Item	Section	Comment	Response
1	PRCP Application Supporting Document Section 3.2.1 Community consultation register	This section provides views from community members regarding the project. However, there is no indication how the community member is relevant to the project (adjacent landholder, downstream landholder). Also, this part indicates the underlying landholder is seeking a **stock watering outcome for the residual void**. It is unclear if this outcome will be achieved in the **long term** and whether groundwater will occur in the void from time to time and decreased water quality in the void will not suit stock watering 50 years after mining ceases.	Community member(s) relationship to the Project is given in Section 3.2.2.4 (Table 30). Figure 13 has also been added which shows the location of close neighbours to the Project. How underlying landholders and other stakeholders views have been addressed is given in Section 3.3.5. Initial landholder discussion was around the void being deeper than the current proposed level (ie. less backfill). This suggested a PMLU of water storage but not necessarily stock watering. The partial backfill option facilitating grazing has been accepted as a PMLU by the landholder as it provides an economic use for the area. The backfill level is well above the rebounded groundwater level (Section 3.5.4.1) and as such groundwater will not occur in the void. The water modelling shows that water level and subsequent quality will vary in the void following periods of rain. At times the water will be usable for stock watering however in most periods the void will be dry as indicated by the water modelling.
2	PRCP Application Supporting Document Section 3.2.2 community consultation plan	The guideline requires the PRC Planning part to provide specific information regarding future consultation. This section provides generic information only and does not provide the required information (including how and when stakeholders will be informed and what information will be released).	Planned future community consultation including how, when and what information will be released is given in Table 31 (Section 3.2.2.7).
3	PRCP Application Supporting Document Section 3.3.1.2 WRD1 and other features, Section 3.5.4.8 How the rehabilitation method supports the rehabilitation milestones	This section provides an assessment of alternative PMLUs and notes that the land "**has been assessed as not suitable for pasture grazing due to low fertility**" (pg. 70). However, Section 3.5.4.8 advises that fertility and dispersibility is acceptable for rehabilitation without amelioration (pg. 108).	Further clarification has been added for this section. As the land is currently, it is not suited to grazing (according to cropping guidelines) , it is however suited after rehabilitation Section 3.3.1.2 b). and Section 3.5.1.3e.
4	PRCP Application Supporting Document Section 3.3.2.1 (b) limiting factors	This section acknowledges that suitability for grazing is dependent on the open cut not holding permanent water and this is repeated throughout the document. The EA application states that groundwater levels in the area of the void are currently around 39m below ground level (around 180 – 184m AHD) based on limited monitoring undertaken during the dry season. The design of the void says the pit is around 28m deep at 190m AHD. Void water modelling provided in the void management plan indicates water levels will remain around 200m AHD for the median long-term prediction. The data provided indicates that the base of the void may be within 6-10m of the water table during the dry season but the void may retain surface water. There is no explanation regarding the interaction of surface and groundwater, and groundwater fluctuations that provide certainty that there will not be permanent water at the base of the void.	Pre-mining water level and quality is given in Section 3.1.3.5. The final void water balance in the surface water chapter provides water level and quality. Updated to include a reference to Section 3.5.4.1 which provides a description of the void water level modelling done that demonstrates that no permanent water body will remain.
5	PRCP Application Supporting Document Section 3.5.1.3(e) Vs Section 3.5.1.4 (saline and sodic drainage potential)	The first section notes that fertiliser is unlikely to be necessary for rehabilitation (pg. 89). The second section notes that overburden and interburden are strongly sodic which often have unbalanced nutrient ratios and may need to be corrected with added fertilisers (pg. 95). The LEM report demonstrates that 80% vegetation cover must be achieved to reduce erosion to "acceptable" rates.	Section 3.5.1.3e updated to clarify fertiliser is not required. Section 3.5.1.4b saline and sodic drainage potential updated to address the comments. Overburden will be covered with topsoil and therefore does not require amelioration to address dispersion potential. This section has also been linked to soil stripping section and measures to protect landform from erosion (revegetation plan). Overburden may require amelioration if it is to be used as a topsoil substitute however the soil survey and rehabilitation requirements indicate sufficient topsoil is available. Section 3.1.3.6 b includes a clarifying statement that sufficiency values are used as a guide only.
6	PRCP Application Supporting Document Section 3.5.1.4 Table 42 and discussion	Appendix C of the EA application provides geochemical analysis which indicates some samples may be PAF.	The PRCP / EA application states the 1% of interburden samples at Olive Downs has been classified as PAF. Only 12 samples were taken at the Project which are ***all*** classified as NAF. Included geochemistry results from the neighbouring BHP BMA Daunia Mine which suggests a negligible risk of acid generation given the ANC. How sampling will inform mine development and management is addressed in the next item.
