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26 August 2022

Department of Environment and Science Minerals Business Centre
PO Box 7230
Cairns, QLD 4870

Attention Chris Wake,

Dear Chris,

RE: Response to Information Request EPML00863713; 101/0008105

Please find below consolidated responses to the Department's information request relating to Newmont Landco Pty Ltd.'s original PRCP submission of 30 September 2021.

An update to the full PRCP document, schedule, and spatial material will accompany this letter.

Please be in contact as required.

Regards,

DocuSigned by:
GLEN WARE
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Glen Ware

Manager Legacy Sites

Newmont Australia

Enc.

Table 1: Information Requested and Consolidated Response

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Item	Relevant Section (Proposed PRC Plan, PRCP Schedule and/or PRCP Guideline)	Matter	Information Request	Brief Description of How Matter Has Been Addressed	Relevant Section(s) Where Addressed
PRC Plan – Rehabilitation Planning Part					
1	Mt Leyshon PRC Plan, Section 1.2.2 – Ongoing Community Consultation and Appendix E (Mt Leyshon Community and Stakeholder Engagement Plan) Section 3.5 Community Consultation, PRCP Guideline (Version 2.00)	A community consultation plan is provided (Appendix A) with the PRC plan. The plan can be further improved to include greater detail regarding how ongoing consultation will occur with regards to the rehabilitation to be carried out under the PRC plan. The detail should include the objectives of consultation, the information that will be released to the community, how the community's feedback will be considered including any feedback regarding milestone timeframes. This is a requirement of the PRCP Guideline and necessary to meet the requirements of s126C(1)(c)(iv) of the EP Act.	Provide a revised PRC plan that details how ongoing consultation will be carried out in relation to the rehabilitation that will be carried out under the PRC plan.	The Mt Leyshon Community Engagement Plan has been updated to Specifically call for engagement with stakeholders regarding PRCP access, scheduling, and rehabilitation planning, this is also captured in the action plan of the community engagement plan. Section 1.2.2 of the Mt Leyshon PRC Plan has also been updated to provide a better summary of planned ongoing community consultation activities specific to engagement with stakeholders on PRCP matters, namely scheduling and rehabilitation planning. It is noted that the need for consultation with surrounding landowners on the PRC Plan is limited because Newmont owns all of the pastoral properties within and immediately adjacent to the Mt Leyshon mining lease area.	Mt Leyshon PRC Plan, Section 1.2.2 – Ongoing Community Consultation and Appendix E (Mt Leyshon Community Engagement Plan (updated))
2	Mt Leyshon PRC Plan, Section 1.5.1 General Rehabilitation Practices – Soil and Capping Material Assessment Section 3.6.1 General Rehabilitation practices, PRCP Guideline (Version 2.00)	**Capping/cover repairs to TSFs:** Based on the information provided it appears that repairs to the TSF capping layer will incorporate 0.8m capping material, covered by 0.5m rock armour, overlain by 0.3m layer of growth media. It is unclear if the capping repairs will be consistent with the previous strategy of using compacted oxide heap leach. A statement is made that the existing heap leach material stockpile may be used as a source for growth and capping material requirements. There are concerns regarding the suitability of the heap leach material for use as a capping layer, specifically regarding the later acknowledgement that some of the heap leach material is PAF (Waste Characterisation, Rehabilitation Planning Part and Section 2.6.12, Mt Leyshon Closure Plan 2019).	Provide a revised PRC plan that: • Confirms compacted oxide heap leach will not be used as the capping material.	The description of cover repair works required for the already rehabilitated landforms has been revised. The cover repair works will consist of placing additional topsoil and, in some cases rock armour, on discrete areas of already rehabilitated landforms where erosion has occurred and/or vegetation has not established. No capping material (compacted oxide heap leach or otherwise) is required for the cover repair works. The material balance has been updated to reflect this. Based on recent material balance investigations and calculations, there is sufficient topsoil and rock material available onsite from the Northern Borrow Pit and Quarry to execute all future rehabilitation works at the site.	Mt Leyshon PRC Plan, Section 1.5.1 General Rehabilitation Practices – Soil and Capping Material Assessment
		Capping Material drawn from borrow pits Based on information provided in Table 1.17 Soil and Capping Material Requirements, it appears that rehabilitation works for the majority of landforms will incorporate a capping layer of 0.8m. As stated in the PRC plan, porphyry waste rock has been classified by site testing to be NAF and is a cover material that historically has been successfully applied to sloped surfaces. It is unclear if porphyry waste rock will be the material sourced and consequently, whether the borrow areas contain sufficient volumes of suitable capping material.	Provide a revised PRC plan that: • Clarifies if the material drawn from the borrow pits will be porphyry waste rock.	The description of cover repair works required for the already rehabilitated landforms has been revised. The cover repair works will consist of placing additional topsoil and, in some cases rock armour, on discrete areas of already rehabilitated landforms where erosion has occurred and/or vegetation has not established. No capping material (compacted oxide heap leach or otherwise) is required for the cover repair works. The material balance has been updated to reflect this. Based on recent material balance investigations and calculations, there is sufficient topsoil and rock material available onsite from the Northern Borrow Pit and Quarry to execute all future rehabilitation works at the site.	Mt Leyshon PRC Plan, Section 1.5.1 General Rehabilitation Practices – Soil and Capping Material Assessment and Material Testing
3	Mt Leyshon PRC Plan, Section 1.5.1 General Rehabilitation Practices – Waste Characterisation	The Rehabilitation Planning Part refers on a number of occasions to a study (WMC 2009) which includes a geo-environmental assessment used to inform closure works. This study has not been provided as an attachment to the	Provide a revised PRC plan that:	The Mt Leyshon Geo-Environmental Assessment Report (WMC, 2009) has now been provided in Appendix L.	Mt Leyshon PRC Plan, Section 1.5.1 General Rehabilitation Practices – Waste Characterisation and Appendix L (new Appendix)

