

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 PRCP schedule.

To: Great Northern Mining Pty Ltd
2 Hicks Street
Emerald, QLD, 4720
Via email transmission only

Email: Suminda.Galketiya@furagems.com

Attention: Suminda Galketiya

Your reference: EPML00439113, C-EATPRCP-100257391

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

1. Application details

The application for a PRCP schedule was received by the administering authority on 18 May 2022.

The application reference number is: C-EATPRCP-100257391

Land description: ML2185; ML2187; ML2188; ML2190; ML2191; ML6830; ML6854; ML6855; ML6856; ML6857; ML6858; ML6859; ML6860; ML6865; ML6866; ML6867; ML6868; ML6869; ML6870; ML6875; ML6876; ML6877; ML6878; ML6880; ML6890; ML6891; ML6892; ML6932; ML6933; ML70195; ML70199; ML70200; ML70229; ML70230; ML70285; ML70286; ML7138; ML7139; ML7142; ML7143; ML7144; ML7145; ML7155; ML7156; ML7157; ML7158; ML7159; ML7160; ML7161; ML7162; ML7163; ML7165; ML7166; ML7167; ML7168; ML7169; ML7170; ML7171; ML7172; ML7173; ML7174; ML7175; ML7176; ML7177; ML7178; ML7179; ML7180; ML7181; ML7182; ML7164; ML70304; ML70305, ML70357

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 attached in Appendix 1 below.



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.

Should the information request require an EIS process or applicant to submit a progressive rehabilitation and closure (PRC) plan then it must be completed and submitted.

A response to the information requested must be provided by 19 May 2023 (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.

4. Human rights

A human rights assessment was carried out in relation to this decision/action and it was determined that **the decision/action is compatible with human rights**.

If you require more information, please contact Jessica Edgar on the telephone number listed below.



Signature

17/11/2022

Date

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

Enquiries:
Coal Business Centre
Phone: 07 4987 9364
Email: CRMining@des.qld.gov.au

Attachments

Appendix 1: Information requested in relation to the Great Northern Mining Pty Ltd PRC plan application

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Item	Relevant section (proposed PRC plan and/or PRCP Guideline)	Matter	Information Request
Project Description			
1	2.7 - Hydrogeology	Section 2.7 states that the groundwater levels on Subera vary around 35m below ground level. Information is not provided about the groundwater levels relating to the 'Scrub Lead' leases (ML70285 and ML70286). Detailed information on the occurrence of groundwater across Subera is not available, and the 'variation' in groundwater levels across the site is not detailed. There is no information provided about future mining depth or intersection with groundwater in the future.	a) Provide details of the groundwater occurrence for Subera and Scrub lead. b) Explain variation in GW levels for Subera, including potential reasons of the variation and water level monitoring data showing the variation. c) Clarify if the future maximum depth of economic mining during the expected mine life of 30 years, intercepts the projected ground water level and any considerations provided to impacts of groundwater level on rehabilitation.
2	2.10 – Land Stability	Section 2.10 in relation to the Subera leases states that GNM (Great Northern Mine) has no control over the background landholders management practices. This poses a potential risk to the achievement of rehabilitation timeframes and outcomes if the rehabilitated areas will be grazed prior to completion of rehabilitation under the PRCP schedule and/or surrender. Section 2.10 in relation to the Scrub lead leases describes that the leases are exposed to ongoing erosion, depressions holding water and an elevated overburden dump which is traversed by a power line.	a) For Subera - In relation to the risks raised at Subera, details should be provided in the risk assessment of the potential risk to establishing rehabilitation and achieving the PMLU milestones and criteria. - If land is proposed to be available to the landholder for grazing during rehabilitation, with no period of grazing exclusion while establishing a rehabilitated landform, provide further details on how these risks will be managed.

