

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: Jellinbah Group Pty Ltd; Tremell
Pty Ltd; Marubeni Coal Pty Ltd;
Sojitz Coal Resources Pty Limited

C/- AARC Environmental Solutions
Pty Ltd

164 Wharf Street
SPRING HILL QLD 4000

ATTN: Ismael Rodrigo
Email: irodrigo@aacrc.net.au

Our reference: EPML00516813

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 25 November 2021.

The application reference number is: EPML00516813

Land description: ML80053, ML80068, ML80108, ML80129, ML80140, ML80165, ML80184, ML2418, ML6992, ML700011, ML700012, ML700013, ML70445, ML70446, ML70448, ML70449, ML80018

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 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 30 November 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.

4. Human rights

A human rights assessment was carried out in relation to this decision/action and it was determined that no human rights are engaged by the action.

If you require more information, please contact Jeremy Wheeler on the telephone number listed below.



Signature

19/05/2022

Date

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

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

Attachments

Attachment 1: Information requested.

Appendix 1: Additional information required for proposed PRC plan

Item	Relevant section (proposed PRC plan and/or PRCP Guideline)	Matter	Information Request
Rehabilitation Planning Part			
1	3.3.1 Land Outcome Documents and 3.3.2 Proposed post mining land uses	Table 12 provides projective surface areas for each disturbance type as approved in the EA. However, Table 13 and the PRCP Schedule appear to show significantly larger areas for spoil areas (>10% slope) and water containment dams than what is authorised under the EA.	Provide an updated Rehabilitation Planning Part and PRCP Schedule that reflects the authorised disturbance in the EA or provide additional information to demonstrate that the Post Mine Land Use areas in the proposed PRC plan are consistent with the conditions of the EA.
2	3.1.1.10 Existing Rehabilitation	While this section provides information about rehabilitation that has been undertaken and refers to “certification areas” it does not clearly state how much and where land has been progressively certified by the administering authority under the EP Act. Where land has not been progressively certified under the EP Act and appears at an advanced Rehabilitation Milestone in the PRCP Schedule: • provide further information about the rehabilitation methodologies used for each of the areas, • demonstrate how those methodologies reflect the methodologies in the Rehabilitation Planning Part, and • demonstrate how the land achieved the Milestone criteria of the preceding Rehabilitation Milestone.	Provide an updated Rehabilitation Planning Part to include a clear distinction between, and further information about, land that has received progressive certification and land where rehabilitation is ongoing.
3	3.2.2 Table 11: <i>Summary of community consultation register</i> Appendix E: Stakeholder Engagement Plan	It's unclear if the community consultation plan has omitted “commitments made by the applicant” as required by the PRCP guideline section 3.5 or if no commitments have been made/recorded. Further, the Stakeholder Engagement Plan referenced in section 3.2.2 proposes consultation with stakeholders to be undertaken on a “complaint basis” or on an “as needs basis”. It's unclear how this approach meets the objectives detailed in section 2.1 of the Stakeholder Engagement Plan, or the requirements of the PRCP guideline.	Provide an updated Rehabilitation Planning Part that includes a community consultation register which includes the commitments made by the applicant and/or clearly identifies if no commitments have been made. Provide further information on how the proposed consultation frequency will achieve the objectives of the Stakeholder Engagement Plan and requirements outlined in section 3.5 of the PRCP guideline.

