



30 May 2025

Ref: 2024.07003

Department of Environment and Science

Minerals Business Centre

PO Box 7230

CAIRNS QLD 4870

ATTENTION: Lisl Mohr

Via email: ESCairns@des.qld.gov.au

Dear Lisl,

**RE: ENVIRONMENTAL AUTHORITY AMENDMENT RESPONSE TO NOT PROPERLY MADE
NOTICE**

MMG submitted an amendment application for Environmental Authority (EA) EPML00731213, and Progressive Rehabilitation and Closure Plan (PRCP-EPML00731213-V2), to the Department of the Environment, Tourism, Science and Innovation (DETSI) on 6 May 2025.

On 20 May, the DETSI determined that the application was not properly made, and further information was required to progress the application. Wulguru Technical Services acknowledges the Not Properly Made Notice and provides this letter in response. A revised Supporting Information Report and Progressive Rehabilitation and Closure Plan is also attached. We look forward to working with the DETSI through the assessment process.

Should you have any questions, please do not hesitate to contact me at madison@wulgurutechservices.com.au or 0407 491 814.

Yours sincerely,

Madison Jackson, CEnvP

Wulguru Technical Services

Appendix A – Response to Not Properly Made Notice

Appendix B - Proposed revisions to the PRCP Schedule



Appendix A – Response to Notice

Legislative requirement under the EP Act	Reason	Required Action (s)	Response	Reference
Section 226(1)(d) An amendment application must describe the proposed amendment	Amendment 6 proposes the inclusion of three (3) mining leases, MLA100383 (Southwest MLA), MLA100359 (Northwest MLA) and MLA100382 (Northeast MLA) to the EA to conduct exploration drilling. The resource authority public report for MLA100359 and MLA100382 specify the tenure type is Infrastructure (Minerals) with a prescribed purpose of environmental dam, road / access / right of way (MLA100359) and living quarters / camp (MLA100382). As such, it is not considered that MLA100359 and MLA100382 are authorised for exploration activities.	Provide additional information to demonstrate that exploration activities are authorised on MLA100359 and MLA100382.	The EA amendment application has been revised to be consistent with the purposes listed in the resource authority public reports. No change has been made for ML100383.	Supporting Information Report, sections 1.4.1.6 and 2.2.7.
Section 226(1)(d) An amendment application must describe the proposed amendment	Amendment 8 proposes a reduction in the authorised maximum disturbance area	Provide an updated PRCP that considers the entire disturbance footprint, which	The spatial data for both the EA amendment application and the PRCP have been	PRCP Spatial Submission PRCP Schedule



	stipulated in Schedule A – Table 1 (Authorised Mining Activities) of the EA. The revised authorised disturbance proposed for Schedule A – Table 1 is 479.37ha, however, the amended Progressive Rehabilitation and Closure Plan (PRCP) schedule is proposing 470.25ha. The PRCP must capture all areas of approved disturbance in the EA.	is consistent with the EA approved disturbance.	reviewed. The PRCP spatial incorrectly assigned 0.37 ha of disturbance area for meteorological masts, compared to the 0.99 ha approved in the EA. This has been rectified so the PRCP is consistent with the maximum approved disturbed in the EA. The difference noted in Item 2 of the NPM notice largely relates to 10 ha of exploration disturbance that was not captured in either the PRCP Schedule or PRCP spatial data submission. Rehabilitation of exploration disturbance is dictated by condition PRCP4 of the approved PRCP Schedule. It has not previously been captured under any Rehabilitation	
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			Area (RA) within the PRCP schedule or the PRCP Spatial Submission. This is consistent with the DESTI Information Sheet, <i>ESR/2024/6766 Incorporating greenfield sites and exploration disturbance into progressive rehabilitation and closure plans.</i> A revised spatial submission is provided for clarity. This submission still excludes 10 ha of exploration disturbance, as per the approved PRCP Schedule conditions.	
Section 226(1)(d) An amendment application must describe the proposed amendment	In reference to the proposed amendments to the PRCP schedule, the submitted PRCP schedule includes amendments to rehabilitation milestones (RM) and	All proposed amendments must be described in the application form and/or the application supporting documents.	Specific details on changes to the schedule are provided in Appendix B to this response. It has also been	Appendix B PRCP Schedule PRCP, Appendix O