			b) For Scrub Lead, provide: • A risk assessment demonstrating that the elevated overburden dump feature can meet stable condition and any works required to ensure the feature meets safe, stable, non-polluting criteria. • Information on slope stability, erosional stability and how the rehabilitation methodology ensures lease area is safe, stable non-polluting. • Provide information on ponding such as the estimated volumes of water captured, whether the ponding is ephemeral and whether rehabilitation of the features is planned.
3	2.13 Properties and Productivity	Details on the land capability framework used to assess the land capability of 'Subera' cattle grazing land is not provided.	Confirm which land capability framework/ methodology has been used to assess the 'Subera' property as Class V1.
4	4.6 Existing rehab	Section 4.6 indicates that Great Northern Mining Pty Ltd has committed to rehabilitating all historical disturbance on the mining leases. The historical disturbance areas are shown in Figures 24 and 25. Figure 27 shows all current disturbance and rehabilitation at Great Northern Mine. The areas of ML70285 and ML70286 identified as rehabilitated to milestone RM5 in Figure 27 do not match the historical disturbance shown in Figures 24 and 25.	a) Clarify the total area of historical disturbance that was inherited with the grant of ML70285 and ML70286 and total area of completed rehabilitation of the historical disturbance. b) Provide an explanation of the different mapping of the areas.
5	4.9 Mining Sequence	Section 4.9 describes that previously certified rehabilitation has been re-disturbed in order to fully exhaust the resource. The areas that have been re-disturbed are not identified in Appendix A or excised from Tables 7, 8 and 9 which appear to be representative of the original	a) Provide information to identify the total areas of re-disturbed certified rehabilitation. This includes: • the total areas disturbed (in ha) • the mining domain in which the disturbance occurred • description of the disturbance • description of planned rehabilitation activities

		certified areas. These areas can no longer be considered as certified rehabilitation.	b) The areas should also be separately identified in Tables 7, 8 and 9.
6	4.10 Area available for mining, Figure 31	Figure 31 indicates that every area across the mining lease comprising the Great Northern Mine is available for mining. Areas that have been progressively rehabilitated and received certification have not been excised from areas available for mining. Areas that have received progressive rehabilitation certification and not been re-disturbed again should be excluded from areas available for mining.	a) Exclude the certified rehabilitation area from the land/area available for mining category and; b) In the PRCP schedule provide a separate rehabilitation area (RA) for the same.
7	6. Post Mining Land Use	Section 6 describes that the land covered by ML's 70285 and 70286 will be administered under the <i>Qld Fossicking Regulation 1994</i> on relinquishment. It is stated that the land at lease relinquishment will be 'Fit for Purpose'. There are no further details to describe what 'Fit for Purpose' entails as a post mining land use or how the land will be considered safe, stable and non-polluting.	For the fossicking land within the Scrub lead area, provide detailed characteristics of the area that will be reinstated through the rehabilitation.
8	6. Post Mining land uses	Section 6 of the PRC plan states that Great Northern Mining hold written agreement with the landholder for the transfer of the industrial area, water storages, certain roads and tracks and poly pipelines at lease relinquishment. These written agreements have not been provided to support the PRCP. Further, Table F1 of EA EPML00439113 provides for 6.5ha of road and tracks to remain as landholder access. The PRCP schedule provides for 6.7ha to be returned to the land holder as RA3. This appears to be an inconsistency between the area proposed in the PRCP schedule and the area authorised by the EA.	a) Provide a copy of the written agreements between Great Northern Mining Pty Ltd and the Landholder for the retention of the named infrastructure. b) Ensure that the infrastructure proposed to be retained by the landholder is consistent with the authorisation for retained infrastructure in accordance with the EA, and c) Include details of rehabilitation necessary for any additional infrastructure areas beyond 6.5ha.

