

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 proposed PRC plan.

To: PEABODY COPPABELLA PTY LTD
CITIC AUSTRALIA COPPABELLA PTY LTD
WINCHESTER COAL OPERATIONS PTY LTD
KC RESOURCES PTY. LTD.
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C/-Peabody Australia
Level 5, 100 Melbourne Street SOUTH BRISBANE QLD 4101
Email: kgomez-gane@peabodyenergy.com

ATTN: Kylie Gomez-Gane

Our reference: EPML00916813; 101/0000041-001(E)

Further information is required to assess an application for a proposed PRC plan

1. Application details

The application for a proposed PRC plan was received by the administering authority on 29 July 2021.

The application reference number is: **EPML00916813**

Land description: ML70450 and ML70455

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 outlined in **Attachment 1: Information Requested (Table)** of 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 12 April 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 the decision/action is compatible with human rights.

If you require more information, please contact Marijke Schuurs (Senior Environmental Officer) on the telephone number listed below.



Signature

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

1/10/2021

Date

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

Attachments

Attachment 1: Information Requested (Table)

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Item	Relevant section (proposed PRC plan, PRCP schedule and/or PRCP Guideline)	Matter	Information Request
PRC plan – Rehabilitation planning part			
1	Section 3.1.1.8 Flora and Fauna Section 3.1 Project planning of the guideline Progressive rehabilitation and closure plans (ESR/2019/4964) (PRCP Guideline)	Section 3.1.1.8 of the PRC plan details baseline information about fauna present on the land the subject of the application. However, the information provided is limited in some respects. Section 3.3 of the PRC plan states the post-mining land use (PMLU) for elevated overburden dumps and elevated co-disposal area is “native bushland for wildlife usage”. A more detailed explanation of baseline fauna presence and populations is required for comparison with and to support rehabilitation milestones that will achieve the PMLU “native bushland for wildlife usage”. As certain wildlife are found in association with specific vegetation communities, the requested information is also important to justify the selected species seed mix that will be used in revegetation (as provided in Table 36, section 3.5.1.8 of the PRC plan).	Provide a revised PRC plan that includes the following: 1. a breakdown by species of total terrestrial vertebrate species recorded; and 2. spatial representation of the fauna species recorded during baseline surveys relative to the location of pre-mining regional ecosystems within the land the subject of the application.
2	Section 3.1.4.1 Relevant activities on site (Table 20 Disturbance domains and sub-domains that will require rehabilitation)	Table 20 states that the size/extent of activity for “residual void including ramps”, which captures the sub-domains highwall and low wall and pit lake, is 167ha. It is further reiterated in Table 32 of section 3.3.1 that the residual void including ramps has a proposed land outcome of NUMA and the projected area is 167ha. Table F1 Landform Design Criteria of environmental authority EPML00916813, which is a tier one land outcome document (LOD) as per section 750 of the <i>Environmental Protection Act 1994</i> (EP Act), authorises a maximum projective surface area of 130ha for voids and does not specify an area for ramps into voids. The other LOD, the environmental impact statement assessment report (EIS assessment report) is silent on pre-	Provide a revised PRC plan that: • distinguishes the projective surface area that comprises the residual void and ramps into voids within the proposed projected area of 167ha for NUMA; • includes an explanation and justification for assigning ramps into voids as part of the NUMA, with a focus on why another post-mining land outcome is not more suitable; and