	milestone criteria (MC) not being described in the application form or the application supporting information being: ☐ Amendment of commencement date for RA1, RA2, RA4, RA5 and RA6 ☐ Amendments to MC in every RM including: - o Amendments within each criterion; - o Changing of TSF slopes and addition of additional surface water and groundwater monitoring sites. ☐ Extension of the time needed for achievement of surface requirements for native ecosystem and grazing. ☐ Further, RA3 initially proposed to commence rehabilitation in 2048. This application proposes for rehabilitation to commence in 2051.		attached as Appendix O to the PRCP. No change has been proposed for any monitoring location proposed in the PRCP schedule.	
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	A description, information or justification of the abovementioned amendments has not been provided in the application.			
Section 226(1)(d) An amendment application must describe the proposed amendment	Amendment 7 proposes to relocate four (4) of the air monitoring locations stipulated in the EA off the MLs owned by Harmony Gold Mining Company Limited. The application supporting information identifies that the new locations will be positioned on the perimeter of the Dugald River Mine MLs to allow suitable reference data to be collected and compared to the compliance monitoring position, however, further justification that demonstrates the suitability for the selection of each proposed monitoring locations has not been provided.	Provide additional information to demonstrate the suitability of each of the selected air quality monitoring locations.	Further details are provided below: • Reference location DG_001 is proposed to be relocated approximately 1.5 km west of the current location. The purpose of the monitoring is to collect reference data to the east of the main operations area. The proposed location can continue to achieve this purpose. • The compliance monitoring location (DG_005) is currently located at Roseby Homestead, being the	Supporting Information Report, Section 1.4.1.7



			nearest sensitive receptor. This monitoring location is not located on the Harmony Gold ML, therefore it will be retained in its current location and utilised for compliance monitoring and assessment. No change is proposed. • Reference location DG_006 is not located on Harmony Gold MLs and will be retained in its current location. No change is proposed. • Reference location DG_007 is proposed to be relocated approximately 200 m to the south of the	
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			current location, outside the boundaries of the Harmony Gold MLs. The purpose of the location is to monitor the northern end of the Knapdale Range. The proposed location can continue to achieve this purpose. • Reference location DG_008 is proposed to be relocated approximately 100 m west of the current position, outside the boundaries of the Harmony Gold MLs. The purpose of the location is to act as a reference site for the northeastern corner of the ML area. The	
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			proposed location can continue to achieve this purpose. • Reference location DG_009 is not located on Harmony Gold MLs and will be retained in its current location. No change is proposed. • Reference location DG_010 is proposed to be relocated approximately 1 km south of the current location. The purpose of the site is to monitor reference data from the southeast of the Project. The proposed location can continue to achieve this purpose.	
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			All equipment will be sited in accordance with Australian Standard / New Zealand Standard AS/NZS 3580.1.1:2016 "Methods for sampling and analysis of ambient air Part 1.1: Guide to siting air monitoring equipment". The proposed locations have a clear sky angle of 120 degrees, and are positioned away from trees, buildings and sources of dust, such as open paddocks.	
Section 126C(1)(e) A proposed PRC plan must for each proposed PMLU for land, state the proposed methods or techniques for rehabilitating the land to a stable condition in a way that supports the rehabilitation milestones under the proposed PRCP schedule.	The amendments to timeframes within the PRCP schedule have not been discussed within the supporting documents, therefore it is considered that the applicant has not provided methods or techniques for rehabilitating the land to a stable condition in a way	Provide information on the proposed amendments to timeframes within the PRCP schedule, including proposed methods or techniques for rehabilitating the land to a stable condition in a way that supports the rehabilitation milestones.	Specific details on changes to the schedule are provided in Appendix B to this response. It has also been attached as Appendix O to the PRCP.	Appendix B PRCP, Appendix O.



