

# 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 amendment application for a site-specific environmental authority and proposed PRC plan.*

To: MMG Dugald River Pty Ltd  
Level 6, 445 Upper Edward Street  
Spring Hill, QLD 4000

ATTN: Gemma Green  
Email: gemma.green@mmg.com.au

Your reference: EPML00731213, A-EA-AMD-100480009  
Our reference: 101/0008757

### Further information is required to assess an amendment application for environmental authority

#### 1. Application details

The amendment application for a site-specific environmental authority and proposed PRC plan was received by the administering authority on 8 August 2023.

The application reference number is: **A-EA-AMD-100480009**.

Land description: Mineral Development License (MDL) 79, Mining Lease (ML) 2467, ML2468, ML2469, ML2470, ML2471, ML2477, ML2478, ML2479, ML2480, ML2481, ML2482, ML2496, ML2497, ML2498, ML2499, ML2500, ML2501, ML2502, ML2556, ML2557, ML2558, ML2559, ML2596, ML2599, ML2601, ML2638, ML2684, ML2685, ML7496, ML90047, ML90049, ML90050, ML90051, ML90211, ML90212, ML90213, ML90218, ML20220, ML90230 and ML90237.

#### 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 request is specified in attachment 1 to this notice.

#### 3. Actions

The abovementioned application will lapse unless you respond by giving the administering authority -



- (a) all of the information requested; or
- (b) part of the information requested together with a written notice asking the authority to proceed with the assessment of the application; or
- (c) a written notice –
  - i. stating that you do not intend to supply any of the information requested; and
  - ii. asking the administering authority to proceed with the assessment of the application.

Should the information request require an EIS process or applicant to submit a progressive rehabilitation and closure (PRC) plan then it must be completed and submitted.

A response to the information requested must be provided by 26 September 2024 (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 ESCairns@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.

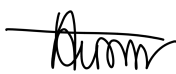
#### 4. Human rights

A human rights assessment was carried out in relation to this decision and it was determined that the decision is compatible with human rights.

#### 5. Review and appeal rights

You may apply to the administering authority for a review of this decision within 10 business days after receiving this notice. Information about your review rights is attached to this notice or search 'DESI Internal review and appeals' at business.qld.gov.au. This information is guidance only and you may have other legal rights and obligations.

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



Signature

26/03/2024

Date

Ayla Turner  
Department of Environment, Science and Innovation  
Delegate of the administering authority  
*Environmental Protection Act 1994*

**Enquiries:**  
Minerals Business Centre  
PO Box 7230, Cairns QLD 4870  
Phone: (07) 4222 5352  
Email: ESCairns@des.qld.gov.au

#### Attachments

Attachment 1: Information Request for Dugald River Mine (DRM)

[Information sheet: Internal review and appeals](#) (ESR/2015/1742)

**Attachment 1: Information Request for Dugald River Mine (DRM).**

Item	Matter	Information Request
<b>General</b>		
1	<p><u>Land disturbance</u></p> <p>Inconsistencies have been identified regarding the total cumulative proposed disturbance footprint in the <i>Environmental Authority EPML00731213 Amendment Application Supporting Information Report (December 2023)</i> (the report). Section 2.2.1.1.1. of the report asserts the approximate total additional surface disturbance required for the construction of the wind farm facility is 86.51 hectares (ha), which includes 31.36 ha for the construction of wind turbine pads and meteorological masts, 46.79 ha for access tracks, 6.5 ha for clearing of a laydown area, and 1.86 ha for power infrastructure.</p> <p>Tables 3 and 18 of the report state the proposed amendment will entail an additional disturbance footprint of 78.15 ha for the construction and operation of the wind farm, however, the summary of potential impacts statement under Section 6.1. states that the proposed wind farm requires an additional disturbance area of 75 ha.</p> <p>Further, section 4.4.3. states 86 ha is required to be cleared for the wind farm and ancillary infrastructure and 2 ha for the other amendments, totalling 88 ha and table 5 refers to approximately 88.44 ha of additional surface disturbance.</p> <p>The proposed amendments to Schedule A – Table 1 (Authorised Mining Activities) of the EA, as detailed within Appendix A of the report, states the additional maximum disturbance areas include:</p> <ul style="list-style-type: none"> <li>• <i>Powerline: 2.0 ha</i></li> <li>• <i>Groundwater infrastructure: 0.5 ha (note, table 3 of the report suggests this area is 0.54 ha)</i></li> <li>• <i>Ventilation shaft 9: 0.05 ha</i></li> </ul>	<p>Clarification regarding the total cumulative additional proposed disturbance and its breakdown into each feature/domain is required to be provided. Provide detailed mapping and updated spatial information of all proposed areas to be included as part of this amendment.</p> <p>Provide clarity regarding the total switchyards proposed. If there are two switchyards proposed as suggested, provide an assessment on the additional switchyard to be assembled including the location, the proposed disturbance footprint, potential impacts and management measures.</p> <p>Ensure the total cumulative proposed disturbance footprint is reflected and incorporated into the proposed progressive rehabilitation closure plan (PRC Plan).</p> <p>A significant portion of this disturbance is located within sensitive areas with further information required to sufficiently understand the level of risk and extent of impact the renewables project will have on these sensitive values (see items requested below).</p>