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		approved land outcomes for ramps into voids, except for the following statements: 1. “However, approximately 130 ha of land, comprising the residual voids, would be permanently alienated from productive grazing”; and 2. “...production [of beef cattle] should be restored in the future after rehabilitation of mining lands is completed, except for the final voids and reduced productivity of the mine dumps.” It is not clear from the information provided in the PRC plan what area of the proposed NUMA is comprised of the void and what area is made up of ramps into void. This information is necessary to ensure consistency with the environmental authority EPML00916813 and the pre-approved area of 130ha for the final void. On consideration of the statements made in the EIS assessment report, it is suggested that ramps into voids might be able to support a post mining land outcome other than a NUMA since they have not been included as part of the 130ha of land that will be permanently alienated. Condition F27 of the environmental authority requires all areas significantly disturbed by mining activities to be rehabilitated to a stable landform with a self-sustaining vegetation cover. Further, in section 3.4.1 of the PRC plan, the following statement is made: “Erosion of the low wall slopes within the residual void may occur over time; however, rates of erosion should reduce over time as...vegetation establishes on the slopes.” However, the PRC plan does not sufficiently explain why ramps into voids cannot support a use and how it is intended to be managed in a way that achieves best practice management.	• demonstrate how the Management Milestone criteria for Improvement Area 1 of the PRCP schedule will achieve best practice management and minimise the risks to the environment specifically for ramps into voids.

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3	Section 3.1.4.2 Rehabilitation Strategy Figure 43 Cross Sections through West Pit (Section 1 (West Pit)) in Appendix 4.1 PRC Plan Schedule	Some of the key final rehabilitation design criteria are: - for co-disposal the outer batter slope will be 8° or less; - coal stockpile areas will be flat to undulating with a slope of <4.6°; and - infrastructure areas will have a flat to undulating slope of <4.6°. This information has been translated in the design criteria (a) for RM2 in the PRCP schedule. Table F1 Landform Design Criteria of environmental authority EPML00916813 authorises the maximum slope range for elevated landforms as 4.6° to 5.7° and for infrastructure areas as 2.3°. This is not consistent with the design criteria that have been proposed in the PRC plan and PRCP schedule. As an elevated landform, the co-disposal must have a maximum rehabilitated slope of 5.6°. Infrastructure areas, which includes coal stockpile areas as per Table 20 of the PRC plan, must have a maximum rehabilitated slope of 2.3°. It is noted that the rehabilitation design criteria in section 3.1.4.2 has been derived from the EIS assessment report. However, in accordance with section 754(5) of the EP Act, where there is inconsistency in LODs for land outcomes, the document appearing first in the definition of LODs in section 750 prevails to the extent of the inconsistency.	Provide a revised PRC plan and PRCP schedule implementing rehabilitation design criteria for slope angles that is consistent with what is authorised by environmental authority EPML00916813. A response to this item must be considered with the response to item 13.
4	Section 3.5.1.4 of the PRC plan (Figure 27 Conceptual Waste Dump Encapsulation Strategy)	Figure 27 is referred to as a demonstration of how overburden dumps will be constructed to encapsulate weathered fine-grained material. Figure 27 is difficult to interpret as it does not contain information regarding the projection, a legend or a description of the horizontal scale and it does not clarify which pit is being represented in the figure.	Provide a revised PRC plan that includes an updated version of Figure 27, sufficient to interpret what is visually represented by the figure.

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5	Section 3.5.1.5 Landform design of the PRC plan Section 3.6 of the PRCP Guideline	Section 3.5.1.5 of the PRC plan currently states that transitional PRC plans are not required to demonstrate how aspects of the mine have been designed for closure, and that at this stage, no specific modelling has been done to predict the long-term stability of the current final landform design. A reference to Section 3.1 of the PRCP Guideline is provided to support this statement. Please note, requirements for information regarding landform design as outlined in section 3.6.1 of the PRCP Guideline are prefaced by statements requiring all applicants (including existing EA holders) to provide information required by section 3.6 of the Guideline. Some suggestion is provided in the discussion in section 3.5.1.5 that field plots on various slope profiles and laboratory studies using site-sourced material may be used to collect data and adjust the final landform design where required. In accordance with the requirements of Section 3.6 of the PRCP Guideline, it is recommended that a commitment is provided in the PRC plan to gather such data and/or undertake studies to verify the predicted success of the final landform design. Earlier in section 3.1.1.6 of the PRC plan, Table 14 Estimated Erosion Rates using the RUSLE are presented for various disturbance levels on landforms. This information may be useful to demonstrate that modelling to predict long-term stability of the final landform design has been undertaken, which is a requirement of Section 3.6 of the PRCP Guideline. However, based on the information currently presented in Table 14, it is uncertain as to whether the RUSLE assessments were based on the properties of soils and overburden specifically located on the site.	Provide a revised PRC plan that includes: • A commitment to undertake studies and gather data as part of trials to verify the predicted success of the final landform design. • Further information to clarify whether information presented in Table 14 is useful to demonstrate that modelling to predict long-term stability of the final landform design with specific reference whether the assessments were based on the properties of soils and overburden located in the project area and if it was used to inform the landform design presented in section 3.5.1.5. • A commitment to a certification process that ensures landforms are constructed according to design.