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		PRC plan and likely contains information relevant to the PRC plan assessment.	• Includes a copy of the referenced (WMC 2009) study.		
		Long term closure observed leaching results It is noted that there are no dams or sumps suitably located to reflect the hydrochemistry of seepage from the NWRSF. Based upon data presented, it appears that there is a likely risk of contaminated seepage emanating from this landform. Further information is sought to identify how it will be demonstrated that no environmental harm is being caused by seepage from the NWRSF.	Provide a revised PRC plan that: • Identifies how it will be demonstrated that no environmental harm is being caused by seepage from the NWRSF.	It is noted that there are no dams or sumps located immediately downgradient of the NWRSF which can be used to characterise the quantity and quality of seepage from the NWRSF. However, groundwater flow directions in the vicinity of the NWRSF are well defined. The seepage pathway from the NWRSF to the environment would be to the north-west, past the Scats Stockpile and into Plum Tree Creek. The closest groundwater monitoring bores to the NWRSF and Plum Tree Creek are NMLMB19, NMLMB20, NMLMB22. No mounding of groundwater has been observed at these bores as would be the case if there was a significant inflow to groundwater from seepage originating from either the NWRSF or the Scats Stockpile. Furthermore, sulphate concentrations (primary contaminant of concern) at NMLMB22, which would capture the influence of any seepage from the NWRSF or the Scats Stockpile are stable and do not show any indication of sulphate contributions from the NWRSF or the Scats Stockpile. It is concluded that rainfall infiltration through the cover system of the NWRSF is not contributing any significant quantity of seepage to groundwater. This discussion, along with supporting graphs, has been added to Section 1.5.1 General Rehabilitation Practices – Waste Characterisation, Long term closure observed leaching results of the PRC Plan.	Mt Leyshon PRC Plan, Section 1.5.1 General Rehabilitation Practices – Waste Characterisation, Long term closure observed leaching results
		The legends for Figures 1.36 and 1.40 currently have labels on the right-hand Y-Axis that read “Precipitation (mm)”. It is assumed that these labels should instead refer to pH values.	Provide a revised PRC plan that: • Updates the labels on Figures 1.36 and 1.40 to correctly refer to pH units instead of precipitation.	Figures 1.36, 1.37 and 1.40 (now re-numbered) have been updated such that the labels on the secondary Y-Axis read “Precipitation (mm)”.	Mt Leyshon PRC Plan, Section 1.5.1 General Rehabilitation Practices – Waste Characterisation, Long term closure observed leaching results, Figures 1.36, 1.37 and 1.40 (now re-numbered).
4	Mt Leyshon PRC Plan, Section 1.5.1 General Rehabilitation Practices – Landform design	**Design for Scats Stockpile** The proposed landform design for the Scats Stockpile incorporates a 15° slope gradient for external batters. Currently, the Rehabilitation Planning Part does not provide justification that this slope gradient will be structurally and erosionally stable as it applies to the specific material characteristics of the scats. The department acknowledges the discussion that similar landform geometries are considered to be stable but understands that these landforms have been constructed from other materials with different geotechnical and erosional properties. It is also unclear what the slope gradients of internal faces of the stockpile fingers will be and whether these will be stable.	Provide a revised PRC plan that: • Provides a discussion regarding the suitability of the design slope gradient for final batters on the Scats Stockpile, considering the specific material characteristics of the scats.	The design of the Scats Stockpile final landform has been revised since the original PRC Plan submission and no longer includes any valleys or slopes between the different stockpile fingers. Additional analysis and discussion regarding the structural and erosional stability of the proposed Scats Stockpile final landform has been provided.	Mt Leyshon PRC Plan Appendix N.