4	3.5.7.2 Flooding	This section provides some information about flood depths in and around water courses through and adjacent to the site. It is noted that Appendix I includes further information about the results of flood modelling undertaken. However, the rehabilitation planning part does not include: • information regarding the velocity of flooding modelled across the site, • potential areas where velocities may cause erosion, and • consequences/mitigation measures for final landform design (other than noting selective placement of non-erosive material and rock mulch will be used). The <i>Jellinbah Mine Closure Water Management and Void Assessment Report</i> notes that there are three flood protection landforms (Plains North, McKenzie North and Levee between Plains North and Plains South) to prevent ingress to the final voids. However, the location, design, significance for water management and PMLU for these landforms is not provided.	Provide an updated Rehabilitation Planning Part that includes further information about flood velocities and areas of flooding susceptibility and influence.
5	3.5.7.2 Flooding 3.5.7.3 Soil and capping material assessment 3.5.7.6 Cover design	Sections 3.5.7.2 and 3.5.7.6 both note a need for rock material for stabilisation or to increase surface roughness in the cover design. However, section 3.5.7.3 does not provide the information required by the PRCP Guideline regarding rock material including a description of the quality of rock required, a material balance and location of suitable rock.	Provide an updated Rehabilitation Planning Part that includes additional information addressing the requirements under <i>Soil and capping material assessment</i> in section 3.6.1 of the PRCP Guideline regarding rock material required to achieve the rehabilitation methodology.
6	3.5.7.3 Soil and capping material assessment	This section states that the soils are structurally competent in their natural setting and not considered at high risk of erosion. However, Table 6 and the supporting technical reports (provided for some parts of the project) indicate most soils are mildly to strongly sodic and it is recognised that amelioration is required. The risk assessment also identifies that the presence of erodible topsoils and subsoils pose a risk to the spoil piles achieving a stable condition. Further, this section provides topsoil balance and the volume of topsoil required for rehabilitation of existing and future disturbance in Table 24: <i>Predicted rehabilitation topsoil requirements - end of mine</i>. Detailed	Provide an updated Rehabilitation Planning Part that includes additional information addressing <i>Soil and capping material assessment</i> in section 3.6.1 of the PRCP Guideline regarding soil material.

		information regarding the assumptions made to develop the material balance including minimum topsoil application rates, the quality of the topsoil and the location and accessibility of topsoil resources is not provided.	
7	3.5.7.4 Waste characterisation	Spoil material: this section provides waste characterisation information for some parts of the project and is focussed on the potential for acid generation. It is unclear how the summarised information relates to the remaining areas of the project. Section 3.5.7.5 indicates that landforms will be shaped according to the material they are constructed from with Figures 35 and 36 appearing to provide target slope angles depending on whether the material is Tertiary or Permian age. The PRCP Guideline states that sufficient information is required to be capable of confidently classifying waste based on management requirements. While conclusions are drawn that no specific management strategies are considered necessary, these appear to be based on the potential to generate acid and not the potential for the spoil to be sodic and dispersive. Tailings material: this section provides information based on a report undertaken in 2020 that provides analysis results from 12 samples collected over a 2 day period. Recommendations in this report indicate the coarse reject material has a variable chemical nature and tailings have high EC. The geochemical assessment of the Mackenzie North Coal project indicates some tailings have the potential to generate acid and recommends selective handling of this material. Further information from representative sampling and analysis is requested to demonstrate tailings material does not pose a risk to the receiving environment. This information is considered necessary to demonstrate the proposed rehabilitation methodology for the in pit tailings disposal dam will achieve a stable condition and given no improvement actions are currently proposed for the Max Pit/Max Void in pit tailings storage facility.	Provide an updated Rehabilitation Planning Part that includes additional representative sampling, analysis and interpretation undertaken across the site to determine whether spoil material poses a risk to achieving a stable condition and whether it requires selective handling. Provide an updated Rehabilitation Planning Part that includes additional representative sampling, analysis, and interpretation to identify risks posed by the tailings and coarse reject material in accordance with the PRCP Guideline.
8	3.4 NUMAs 3.5.7.6 Cover Design	Section 3.4 provides information on proposed Non Use Management Areas and includes Max Pit/Max Void. The Rehabilitation Planning Part provides conflicting information about Max Pit.	Provide an updated Rehabilitation Planning Part that includes information regarding the actions that will be taken to