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		Quality Assurance/Quality Control (QA/QC) is discussed in section 3.5.1.5. It is recommended that the rehabilitation planning part commits to a certification process that ensures landforms are constructed according to the proposed design.	
6	Section 3.5.1.8 Revegetation (Table 36 Native Species Seed Mix) Section 3.6.1 Revegetation of the PRCP Guideline	Table 36 of the PRC plan provides the proposed species seed mix to achieve the post-mining land use of native bushland. It is not clear how the proposed seed mix has been derived and how it is appropriate to achieve a PMLU of native bushland for wildlife usage. The PRC plan does not include a description of the vegetation community/ies or ecosystem that is proposed to be established and how the native bushland would facilitate wildlife use. This information is important for forming SMART milestone criteria in the PRCP schedule. It is noted that Table 15 in section 3.1.1.8 lists regional ecosystems that have been recorded within the land the subject of the application, which could be considered in the PRC plan for the PMLU native bushland for wildlife usage. The PMLU for the co-disposal area is proposed as native bushland for wildlife usage. Table 36 includes a number of large tree species. With consideration to the recommended 1m inert capping layer and encapsulation of material to prevent water and oxygen ingress, as stated in section 3.5.1.6 of the PRC plan, the introduction of trees to this landform will potentially impact the integrity of the design.	Provide a revised PRC plan that includes: 1. A description of the ecosystem or vegetation community/ies that will be established for the PMLU native bushland. When selecting appropriate regional ecosystem/s, consideration must be given to how the vegetation composition will provide habitat for local fauna (refer to item 1). 2. Based on the information requested, provide justification, and update if required, the choice of seed mix with reference to the ecosystem/s communities that will be achieved. 3. Consider whether the inclusion of tree species (or other deep rooting plants) in the seed mix for the co-disposal area is suitable. Provide a discussion regarding the suitability of the proposed seed mix to maintain the integrity of the landform design. Alternatively, provide a revised

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			PRC plan that includes a revised seed mix for this landform that is separate from the seed mix for other elevated landforms. Update the PRCP schedule, with particular focus on the milestone criteria for RM6, RM8 and RM10, to include additional milestone criteria that will achieve the described vegetation community. A response to this item must be considered with the response to item 15.
7	Section 3.7 Monitoring and maintenance Section 3.6.1 Revegetation of the PRCP Guideline	As stated in item 1 of this table, section 3.3 of the PRC plan proposes “native bushland for wildlife usage” as a PMLU for elevated landforms. The PRCP Guideline states the following information requirements: “where fauna habitat is proposed, [include] a management and monitoring plan to describe how the rehabilitated areas will be utilised by fauna and what other management measures would need to be implemented”. Section 3.7 does not include consideration of monitoring fauna.	Provide a revised PRC plan that considers monitoring fauna in the monitoring and maintenance program. Update the risk assessment to consider the risk that native bushland established is not habitable for fauna.
PRCP schedule			
8	Reference Maps of Rehabilitation Areas	Currently the proposed PRCP schedule includes one map indicating the locations of rehabilitation and improvement areas on ML70450 (Figure 45 in Appendix 4.1 of the PRC plan). A second map to indicate rehabilitation areas on ML70455 has not been provided. Reference maps for each Rehabilitation Area are required (PRCP Guideline, Section 4.1, Step 2).	Provide a revised PRCP schedule to include a reference map that identifies the boundary of rehabilitation areas located within ML70455.