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		It is noted that the Upper Plum Tree Creek Dam will be subsumed by the re-profiling works. This dam is currently used to monitor seepage from the Scats Stockpile.	Provide a revised PRC plan that: • Clarifies if a new seepage monitoring sump/system will be employed to continue to capture and monitoring of shallow seepage flows from the Scats Stockpile.	The Upper Plum Tree Creek Dam will be subsumed by the rehabilitation of the Scats Stockpile. However, the Plum Tree Creek Dam will remain in place during rehabilitation and for some time afterwards to capture any seepage and to act as a sediment basin for the steeper western and northern batters of the Scats Stockpile final landform during vegetation establishment. Water quality in the Plum Tree Creek Dam will be monitored to ensure that the rehabilitated Scats Stockpile is trending towards achieving a stable condition.	Mt Leyshon PRC Plan Appendix N
		Based on information presented (including Figures 1.42 – 1.45) it appears that unlike the other landforms with domes, free draining tops, the Scats Stockpile will involve a series of fingers with intermediate valleys. The addition of a Figure showing the profile of the final rehabilitated landform once re-shaping, application of capping and growth media activities are complete is recommended to demonstrate how the top surfaces of the Scats Stockpile will be free draining and water will be managed to avoid concentrated surface water flows. In addition, further discussion is recommended to clearly identify if the final surface of the rehabilitated Scats Stockpile will be suited to the proposed PMLU of grazing.	Provide a revised PRC plan that: • Clarifies the objectives of the final rehabilitated surface of the Scats Stockpile landform regarding water management and its suitability for the proposed PMLU of grazing.	The design of the Scats Stockpile final landform has been revised since the original PRC Plan submission and no longer includes any valleys or slopes between the different stockpile fingers. Surface water drainage on the rehabilitated landform will occur by way of sheet flow down the vegetated surfaces of the landform, with constructed drainage channels around the perimeter of the landform. The Plum Tree Creek Dam will be retained at the northern end of the landform to collect any seepage water and to act as a sediment dam for the steeper western and northern batters of the landform. The rehabilitated Scats Stockpile landform will be a free-draining surface, with no concentrated surface water flows on the landform itself (only around the perimeter of the landform). Additional discussion regarding the ability of the rehabilitated Scats Stockpile to support a grazing post-mining land use has been provided. All rehabilitation areas are to be managed under a land use management plan in accordance with the rehabilitation milestone criteria.	Mt Leyshon PRC Plan Appendix N
		The Rehabilitation Planning Part states that key controls will be put in place to manage the risks associated with each rehabilitation works but provides no detail regarding these measures.	Provide a revised PRC plan that: • Provides examples and further description of specific QA/QC strategies.	More detail has been provided to include hold points based on milestone progression and the use of inspection and test plan documentation to verify conformance prior to progressing. This process will ensure methodologies are followed with accountabilities and responsibilities nominated and provide a mechanism to suspend works until an acceptable standard is achieved.	Mt Leyshon PRC Plan, Section 1.5.1 General Rehabilitation Practices – Landform design
5	Mt Leyshon PRC Plan, Section 1.5.1 General Rehabilitation Practices – Cover Design	For existing cover systems – it is unclear from the information presented if Newmont have been able to quantify the performance of individual cover systems in minimising rainfall infiltration and oxygen ingress. Demonstration that each cover system is functioning as intended will be necessary to provide evidence that the rehabilitated land achieves stable condition, and	Provide a revised PRC plan that: • Describes how the performance of existing cover systems will be measured and monitored.	Additional work has been undertaken to assess the influence of cover performance of the existing rehabilitated landforms on the receiving environment and is provided in Appendices P and Q of the PRC Plan. This indicates that the existing installed cover systems are not currently causing any environmental harm, and are not	Mt Leyshon PRC Plan, Section 1.5.1 Hydrogeology, Section 1.5.1 General Rehabilitation Practices – Monitoring of Control Measures and Appendices P and Q.

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	Appendix H Mt Leyshon Tailings Management Plan Section 3.6.1 General rehabilitation practices, PRCP Guideline (Version 2.00)	this will be demonstrated by the inclusion of specific milestone criteria in the PRCP schedule.		expected to cause environmental harm in the long-term future. Newmont has considered options to retrospectively install cover system performance monitoring devices (e.g. lysimeters and/or soil moisture probe arrays) on the existing rehabilitated landforms to obtain a better understanding of the cover system performance of the individual landforms. Newmont has decided not to proceed with direct cover performance monitoring of individual landforms for the following reasons: • Newmont has already installed an extensive groundwater and surface water monitoring network in the vicinity and down-gradient of the mine landforms that provides information on the combined influence of cover system performance of the mine landforms on the receiving environment. • Due to the long period of post-closure environmental monitoring that has occurred at the Mt Leyshon Mine, the influence of the cover system performance of the existing rehabilitated landforms on the receiving environment is well understood and indicates that the surface runoff and seepage from the rehabilitated mine waste facilities at the Mt Leyshon Mine is not currently causing any environmental harm and is not expected to cause environmental harm in the long-term future. • Instrumented monitoring devices are localised and there is no guarantee that they will be representative of the facility as a whole. • Direct cover performance monitoring of the individual landforms would be a very costly program to undertake given the number and large areas of the individual landforms and the cost required to maintain the cover system performance monitoring installations in a serviceable condition (e.g. requirement for frequent maintenance and replacement of sensors). • The high cost of direct cover performance monitoring of the individual landforms is not warranted by the known performance of the existing rehabilitated landforms in terms of the low risk of environmental harm being caused. As a replacement for direct cover system performance monitoring, Newmont is planning to utilise existing surface water monitoring data (seepage sump pump metering data) and groundwater monitoring data	