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	<ul style="list-style-type: none"> <li>• <i>Switchyard 2: 1.0 ha</i></li> <li>• <i>Sewage Treatment Plant: 0.38 ha</i></li> <li>• <i>Power infrastructure: 1.86 ha (note, appendix A suggest this area is 2 ha )</i></li> <li>• <i>Laydown: 6.5 ha</i></li> <li>• <i>Wind farm and ancillary infrastructure: 31.36 ha</i></li> <li>• <i>Access roads: 46.79 ha</i></li> </ul> <p>This amounts to a total of 90.44 ha and differs from the information included elsewhere in the report.</p> <p>Further, it is unclear if areas identified as 'electrical' in Figure 2 – Proposed Disturbance Areas have been accounted for in the total cumulative disturbance footprint proposed.</p> <p>Section 2.2.2. of the report discusses the proposed replacement of the sewage treatment plant (STP) which will require an additional 0.2 ha, however, Table 21 identifies this total area as 0.18 ha.</p> <p>Section 2.2.1.1.5 of the report states a switchyard is proposed on land previously disturbed. Further on, it is identified a second switchyard will be assembled to support electrical equipment (pg. 43). It is unclear the number of switchyards and the total disturbance area required for this feature as only one has been assessed, and Figure X – Proposed Windfarm only depicts 1.</p>	
<b>Wind Farm Facility (Renewables Project)</b>		

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2	<p><u>Wind turbines and laydown area</u></p> <p>In section 2.2.1. of the report, it is identified that the ninth location for the wind farm facility will be used as a laydown area for turbine components (eight wind turbines proposed). However, Figure X – Proposed Windfarm identifies nine turbine locations and an additional area named ‘Windfarm Laydown’ directly adjacent to the mine infrastructure area. It is unclear the total number of wind turbines proposed, and the potential land development required for these areas.</p> <p>In addition, it is unclear what the material to be placed within the windfarm laydown area is suspected to be.</p>	<p>Clarify the total number of wind turbines supported by detailed mapping. Provide information outlining what ‘turbine components’ entails, and the potential land development required for this area (e.g., landform development/shaping, construction methodology, topsoil stripping and stockpiling and management measures).</p>
3	<p><u>Matters of State Environmental Significance (MSES) - Regulated vegetation (essential habitat) and impacts to purple-necked rock wallaby (PNRW)</u></p> <p>Section 4.1.1.1.4. of the report outlines that the proposed renewables project will require clearing of approximately 68.7 ha of regulated vegetation - essential habitat, associated with the PNRW.</p> <p>A significant residual impact assessment (SRI) was undertaken (Table 39 of the report) which determined that impacts to this MSES value are likely to result in <b>temporary disturbance to a subpopulation of PNRW</b> associated with the clearance and construction phase of the project. However, within section 4.1.1.1.4. of the report, DRM have determined the proposed project is unlikely to significantly impact the population, with <b>no proposed disturbance to any known PNRW colony</b> and proposed tracks not transversing any known or suitable PNRW shelter habitat.</p>	<p>Provide clarification concerning impacts to the PNRW associated with the clearance of regulated vegetation (essential habitat) for this species.</p> <p>If there are impacts anticipated, undertake an assessment in accordance with the Queensland Environmental Offsets Policy to support the proposal and demonstrate that the offset hierarchy has been considered.</p>

