



21.12.2022

Ref: 2021.09001

Department of Environment and Science
Minerals Business Centre
PO Box 7230
CAIRNS QLD 4870
ATTENTION: Mikaela Dry
Via email: ESCairns@des.qld.gov.au

Dear Mikaela,

**RE: PROGRESSIVE REHABILITATION AND CLOSURE PLAN: RESPONSE TO NOT PROPERLY
MADE NOTICE – AGATE CREEK GOLD MINE**

Savannah Goldfields Limited (SVG) (formerly Laneway Resources Limited) submitted the Agate Creek Gold Mine - Progressive Rehabilitation and Closure Plan (PRCP) to the Department of Environment and Science (DES) on 17 October 2022 (REF: C-EATPRCP-100175677).

On 22 November 2022, the DES issued Wulguru Technical Services (WTS) with a Not Properly Made Application notice, and additional information as prescribed under Section 550 of the *Environmental Protection Act 1990* is required.

WTS acknowledges the Department of Environment and Science's Not Properly Made Application notice. Attached to this letter is SVG's responses to the Not Properly Made Application notice. We look forward to working with the DES through the PRCP process.

Should you have any questions, please do not hesitate to contact me at scott@wulgurutechservices.com.au or 0437 799 193.

Yours sincerely,

Scott Hayes-Stanley, CEnvP, MSSSI

Wulguru Technical Services

Appendix A – Responses to Not Properly Made Application Notice

Appendix A – Response to Information Request

Item	Information Request	Where addressed in Supporting Documentation
1	<p>The PRC plan application is missing information required by section 126C(1)(a) of the Environmental Protection Act 1994 (EP Act) for this type of application.</p> <p>a) The PRCP schedule was not provided in the approved form (ESR/2019/5103). The proposed PRC plan must include the PRCP schedule in the approved form as required by section 126C(1)(a) of the EP Act.</p>	PRCP Schedule
2	<p>In accordance with section 126C(1)(j) of the EP Act, the PRC plan application is required to include the 'other information' the administering authority reasonably considers necessary to decide whether to approve the PRCP schedule. As prescribed under section 550 of the EP Act, this includes information specified in the Guideline Progressive Rehabilitation and Closure plans (PRC plan Guideline) (ESR/2019/4965 – Version 2). The information requirements that have not been met, are as follows:</p> <p>a) PRC plan Guideline Section 3.1:</p> <p>i) The proposed PRC plan must include a detailed description of the design for closure which demonstrates how progressive rehabilitation and closure has been considered in the design of the mine site. All relevant design for closure information is required in accordance with section 126C(1)(j) of the EP Act and meet the requirements of section 3.1 of the PRCP guideline.</p> <p>ii) The proposed PRC plan does not provide details on whether the different relevant activities can be progressively rehabilitated. All relevant information regarding progressive rehabilitation is required in accordance with section 126C(1)(b) and (c)(ii) of the EP Act and meet the requirements outlined in section 3.1 of the PRCP guideline.</p> <p>iii) Sensitive receptors were not identified or included in the spatial information. This is required as part of the spatial information pursuant to section 126C(1)(c)(ii) of the EP Act and in accordance with section 3.1 of the PRCP guideline.</p> <p>b) PRC plan Guideline Section 3.5</p> <p>i) Section 5.3.2 of the PRC plan identifies that a community consultation plan will be prepared, and a register will be developed and updated throughout the life of mine, however, no plan or register was provided. A community consultation plan is required as part of the proposed PRC plan pursuant to section 126C(1)(c)(iii) and (iv) of the EP Act and must meet the requirements of section 3.5 of the PRCP guideline.</p> <p>c) PRC plan Guideline Section 3.2</p> <p>i) The proposed PRC plan does not include a community consultation plan, thus the outcomes of the consultation for the proposed PMLUs have not been provided. The proposed PRC plan must provide outcomes of consultation with the community regarding the nominated</p>	<p>5. Design for Closure</p> <p>There are no sensitive receptors identified within the tenements.</p> <p>PRCP Appendix H: Savannah Goldfields Limited Community Consultation Plan</p>

Item	Information Request	Where addressed in Supporting Documentation
	<p>PMLUs and include all relevant information in accordance with section 126C(1)(d)(i) of the EP Act and meet the requirements outlined in section 3.2 of the PRCP guideline.</p> <p>d) PRC plan Guideline Section 3.6</p> <p>i) Section 9.1.15 of the proposed PRC plan discusses the final landform design of the site, however, several items of critical information is missing. This information includes 3D design plans of the final landform, the method of determining the landform design, modelling that predicts the long-term stability of the final landform design, the method of construction, and trial methodology to verify the predicted success of the final landform design. This information is vital to demonstrate that the land will achieve a safe and structurally stable condition. The proposed PRC plan must include all relevant information in accordance with section 126C(1)(e) and (j) of the EP Act and meet the requirements of section 3.6.1 of the PRCP guideline.</p> <p>ii) Section 9.1.14 of the PRC plan discusses the waste characterisation of the site and concludes less than 14% of the total samples can be categorised as Potentially Acid Forming (PAF). As PAF material is present, cover design information is required, however, has not been included in the proposed PRC plan for the proposed waste rock dumps. The proposed PRC plan must provide information about the cover design to demonstrate that mined and waste material generated by the mine is managed appropriately and ensures the surface treatment of the landform achieves rehabilitation success. The proposed PRC plan must include all relevant information in accordance with section 126C(1)(e) and (j) of the EP Act and in section 3.6.1 of the PRCP guideline.</p> <p>iii) Section 9.1.11 of the proposed PRC plan provides water management information however does not include all the necessary requirements to demonstrate the proposed PMLU(s) are appropriate and achievable. The proposed PRC plan must include all relevant information in accordance with section 126C(1)(e) and (j) of the EP Act and in section 3.6.1 of the PRCP guideline.</p>	<p>6.2. Proposed PMLUs</p> <p>9.1.15. Final Landform Design</p> <p>9.1.15. Final Landform Design</p> <p>9.1.11. Water Management</p>
3	<p>The environmental authority (EA) application is missing information required by section 125(1)(n) of the EP Act for this type of application.</p> <p>a) The EA application must be accompanied with a proposed PRC plan that complies with section 126C of the EP Act.</p>	<p>Revised PRCP submission</p>