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				(groundwater levels and quality) to refine the groundwater model for the site so that it can be used on an ongoing basis to infer cover performance for individual landforms and corresponding impacts to the surrounding groundwater systems.	
		The PRCP schedule proposes a 100-year monitoring period associated with the release of contaminants via seepage from constructed landforms. It is acknowledged that some discussion has been provided to identify the reduction in seepage flows from the TSF as a result of drawdown of pore water to date and improved cover performance which has reduced infiltration rates (Table 1.22). Appendix H outlines piezometer monitoring undertaken to verify if the phreatic surface within the TSF perimeter embankments is trending downwards as expected. However, Section 5.1 of the appendix states 'the absence of piezometers across the top surface of the TSFs does not allow for direct measurement of the phreatic surface within the tailings deposit and accordingly makes it difficult to quantify the performance of the TSF cover systems in minimising rainfall infiltration. In order to assess the appropriateness of, and the risks associated with the extended period of time proposed in the PRCP schedule, further information is required to describe and quantify what is driving the rates of seepage; how long AMD generation is likely to continue within each of the landforms; demonstration that cover systems are minimising infiltration of oxygen and water, and the impacts of climatic conditions upon rates of seepage/flushing of contaminants from the landforms. The Schedule must allocate timeframes for each Rehabilitation Area that are unique to the performance of each cover system and demonstrate the staggered achievement of non-polluting landforms (i.e., different completion dates for RM7). A discussion regarding this should be included in the rehabilitation planning part.	Provide a revised PRC plan that: • Provides quantifiable data and additional information sufficient to justify the timeframes proposed in the PRCP schedule.	The outputs of the SW and GW monitoring programs, and model updates will provide quantifiable data that will inform the progression of each RA to the next RM. The product of the improved model is intended to aid planning through quantification of potential impacts by potentially providing more accurate forecasts of long term contaminant migration extents which is likely to be driven by cover performance by acting as a predictive tool coupled with rehabilitation monitoring (e.g. SW monitoring data) to trigger a need for intervention, for example, rehabilitation works (via PRCP updates/scheduling) to increase confidence in achieving completion criteria. It is premature to identify discrete timeframes for each RA to progress. A further period of monitoring is required to assess the effectiveness of the repairs to the existing rehabilitation areas included in the PRCP on minimising and ultimately eliminating the requirement for ongoing active water management operations. It is expected that the confirmation of improvements to surface water quality and cessation of surface water interception/pumping will be able to occur within a relatively short timeframe (e.g. 5 to 10 years); however, a longer period of time is expected to be required to assess the effectiveness of the rehabilitation works on the shallow seepage flows and the potential assimilative capacity of the receiving environment. A nominal 100-year monitoring period has therefore been proposed.	Mt Leyshon PRC Plan, Section 1.7.2 Selection of Rehabilitation Milestones and Criteria
		Scats Stockpile cover design: The PRCP Guideline (pp. 31 – 32) articulates a number of specific details regarding cover designs that must be provided. Currently, the Rehabilitation planning part identifies optional approaches to capping layers/cover design, and this does not meet the requirements of the PRCP Guideline. It is necessary to confirm detailed design specifications for the cover system on the Scats Stockpile as this information will be used to inform the assessment of the proposed PRCP schedule and whether milestone criteria sufficiently demonstrate the land has achieved a stable condition. It is anticipated that the design performance criteria to be achieved by the proposed cover system will be present as milestone criteria in the PRCP schedule and also linked to other criteria demonstrating the ability of the receiving environment to assimilate the final water quality (and not cause environmental harm).	Provide a revised PRC plan that: • Describes a cover design for the Scats Stockpile that meets requirements of Section 3.6.1 of the PRCP Guideline.	A revised design has been developed for the rehabilitation of the Scats Stockpile and is provided in Appendix N of the PRC Plan. This design now avoids any references to optional approaches for capping layers/cover design.	Mt Leyshon PRC Plan, Section 1.5.1 General Rehabilitation Practices – Scats Stockpile Rehabilitation and Appendix N.

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6	Mt Leyshon PRC Plan, Section 1.5.2 General Rehabilitation Practices – Tailings Storage Facilities Appendix H Mt Leyshon Tailings Management Plan	Considering information presented in the Rehabilitation planning part and Appendix H, it is unclear if spillways for each TSF have been designed adequately and reflect design criteria specific for closure scenarios (for example ANCOLD specifications).	Provide a revised PRC plan that: • Confirms if closure spillways on TSFs have been adequately designed; or alternatively, provide performance data to establish the stability of the landforms.	An additional sub-section titled Closure Spillways has been added to Section 1.5.2 (General Rehabilitation Practices – Tailings Storage Facilities) of the PRC Plan and provides information on: • Details of the configuration and current condition of the TSF closure spillways. • Flood modelling undertaken for the closed TSF landforms that confirms that the TSF closure spillways have sufficient flow capacity to convey the 1:1,000 AEP peak flood discharges from the top surfaces of the TSF landforms. • The historical performance of the spillways during the 20 year post-closure period for the mine which has included a large rainfall event that exceeded the 1:100 AEP design rainfall event.	Mt Leyshon PRC Plan, Section 1.5.2 General Rehabilitation Practices – Tailings Storage Facilities
		New Northern Tailings Storage Facility (page 113): "future rehabilitation improvement works planned:" – this statement is incomplete, with detail missing.	Provide a revised PRC plan that: • Includes a description of the planned future improvement works for the NNTSF.	A description of the planned future rehabilitation improvement works for the NNTSF is now included in the PRC Plan.	Mt Leyshon PRC Plan, Section 1.5.2 General Rehabilitation Practices – Tailings Storage Facilities
7	Mt Leyshon PRC Plan, Section 1.6 Risk Assessment Section 3.7 Risk assessment, PRCP Guideline (Version 2.00)	**Risk Assessment:** Currently the risk assessment provides no consideration of the failure for rehabilitated areas to sustain the PMLU.	Provide a revised PRC plan, with an updated Risk Assessment that: • Considers the risks associated with a failure of the rehabilitated areas to sustain the PMLU.	Additional risk event added to Table 1.3.1 to include failure of rehabilitated areas to sustain PMLU.	Mt Leyshon PRC Plan, Section 1.6 Risk Assessment
		Regarding the Scats Stockpile, the risk assessment needs to consider the final rehabilitated landform. For example, the Risk Description "PMLU not safe to humans, animals or the environment" does not consider the risks present post re-shaping of the stockpile into the final landform. Another example is against the Risk Description regarding structurally stability – the risk matrix discusses current landform geometries but needs to assess this based on the final rehabilitated landform.	Provide a revised PRC plan, with an updated Risk Assessment that: • Has addressed relevant risks for the Scats Stockpile from the perspective of the final rehabilitated landform.	Risk assessment updated to include pre and post final landform controls identified for each risk associated with the Scats Stockpile and its configuration.	Mt Leyshon PRC Plan, Section 1.6 Risk Assessment
		For matters associated with erosional stability – the risk matrix needs to consider risks associated with failure of the capping layer/growth media application and/or vegetation establishment.	Provide a revised PRC plan, with an updated Risk Assessment that: • Considers risks associated with failure of the capping layer/growth media application and/or vegetation establishment.	Risk assessment updated to include additional potential causes linked to risk events, for example; *PMLU not structurally stable – erosional stability* and *PMLU not structurally stable – revegetation stability.*	Mt Leyshon PRC Plan, Section 1.6 Risk Assessment
		No controls are proposed to minimise potential for wind-borne material from the scats to be deposited in the receiving environment.	Provide a revised PRC plan, with an updated Risk Assessment that: • Proposes controls to minimise the potential for wind-borne material from the scats to be deposited in the receiving environment.	The risk assessment section of the PRCP has been updated to determine appropriateness of controls to manage the potential for wind borne erosion from the exposed Scats Stockpile surface prior to covering. Wind borne erosion for the Scats Stockpile is considered a low risk once the rehabilitation works (vegetated cover installation) have been completed.	Mt Leyshon PRC Plan, Section 1.6 Risk Assessment