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9	RA4 – Infrastructure Areas – Access Tracks and Haul Roads	RA4 does not include reference to milestone RM1 which contains criteria for infrastructure decommission and removal. It is expected that, given RA4 is for infrastructure areas, RM1 would apply to this rehabilitation area.	Update the schedule for RA4 to include reference to milestone RM1. Provide a revised PRCP schedule that includes the resultant change to the schedule for RA4. A response to this item must be considered with the response to item 12 for RM1, below.
10	RA8 – Water Management Structures Step 6 in Section 4.1 Steps for developing a PRCP schedule of the PRCP Guideline	The schedule for RA8 states that the first area of 73ha becomes available for rehabilitation on 10/12/2047. However, rehabilitation works for the first milestone, RM1, will not commence until 01/01/2050. The difference in time between when the land become available for rehabilitation and commencement of RM1 is approximately 2 years and 1 month. The expectation as stated in step 6, section 4.1 of the PRCP Guideline is that the first rehabilitation milestone starts within a reasonable period after the land becomes available for rehabilitation, for example, within 6 months after land becomes available.	Provide a revised PRC plan to include an explanation for the proposed commencement date, 01/01/2050, of the first rehabilitation milestone for RA8, which is approximately 2 years and 1 month after the land becomes available.
11	IA1 – Residual Voids including Ramps	The total size in hectares (ha) of Non-use management area (NUMA) IA1 in the proposed PRCP schedule is 172ha. However, this area is not the same as the size/extent of activity stated in Table 20 of section 3.1.4.1 and Table 32 of section 3.3 of the PRC plan, which is 167ha. A difference in the proposed area that will be a NUMA is also evident in the spatial information, as detailed in item 22 below.	Provide an explanation for the difference in proposed area for the NUMA between the PRCP schedule and the PRC plan, and based on the information to be provided, revise the relevant sections of the PRC plan and PRCP schedule to have a consistent projected surface area of the NUMA. A response to this item must be considered

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			with the response to item 2 to ensure the responses are consistent.
12	Rehabilitation Milestone Criteria – RM1	Section 3.5.5 of the PRC plan details actions that will be required to achieve infrastructure decommissioning and removal that have not been translated into the criteria for RM1. It is noted that the currently proposed milestone criteria follow the example provided in Appendix 2 of the PRCP guideline. However, the example provided is not site specific and the milestone criteria for RM1 must include consideration of and rehabilitation actions associated with all infrastructure detailed in section 3.5.5. Criterion (e) states the following: “Areas free of hazardous material or are rendered safe”. When applied to this milestone, the criterion is linked via Table 42 in the PRC plan to a contaminated land assessment. To meet SMART principles, the criterion should directly refer to the completion of such an assessment or clearly articulate actions such as, contaminated material removed for licenced disposal and contaminated areas remediated by onsite treatment. Alternatively, where remediation of contaminated land is anticipated, it is recommended that this work is addressed via its own milestone. Refer to Appendix 3 Reference Milestones of the PRCP Guideline for further guidance.	Update the milestone criteria for RM1 to include decommissioning and removal of all built infrastructure, including access roads, car parks, hardstands, haul roads and water management structures. The criteria must be consistent with the supporting information provided in section 3.5.5 of the PRC plan. Update RM1 criterion (e) to reflect SMART principles; or consider introducing a new Rehabilitation Milestone to address the activities associated with contaminated land assessment. Provide a revised PRCP schedule that includes the resultant changes to the schedule milestones and milestone criteria.
13	Rehabilitation Milestone Criteria – RM2	Section 3.1.4.2 of the PRC plan outlines final rehabilitation design criteria for the out of pit overburden dumps, co-disposal, ROM pad, coal stockpile areas, in-pit overburden backfill, and infrastructure areas. Section 3.5.1.5 recommends a graded bank spacing of 75m for the maximum design slope of 5.7° for out of pit overburden dumps.	Update or insert additional criteria into RM2 to capture specific design criteria for the various landforms. Ensure criteria meet SMART principles. A response to this item must be considered with the response to