	that supports the rehabilitation milestones. Further, the applicant did not provide any management practices that will be implemented to make the proposed increased timeframes realistic and attainable.	Provide justified management practices that will be implemented to make the increased timeframes realistic and attainable.	The application proposed an increase in timeframe for the following milestones: - RM15 applied to RA2 increased from 5 years to 6 years. This was an error. The period has reverted to 5 years in this response. - RM2 applied to RA4 increase from 1 year to 3 years. The revised TSF Closure Plan determined 3 years would be required to apply the cover system to the TSF. This timing was not previously defined. There is no change to the rehabilitation methods other than	
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			the estimated time to complete application of the cover system. Given the scale of the TSF, this is a more realistic and attainable timeframe. - RM6 and RM9 applied to RA4 increased from 1 to 3 years. This was an error. The period has reverted to 1 year in this response. - RM13 applied to RA5 increased from 3 years to 5 years. The previous timeframe of 3 years was an error. 5 years is required to	
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			conduct a major round of monitoring (every 5 years), to verify achievement of the RM. This change also provides consistency across other RA's. The period for RM13 is 5 years across all other RA's. - RA15 applied to RA5 increased from 5 years to 10 years. This was an error. The period has reverted to 5 year in this response. - RM1 applied to RA6 increased from 1 year to 4 years. Modelling completed for the revised TSF	
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			Closure Plan determined the tailings would require 4 years to effectively dry and permit a trafficable surface for the remaining RM to commence. Drying time was not previously accounted for in the schedule. There is no change to the rehabilitation methods. - RM7 applied to RA6 increased from 1 year to 3 years. The revised TSF Closure Plan determined 3 years would be required to apply the cover material	
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			across the entire surface of the TSF. This timing was not previously accounted for. There is no change to the rehabilitation methods. The PRCP provides significant detail regarding the methods and techniques for rehabilitating the land to a stable condition in a way that supports the rehabilitation milestones. Additional supporting data related to the proposed TSF is provided in the TSF Closure Plan.	
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**Appendix B. Proposed revisions to the PRCP Schedule**

Rehabilitation Area (RA)	Rehabilitation Milestone (RM)	Proposed change to schedule	Justification	Proposed change to milestone criteria	Justification
RA1	RM1	The commencement date for RM1 changed from 2048 to 2044.	Changes to the DRM mine plan have resulted in the life of mine (LoM) being reached by 2043, compared to previous mine planning which nominated 2047. RA1 is therefore available for rehabilitation in 2044, immediately after the cessation of the LoM.	N/A	N/A
	RM2	The commencement date for RM2 changed from 2050 to 2046.	RM2 to RM14 have been brought forward, as a result of RM1 commencing earlier.	N/A	N/A
	RM3	The commencement date for RM3 changed from 2050 to 2046.	RM2 to RM14 have been brought forward, as a result of RM1 commencing earlier.	N/A	N/A
	RM9	The commencement date for RM9 changed from 2050 to 2046.	RM2 to RM14 have been brought forward, as a result of RM1 commencing earlier.	Topsoil application depth changed from a minimum of 0.2 m to a range of 0.1 m – 0.2 m.	The previously approved planning part of the PRCP nominated application of topsoil at a depth of 0.1 m – 0.2 m. The previous



Rehabilitation Area (RA)	Rehabilitation Milestone (RM)	Proposed change to schedule	Justification	Proposed change to milestone criteria	Justification
					PRCP and schedule were inconsistent. The application of 0.1 – 0.2 m topsoil is supported by information presented in PRCP Section 3.5.6.5 and the TSF Closure Plan.
	RM10	The commencement date for RM10 changed from 2051 to 2047.	RM2 to RM14 have been brought forward, as a result of RM1 commencing earlier.	N/A	N/A
	RM12	The commencement date for RM12 changed from 2053 to 2049.	RM2 to RM14 have been brought forward, as a result of RM1 commencing earlier.	Sub criteria (b) was amended to be an <i>“Average erosion rate of <5 t/ha/y with the maximum erosion rate at any point on the landform of <10 t/ha/y”,</i> compared to the previously approved	The erosion target was changed to be consistent with industry best practice. The addition to the MC will provide improved environmental outcomes. It does not change any rehabilitation method previously proposed.



Rehabilitation Area (RA)	Rehabilitation Milestone (RM)	Proposed change to schedule	Justification	Proposed change to milestone criteria	Justification
				<i>"Average erosion rate <5 t/ha/yr".</i> Sub criteria (I), previously approved in the PRCP schedule was removed in the amended PRCP. In this NPM response, the criteria have been reintroduced to RM12.	The criteria were deemed to be superfluous and a duplication of the other seepage rate criteria. It has been added back into this revised schedule, for completeness.
	RM14	The commencement date for RM14 changed from 2059 to 2055.	RM2 to RM14 have been brought forward, as a result of RM1 commencing earlier. 15 years is allowed for the achievement of the native ecosystem PMLU, from seeding. This is consistent with the previous schedule.	N/A	N/A