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		The risk assessment does not identify those responsible for the approval and implementation of the plan, resource requirements, timing and scheduling details for the risk treatment step. This information is required by the PRCP Guideline. The risk assessment is necessary to assess the adequacy of timeframes allocated in the PRCP schedule.	Provide a revised PRC plan, with an updated Risk Assessment that: • Identifies those responsible for the approval and implementation of the plan, resource requirements, timing, and scheduling details for the risk treatment step.	Risk assessment amended to include 'responsibility' column. Rehabilitation Planning Section 1.6 also updated to include overarching accountability of the PRCP and risk treatments.	Mt Leyshon PRC Plan, Section 1.6 Risk Assessment
8	Mt Leyshon PRC Plan, Section 1.7 Monitoring and Maintenance Appendix D (Mt Leyshon Rehabilitation and Pastoral Lease Condition Monitoring 2021) Appendix F (Mt Leyshon Closure Plan 2019)	There is discussion in section 1.7.3 that milestone criteria are relevant only to future rehabilitation works and are not applied retrospectively. There is also a statement that milestone criteria are used to inform if rehabilitation has been *or is likely* to be achieved. This position is somewhat inconsistent with the intent of the PRCP framework in that all areas disturbed by mining activities on the site are required to achieve the final outcome of 'land in a stable condition' for the PMLU of grazing or achieve sufficient improvement of the NUMA. To demonstrate this, all areas will be required to achieve rehabilitation milestones. While various areas which have previously been rehabilitated will not be required to achieve some of the earlier milestones (such as Landform Shaping), they are still required to achieve subsequent/final milestones. Milestone criteria are parameters that demonstrate achievement of a milestone and cannot be ambiguous in allowing for the likelihood of achieving the outcome. For these reasons, milestone criteria must specifically demonstrate achievement of the Rehabilitation or Management Milestone, and the Monitoring and Maintenance program provided in the Rehabilitation planning part clearly articulate the systems that will be carried out in order to demonstrate the milestones and milestone criteria have been achieved.	Please note the comments regarding perceived inconsistencies of statements made in Section 1.7 of the PRC plan. If necessary, provide a revised PRC plan to clarify these statements.	Removal of retrospective comment from PRCP document and nominated that RA's must achieve criteria, not be likely to achieve a criteria. Milestone criteria have been updated to be more specific, provide methods of measurements. Former RM6 which recognised that RA's were in a monitoring phase has been replaced with an RM that states the RA has met the criteria for PMLU. Further discussion around the use of the LFA/EFA based rapid assessment technique to measure rehabilitation performance, and the use of proposed trigger limits to demonstrate suitability of water reporting off site has been provided.	Mt Leyshon PRC Plan, Section 1.7.3 Monitoring and Maintenance
		Management milestones for the NUMA are required to be included in the Monitoring and maintenance program.	Provide a revised PRC plan with a Monitoring and Maintenance Program that: • Includes management milestones (and their relevant criteria) in the Monitoring and Maintenance Program.	Management milestones for NUMA added to rehabilitation milestone table. Criteria applied to management milestones to enable demonstrate of satisfying milestone.	Mt Leyshon PRC Plan, Section 1.7 Monitoring and Maintenance
		It is noted that a number of milestone criteria for RM7 refer to criteria that reflect LFA and EFA monitoring frameworks. However, the Rapid Assessment system utilised for monitoring appears to diverge away from these frameworks. It is not readily apparent how the proposed monitoring program will demonstrate achievement of criteria which rely on monitoring results obtained from LFA/EFA frameworks.	Provide a revised PRC plan with a Monitoring and Maintenance Program that: • Clarifies how the Rapid Assessment system will demonstrate achievement of those criteria that are based on LFA/EFA monitoring frameworks.	Table (1-33 of the PRCP) created to show how Rapid Assessment is based on LFA/EFA frameworks and enables tracking toward completion criteria. Rehabilitation monitoring completion criteria amended to be based on closure plan requirements and achievement of criteria from full LFA/EFA assessment for a three year period.	Mt Leyshon PRC Plan, Section 1.7 Monitoring and Maintenance
		Table 1.3.2 links monitoring methods and frequency with each Rehabilitation Milestone. There is no indication of how surface and groundwater monitoring has been integrated into the Monitoring and Maintenance program.	Provide a revised PRC plan with a Monitoring and Maintenance Program that: • Includes surface and groundwater monitoring.	Monitoring methodology and frequencies updated in existing table to include surface (annual REMP monitoring) and groundwater monitoring (annual in accordance with GMP). Further to this, discussion has been provided in the monitoring and maintenance section to provide detail around the criteria set for both surface and groundwater quality.	Mt Leyshon PRC Plan, Section 1.7 Monitoring and Maintenance