7	PRCP Application Supporting Document Section 3.5.1.4 saline and sodic drainage potential and section 7.1 of the mineral waste characterisation report (Appendix E).	This section notes that ESP can reach 61% and strongly sodic overburden and interburden is likely to have structural stability problems. It is unclear throughout the document ***how ongoing waste characterisation will identify the extremely sodic material*** so that it can be selectively placed at the bottom of the WRD or pit.	New section added (3.5.1.4e) which outlines ongoing sampling during operations and the development of a Mineral Waste Management Plan to support this process.
8	PRCP Application Supporting Document Section 3.5.1.5 (a) Design plans	The design plan is for all embankments/slopes will be battered to 15% or less with the intent to create a gentle sloping landform to facilitate grazing ingress. The cross sections presented in the void management plan demonstrates that the elevation difference between the top of the void and the void floor is on average approximately 25m. There is a risk that the slope angle may not be viable for grazing animals to access.	Figure 15 has been added in Section 3.5.1.5 (a) which shows that no areas of the void are steeper than 15%. Additional information added using the *Guidelines for Agricultural Land Evaluation in Queensland* and information from Meat and Livestock Australia.
9	PRCP Application Supporting Document Section 3.5.1.5(b) Method for determining final landform design	Backfilling to 200RL within the LHD Pit is based on the assumption that groundwater occurrence is ~195RL in order to avoid long term ponding of runoff water in the bottom of the pit void. However, there is no information provided that verifies the occurrence of groundwater in the vicinity of this RL, nor is the seasonal variation of groundwater considered.	This information is provided in Section 3.5.1.5 (C) and the *Isaac River Groundwater Modelling Technical Appendix.*.
10	PRCP Application Supporting Document Section 3.5.1.5 (c) Key considerations	The guideline requires information about what QA/QC measures will be put in place to ensure the landform conforms with the proposed design. This section states "monitoring of all control measures will be performed".	Updated Section 3.5.1.5 (c) and (d) to address shortfall.

11	PRCP Application Supporting Document Section 3.5.1.5 (d)	It is stated that landform evolution modelling was undertaken, however what is presented in this section are results from WEPP. LEMs allow the landscape surface to demonstrate change through time, which is not a function of WEPP. Although demonstration of stability through the use of a LEM is not mandatory according to the PRCP Guideline, it is necessary that trials are carried out during the rehabilitation planning stage to confirm the design predications prior to construction of the final site design.	Updated the description of the modelling undertaken and client has agreed to rehabilitation trials (Section 3.6.5) to validate model.
12	PRCP Application Supporting Document Section 3.5.1.5 (f) Methodology to verify predicted success	This section acknowledges that erosion modelling demonstrates erosion rates will be acceptable once vegetation cover reaches 80%. It is not presented what would happen in the meantime and what measures will be put in place to ensure the topsoil stays in situ while vegetation is growing.	Updated Section 3.5.1.5 (f) to include ESCP controls and a reference has been added to the *Conceptual Erosion and Sediment Control Plan* which is included as an appendix
13	PRCP Application Supporting Document Section 3.5.1.5 (f) Methodology to verify predicted success	This section references that the LEM (WEPP) will be calibrated and that successful rehabilitation of the final landform will be assessed through completion criteria and monitoring following the plan described in Section 3.7, which is validation of a model. However, the calibration of the model is not reflected in any completion criteria presented in Section 3.7.7.	WEPP will be calibrated in rehabilitation trials (Section 3.6.5).
14	PRCP Application Supporting Document Section 3.5.1.7 Water Management	It is stated that the design for WRD1 will store rainfall and release it as evapotranspiration, however the final landform visualisation presented in the Void management plan does not show where water may be temporary stored, nor does the cover design specify the competency of the subgrade material to prevent surface infiltration of water.	This section has been updated to better explain water management. The final landform (WRD1) will be water shedding or externally draining with only a small amount of water 'stored' near the surface due to limited infiltration. This water will sustain the vegetative cover. .
15	PRCP Application Supporting Document Section 3.5.1.7 Water Management	This section has considered the potential impacts of the WRD seeping into groundwater however given the topographical differences between the WRD and the proposed water storages within the final void, there is no consideration for surface water seepage.	Seepage has been address in Section 3.5.1.7 (b).