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4	<p><u>MSES - Regulated vegetation (intersecting a watercourse)</u></p> <p>Conflicting information has been identified regarding the total cumulative impact area to regulated vegetation intersecting a watercourse. For example:</p> <ul style="list-style-type: none"> <li>• Section 2.2.1.1.5. of the report states that bed level crossings will be constructed at five creek crossings during road establishment.</li> <li>• Section 3.6.3.1.4. states that there are nine instances of stream order 1 and 2 regulated vegetation watercourses mapped within the proposed disturbance area of the project.</li> <li>• Section 4.1.1.1.5. of the report states approximately 3.5 ha of clearing is required within areas mapped as regulated vegetation intersecting a watercourse.</li> <li>• Table 21 of the report states that <i>‘There are no watercourses, as defined under the Water Act within the proposed disturbance areas. The pads do not intersect any drainage lines. The access roads for the wind farm will cross drainage lines on five occasions’.</i></li> </ul> <p>Section 4.1.1. of Appendix L (Ecological Assessment Report) identifies a significant residual impact will occur as impacts exceed criteria 1 and 3 of Table 1 (2.1 Significant residual impact test – criteria Table 1) of the <i>Significant Residual Impact Guideline (December 2014)</i>. No further information, assessment or consideration of potential offsets have been provided.</p> <p>Section 2.2.1.1.5. of the report discusses the requirement for creek bed level crossings during road establishment to allow unobstructed</p>	<p>Provide further information regarding the proposed disturbance to this MSES value as a result of the proposed project. This includes:</p> <ul style="list-style-type: none"> <li>• Total number of necessary crossings required and justification for these areas. A detailed assessment must be provided highlighting if the crossings are avoidable or can be achieved through a lesser impact footprint.</li> <li>• Detailed mapping and location of all necessary crossings.</li> <li>• Associated extent of impact to this MSES.</li> </ul> <p>This information is required to enable assessment of the impacts and potential offset requirements. The avoid, minimise, and offset hierarchy must be clearly described with justification for the impacts to this MSES. If a significant residual impact is likely to occur as suggested, please provide the assessment undertaken in accordance with the Queensland Environmental Offsets Policy to support the proposal.</p> <p>Provide further information regarding the proposed creek bed level crossings to be implemented for the proposed project. This includes:</p> <ul style="list-style-type: none"> <li>• Defining the total creek bed level crossings required.</li> <li>• Construction details and potential impacts during the construction and operational stage.</li> <li>• Management details to ensure creek bed level crossings support unobstructed surface water flow.</li> </ul>

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	<p>surface water flows. Limited information has been provided regarding the proposed creek bed level crossings and it is noted detailed designs will be prepared as part of the construction management program prior to commissioning.</p>	
5	<p><u>Regional ecosystems</u></p> <p>The endangered Regional Ecosystem (<i>Eucalyptus camaldulensis</i> - woodland on channels and levees) (ERE:1.3.7b) is mapped as present on the site and is listed as a category B Environmentally Sensitive Area (ESA) and MSES. Section 4.1.1.1.6. of the report states that ground-truthing surveys delineating the ERE 1.3.7b, indicate that only 1.04 ha of this ESA will be impacted as a result of the project. It is concluded that the project is not anticipated to have a significant impact on this ERE/ESA due to the limited size of disturbance. No further impacts, risks or management measures have been provided.</p>	<p>A definitive area and detailed mapping of the location of disturbance in relation to the River Red Gum Ecosystem (RE:1.3.7b) is required to enable assessment of the impacts and potential offsets. The avoid, minimise, and offset hierarchy must be clearly described with justification for the impacts to this ecosystem. The entire impact must be described to enable the consideration of offsets. If a significant residual impact is likely to occur, provide an assessment undertaken in accordance with the Queensland Environmental Offsets Policy to support the proposal.</p>
6	<p><u>Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act) and Nature Conservation Act 1992 (NC Act) listed species</u></p> <p>Conflicting information has been identified regarding the total number and assessment of EPBC Act and NC Act listed species within the area. It is noted that several species did not undergo an SRI assessment. The following species were identified as having a 'possible' likelihood of occurrence within 50 kilometres (km) of the project area, however SRI assessments have not been conducted in relation to these: Fork-tailed swift, Carpentarian grasswren, Grey falcon and Painted honeyeater.</p>	<p>Provide clarification regarding the rationale followed to determine which species required SRI assessments.</p> <p>Provide succinct and complete information and assessments for all species identified as having the potential to occur within or surrounding the project area. This information is required to understand the potential impacts, risks and mitigation measures and strategies proposed to be implemented for all listed species under the EPBC Act and NC Act.</p>