Rehabilitation Area (RA)	Rehabilitation Milestone (RM)	Proposed change to schedule	Justification	Proposed change to milestone criteria	Justification
RA2	RM4	N/A	There has been no change to this commencement date in this application. RA2 is available to commence rehabilitation in 2050. Rehabilitation of the borrow pits (RA2) will commence after material has been exhausted for capping of the TSF.	N/A	N/A
	RM9	N/A	N/A	Topsoil application depth changed from a minimum of 0.2 m to a range of 0.1 m – 0.2 m.	The previously approved planning part nominated application of topsoil at a depth of 0.1 m – 0.2 m. The previous PRCP and schedule were inconsistent. The application of 0.1 – 0.2 m topsoil is supported by information presented in PRCP Section 3.5.6.5 and the TSF Closure Plan.
	RM11	N/A	N/A	N/A	N/A



Rehabilitation Area (RA)	Rehabilitation Milestone (RM)	Proposed change to schedule	Justification	Proposed change to milestone criteria	Justification
	RM13	The application proposed the period be changed from 5 years to 4 years. In this NPM response, the period has reverted to 5 years.	The period allowed for RM13 was changed erroneously. These periods have now reverted to the approved periods (5 years) in the previous PRCP schedule.	Sub criteria (c) was amended to be an <i>“Average erosion rate of <5 t/ha/y with the maximum erosion rate at any point on the landform of <10 t/ha/y”,</i> compared to the previously approved <i>“Average erosion rate <5 t/ha/yr”</i>.	The erosion target was changed to be consistent with industry best practice. The addition to the MC will provide improved environmental outcomes. It does not change any rehabilitation method previously proposed.
	RM15	The application proposed the period be changed from 5 years to 6 years. In this NPM response, the period has reverted to 5 years.	The period allowed for RM15 was change erroneously. These periods have now reverted to the approved periods in the previous PRCP schedule. 10 years is allowed for the achievement of the low intensity grazing PMLU, from seeding. This is	N/A	N/A



Rehabilitation Area (RA)	Rehabilitation Milestone (RM)	Proposed change to schedule	Justification	Proposed change to milestone criteria	Justification
			consistent with the previous schedule.		
RA3	RM1	The commencement date for RM1 changed from 2048 to 2051. The period for achieving the RM reduced from 2 years to 1 year.	In the previous schedule, rehabilitation of RA3 and RA4 were scheduled to commence concurrently. For best practice management of contaminants, RA3 (runoff dams and diversions) will be retained until the WRDs (RA4) have stabilised. WRDs are scheduled to be removed by 2050. RA3 will commence rehabilitation immediately following, in 2051. This change to the schedule is proposed to allow capture of sediments and potential contaminants from the WRDs, leading to better environmental outcomes. Given the area within RA3 has reduced from 41.6 ha to 32.29 ha,	N/A	N/A



Rehabilitation Area (RA)	Rehabilitation Milestone (RM)	Proposed change to schedule	Justification	Proposed change to milestone criteria	Justification
			less time has been allocated to complete RM1.		
	RM2	The commencement date for RM2 changed from 2048 to 2049. The period to achieve the RM reduced from 2 years to 1 year	In the previous schedule, rehabilitation of RA3 and RA4 were scheduled to commence concurrently. For best practice management of contaminants, RA3 (runoff dams and diversions) will be retained until the WRDs (RA4) have stabilised. WRDs are scheduled to be removed by 2050. RA3 will commence rehabilitation immediately following, in 2051. This change to the schedule is proposed to allow capture of sediments and potential contaminants from the WRDs, leading to better environmental outcomes. Given the area within RA3 has reduced from 41.6 ha to 32.29 ha,	N/A	N/A



Rehabilitation Area (RA)	Rehabilitation Milestone (RM)	Proposed change to schedule	Justification	Proposed change to milestone criteria	Justification
			less time has been allocated to complete RM2.		
	RM5	The commencement date for RM5 changed from 2050 to 2052.	The commencement date of this RM has been delayed, as a result of RM1 commencing earlier.	N/A	N/A
	RM9	The commencement date for RM9 changed from 2050 to 2052.	The commencement date of this RM has been delayed, as a result of RM1 commencing earlier.	Topsoil application depth changed from a minimum of 0.2 m to a range of 0.1 m – 0.2 m.	The previously approved planning part nominated application of topsoil at a depth of 0.1 m – 0.2 m. The previous PRCP and schedule were inconsistent. The application of 0.1 – 0.2 m topsoil is supported by information presented in PRCP Section 3.5.6.5 and the TSF Closure Plan.
	RM11	The commencement date for RM11 changed from 2055 to 2057. An additional change is proposed in this NPM	The commencement date of this RM has been delayed, as a result of RM1 commencing earlier. RM11 has been reduced to 1 year as a more practical timeframe. MMG	N/A	N/A