		Section 3.5.7.1, 3.5.7.5, 3.5.7.7 and the Jellinbah Mine Closure Water Management and Void Assessment Report provided in Appendix I all indicate Max Pit/Max Void is a residual void. However, section 3.5.7.5 provides information about in pit tailings disposal occurring in Max Pit/Max Void and states that storage capacity was exhausted in September 2021. This is supported by aerial imagery that indicates that Max Pit has been filled with tailings to level similar to the surrounding land and is no longer a residual void. The adjacent Russel's Dam is also used for in pit tailings disposal and will be capped and covered with topsoil to achieve a PMLU of low intensity grazing. However, it appears that no rehabilitation or improvement actions are planned for Max Pit/Max Void to contain contaminants and prevent environmental impacts outside the boundary of the resource tenure.	ensure Max Pit/Max Void is sufficiently improved. Provide an updated PRCP Schedule that includes those actions.
9	3.5.7.5 Final Landform Design Management Milestones in the PRCP Schedule	While this section provides indicative cross sections of some areas of some pits, it does not provide information regarding how the proposed FOS and treatment of void walls achieves a safe condition and reflects best practice. Table 3-1 of the Review of Pit Slope Design Compliance in Appendix I indicates that some pit slopes will not achieve sufficient FOS either with or without redesign. The FOS for the pit walls relies on the pit water level reaching equilibrium at a certain height. It is unclear what assumptions were used in determining the maximum in-pit water level. The risk of not meeting the FOS as a result of the maximum in-pit water level not being met has not been addressed. No information is provided on necessary setback distances for safety infrastructure proposed in MM2 and how the distances were determined. It is unclear whether safety infrastructure will remain located within the mining tenure boundary once an acceptable factor of safety is achieved, a setback distance has been determined and the proposed safety bunds are constructed.	Provide an updated Rehabilitation Planning Part that includes information that demonstrates the proposed FOS for high walls is considered safe and meets industry best practice (for example, <i>Geotechnical considerations in open pit mines</i> (DME 1999)). Provide an updated Rehabilitation Planning Part that includes: • information to support the stated maximum in-pit water levels for the FOS analysis, and • in the Risk Assessment an analysis of the risk of not meeting FOS as a result of not achieving the maximum in-pit water level in the Risk Assessment.

			Provide an updated Rehabilitation Planning Part that includes designs showing locations of the final (redesigned) crests, set back distances, proposed safety berms, any adjacent permanent infrastructure, and the mining lease boundary. Provide an updated Rehabilitation Planning Part that includes information regarding the methods used to determine the location of the safety infrastructure demonstrating that it complies with industry best practice (for example, <i>Safety bund walls around abandoned open pit mines</i> (DME 1997)).
10	3.5.7.5 Landform Design – Spoil areas, Erosion stability of landforms	This section provides information regarding spoil piles and proposed slope angles. The EA appears to limit the maximum slope angle for spoil piles to 17% (provided in Table 26). The risk assessment provided in Appendix D notes an existing control for the risk of significant slope failure is that slopes are <17%. However, this section also indicates there are spoil piles that exceed the maximum angle and the PRCP Schedule proposes slopes exceeding 17% subject to demonstration of geotechnical stability. Table 6 and section 3.5.7.4 of the Rehabilitation Planning Part and supporting documentation in Appendix I demonstrates that the soils are sodic. This section does not provide final landform designs for the site, landform evolution modelling or information that demonstrates slopes >17% will achieve a stable condition. Much of the information required under the Landform Design heading in section 3.6.1 of the PRCP guideline has not been provided.	Provide an updated Rehabilitation Planning Part that includes additional information relating to the final design plans and the method for determining the landform design as well as further information (e.g. landform evolution modelling) to demonstrate the land will achieve a stable condition suitable for the PMLU.
11	3.5.7.5 Landform Design – Reinstated Drainage	It is noted that two diversions/reinstated drainage areas will remain after mine closure. The Environmental Authority contains conditions relating to permanent watercourse diversions, how they must function at mine	Provide an updated Rehabilitation Planning Part that includes information

		closure and requires the submission of design plans. However, the Rehabilitation Planning Part provides limited information regarding these landforms, relevant milestone criteria are generic, do not reflect the requirements of the EA or demonstrate that the diversions will achieve a stable condition.	regarding the permanent diversions including: • How the landforms will achieve the requirements of Schedule H of the EA and achieve a stable condition, • Justification for not transitioning each requirements in Schedule H of the EA to the PRCP, • Designs for both the landforms including erosion protection measures and features incorporated to achieve the PMLU, and • Copies of documents to support the proposed designs and demonstrate the designs will achieve a stable condition.
12	3.5.7.6 Cover Design	It is noted that a cover system is only proposed for the proposed in-pit tailings disposal area of Russell's Dam. There is no information provided regarding why no cover system is required for the balance of the disturbed areas. Supporting information indicates that tailings material has the potential to be highly saline with potential areas of acid generation. It is unclear how the proposed cover system is expected to achieve the functions proposed in this section. Further, it is unclear how the proposed cover system will prevent capillary rise and support the PMLU. Further, table 31 provides "Cover Design Criteria" for each layer which are then used in milestone criteria. It is unclear how the criteria will ensure the landform will achieve a stable condition. For example, the criteria: • state ESP within the range of baseline soil – the background information demonstrates the soil can be very sodic with ESP concentrations of 27% and this criteria indicates no amelioration measures will be undertaken to improve stability,	Provide an updated Rehabilitation Planning Part that includes information that demonstrates the proposed criteria will achieve a stable condition and support the PMLU or amend the criteria to achieve a stable condition and provide supporting information justifying the amended criteria.