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				Surface Water Quality: PRCP updated to provide detail regarding use of the surface water quality compliance monitoring requirements of the Environmental Authority as completion criteria. Groundwater Quality: PRCP updated to provide detail regarding use of the groundwater quality compliance monitoring requirements of the Environmental Authority as completion criteria.	
		It is expected that a post closure monitoring program is provided with the PRC plan and referred to in Table 1.32, to demonstrate the performance of cover systems including the parameters and spatial distribution. This program must comply with best practice (for example, section 8.3.2 of the Global Cover System Design – Technical Guidance Document published by the International Network for Acid Prevention (November 2017).	Provide a revised PRC plan with a Monitoring and Maintenance Program that: • Includes a monitoring program to demonstrate performance of cover systems.	Refer response provided for RFI Item Number 5 above.	Mt Leyshon PRC Plan, Section 1.5.1 Hydrogeology, Section 1.5.1 General Rehabilitation Practices – Monitoring of Control Measures and Appendices P and Q.
		-	Provide a revised PRC plan with a Monitoring and Maintenance Program that: • Reflects any adjustments necessary to the Monitoring and Maintenance Program arising from items in this Information Request.	Monitoring methodology and frequencies updated in existing table to include surface (annual REMP monitoring) and groundwater monitoring (annual in accordance with GMP). Further to this, discussion has been provided in the monitoring and maintenance section to provide detail around the criteria set for landforms using the rapid assessment technique based on LFA/EFA, full LFA/EFA assessments, and for surface and groundwater. Landforms: Adjustments have been made to demonstrate that the rapid assessment technique is based on LFA/EFA methodologies. The rapid assessment technique provides quantifiable results which can be compared to analogue sites to determine if trending toward acceptable and then full LFA/EFA assessments undertaken and completion criteria met when three years of full LFA/EFA assessments meet criteria. Surface Water Quality: PRCP updated to provide detail regarding use of the surface water quality compliance monitoring requirements of the Environmental Authority as completion criteria. Groundwater Quality: PRCP updated to provide detail regarding use of the groundwater quality compliance monitoring requirements of the Environmental Authority as completion criteria.	Mt Leyshon PRC Plan, Section 1.7 Monitoring and Maintenance

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PRCP Schedule					
9	Rehabilitation Areas and Improvement Area – Commencement of first milestone (individual worksheets, Cell A5 and Cell E5) Rehabilitation and Management Milestones – Milestone Criteria Section 4.1, Step 5 PRCP Guideline (Version 2.00)	The PRCP template (Cell A5) requires an entry to identify the milestone reference relevant to "Commencement of the first milestone". For example, against the entry for RA1, this would be RM3. Milestone criteria are parameters that are measurable for achieving the milestone. Criteria must clearly demonstrate through SMART principles that the milestone has been successfully completed. They are used to demonstrate completion of progressive rehabilitation and improvement steps and events. An initial reading of the proposed PRCP schedule has identified instances where milestone criteria can be improved to ensure they meet the requirements outlined by Section 4.1, Step 5 in the PRCP Guideline. The following items (10-18) are examples of instances where this applies.	Provide a revised PRCP schedule that includes a reference to the relevant Rehabilitation or Management Milestone at Cell A5. Consider the following items (10-18) and provide a revised PRCP schedule to include recommendations.	The PRCP schedule has been updated throughout to include the commencement milestone for each RA and NUMA.	Rehabilitation Areas and Improvement Area – Commencement of first milestone (individual worksheets, Cell A5 and Cell E5)
10	RM1 Infrastructure Decommission and Removal Section 4.1, Step 5 PRCP Guideline (Version 2.00)	Milestone criteria are parameters to measure achievement of the milestone. They must be appropriate for achieving the milestone and facilitate achieving subsequent milestones. The first two criteria proposed against RM1 demonstrate an area's readiness for commencing the milestone, and do not provide a measure of achievement of the milestone. It is recommended that these are removed from the schedule. As currently proposed, the third criterion "prepare a decommissioning strategy to facilitate works" does not provide a measurable parameter to demonstrate achievement of the milestone. It is recommended to amend the text to identify that the infrastructure decommissioning and removal activities have been undertaken in accordance with a decommissioning strategy.	Consider the matters discussed and provide a revised PRCP schedule to include recommendations.	RM1 amendment to specify that infrastructure is to be removed unless it is relied upon for rehabilitation and water management purposes or otherwise agreed and asset transfer agreement in place for infrastructure retained. A method by way of inspection against asset register and termination documentation is used to demonstrate achievement.	RM1 Infrastructure Decommission and Removal
11	RM2 Landform Shaping	To ensure criteria meet SMART objectives, it is recommended that specific landform design 'rules' (e.g., slope gradients) are identified as milestone criteria. This is important to ensure the various design specifications for different landforms are readily identified as being achieved. The criterion related to ESC structures should be amended to include reference to certification of the design and construction by an appropriately qualified person (refer to Table 1.32 of the Rehabilitation planning part). It is recommended that the third criterion is updated to include reference to certification by a suitably qualified person – "Report provided by a suitably qualified person to verify 'as constructed' complies with the final landform design".	Consider the matters discussed and provide a revised PRCP schedule to include recommendations.	Amended as per below: • Bulk earthworks have been completed to achieve final landform design batter slope requirements: Facility / Batter Slope (Degrees) Scats stockpile: 15 Northern Waste Rock Storage Facility: 12 Southern Waste Rock Storage Facility: 11 Eastern Waste Rock Storage Facility: 13 Old Northern Tailings Storage Facility: 15 Southern Tailings Storage Facility: 14 New Northern Tailings Storage Facility: 16	RM2 Landform Shaping