Rehabilitation Area (RA)	Rehabilitation Milestone (RM)	Proposed change to schedule	Justification	Proposed change to milestone criteria	Justification
		response. The previously approved period to achieve RM was 3 years. This has been revised to 1 year.	has committed to completing all works for the RM within 1 year. This period is consistent with RM11 being applied for other RA's.		
	RM13	The commencement date for RM9 changed from 2058 to 2060. Further changes have since been applied, taking the commencement date back to 2058.	The commencement date of this RM has been delayed, as a result of RM1 commencing earlier. Changes to the preceding RM11 period have resulted in this now reverting to 2058.	Sub criteria (c) was amended to be an <i>"Average erosion rate of <5 t/ha/y with the maximum erosion rate at any point on the landform of <10 t/ha/y"</i> , compared to the previously approved <i>"Average erosion rate <5 t/ha/yr"</i> .	The erosion target was changed to be consistent with industry best practice. The addition to the MC will provide improved environmental outcomes. It does not change any rehabilitation method previously proposed.
	RM15	The application originally proposed a changed of	The commencement date of this RM has been delayed, as a result of RM1 commencing earlier.	N/A	N/A



Rehabilitation Area (RA)	Rehabilitation Milestone (RM)	Proposed change to schedule	Justification	Proposed change to milestone criteria	Justification
		the commencement date from 2063 to 2065. Further changes have since been applied, taking the commencement date back to 2063.	Changes to the RM11 period have resulted in this now reverting to 2063.		
RA4	RM2	There is no change to the commencement date for this RA. The period to complete this RM has increased from 1 year to 3 years.	Material within RA4 (NAF waste rock) will be utilised for the capping of the TSF. Modelling completed for the revised TSF closure plan, calculated that the surface of the TSF will complete drying and be trafficable by 2047. Waste rock can then be placed from 2048, allowing commencement of RA4 in 2048. The revised TSF Closure Plan identified that the application of the cover system will require 3 years. This time was not accounted for in	N/A	N/A



Rehabilitation Area (RA)	Rehabilitation Milestone (RM)	Proposed change to schedule	Justification	Proposed change to milestone criteria	Justification
			the previous schedule. RM2 for RA4 has increased to 3 years to allow material to be removed from the WRDs and applied to the TSF cover system.		
	RM6	The commencement date changed from 2049 to 2051. The application proposed a 3-year period for this RM. In this NPM response, the period has reverted to 1 year.	The commencement date was delayed due to the extended period for RM2. The period allowed for RM6 was change erroneously. This period has now reverted to the approved period (1 year) in the previous PRCP schedule.	N/A	N/A
	RM9	The commencement date changed from 2049 to 2051.	The commencement date was delayed due to the extended period for RM2. The period allowed for RM9 was change erroneously. This period has	Topsoil application depth changed from a minimum of 0.2 m to a range of 0.1 m – 0.2 m.	The previously approved planning part nominated application of topsoil at a depth of 0.1 m – 0.2 m. The previous PRCP and schedule were inconsistent.



Rehabilitation Area (RA)	Rehabilitation Milestone (RM)	Proposed change to schedule	Justification	Proposed change to milestone criteria	Justification
		The application proposed a 3-year period for this RM. In this NPM response, the period has reverted to 1 year.	now reverted to the approved period in the previous PRCP schedule (1 year).		The application of 0.1 – 0.2 m topsoil is supported by information presented in PRCP Section 3.5.6.5 and the TSF Closure Plan.
	RM11	The commencement date changed from 2050 to 2052. The period was changed from 3 years to 1 year.	The commencement date changed due to the extended period for RM2 and the change in period for RM6 and RM9. RM11 has been reduced to one year as a more practical timeframe. MMG has committed to completing all works for the RM within 1 year. This is consistent with the period for RM11 applied to other RA's.	N/A	N/A
	RM13	N/A	N/A	Sub criteria (c) was amended to be an "Average erosion rate of	The erosion target was changed to be consistent with industry best practice. The addition to the MC