		- state rock cover >75% for external slopes, 50-75% for drainage lines and 25-35% elsewhere – it is unclear how this supports the PMLU of grazing, - for EC does not have a unit of measure. It is unclear how the topsoil criteria relate to Table 38 – Topsoil Suitability.	
13	3.5.7.7 Water management	This section provides information regarding water management during operation and information regarding residual voids at closure. However, it provides limited information regarding: - how water will be managed across the site to achieve a stable condition, - which dams will remain (RA7) and how they will support the PMLU, - the stability of the proposed watercourse diversions with hydraulic modelling demonstrating designs will result in a stable condition, - how surface water flow from Max Pit/Max Void/Max Dam will be treated or prevented from leaving the site, - proposed capacities of each water holding structure at the end of all rehabilitation activities including dams (it is noted that Max Pit/Max Dam has a nominated capacity of 889 ML but aerial imagery indicates the structure has been completely backfilled), - propose quality criteria for water in dams on RA 7, and - propose quality criteria for surface water runoff and justification for the criteria. It is noted that modelling of water quality of residual voids may not consider the addition of contaminants during operation. For example, water quality modelling undertaken for Max Pit/Max Void/Max Dam does not include additional salt loads contributed from evaporation dams during operation (according to section 6.7 of Engeny 2021 Appendix I).	Provide an updated Rehabilitation Planning Part that includes additional information addressing the Water Management part of section 3.6.1 of the PRCP Guideline.
14	3.5.7.8 Revegetation	This section provides information that contradicts other parts of the Rehabilitation Planning Part or is not reflected in the schedule. For example, this section:	Provide an updated PRCP Plan that provides consistent information in the Rehabilitation Planning Part and includes criteria that reflect the proposed

		- proposes the use of hay mulching in rehabilitation activities to prevent soil erosion but this is not reflected in the schedule. - includes seed mixes for “corridor conservation” but this is not a land use proposed in the schedule. - does not propose predicted production rates to demonstrate the proposed species mix will support the PMLU of low intensity/marginal grazing, and - does not include groundcover requirements corresponding to prevention of soil erosion.	methodology for achieving a stable condition in the PRCP Schedule.
15	3.7 Monitoring and maintenance	This section does not appear to include monitoring proposed in the balance of the Rehabilitation Planning Part (including the Risk Assessment), the EA or as part of best practice. For example: - Monitoring required by Land Suitability and Assessment in accordance with Sheilds and William 1991 (mentioned on page 49), - monitoring of the tailings storage pit as specified in Appendix I, pdf pages 564 & 1453, - monitoring of watercourse diversions as required by conditions H5 and H6 of the EA, - Sampling and analysis of topsoil once spread to determine the need for amelioration, - Monitoring and QA/QC for the construction of the cover system over the tailings storage pit to ensure it achieves the design and the topsoil and subsoil meet specified quality requirements, - Installation of monitoring proposed on page 106 for the completed cover system, and - Monitoring and QA/QC for all landforms to ensure they achieve the milestone criteria prior to progression to the next milestone. Further the proposed monitoring in Table 50 does not provide for determining whether a stable condition will be, or has been, achieved. For example: - Proposed triggers for corrective action (applies to many RMs), - Continuous monitoring proposed for RM2 and RM3 but it is unclear how this continuous monitoring will be achieved. - Proposed triggers for action regarding RM6,	Provide an updated Rehabilitation Planning Part that includes a Monitoring and Maintenance plan that: - Includes additional information addressing the requirements of section 3.8 of the PRCP Guideline, - incorporates all the monitoring proposed in the Rehabilitation Planning Part, - collects information needed to demonstrate milestone criteria have been achieved, and - collects information needed to demonstrate a stable condition has been achieved.