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				•Install future ESC Structures as per design and certified by an appropriately qualified person • Report provided by suitably qualified person to verify "as constructed" complies with the final landform design for any future re-shaping works.	
12	RM3 Cover System Install	It is recommended that milestone criteria currently proposed for RM3 are amended to ensure each criterion meets SMART objectives and the criteria overall facilitate achieving subsequent milestones. As previously mentioned, it is expected that specific design criteria and performance outcomes regarding cover systems will be included in the PRCP schedule as milestone criteria.	Consider the matters discussed and provide a revised PRCP schedule to include recommendations.	Cover system install for RM3 relates to the Scat's Stockpile only and has been expanded to specify materials, and installation requirements (in accordance with OEM specifications at the time). Conformance checks based on the design are to be used to demonstrate compliance to design.	RM3 Cover System Install
13	RM4 Final Surface Preparation	Table 1.32 of the Rehabilitation planning part outlines the nominated depths of growth media for specific locations. It is recommended that relevant criterion at RM4 is amended to specify nominated depth. For example: Growth media applied at the following minimum depths – • 0.45m on stockpiles • 0.1m on roads and mine infrastructure areas • 0.3m on all other areas It is recommended the final criterion is amended to specify that an appropriately qualitied person has undertaken conformance checks to verify final surface preparation has been completed in accordance with the design.	Consider the matters discussed and provide a revised PRCP schedule to include recommendations. Check growth media depths for RM4 for scats stockpile	Remediation of existing surfaces to final design and verification by suitably qualified person included in the criteria along with specific ameliorant rates for materials to be used from borrow pits to enable growth media use. Growth media depths updated to specify depth requirements by landform (stockpiles, scats stockpile, mine infrastructure, northern borrow pit and quarry).	RM4 Final Surface Preparation
14	RM5 Revegetation (Pasture Grazing)	To meet SMART criteria, it is recommended that a list of the target pasture species and nominated rates are listed as part of the relevant milestone criterion. In order to demonstrate a sustainable outcome of grazing is achieved, it is recommended that a number of species are present in the seed mix. This improves the biodiversity and resilience of the pasture. It is recommended that a criterion is included to limit the proportion of invasive species present in the pasture. Weed management is identified in the Mt Leyshon Closure Plan.	Consider the matters discussed and provide a revised PRCP schedule to include recommendations.	A pasture seed mix of equal portions of *Buffel, Seca, Couch, Wynn-Cassia, Rhodes* at a rate of 5-8kg/ha has been specified. Please note, weed management has been incorporated into RM6.	RM5 Revegetation (Pasture Grazing)
15	RM6 Achievement of rehabilitated landform	The proposed criteria do not sufficiently demonstrate achievement of the milestone and are not parameters that measure achievement of the milestone. It is assumed that the purpose of this milestone is to allow sufficient time for pasture to mature, confirmation of the absence of site contamination, achievement of erosional stability and suitable quality of surface water runoff.	Consider the matters discussed and provide a revised PRCP schedule to include recommendations.	The original RM6 has been removed and replaced by a new RM6 which achieves PMLU to a stable condition, to reach this RM, demonstration of meeting criteria resultant of monitoring programs is required. It was determined that the original RM6 was superfluous..	RM6 Achievement of rehabilitated landform