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		It is recommended that all the specific design criteria are reproduced as milestone criteria clearly articulating which landforms they apply to. For example, the out of pit overburden dumps will have a maximum vertical height of 50m, outer batter slope angle of maximum 5.7° and crest slope angle of maximum 2.3°. There is also discussion in section 3.5.1.4 of the PRC plan regarding the encapsulation of weathered fine-grained material within coarser unweathered material during construction of overburden dumps. It is recommended that a milestone criterion is added to RM2 to demonstrate achievement of the necessary selective placement of materials. The co-disposal facility is proposed to be constructed as a two-cell, turkeys nest configuration and lined to prevent against seepage into the surrounding substrate and groundwater (section 3.5.2). It is recommended that a criterion is introduced at RM2 to certify the co-disposal facility has been constructed in accordance with the detailed design. These recommendations will ensure the criteria achieve SMART principles and demonstrate that final landforms achieve the design specifications necessary to achieve the final outcome of land in a stable condition.	item 3 to ensure the responses are consistent Provide a revised PRCP schedule that includes the resultant changes to the milestone criteria.
14	Rehabilitation Milestone Criteria – RM4	Criterion (a) of RM4 requires, “Topsoil spread to a minimum depth of 100mm”. This is consistent with the cover design as provided in section 3.5.1.6 of the PRC plan and Appendix 4.5 ‘EIS Soil, Overburden and Land Use Report (GSSE – Sept 2010)’. Research carried out in the Bowen Basin indicates that 100mm of topsoil on sodic spoil will erode after a relatively short period of time (within, for example, 10 years) on slopes with a gradient of more than 15% and vegetation cover of less than 50%.	Provide an explanation of how the final landform design and rehabilitation methodology has taken into account failure of areas that are rehabilitated with 100mm of topsoil, including the potential total loss of topsoil from a rehabilitation area. Alternatively, provide a revised PRCP

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		Therefore, spreading topsoil for rehabilitation at a greater depth than 150mm if the existing topsoil inventory allows, is preferred. Also considering the estimated surplus of topsoil material (Table 33 of the PRC plan) and sodic nature of overburden material for the project, which is assumed to be underlying the topsoil on the final constructed landforms, it is recommended that the minimum depth of topsoil spread is increased.	schedule, with an update to RM4 criterion (a), that uses topsoil spread to a minimum depth of 150mm in the cover design. Update any relevant section of the PRC plan to include the response to the above information.
15	Rehabilitation Milestone Criteria – RM5 and RM6	Criterion (b) in RM5 and RM6 refers to seed mixes with particular types of species. It is recommended that the criteria are revised to include a clear reference to the proposed seed mixes listed in Table 35 and Table 36 of the PRC plan. For example: <i>Seed mix contains a range of native and introduced grass and legume species consistent with surrounding pastoral areas as identified in the Codrilla Coal Mine Project PRC plan v.2, dated 6 September 2021, Table 35 Pasture Species Mix.</i> This recommendation ensures a clear measure to identify achievement of the criteria.	Provide a revised PRCP schedule with updates to RM5 and RM6 criterion (b) that include clear references to the proposed seed mixes listed in Table 35 and Table 36 of the PRC plan.
16	Rehabilitation Milestone Criteria – RM7 and RM8	Criteria (d) states, “invasion of noxious weeds is no worse than surrounding areas”. In its current form, the criteria do not achieve SMART principles. Section 3.7.1.1 of the PRC plan lists one objective of the vegetation monitoring program is to, “measure the presence of declared weeds as per the Land Protection (Pest and Stock Route Management) Act 2002 to enable the weed management issues to be identified”. It is recommended criteria (d) is revised to specifically refer to this measure. Please also note, the Land Protection Act is now referred to as the <i>Stock Route Management Act 2002</i> and management of pest species within Queensland is currently	Update criteria for RM7 and RM8 to: • ensure criteria (d) meets SMART principles; • revise criteria (f) to reflect a better measure of the presence of gully erosion on final landforms; • revise criteria (g) to include a specific list of parameters/contaminants with