		- Features/parameters that will be inspected for RM 7 and stated frequencies, - Addition information regarding QA/QC for RM8, and - Water quality criteria and limits that will apply to RM14 and RM16.	
16	RA9 (Other areas of disturbance approved within approved disturbance extent)	It's unclear what the relevant activities/disturbance types are for RA9. The suitability of each RM cannot be determined without an understanding of the relevant activities/disturbance types.	Provide an updated Rehabilitation Planning Part that includes a more detailed description of what RA9 incorporates.
PRCP Schedule			
17	Rehabilitation Areas	The area assigned to spoil slope > 10% in RA2 (3116 ha) is significantly larger than the area in Table G2 of the EA (2347 ha). The area of retained dams in RA7 (60.5 ha) is greater than the area in Table G2 (50 ha) of the EA. Where land has been progressively certified ensure that it is not included in the PRCP schedule.	Provide an updated PRCP Schedule including Reference Maps that reflect the disturbance areas under the EA and that do not include areas that have been progressively certified. Alternatively or provide additional information to demonstrate that the Post Mine Land Use areas in the proposed PRC plan are consistent with the conditions of the EA.
18	Milestone Criteria generally	Suggest numbering the milestone criteria for ease of reference	For ease of reference, use the following format for each criterion: 1. Criterion a) sub criterion ii) further sub criterion
19	RM3	This Rehabilitation Milestone must include all rehabilitation methodologies proposed in the Rehabilitation Planning Part including proposed rock armour of slopes and watercourses if it is demonstrated that this aligns with the PMLU. The criterion regarding ESP is not measurable and potentially will not achieve a stable condition (given background soils can have very high ESP).	Provide an updated PRCP Schedule that includes criteria that reflect the rehabilitation methodology proposed in the Rehabilitation Planning Part and is required to achieve a stable condition. Provide Milestone Criteria that delivers on SMART principles.

		It is noted that there is the potential that amelioration of the subsoil will be required prior to the spreading of topsoil. However, no amelioration is proposed.	
20	RM4	This rehabilitation milestone does not appear to incorporate activities required for all rehabilitation areas. For example it does not include landform development of bunds to prevent flooding of voids. Page 77 of the rehabilitation planning part indicates that non-erosive material and rock mulch protection will be used where flooding contacts landforms. However, these mitigation measures are not reflected in this milestone. This milestone allows spoil slope areas of up to 25%. Insufficient information has been provided in the Rehabilitation Planning Part to demonstrate slopes of that gradient will achieve a stable condition.	Provide an updated PRCP Schedule that includes criteria that reflect the rehabilitation methodology proposed in the Rehabilitation Planning Part and is required to achieve a stable condition.
21	RM5	This Rehabilitation Milestone must incorporate the requirements of the EA including reference to a specific design report for the Mackenzie North area and ensuring the diversions were constructed to meet the requirements of the design plans. This Rehabilitation Milestone does not include the installation of erosion protection that is likely required or the incorporation of geomorphic features to replicate natural watercourses.	Provide an updated PRCP Schedule that includes criteria that reflect the rehabilitation methodology proposed in the Rehabilitation Planning Part and is required to achieve a stable condition.
22	RM6 and RM7	Criteria are required addressing shaping to support the PMLU and the reinstatement of drainage lines.	Provide an updated PRCP Schedule that includes criteria that reflect the rehabilitation methodology proposed in the Rehabilitation Planning Part and is required to achieve a stable condition.
23	RM8	Some criteria do not deliver on SMART principles. For example: - the criterion regarding Electrical Conductivity requires a unit of measurement. - ESP must be given an absolute value to reflect soil that is suitable for achieving a stable condition (it is noted that soil quality criteria differ to tables 38 and 39, it is unclear why a lower quality is proposed for the in-pit tailings disposal area).	Provide Milestone Criteria that delivers on SMART principles. Provide an updated PRCP Schedule that includes criteria that reflect the rehabilitation methodology proposed in the Rehabilitation Planning Part and is required to achieve a stable condition.