16	PRCP Application Supporting Document Section 3.5.3.2 Infrastructure and buildings	This section proposes to dispose of infrastructure into the backfilled open cut. It is possible this material will be below groundwater level. There is no assessment about the risks and potential impacts associated with this activity.	Section 3.5.3.2 has been updated. No infrastructure will be disposed of in the backfilled void unless a future EA amendment is pursued to allow for disposal of inert waste in the void.
17	PRCP Application Supporting Document Section 3.5.4.1 Voids	This section outlines how the open cut will be rehabilitated. However, timeframes for undertaking, completing the work and monitoring proposed to ensure the landform will comply with the concept design provided in the PRCP have not been provided.	Section 3.5.4.1 (b) added to help clarify timelines and Section 3.5.4. (a) to explain QA/Qc controls during construction. Detailed timing of the OC1 rehabilitation is provided in the PRCP schedule.
18	PRCP Application Supporting Document Section 3.5.4.1 Voids	The ability for the voids to sustain a PMLU is largely dependent on the hydrological regime and whether flooding can occur via groundwater recharge or surface infiltration. There are numerous statements in this section regarding groundwater characteristics when dewatering is occurring and how groundwater levels will respond when dewatering ceases, however there is no supporting numerical information to validate.	Updated Section 3.5.4.1 to include groundwater characteristics.
19	PRCP Application Supporting Document Section 3.5.4.8	This section provides a description of how the rehabilitation method relates to milestones. However, specific monitoring methods to ensure rehabilitation is implemented according to the PRCP have not been provided.	Monitoring and review methodology are outlined in Table 61 - Table 69.
20	PRCP Application Supporting Document Section 3.5.4.8	This section provides contradictory information regarding whether amelioration is required for soils. Soil analyses provided in ***Tables 15 and 16 indicate that addition of gypsum and fertilisers will be required to achieve a stable landform*** and LEM indicates that acceptable erosion rates would only be achieved with 80% vegetation cover. This section also proposes for revegetation to meet ≥ 80% compared to analogue sites. The LEM specifically requires 80% groundcover.	Clarification of amelioration and stability of overburden are addressed in item 5. Completion criteria has been updated - no longer includes 'compatible to analogue sites' and requires at least 80% groundcover in accordance with the WEPP. Demonstrating sufficient vegetation can be achieved and erosion and protection measures during initial stages of plant growth are given in Sections 3.5.1.5 f and 3.5.1.8.
21	PRCP Application Supporting Document Section 3.6.3 Risk assessment. Tables 49 and 50 Vs table 51.	The risk assessment tables (49 and 50) contradict the risk treatment table (51).	The risk assessment section has been updated from the previous submission to ensure it is more specific to risks of a stable condition for the land not being achieved. An initial risk assessment was carried out including only the controls currently in place. Current control measures are minimal given the Project is still in the planning and approvals phase. As such most controls will be implemented during the operations phase and are listed in the risk treatment plan. This approach is consistent with the ISO 31000 standard and allows for an evaluation of the risks with minimal controls in place ie. modelling, planning, design and technical assessments. This helps to clearly identify higher risks and prioritises where additional risk treatment is required. Further controls are listed in the risk treatment plan with justification, monitoring, timing, responsibility etc. provided. Further risk evaluation is then carried out to calculate the final residual risk score. It is important to note that the risk assessment and risk treatment tables are separate processes and the controls listed in one should not match the other. The risk assessment is to list and evaluate the risk with current controls while the risk treatment plan lists additional controls to further reduce the risk score. This approach is consistent with the guideline and the ISO 31000 standard.
22	PRCP Application Supporting Document Appendix H	The body of the PRC Planning part provides contradictory advice to the Rehabilitation Plan attached as Appendix H.	Updated annual revegetation monitoring updated as per revegetation plan. Completion criteria has been updated to reflect the body of the PRCP.
23	PRCP Application Supporting Document Section 3.1.3.7 Land stability and Rehab criteria	The rehabilitation criteria provides a target erosion rate of <10t/ha/yr but the LEM advocates 6t/ha/yr. There is no information regarding erosion rates in the surrounding environment.	Completion criteria has been updated to include max erosion rate at any point on the landform and the average erosion rate.

24	PRCP Application Supporting Document Table 34 Completion criteria	The LEM report concludes that 80% cover (as vegetation) is required to achieve acceptable erosion rates. The completion criteria proposes revegetation ≥ 80% compared to analogue sites.	Completion criteria updated to exclude comparison to analogue sites.