Rehabilitation Area (RA)	Rehabilitation Milestone (RM)	Proposed change to schedule	Justification	Proposed change to milestone criteria	Justification
				<i><5 t/ha/y with the maximum erosion rate at any point on the landform of <10 t/ha/y”, compared to the previously approved “Average erosion rate <5 t/ha/yr”.</i>	will provide improved environmental outcomes. It does not change any rehabilitation method previously proposed.
	RM15	N/A	N/A	N/A	N/A
RA5	RM1	The commencement date changed from 2048 to 2044. The split between areas available for commencement of RM1	Changes to the DRM mine plan have resulted in the LoM being reached by 2043, compared to previous mine planning which nominated 2047. RA1 is therefore available for rehabilitation in 2044, immediately after the cessation of the LoM. The split between areas available in 2045 and 2047 was reviewed in consideration of revised disturbance areas proposed in the application.	N/A	N/A



Rehabilitation Area (RA)	Rehabilitation Milestone (RM)	Proposed change to schedule	Justification	Proposed change to milestone criteria	Justification
		changed from 134.98 ha and 73.18 ha to 95.5 ha and 86.65 ha, respectively.	The ROM, ROM haul roads, processing plant and conveyor area and powerlines (86.65 ha), will be retained until 2045 to allow processing of any residual ore after closure. Rehabilitation of these area will commence in 2046.		
	RM2	The commencement date changed from 2048 to 2044.	RM2 to RM15 have been brought forward, as a result of RM1 commencing earlier.	N/A	N/A
	RM6	The commencement date changed from 2048 to 2044.	RM2 to RM15 have been brought forward, as a result of RM1 commencing earlier.	N/A	N/A
	RM9	The commencement date changed from 2049 to 2045.	RM2 to RM15 have been brought forward, as a result of RM1 commencing earlier.	Topsoil application depth changed from a minimum of 0.2 m to a range of 0.1 m – 0.2 m.	The previously approved planning part nominated application of topsoil at a depth of 0.1 m – 0.2 m. The previous PRCP and schedule were inconsistent.



Rehabilitation Area (RA)	Rehabilitation Milestone (RM)	Proposed change to schedule	Justification	Proposed change to milestone criteria	Justification
					The application of 0.1 – 0.2 m topsoil is supported by information presented in PRCP Section 3.5.6.5 and the TSF Closure Plan.
	RM11	The commencement date changed from 2049 to 2045. The period to achieve RM11 was reduced from 3 years to 1 year.	RM2 to RM15 have been brought forward, as a result of RM1 commencing earlier. RM11 has been reduced to one year as a more practical timeframe. MMG has committed to completing all works for the RM within 1 year. This is consistent with RM11 applied to other RA's.	N/A	N/A
	RM13	The commencement date changed from 2050 to 2046. The period to achieve RM13 changed from 3 years to 5 years.	RM2 to RM15 have been brought forward, as a result of RM1 commencing earlier. The period to achieve RM13 changed from 3 years to 5 years to allow one round of major monitoring	Sub criteria (c) was amended to be an <i>"Average erosion rate of <5 t/ha/y with the maximum erosion rate at any point on the landform of <10 t/ha/y"</i> ,	The erosion target was changed to be consistent with industry best practice. The addition to the MC will provide improved environmental outcomes. It does



Rehabilitation Area (RA)	Rehabilitation Milestone (RM)	Proposed change to schedule	Justification	Proposed change to milestone criteria	Justification
			(every 5 years) to verify achievement of the RM. This is consistent with the period for RM13 applied to other RA's.	compared to the previously approved <i>"Average erosion rate <5 t/ha/yr"</i> .	not change any rehabilitation method previously proposed.
	RM15	The commencement date changed from 2056 to 2051. The application proposed a changed period from 5 years to 10 years. This NPM response reverts the period back to 5 years.	RM2 to RM15 have been brought forward, as a result of RM1 commencing earlier. The period was changed erroneously. This has now been resolved and reverted to 5 years as per the approved schedule. 10 years is allowed for the achievement of the low intensity grazing PMLU, from seeding. This is consistent with the previous schedule.	N/A	N/A
RA6	RM1	The commencement date changed from 2048 to 2044.	Changes to the DRM mine plan have resulted in the LoM being reached by 2043, compared to the previous mine planning which nominated 2047.	N/A	N/A