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	<p>Further, additional SRI assessments have been conducted for species not identified in the lists proposed by MMG Dugald River Pty Ltd (DRM) but listed under the EPBC Act and NC Act.</p> <p>The total number of potential species to occur within the project area is conflicting throughout the report. For example:</p> <ul style="list-style-type: none"> <li>• Table 16 of the report lists fifteen (15) EPBC Act marine or migratory species identified through desktop assessments as having potential to occur within 50 km of the project area. However, appendix L identifies twenty-one (21) marine and migratory species as having the potential to occur within a 50 km radius of the project area.</li> <li>• Table 17 of the report lists 15 species of fauna and one (1) species of flora listed as Endangered, Vulnerable or Near Threatened (EVNT) have potential to occur within a 50 km radius of the project area. However, appendix L identifies nineteen (19) species of fauna listed under the EPBC Act as having the potential to occur within 50 km radius of the project area.</li> </ul>	
7	<p><u>Bats</u></p> <p>Section 4.1.1.1.11. of the report states that “While no data is available on how high these species fly, most microbat species are typically thought to forage within or just above the canopy”. It is understood a range of species utilise heights equivalent to those within the rotor-sweep area (RSA) of the proposed wind turbines. Bats in north Queensland (including species noted at the project site) have been observed and published as foraging 100 to 300 meters (m) above the</p>	<p>Provide a detailed assessment of the wind farm facility impacts on the bat species recorded from the area. This review should examine the potential mortality rate of species and be based on available wind farm monitoring reports, published flight heights for the species present, and if possible, new locally derived data by sampling bat activity at or near the altitude of the RSA.</p>



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	ground. A detailed assessment of the impact on bat fauna from the proposed wind farm facility is required.	Further, provide an alert-to-action trigger plan for bat collision or area exclusion. This plan must detail the nature of the action taken, the metric to act, and the minimum duration of the action.
8	<p><u>Birds</u></p> <p>From the information provided in the application documents it is unclear how the assessment of migratory species have been considered in relation to the relevant guidelines. Further information is required regarding how seasonal movements have been sampled or appropriately considered in the assessment. This information is required to assess and confirm the appropriateness of the sampling/monitoring undertaken and to ensure impacts to listed migratory species is managed or mitigated.</p>	<p>Provide an assessment of diurnal and nocturnal bird movements during the period of migration through the East-Asian Australian Flyway, considering the proposed operation. To note, this is best undertaken with elevated acoustic recording devices to identify bird movements.</p> <p>Further, provide an alert-to-action trigger plan for bird collision or area exclusion. This plan must detail the nature of the action taken, the metric to act, and the minimum duration of the action.</p>
9	<p><u>Bird and Bat Management Plan</u></p> <p>As operational monitoring is proposed to be undertaken for the wind farm facility, this measure must be described in a bird and bat management plan. This plan must include survey details, collision risk modelling, the proposed thresholds for impacts and the proposed response measures. The principles of Before-After-Control-Impact (BACI) design principles are recommended for surveys for both birds and bats.</p>	<p>As stated above, provide an assessment of diurnal and nocturnal bird monitoring during the migratory period of migratory species.</p> <p>The information required to enable assessment of the bird and bat management plan includes provisions for Bird and Bat Collision Risk modelling. This modelling must specifically address species that have been identified as having a known or possible likelihood of occurrence, and include survey details, proposed thresholds and proposed response measures. The principles of BACI are recommended for surveys for both birds and bats.</p>
10	<p><u>Proposed adaptive management strategies for birds and bats</u></p> <p>Appendix L outlines the proposed management strategies to be implemented during the construction, operation and decommissioning phases of the renewables project. The strategies are generally supported, however detail is required on when the proposed measures</p>	<p>Provide a detailed description on the mechanism and timing of monitoring impacts of the overall facility on bats and birds. This monitoring must include cadaver searches as well as monitoring the activity of birds and bats around the wind farm facility. A reporting schedule and triggers to instigate management changes must be included in this protocol.</p>

