repeatable this criterion is to the geographical setting of Kogan Creek Coal Mine and if the proposed ground cover also provides suitable coverage to provide a sustainable PMLU.	Provide a revised PRC Plan that justifies the proposed vegetation ground cover to sustain the nominated PMLU. Specify if the proposed ground cover is applicable for slopes.	The completion criteria nominated are based on an assessment of completion criteria approved by DES for a number of mining sites. There is no evidence to suggest that these are not acceptable completion criteria. CSE notes that a significant proportion of the surrounding land that supports light grazing often has a ground cover <50% given the very poor natural soils present.	Corrected target percentage of groundcover for RM8. Added justification of vegetation cover criteria at s3.5.4.
9	RM7	The criteria related to erosion doesn't align with the SMART principles outlined in Section 4.1, Step 5 of the PRCP Guideline. Departmental advice was provided in pre-lodgement that “<i>whilst comparisons to analogue sites may be appropriate, the planning part does not detail where the analogue sites are located or the recorded erosion rates. Refer to the example milestone criteria in the guideline for developing a maximum erosion rate, groundcover coverage and milestone criteria related to rill or gully erosion</i>”. Whilst it is acknowledged that the Rehabilitation Monitoring and Maintenance Plan references an erosion classification scheme, the Department didn't draw the same conclusions from the report that is referenced (Neldner et al. 2019). The Department is of the view that the criteria assigned to moderate, between 15-30 rills/gully with an average depth between 10-30cm across a 50m transect, will not facilitate a stable landform considering that the site will not be operational during the monitoring period, and therefore rectification works may not be possible. More appropriate erosion monitoring for closure purposes may include the presence/absence of rills/gullies or a calculated maximum soil loss expressed in t/ha/yr.	Provide a revised PRCP Schedule that: 1. Provides milestone criteria associated with erosion monitoring that meets the SMART principles. 2. Indicates the locations of analogue sites and expected soil properties to allow for comparisons. 3. Includes evidence justifying the appropriateness of the referenced Neldner et al 2019 report in establishing the erosion classification.	CSE noted the advice provided at the time of pre-lodgement. As indicated in the PRCP, it is the case that analogue sites have not yet been established, but will be as rehabilitation monitoring commences. In the absence of monitoring data relating to analogue sites, CSE is unable to provide SMART criteria in relation to some criteria. It is not the case, as stated within the 'matter' that monitoring will not occur until the site is no longer operational. Rehabilitation monitoring will commence while the site is operational and analogue sites will be established during initial transect set-up. Rectification works will be undertaken while the site is operational as has already occurred as outlined in S3.1.2 as demonstration of this. We do acknowledge the validity of the point in relation to Neldner and will review alternative references.	Revised erosion milestone criteria (RM7) to meet SMART principles. Updated erosion classification in MMP to match Table 8. Included method for selecting analogue site locations in MMP.
10	RM8	RM8 provides criteria that tree species will be established for both the light grazing PMLU and the fauna habitat PMLU, however the PRC Planning Part does not reference the type of tree species to be planted. This is considered material to the viability of the PMLU as the PRC Planning Part references that remnant Eucalyptus species woodlands are considered to provide the best target community to meet the fauna habitat PMLU.	Provide a revised PRC Plan that includes a proposed species mix that will be planted to facilitate the fauna habitat PMLU.	Rehabilitation is often an inexact science, and one that relies on successes and failures to mould rehabilitation methodologies over time and based on experience. All rehabilitation events undertaken will inform future rehabilitation activities. Rehabilitation activities are not sufficiently advanced that a species list of upper storey species has yet been developed. Species selection will be done, as is almost always the case with consideration of local native species suited to the soils and climate of the site. This will clearly be done prior to that that revegetation activity being undertaken. This process is outlined at s 3.5.14.3.	Updated s3.5.14.3 to include a method for developing a species list for fauna habitat PMLU (final void) and a provisional species list added (Table 19)
11	Progression of rehabilitation	Section 126D(4) of the EP Act provides that a PRCP Schedule must provide for each rehabilitation milestone to be achieved “as soon as practicable” after the land to which it relates becomes available for rehabilitation. Considerations for determining when rehabilitation or improvement can be achieved “as soon as practicable” include, but are not limited to: □ the size of the area to be rehabilitated or improved; □ the complexity of the rehabilitation or improvement methods; and □ the suitability of weather seasonality for the rehabilitation or improvement. The proposed PRCP Schedule shows an approximate four-to-five- year time gap between the commencement of the first milestone and the “date area is available” for all RAs except for RA7. This generally does not meet the requirements for land to be rehabilitated as soon as practicable after the land becomes available. As discussed during pre-lodgement, it is likely that the value populated in “date area is available” is erroneous and the intent is to that “commencement of the first milestone” date is close to the “date area is available”.	Provide a revised PRCP Schedule whereby the nominated “date area is available” is consistent with the “commencement of first milestone”.	CSE acknowledges the disparity apparent with the dates in the milestone schedule Kogan is currently trialing irrigation in an effort to produce quick establishment of groundcover to reduce the primary risk of erosion and to overcome the poor nature of the soils. It is anticipated that in some seasons there will not be enough surface water to irrigate and hence an allowance has been made in the scheduling to cater for this.	Milestone schedule updated

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12	Progression of rehabilitation	The PRCP Schedule template is structured so that applicants can show achievement of progressive rehabilitation by increasing the values assigned to the cumulative area achieved to ultimately match the total RA size. The milestones must be achieved consecutively. Within the <u>Cumulative area available (ha) cell</u>, the PRCP Schedule must identify the area of land within the RA that will become available at a given time. In the proposed PRCP Schedule this information is currently blank. Appendix 2 of the PRCP Guideline provides an example Schedule (see below) that demonstrates progression of rehabilitation through a sequential cumulative area being achieved. The proposed PRCP Schedule doesn't follow the same logic as the example provided above as the nominated values assigned to "cumulative areas to be achieved" are not demonstrative of rehabilitation progression. Using RA3 (see below) as an example, note that the values for RM2 – RM6 are repeated across the columns, indicating that 103.9 Ha of each of these milestones is achieved in each relevant time period (denoted by the columns), which does not appear to be the intent. If RM2-RM6 is not performed during the nominated time period (e.g. between 10/12/52 – 10/12/57 or between 10/12/57 – 10/12/63), then the cumulative area achieved cell for these RMs should be blank.	Provide a revised PRCP Schedule that: 1. Follows the principles of how to demonstrate progression of rehabilitation for all RA's. Refer to Appendix 2 of the PRCP Guideline and the instructions tab in the PRCP Schedule template for further guidance. 2. Includes entries in the row titled "Cumulative area available".	CSE acknowledges that there has been a misinterpretation in relation to the completion of the milestone schedule and will delete the confusing entries.	Milestone schedule updated