Rehabilitation Area (RA)	Rehabilitation Milestone (RM)	Proposed change to schedule	Justification	Proposed change to milestone criteria	Justification
		The period to complete RM changed from 1 year to 4 years.	RA5 is available for rehabilitation in 2044, immediately after the cessation of the LoM The revised closure landform design for the TSF, modelled that drying of tailings would require four years. This period was not accounted for in the previous schedule. There is no change to the rehabilitation methods.		
	RM7	The commencement date changed from 2049 to 2048. The period to achieve the RM changed from 1 year to 3 years.	RM2 has been brought forward, as a result of RM1 commencing earlier and the change in period for RM1. The closure plan determined that application of the TSF cover system would require 3 years. This period was not accounted for in the previous schedule. There is no change to the rehabilitation methods.	Sub criteria (i) changed from slopes with a grade of 1% to slopes with a grade of <1.5%. The spillway criteria in sub criteria (k) changed from defining slope and length details to defining a RL for placement. The slope and length details	A revised closure design was developed for the TSF regarding the proposed TSF lift in the application. Detailed work has been completed to determine the most appropriate surface slope and spillway for closure regarding surface water management and erosion risk. This is explained in extensive detail in Appendix E of the PRCP.



Rehabilitation Area (RA)	Rehabilitation Milestone (RM)	Proposed change to schedule	Justification	Proposed change to milestone criteria	Justification
				have been reinstated in this revised submission. Sub criteria (o) changed erroneously. This has reverted to the previously approved criteria in the PRCP schedule. Sub criteria (p) was amended to <i>“Average erosion rate of <5 t/ha/y with the maximum erosion rate at any point on the landform of <10 t/ha/y”</i>, compared to the previously approved <i>“Average erosion rate <5 t/ha/yr”</i>.	The erosion target was changed to be consistent with industry best practice. It provide another milestone to achieve, but does not limit the current target.



Rehabilitation Area (RA)	Rehabilitation Milestone (RM)	Proposed change to schedule	Justification	Proposed change to milestone criteria	Justification
	RM9	The commencement date changed from 2050 to 2051. The application proposed a change in period from 2 years to 1 years. This NPM response has reverted this period back to 2 years.	The commencement date of this RM changed as a result of the previous changed to preceding RMs. The period allowed for RM9 was change erroneously. This period has now reverted to the approved period in the previous PRCP schedule.	Topsoil application depth changed from a minimum of 0.2 m to a range of 0.1 m – 0.2 m.	The previously approved planning part nominated application of topsoil at a depth of 0.1 m – 0.2 m. The previous PRCP and schedule were inconsistent. The application of 0.1 – 0.2 m topsoil is supported by information presented in PRCP Section 3.5.6.5 and the TSF Closure Plan.
	RM10	Commencement date changed from 2050 to 2051. The application proposed a change in period from 2 years to 1 years.	The commencement date of this RM changed as a result of the previous changed to preceding RMs. The period allowed for RM9 was change erroneously. This period has now reverted to the approved period in the previous PRCP schedule.	N/A	N/A



Rehabilitation Area (RA)	Rehabilitation Milestone (RM)	Proposed change to schedule	Justification	Proposed change to milestone criteria	Justification
		This NPM response has reverted this period back to 2 years.			
	RM12	N/A	N/A	Sub criteria (b) was amended to be an <i>“Average erosion rate of <5 t/ha/y with the maximum erosion rate at any point on the landform of <10 t/ha/y”,</i> compared to the previously approved <i>“Average erosion rate <5 t/ha/yr”</i>. Sub criteria (l), previously approved in the PRCP schedule was removed in the amended PRCP. In this NPM response,	The erosion target was changed to be consistent with industry best practice. The addition to the MC will provide improved environmental outcomes. It does not change any rehabilitation method previously proposed. The criteria was deemed to be superfluous and a duplication of the other seepage rate criteria. It has been added back into this revised schedule, for completeness.



Rehabilitation Area (RA)	Rehabilitation Milestone (RM)	Proposed change to schedule	Justification	Proposed change to milestone criteria	Justification
RA7				the criteria has been reintroduced to RM12.	
	RM14	N/A	N/A	N/A	N/A
	RM1	N/A	N/A	N/A	N/A
	RM2	N/A	N/A	N/A	N/A
	RM8	N/A	N/A	N/A	N/A
	RM9	N/A	N/A	N/A	N/A
	RM10	N/A	N/A	N/A	N/A
	RM12	N/A	N/A	N/A	N/A
	RM14	N/A	N/A	N/A	N/A