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		regulated under the <i>Biosecurity Act 2014</i>. It is recommended that these changes are reflected in the relevant sections of the PRC plan. Criteria (f) refers to the final condition(s) required for erosion gullies. Section 3.1.1.6 of the PRC plan states that gully erosion should be repaired and rehabilitated as soon as possible. This reflects best practice. In particular, for constructed landforms where gully erosion will likely expose encapsulated and/or dispersive or saline material, which in turn is discharged to the surrounding environment as a contaminant. Table 41 Maintenance Issues and Treatments indicates the expectation that gully erosion will be rectified as part of maintenance activities. It is recommended that criteria (f) is revised to reflect a better measure of the presence of gully erosion on final landforms. The presence of active gully erosion on rehabilitated land will not demonstrate achievement of land in a stable condition. Criteria (g) indicates surface water will have a quality that is “not significantly different to those of the upstream reference site”. The criteria do not specifically identify parameters relevant to the proposed PMLUs or potential contaminants resulting from mining activities. Examples of such parameters are described in section 3.7.1.3 of the PRC plan (pH, EC, turbidity, selected total and dissolved metals, hydrocarbons and nutrients). It is recommended the criteria are revised to ensure they meet SMART principles by identifying the relevant parameters, discharge limits and units to clearly demonstrate surface water runoff does not cause environmental harm and supports the proposed post mining land uses. Criteria (h) states, “Areas free of hazardous material or are rendered safe”. It is not clear what standard of proof is applied to this criterion. When	accompanying thresholds and units of measurement; and ensure criteria (h) meet SMART principles. Include the resultant changes to milestone criteria in a revised PRCP schedule. Provide a revised PRC plan that includes updates to the relevant section with regards to current legislation.

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		applied to these milestones, criterion (h) is linked via Table 42 in the PRC plan to a NEPM assessment. To meet SMART principles, the criterion should directly refer to the completion of such an assessment.	
17	Rehabilitation Milestone Criteria – RM9	The single criterion for this rehabilitation milestone refers to the achievement of a standard “Grazing Class 4”. Section 3.7.1.1 includes parameters for the proposed PMLU that can be reproduced into milestone criteria: for grazing, parameters that can be assessed to indicate pasture productivity, including, density and richness of pasture, groundcover determination (foliage and basal), pasture yield. It is recommended that this is revised to state what classification scheme is being referred to, for example Land Suitability Class 4, and provide a description of characteristics that would define a grazing class 4 standard.	Revise RM9 criterion (a) to define what classification scheme is referred to and include a description of the characteristics that would define a grazing class 4 standard. The definition of characteristics may be included as a footnote to the PRCP schedule. Provide a revised PRCP schedule that includes the resultant changes to the milestone criteria.
18	Rehabilitation Milestone Criteria – RM10	The single criterion for this rehabilitation milestone refer to the achievement of the PMLU native bushland. The criterion does not identify the standard to which certification will be assessed or a description of parameters that define successful achievement of the PMLU. Section 3.7.1.1 includes parameters for the proposed PMLU that can be reproduced into milestone criteria: for native bushland, parameters that can be assessed are measures of cover (foliage and basal), presence/absence of upper-storey (tree) and mid-storey (shrub) species in the rehabilitation block. For further guidance please refer to Appendix 2 of the PRCP Guideline and Schedule 8A, Part 3, Table 2 Post-mining land use assessment of the	Revise RM10 criterion (a) to define what standard of certification is required and/or include specific parameters as criteria to demonstrate successful achievement of a native bushland outcome. Provide a revised PRCP schedule that includes the resultant changes to the milestone criteria.