		The Rehabilitation Milestone does not reflect methods and information contained in the Rehabilitation Planning Part. For example, criteria addressing the below must be included: • the installation of monitoring equipment as proposed in 3.5.7.6. • the cover functions outlined in section 3.5.7.6 • the addition of rock cover material proposed in section 3.5.7.6, and • the use of hay mulching as proposed in section 3.5.7.8.	
24	RM9	This Rehabilitation Milestone does not include criteria regarding testing and analysis of topsoil in accordance with section 3.6.4.2 to ensure it meets quality requirements or to determine the addition of ameliorants. Criteria to achieve EA requirements for watercourse diversions must be included.	Provide an updated PRCP Schedule that includes criteria that reflect the rehabilitation methodology proposed in the Rehabilitation Planning Part and is required to achieve a stable condition.
25	RM10 and 11	The Rehabilitation Milestone does not include methods and information contained in the Rehabilitation Planning Part. For example, criteria addressing the below must be included: • the application of inoculant as proposed in the Rehabilitation Planning Part • species lists proposed in tables 41, 42 and 43 of the Rehabilitation Planning Part preferably with seeding rates for species or for groups of like species, and • revegetation in watercourse diversions.	Provide an updated PRCP Schedule that includes criteria that reflect the rehabilitation methodology proposed in the Rehabilitation Planning Part and is required to achieve a stable condition.
26	RM 13	Provide specific criteria in RM13 for riparian vegetation including species composition to ensure a stable condition.	Provide an updated PRCP Schedule that includes criteria that reflect achieving a stable condition.
27	RM14	The rehabilitation planning part refers to Shields and Williams 1991 as the proposed method for determining land suitability. Include criteria that reflect the parameters used in this document to establish land suitability. The rehabilitation planning part refers to the use of land and aerial surveys to monitor rehabilitation. Include criteria that reflect the parameters that will be monitored to determine success. Include criteria relating to performance monitoring for in pit tailings disposal including landform geometry and settlement.	Provide an updated PRCP Schedule that includes criteria that reflect the rehabilitation methodology proposed in the Rehabilitation Planning Part and is required to achieve a stable condition.

28	RM15	Criteria proposed in the schedule do not follow SMART principles. The criteria do not appear to reflect the requirements of schedule H of the EA including the design reports that have been submitted and the requirements of the Mackenzie River Anabanch Diversion Functional Design Report (including monitoring requirements). There does not appear to be fencing proposed to exclude cattle use and prevent erosion.	Provide Milestone Criteria that delivers on SMART principles (for example parameters and values that water quality must meet and sustain and specific measures of recruitment, specific measures of erosion). Provide criteria to demonstrate the watercourse diversions have achieved a stable condition that reflects the requirements of schedule H of the EA including the monitoring program for the Mackenzie River Anabanch Diversion Functional Design Report.
29	RM16	Proposed criteria do not follow SMART principles and do not cover all aspects that demonstrate a stable condition has been achieved.	Include specific water quality parameters and values. Include criteria relating to the sustainable use of the dams for stock watering including the provision of stock access. Include criteria regarding the erosional stability of the surrounding landform.
30	MM1	Design requirements for low walls and recommendations for the treatment of low walls and floors (to be ripped and blasted) are provided in Appendix I but are not included in criteria. It is noted that Max's Pit/Max's Void is proposed as a NUMA but no improvement measures are proposed.	Include criteria regarding improvement measures for all walls of the residual void. Include criteria relevant improvement measures for Max's Pit/Max's Void.
31	MM2	The proposed criteria do not follow SMART principles.	Include criteria regarding the construction of safety berms and flood levees to prevent water from PMF entering the residual voids. Include criteria providing specific locations, dimensions, and descriptions of the safety measures.
32	MM3	Measures to improve the land outcome for voids is proposed in documents provided in appendix I. Such measures include achieving geotechnical and hydrological stability and achieving a self-sustaining	Provide an updated PRCP schedule that includes criteria regarding maximum pit

		vegetation cover. Provide criteria that reflect sufficient improvement in the outcome for the land. Modelling predicts the rebound of the pit water levels will not exceed the level at which the base of the alluvium/paleochannel intersects the pit. Milestone criteria should be included that ensure the pit water levels do not exceed the level at which pit water may be expected to discharge from the pit through geological units that can transmit water such as the alluvium and paleochannels.	water levels to prevent discharge of pit water to the surrounding environment.
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