9	8.2 Flooding, Appendix A – Rehabilitated GMN Domains	A review of Basin 1% AEP flood levels, and shapefiles provided with the application indicates that there are areas within the mining leases that may be subject to flooding. Limited information is provided in the application relating to flood susceptibility and influence, particularly as it relates to the flooding risk profile of the final landform. Section 8.2 describes that the leases on the town common (Scrub Lead) ML70285 and ML70286 were not rehabilitated with ponded water remaining in low lying areas. The plan states that mining is planned over a limited area of the two leases with rehabilitation planned to maintain the existing landform. Appendix A describes that ponding in low lying areas prevents the establishment of pasture grasses at 'Nardoo pit'. Nardoo is indicated as being at RM6 stage ie. Ready for ripping and seeding in Table 7. Land outcome documents relevant to EA EPML00439113 do not appear to allow for ponded areas to remain on site, and ponded areas may not support the post mining land uses of grazing or fossicking. Rehabilitation methods for correcting ponded areas are not described in the schedule or plan.	a) Provide further information about flooding susceptibility and influence across the site in accordance with section 3.6.1 of the PRCP guideline. b) Explain how ponded areas that are not associated with plant areas or tailings ponds will be rehabilitated. c) Include criteria for rehabilitation in the PRCP schedule for the rehabilitation of ponding areas onsite, which are not associated with the plant operation areas.
10	8.3 Soil and Capping	Section 8.3.1 describes that the topsoil on 'Subera' is of varying quality. There is no further explanation provided about the need for fertilisers or amelioration of topsoil to ensure the topsoil is a viable growth media.	a) Provide more detail about the quality of topsoil across the 'Subera' property identifying whether the soil has any qualities which require action to ensure suitable growth media is established that will achieve the PMLU (e.g. dispersive soils or nutrient deficiencies that may need to be addressed). b) Provide more detail about the application of topsoil including application depth and the requirement for any further ameliorants or fertiliser.

11	8.3 Soil and Capping	There is conflicting information provided in the PRC plan regarding whether drainage lines are available for mining, and will be mined in the future, and what the rehabilitation outcome will be. Section 2.13 describes that pasture species have limited success along drainage lines, and that the native grasses and sedges present in low lying areas are not palatable for grazing. More information is required to understand if drainage lines and low lying areas are part of the the grazing post mining land use outcome, or will be undisturbed by mining.	a) Confirm if the drainage lines will be subject to mining or will remain undisturbed. b) If drainage lines are planned to be mined provide additional information on the intent of the rehabilitation strategy either to return the land to grazing with pasture grasses or re-establish the native vegetation of the pre-mine landscape. c) A final site design figure should demonstrate the areas of undisturbed area within the lease boundaries and identify the pre-mine use.
PRCP Schedule			
12	PRCP Schedule – timeframes	Limited information is included to support the timeframes allocated to rehabilitation in the PRCP schedule.	a) Provide information on the availability and location of probable resources across the mining leases. b) Link this information to the proposed duration of the mining operation being 30 years, and to the timeframes for achievement of rehabilitation milestones.
13	PRCP Schedule	Milestone criteria can be further improved to meet SMART principles.	a) RM2: Topsoil placed - nominate a per/ha application rate for topsoil. b) RM5: Area seeded with desired seed mix - nominate the species mix that will be applied in the seed mix to ensure it is appropriate for pasture productivity. c) RM6: Achievement of PMLU - state an acceptable EC level which must be achieved to ensure water quality is suitable for stock consumption.
14	Shapefiles	There is some ambiguity in the shapefiles regarding the post mining land uses for certain polygons, with some areas being overlaid with polygons describing different PMLU's. For example 'RA2 area 10' and	a) Provide an explanation of the configuration of the shapefiles. b) Remove ambiguity with overlapping polygons where possible.

		'available area 10' overlay ML70286. The PMLU for these shapefiles is grazing, and the existing rehabilitation is classified as grazing. However, in the PRC plan and schedule it is understood that ML70286 comprises part of the Scrub Lead fossicking area and that the PMLU for this area is not grazing.	
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