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	<p>will be implemented. This information must include details regarding the triggers proposed for the commencement of implementation and the monitoring of success in implementing.</p> <p>The NRG ultrasonic acoustic Bat Deterrent System is proposed as a management strategy to reduce impacts to flying fauna. Although this system has shown a 50% reduction in bat fatalities, the outcome still represented fatalities (the other half). The scale and species impacted requires further assessment to determine the appropriateness of this management mechanism.</p>	<p>Further information and assessment is required to determine the appropriateness of the NRG ultrasonic acoustic Bat Deterrent System management mechanism. The scale and species impacted must be appropriately assessed.</p>
11	<p><u>Noise</u></p> <p>The provided noise data focuses on A weighting which is a measure designed around the human auditory response. The impact of noise on fauna has not been addressed in detail. The monitoring program must address the potential impacts from noise and mitigation strategies proposed to manage these impacts to birds and bats.</p>	<p>Provide additional information regarding how the monitoring schedule will recognise the potential impact of noise on birds and bats and propose how this impact, if observed, will be mitigated.</p>
12	<p><u>Water management</u></p> <p>Section 4.2.7.1.3. of the reports states diversion bunds will be erected upslope from disturbed areas and direct runoff into sediment basins and dams. These sediment dams or basins will be constructed to capture sediment and contaminants for treatment or retention. No further information is provided, and Appendix J (Erosion and sediment control plan) has not been attached.</p>	<p>Provide additional information regarding the proposed diversion bunds and sediments dams/basins. This information is required to understand the diversion of water around the site as a result of the proposed activity. This information includes:</p> <ul style="list-style-type: none"> <li>• Details regarding the diversion of water as a result of the proposed activity.</li> <li>• Detailed information and mapping of all proposed diversion bunds, sediment basins and dams.</li> <li>• Clarify if the proposed sediment basins or dams will receive clean stormwater runoff or, as suggested, it is expected to be receive contaminants. If so, further information is required regarding the</li> </ul>

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		<p style="text-align: center;">potential impacts, proposed treatment, and management of this water.</p> <ul style="list-style-type: none"> <li>• Provide Appendix J.</li> </ul>
13	<p><u>Topsoil management</u></p> <p>Section 2.2.1.1.5. of the report discusses the management of topsoil. It is noted topsoil will be stockpiled to the side of the pad disturbance, however, section 4.1.6.1.5 states that topsoil removed will be transported to existing stockpile listed in Schedule A – Table 1.</p>	<p>Clarify how topsoil will be managed as a result of the proposed activity. If topsoil is to be stockpiled at the pad disturbance area, provide details on how this will be managed. If topsoil is to be transferred to the existing topsoil stockpiles, demonstrate these existing features have capacity to hold the proposed material and if further management measures are required.</p>
14	<p><u>Rehabilitation – PRC Plan</u></p> <p>It is proposed the renewables project will be rehabilitated to a native ecosystem. Rehabilitation activities will include removal of all infrastructure above and below ground, landform reshaped to a convex slope profile during construction and the area ripped and seeded, with no topsoil requirement.</p> <p>Section 3.3.43 of the PRC Plan states any pads with potential for erosion will have crests rounded (minor) to a convex slope profile during construction. However, the milestone criteria suggest landform development and re-shaping will occur during rehabilitation.</p> <p>It is unclear from the information provided when landform shaping will occur and how this will be determined. For example, what will constitute ‘potential erosion’ or ‘erosion risk’.</p> <p>Further, it is unclear if land disturbance will be required during the decommissioning/ rehabilitation phase of the renewables project. For example, ‘removal of all infrastructure above and below ground.’ Based on the information above, the administering authority is unable to</p>	<p>Provide a revised PRC Plan that includes additional information regarding rehabilitation of the wind farm facility. This information includes:</p> <ul style="list-style-type: none"> <li>• A detailed description of any additional disturbance that may be required during the decommissioning phase.</li> <li>• If diversion bunds and sediment dams/basins are required as suggested, clarify when and how these will form part of the rehabilitation process.</li> <li>• Define which pads/areas will require landform reshaping to convex slope profile and how this has been determined.</li> <li>• Provide a detailed design of the final landform from the proposed activity. This is required to understand how landform development can achieve the proposed PMLU.</li> <li>• Further justification to support the proposal that no topsoil is required for these areas.</li> </ul>