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		<i>Environmental Protection Regulation 2019</i> (EP Reg) which includes the following relevant objective and performance outcomes: PRCP Objective Rehabilitation milestones are supported by milestone criteria and are suitable for rehabilitating land to a stable condition. PRCP Performance Outcomes 1 Each rehabilitation milestone is appropriate for achieving the post-mining land use for the rehabilitation area. 2 Each rehabilitation milestone is supported by milestone criteria that— (a) Are appropriate for achieving the milestone; and <i>Examples—</i> <i>...2 A post-mining land use for land is a native ecosystem habitat...The milestone criteria that may be appropriate for achieving the milestone are criteria that demonstrate the ecosystem will include species of the type and diversity needed to sustain the ecosystem.</i>	
19	Rehabilitation Milestone Criteria – RM9 and RM10	A single criterion is included in RM9 and RM10. Achievement of the final rehabilitation milestone represents the point at which land has reached a stable condition. That is the area is safe, stable, does not cause harm to the environment and can sustain the proposed use. It is assumed that the currently proposed criteria will demonstrate achievement of the sustainability of grazing or native bushland uses. However, it is recommended additional criteria are introduced against the Rehabilitation	Introduce additional criteria to RM9 and RM10 to demonstrate achievement of the outstanding aspects of stable condition. Provide a revised PRCP schedule that includes the resultant changes to the milestone criteria.

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		Milestones to demonstrate achievement of the remaining aspects of stable condition, i.e. safe, stable, no environmental harm.	With regard to the criteria for RM10, the information requested by items 1, 6 and 7 must be consistent with the response to this item.
20	Management Milestone Criteria	Section 3.1.4.2 and section 3.5.3.1 of the PRC plan outlines additional rehabilitation design criteria for the final void and safety bund that have not been transferred into the PRCP schedule as Management Milestone criteria. This includes the maximum depth of the void and specific highwall and low wall slope gradient. It is noted that the maximum depth of the final void is a requirement of Condition F27 of environmental authority EPML00916813. Information presented in section 3.5.1.1 of the PRC plan indicates groundwater in the residual void (East Pit) is predicted to recover to approximately RL 122m AHD, approximately 60m below the Pit Crest. Long-term standing water levels are expected to be lower than modelled due to evaporative influences. Currently, there is no criterion proposed for MM3 to demonstrate the final void achieves a water level in the void that will not cause harm to the surrounding environment.	Introduce additional criteria the relevant Management Milestones to demonstrate achievement of the required maximum void depth, recommended highwall and low wall slope gradient, and that the final void achieves the appropriate water level necessary to protect against environmental harm. Provide a revised PRCP schedule that includes the resultant changes to the management milestone criteria.
21	Rehabilitation Area Milestones and Improvement Area Milestones	It is noted that criteria in a number of proposed milestones refers to the initialism, "AQP".	Confirm "AQP" is an "appropriately qualified person" as defined in the definitions schedule of environmental authority EPML00916813.
Spatial information			
22	EPML00916813_PRCP_PY_27072021	The spatial information shows that the area of feature IMPRV_AREA described as IA1 Residual void is 167.17ha while the area of NUMA described as Residual void is 171.56ha.	Provide an explanation for the difference between the two features described, given IMPRV_AREA is the NUMA. Provide

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	Feature (FEAT) IMPRV_AREA and NUMA		revised spatial information where the two features have the same area. A response to this item must be considered with the response to items 2 and 11 to ensure the responses are consistent.
General			
23	N/A	Application materials relating to the PRC plan and the final version of a PRC plan, including the approved PRCP schedule are required to be available on the Public Register. To avoid publication of insecure documents and ensure compatibility with the administering authority's public register, it is required that material is provided in .pdf format. The exceptions to this are the PRCP schedule and spatial submissions.	With exception to the PRCP schedule (.xls format) and spatial submissions, provide .pdf versions of all application materials, noting the original submissions and subsequent versions/responses will be available on the Public Register.