25	PRCP Application Supporting Document Appendix I	It is stated in the Geotechnical report that all excavated slopes would be buttressed by fill material. However, the rationale is not explained in the PRCP and the material balance hasn't considered this scenario. As this statement appears in the geotechnical report and may have implications for a stable landform it is not considered to be erroneous.	The geotechnical report has been updated to clarify that the in-pit dumped material will act as a buttress but it is not specifically required for stability ie. increased stability is a by-product of the backfilling. Section 3.3.2.1 (b) has also been updated to further explain this.
26	PRCP Application Supporting Document Appendix I - Void Closure Plan Section 8.6	Figure 8-5 indicates that long-term water quality simulations show a trend of increasing salinity for final void water quality. A statement is made in section 8.6 that 'salinity in the final void is expected to increase over time' and this is supported by the trend demonstrated in Figure 8-5. Based on the simulated trend in the void closure plan, salinity levels of the stored water will not be suitable for use by stock or native fauna within a 100 year period. The cross sections provided in Figure 4-2 and Figure 4-3 indicates these water storages are steep sided and when viewed in conjunction with the final void configuration (Figure 4-1), and are located in relatively inaccessible areas of the final landform. No discussion is found in the proposed PRCP to demonstrate that cattle will be able to safely access these temporary water storages. ***The PRCP needs to demonstrate that in the first instance these features will provide safe and accessible stock watering points, that after these features cease to hold water suitable for stock watering, they can sustain a PMLU and demonstrate no harm is being caused by their presence on or in the land.***	Stock ingress / egress is addressed in item 8. Results of the conceptual water balance of the void is given in Section 3.5.4.1.
27	PRCP Schedule RM1 Section 3.5.4.8 How the rehabilitation method supports the rehabilitation milestones	Section 3.5.4.8 states that as part of RM1, the SD1, SD2, SD3 and MW1 will be desilted and backfilled using their embankments. This represents particular tasks necessary to achieved RM1 and is a measurable outcome which should be used to demonstrate successful completion of the milestone.	Desilting and backfilling added as a criteria to RM4. Note - RM1 was not a suitable place to include this measure as assessment of sediment is milestone RM3. Removal of sediment cannot occur prior to this assessment.
28	PRCP Schedule RM4 Section 3.1.4.2 Size, shape and design of mine features	Section 3.1.4.2 states the OCI design will include backfilling the LHD pit to 200RL to avoid long-term ponding of runoff water and to reduce the size of WRD1. This specification is necessary to ensure impacts to EVs are mitigated and the area achieves the final outcome of 'land in a stable condition'. The department requires this specification to be included as a milestone criteria for RM4 in the PRCP schedule.	Backfilling added as criteria to RM4
29	PRCP Schedule RM4 Section 3.5.4 Methods to rehabilitate land to a stable condition 3.5.4.1 Voids	Section 3.5.4.1. states highwall portals will be sealed with none accessible from the final landform surface. This is an important action and measurable criteria to ensure the final landform will be safe and structurally stable.	Sealing of portals added as criteria to RM4
30	PRCP Schedule RM4 Section 3.5.4.8 How the rehabilitation method supports the rehabilitation milestones	Table 46 describes how modifications to landforms or structures to improve management of surface water runoff will be undertaken as part of landform development and reshaping/re-profiling works. Currently, the criteria for RM4 does not include criteria to demonstrate the final landform has been developed to meet site drainage specifications.	Criteria for 'meeting site drainage specifications' added to RM4
31	PRCP Schedule RM6 Section 3.5.1.3 Soil and capping material assessment	Part f of section 3.5.1.3 lists a number of measures proposed to minimise the loss of soil during respreading and promote successful revegetation. These are important and measurable actions which should be included as milestone criteria for RM6.	Erosion and sediment controls as well as scarification added as criteria to RM6
32	PRCP Schedule RM7 Section 3.5.1.8 Revegetation Appendix H – Revegetation Plan for the Isaac Coking Coal Project.	To ensure the proposed criteria for RM7 is specific, it should refer to the Revegetation Plan.	Updated to 'seeding completed as per the *Revegetation Plan*' in RM7
33	PRCP Schedule RM9 Appendix G – Landform Evolution Modelling Isaac River Coking Coal Project	Appendix G, Section 2.4 Target erosion rate states: "Regarding the pre-mining erosion rates and the studies mentioned above, a target average erosion rate of <5 t/ha/y has been adopted with the maximum erosion rate at any point on the landform of <10 t/ha/y." Currently, the milestone criteria for RM9 is proposed as 'maximum erosion rate of <10t/ha/yr'. To ensure this criteria meets SMART principles, it should be revised to accurately reflect the adopted rates used to inform the landform design.	Average erosion rate added as a milestone criteria to RM9