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	determine if a stable condition can be achieved for all components of the renewables projects.	
<b>Other Amendments</b>		
15	<p><u>Conditions B14, B15 and B16</u></p> <p>It is proposed conditions B14, B15 and B16 (see below) of the EA are removed.</p> <p><i>B14: The buildings and structures in place at the licensed place for the storage, stockpiling and loading of mineral concentrate must be constructed and maintained to withstand a Category 2 cyclone.</i></p> <p><i>B15: The construction and state of the buildings and structures in place at the licensed place for the storage, stockpiling and loading of mineral concentrate must be checked for compliance with condition B14 by an appropriately qualified person at least once every three (3) years.</i></p> <p><i>B16: A wash bay for mobile equipment must be installed as part of the mineral concentrate storage facility, for cleaning machinery before exit from the area and to prevent the movement of mineral concentrate outside the building.</i></p> <p>Justification provided by DRM states the concentrate shed is a concentrate transfer point and not used for the storage of concentrate. It is asserted there is no movement of vehicles in or out of the concentrate shed, instead, concentrate is deposited into the concentrate transfer shed from the processing plant and collected by a front-end loader and transferred into two half height shipping containers. Further, in the unlikely event that a cyclone did occur in the region, there would be no concentrate stored within the shed, and therefore the risk of loss of concentrate is negligible.</p>	<p>Conditions under <b>Concentrate Management</b> of the EA relate to buildings and structures used for storage, stockpiling and loading mineral concentrate. The argument that the concentrate shed is not used for storage of concentrate but instead used as a transfer point still falls under the proposed intent of these conditions. Given the structure will receive mineral concentrate at some point to then be transferred out, further information is required to justify the removal of these conditions. Further, although the likelihood of Category 2 Cyclone is low, it is not uncommon. The intent of the condition is to ensure any buildings or structures <b>storing, stockpiling and loading</b> mineral concentrate are secured to prevent the release of concentrate to the environment during such an event. Further information is required to justify the removal of these conditions.</p>

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	From this information it is unclear how a 'concentrate transfer point' differs from the recommendations and intent of these conditions.					
16	<p><u>Sediment Dam G and D</u></p> <p>It is proposed Schedule C – Table 1 (Release Points) is amended to remove reference to 'runoff from PAF waste rock dumps and Stage 1 and 2' from the Sediment Dam G release point. It is stated by DRM, Sediment Dam G does not and has never received runoff from the PAF waste rock dumps. Given the location of Sediment Dam G, further information is required to support this statement.</p> <p>It is also proposed to include Sediment Dam G and Sediment Dam D to Schedule C – Table 3 (Contaminant Release during Flow Events), and these amendments are suggested to be clerical in nature. Upon assessment, it is identified several release points specific in Schedule C – Table 1, do not appear in Schedule C – Table 3 (see table below). It is unclear at this stage why incorporation of all release points are not required to be included in this amendment.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Table 1 (Release Points)</th> <th style="width: 50%;">Table 3 (Contaminant Release during Flow Events)</th> </tr> </thead> <tbody> <tr> <td>Sediment Dam C, D, F, G, A Stage 2 PAF Pad Run Off Dam STP Dam Stage 1 STP Dam Stage 2 ROM Area Run Off Dam Process Plant Run Off Dam Mine Workshop Run Off Dam Raw Water Dam Tailings Storage Facility (TSF) Seepage Collection Pond</td> <td>Sediment Dam F, A (proposed D and G) Mine Workshop Run Off Dam Stage 2 PAF Pad Run Off Dam Sediment Dam A ROM Area Run Off Dam Process Plant Run Off Dam</td> </tr> </tbody> </table>	Table 1 (Release Points)	Table 3 (Contaminant Release during Flow Events)	Sediment Dam C, D, F, G, A Stage 2 PAF Pad Run Off Dam STP Dam Stage 1 STP Dam Stage 2 ROM Area Run Off Dam Process Plant Run Off Dam Mine Workshop Run Off Dam Raw Water Dam Tailings Storage Facility (TSF) Seepage Collection Pond	Sediment Dam F, A (proposed D and G) Mine Workshop Run Off Dam Stage 2 PAF Pad Run Off Dam Sediment Dam A ROM Area Run Off Dam Process Plant Run Off Dam	<p>Provide further information and clarification regarding the locations receiving runoff from the PAF waste rock dumps. Please clarify all release points receiving runoff/stormwater from the PAF waste rock dumps and ensure these are in line with the stipulated release point locations identified in Schedule C - Table 1.</p> <p>Given, schedule C- Table 3 is not a comprehensive list of the release points specified in schedule C – Table 1, further information is required to support the proposal that these amendments are clerical in nature. Provide information regarding the stream flow monitoring plan specified in conditions C10 to C13 of the EA for the Dugald River Mine. This may be in the form of a water management plan for the site. This information is required to demonstrate all release points listed in the EA are appropriately conditioned.</p>
Table 1 (Release Points)	Table 3 (Contaminant Release during Flow Events)					
Sediment Dam C, D, F, G, A Stage 2 PAF Pad Run Off Dam STP Dam Stage 1 STP Dam Stage 2 ROM Area Run Off Dam Process Plant Run Off Dam Mine Workshop Run Off Dam Raw Water Dam Tailings Storage Facility (TSF) Seepage Collection Pond	Sediment Dam F, A (proposed D and G) Mine Workshop Run Off Dam Stage 2 PAF Pad Run Off Dam Sediment Dam A ROM Area Run Off Dam Process Plant Run Off Dam					