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		To show that RM6 has been achieved, it is recommended that additional criteria to demonstrate achievement of the above parameters are proposed. For example – • Demonstration that vegetation establishment trends towards relevant analogue sites, or it is appropriate in terms of plant species, composition, diversity, abundance, cover and function (taken from Table 6.1 Newmont Tailings Management Plan).			
16	RM7 Achievement of PMLU to Stable Condition	In order to successfully demonstrate that land has achieved a stable condition, it is expected RM7 (as the final Rehabilitation Milestone) will have a suite of criteria that demonstrate: • The Geotechnical stability of TSFs (via FOS and closure spillway designs) • That land achieves erosional stability • That cover systems are performing – no dust generation, infiltration of O_2 and H_2O, ability of the cover to provide a substrate for the vegetation. • No seepage through dam floors and base of landforms • Vegetative cover and the condition of pasture can sustain a grazing outcome • Land is non-polluting, particularly to surface and groundwater receiving environments Currently, criteria proposed for RM7 demonstrate some of the qualities described above, but not all. Additional criteria are required. Comments are also proposed against the following criteria: • Infrastructure in RA removed from RA unless required to complement PMLU. PRCP Guideline (Section 3.6.5) requires that built infrastructure is retained via formal agreement with the landholder. The criterion should reflect this. • Site contamination assessment for entire mine has been prepared by an approved auditor and mine site complies with Contaminated Sites Act 2003 and meets the requirements to be removed from the Environmental Management Register. • The relevant legislation in Queensland for contaminated land is the *Environmental Protection Act 1994*. The criterion should reflect this. In order to remove the site from the EMR, the EA holder must demonstrate that the land is suitable for any use. Based on the information presented in the PRC plan, this will not be achievable. Consideration should be given as to whether the criterion is achievable in its proposed form. • Soil surface stability greater than or equal to the lower limit of the average regional range (analogue sites) for three years of monitoring. The criterion does not identify that it is based on an assessment of soil stability and erosion through Landscape Function Analysis (LFA) monitoring. The criterion should reference the LFA framework. • Erosion features less than or equal to the upper limit of the average regional range (analogue sites) for three monitoring years. The criterion does not identify the framework or schema against which erosion is addressed. The criterion should reference this schema or adequately describe what defines an 'erosion feature'. It is noted that the presence of active erosion	Consider the matters discussed and provide a revised PRCP schedule to include recommendations.	The original RM7 is now RM6 due to the original RM6 not being required. Updated RM6 provides criteria to demonstrate the requirements of the RFI with the exception of geotechnical stability of TSFs and closure spillway designs which is discussed in the PRCP. Erosional stability now includes criteria based on implementation of the rapid assessment technique on rehabilitated landforms compared to analogue sites and full LFA/EFA assessments. Performance of cover systems and seepage matters is assessed by implementation of surface and groundwater monitoring programs and updates to the groundwater model. Vegetative cover and pasture condition is determined by implementation of the rapid assessment technique, based on LFA/EFA assessment methodology and comparison to analogue sites with full LFA/EFA assessments being the completion method of demonstrating achievement of completion criteria over three years. The criteria are developed to achieve non polluting landforms. Criteria reflect the need for formal agreements for retention of infrastructure. There is no longer any reference to the *Contaminated Sites Act 2003,* rather contamination assessments are referenced to meet the requirements of the *Environmental Protection Act (1994).* A table demonstrating that the rapid assessment technique is based on LFA/EFA has been provided noting that the Rapid Assessment technique indicates progression and full LFA/EFA assessments are relied upon to demonstrate achievement of completion criteria. Surface and groundwater criteria have been included and are based on EA contaminant release limits.	Mt Leyshon PRC Plan, Section 1.7 Monitoring and Maintenance, Schedule: RM7 Achievement of PMLU to Stable Condition Mt Leyshon PRC Plan, Section 1.5.2 Tailings Storage Facilities

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		(in particular multiple rills and gullies) does not constitute demonstration of land in a stable condition. • Surface water completion criteria meets those established from the Receiving Environment Monitoring Program (REMP). In order to demonstrate achievement of RM7 and that land is in a stable condition, specific and measurable surface and groundwater objectives that would protect all applicable environmental values are required and must be proposed criteria. It is not appropriate to rely upon future identification of surface water criteria via the REMP. The PRCP schedule proposed two periods of time necessary to achieve RM6 – 20 years for areas not reliant on the water interception system and 100 years for areas reliant on the interception system. For those areas reliant on the water interception system – it is recommended that a criterion is proposed whereby a report is provided at regular intervals (e.g., 10 year periods) analysing long term trends regarding seepage volume and quality intercepted in the water management system, and an assessment as to whether the areas are positively trending towards achieving the final outcomes for the rehabilitated land.			
17	Improvement Area 1 – Available for improvement. Section 4.1, Step 3 PRCP Guideline (Version 2.00)	Currently, the PRC plan identifies that the void will be used as a water containment structure until the water interception system is no longer necessary. The PRCP Guideline identifies when disturbed land is available for the commencement of improvement. Consideration should be given to this definition and its application to the PRCP schedule.	Consider the matters discussed and provide a revised PRCP schedule to include recommendations.	PRCP schedule updated to align with the Guideline, with commencement for improvement not initiating for 100 years which is linked RA's with water interception systems. Timeframe for milestone completions also updated.	Improvement Area 1 – Available for improvement.
18	Management Milestones	On achieving sufficient improvement of a NUMA, each of the following is minimised – a) The risk of the area collapsing, eroding, or subsiding, b) The need to actively manage the area, and c) Access to the area by an animal or person. Management milestones must reflect the steps or actions necessary to progressively achieve best practice management of the area and minimise risks to the environment. The final milestone must demonstrate achievement of sufficient improvement. As proposed, the milestones currently demonstrate active management of the void (i.e., an operational aspect) rather than progressive improvement towards a closure outcome. It is recommended that the timeframes are reviewed to reflect when the void becomes available for improvement. Milestones should then be developed that demonstrate a progressive schedule of works towards achievement of sufficient improvement.	Consider the matters discussed and provide a revised PRCP schedule to include recommendations.	NUMA milestone and milestone criteria updated in PRCP schedule and document to define steps to progressively achieve best practice management of the area and minimise risks to the environment, as per the Guideline.	Mt Leyshon PRC Plan, Section 1.7 Monitoring and Maintenance, Schedule

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