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17	<p><u>Condition C28</u></p> <p>It is proposed to remove condition C28 of the EA as condition A7 requires any management plan to be reviewed every three (3) years. DRM state “Due to the nature of activities (underground extraction) and limited surface disturbance, a review every three years is sufficient to capture any changes on site that may influence water management controls.” Given the proposed amendment requires significant surface disturbance, it is unclear that this statement is supported.</p> <p>Further, the intent of condition A7 is differs from the intent of condition C28 (see below).</p> <p><i>A7 - Any management or monitoring plans, systems, programs or reports required to be developed and implemented by a condition of this environmental authority <b>must be reviewed for effectiveness in minimising the likelihood of environmental harm</b> every 3 years and amended immediately if required. The review must be documented and completed by an appropriately qualified person.</i></p> <p><i>C28 - The holder of this environmental authority must undertake a review of the water management plan before 1 November each year to ensure that proper and effective measures, practices or procedures are in place so that the mine is operated <b>in accordance with the conditions of this environmental authority and that environmental harm is prevented or minimised.</b></i></p>	<p>Provide further justification regarding why the water management plan can be captured under condition A7. Consider the proposed additional disturbance to be undertaken, and the potential impacts to water management (i.e., erosion and sediment controls, creek crossings, etc).</p>
18	<p><u>Removal of Cyanide</u></p> <p>Appendix A includes an amendment to Schedule C – Table 8 (Groundwater Trigger Levels and Contaminant Limits) for the removal</p>	<p>Provide information regarding if this amendment is intended. If so, provide justification for this amendment.</p>

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	<p>of cyanide as a parameter. This amendment has not been discussed in the report.</p>	
19	<p><u>Stage 2 PAF Pad Run Off Dam</u></p> <p>The hydraulic performance criteria specified in Schedule D – Table 2 (Hydraulic performance criteria for Regulated Dams) for the Stage 2 PAF Pad Run Off Dam was assessed as significant under the scenario ‘failure to contain – overtopping’ in 2015 (see footnote 1 of this table). It is proposed the hydraulic performance criteria is removed for the Stage 2 PAF Run Off Dam in accordance with the revised consequence category assessment (CCA) provided (Appendix F) which has assessed the Stage 2 PAF Pad Run Off Dam as low under the ‘failure to contain – overtopping’ scenario. It is unclear how this assessment has changed since 2015 with further information is required to support this proposal.</p> <p>It is stated in section 4.2.3.1.3. of the report “in the event of an overtopping failure from the PAF Stage 2 Run Off Dam, flows would pass south entering Dugald River via the unnamed Dugald River tributaries.” Further on it is stated “in the event of a dam break failure of the PAF Stage 2 Runoff, flows would pass north east entering Dugald River via the unnamed Dugald River tributaries.” However, in Appendix F table 6, it is noted that in the event of an overtopping failure, flows would pass to the north or east. From the information provided, it is unclear the direction of flow under each scenario.</p> <p>Appendix F details in the event of dam break from the Stage 2 PAF Pad Run Off Dam, sediment dam G would be impacted resulting in an overtopping or partial/full collapse of sediment dam G. Limited information is provided to understand the potential impacts this may</p>	<p>Provide further information concerning the change in the CCA for the Stage 2 PAF Pad Run Off Dam for the ‘failure to contain – overtopping’ scenario from 2015 to 2023.</p> <p>Provide clarification regarding the CCA in terms of an overtopping event and the direction of flow suspected under this scenario.</p> <p>Provide information regarding the impacts of an overtopping or partial/full collapse of sediment dam G in the ‘failure to contain – dam break’ scenario for the Stage 2 PAF Pad Run Off Dam. Clarify the expected capacity of sediment dam G under this scenario, the type of waters directed and reporting to this sediment dam, and the potential impacts of such an overtopping or partial/full collapse event of this sediment dam to the receiving environment.</p> <p>Provide information on the intended hydraulic performance objectives for ‘failure to contain -dam break’ for the Stage 2 PAF Run Off Dam.</p>

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	<p>have on the receiving environment, and if this further exacerbates a dam break scenario for the Stage 2 PAF Pad Run Off Dam.</p> <p>Additionally, hydraulic performance objectives for ‘failure to contain – dam break’ scenario are specified in the Manual for assessing consequence categories and hydraulic performance of structures (ESR/2016/1933, Version 5.03) (the Manual). No information has been provided to demonstrate the application of the design criteria required for significant dam break scenarios.</p>	
20	<p><u>PRC Plan – Post mine land use (PMLU)</u></p> <p>It is identified that several Rehabilitation Area (RA) sizes and mine features have been amended which has resulted in the change of the previously approved PMLU for these features. For example, the footprint of RA5 (Mining and Processing Areas) is proposed to be increased to 209.55 ha from 19.52 ha by relocating a number of features previously under RA1 (Ancillary Infrastructure and Services). As a result, the relocated mine features have been amended from the PMLU of native ecosystem to low intensity grazing. This change is determined to significantly change the way the PMLU will be achieved in a way likely to result in significantly different impacts on environmental values compared to the impacts on the values previously approved under the PRCP Schedule. No assessment or reasoning has been provided to support this change.</p>	<p>Provide justification and clarification for the proposed change. If this change is proposed, provide supporting information that demonstrates the land/features subject to the change will achieve the proposed PMLU and establish a safe, stable, non-polluting landform. Ensure all information to be provided is line with the legislative requirements specified in the <i>Environmental Protection Act 1994</i> and in the Guideline <i>Progressive rehabilitation and closure plans (PRC Plans) (ESR/2019/469, Version 3.00)</i> (PRCP Guideline). This includes:</p> <ul style="list-style-type: none"> <li>• Information specified in <b>section 3 Rehabilitation planning part</b> of the PRCP Guideline, including design for closure for features subject to the change.</li> <li>• Information outlined in <b>section 3.2 Post-mining land use</b> of the PRCP Guideline, including outcome of consultation with the community regarding the proposed changed and consideration of PMLU options (options analysis).</li> <li>• Information specified in <b>section 3.5 Community consultation</b> of the PRCP Guideline to demonstrate the proposed changes have</li> </ul>



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		<p>undergone community consultation and details of the outcomes of this consultation have been considered.</p> <ul style="list-style-type: none"> <li>• Information outlined in <b>section 3.6 Rehabilitation and management methodology</b> of the PRCP Guideline. This information is required to demonstrate the proposed PMLU, subject of the change, can achieve a stable condition in a way that supports the rehabilitation milestones under the proposed PRCP schedule. It is noted, the proposed milestone criteria in the PRCP Schedule have not been amended since the approved PRCP Schedule. Considering this, further information is required to demonstrate the rehabilitation methodologies are still fit for purpose for the proposed amendments.</li> <li>• A detailed risk assessment (<b>section 3.7 of the PRCP Guideline</b>), in relation to the proposed changes.</li> <li>• Information specified in <b>section 3.8 Monitoring and maintenance</b> of the PRCP Guideline to demonstrate the monitoring measures have been considered in relation to the proposed changes and the monitoring regimes are able to achieve the milestone criteria.</li> <li>• Information outlined in <b>section 4 PRCP schedule</b> of the PRCP Guideline. Given the proposed changes, the final site design maps, rehabilitation timing and relevant milestone criteria may require amending. If changes are proposed to criteria, this will require justification for the changes which are supported by relevant evidence.</li> </ul>
21	<u>Field trials – Condition PRCP5</u>	Provide justification for the proposed extension relating to the commencement of field trials under condition PRCP5.

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	<p>It is proposed to amend condition PRCP5 of the PRCP Schedule to allow field trials to commence within 5 years of the PRCP approval as opposed to 3 years. The justification provided by DRM is 'the timeline is proposed based on the long life of the operation with anticipated closure being 2048.' Upon assessment, this life of mine timeline has not changed since the previous PRCP approval, therefore it is considered further justification for the extension of the rehabilitation trials is required.</p>	