

15 July 2021

Commercial-in-Confidence

Morag Elliot
Manager
Development Assessment Division, Planning Group
Department of State Development, Infrastructure, Local Government and Planning
PO Box 15009
City East QLD 4002

Dear Morag,

Regional Interest Development Approval - Response to Requirement Notice (RPI21/001 BMA - Saraji East)

We refer to the regional interest development approval (RIDA) application for the construction of a new overhead 66 kilovolt (kV) powerline for the Saraji East Mining Lease Project (SEMLP) (the Project) over Lot 101 on SP310393 within the strategic cropping area (SCA). The RIDA application was made on 8 February 2021 under the *Regional Planning Interests Act 2014* (RPI Act).

A requirement notice received on 22 February 2021 from the Department of State Development, Infrastructure, Local Government and Planning (DSDILGP) (the department) requested the applicant undertake public notification and provide further information for assessment against the SCA criteria.

A meeting was held on 16 March 2021, to discuss particular items in the requirement notice. This letter provides a response to the issues identified within the DSDILGP requirement notice.

Response to public notification requirements

Pursuant to section 55(2) of the RPI Act, it has been determined that the application requires notification. The reason for the decision is that the delegate for the chief executive has determined that it is in the public interest for the application to be publicly notified.

In accordance with section 35 of the RPI Act, the applicant is required to publish a notice about the application in the way prescribed in section 13 of the Regional Planning Interests Regulation 2014 (RPI Regulation) and give the owners of the land notice about the application.

Public notification must commence within 10 business days of providing the information required to assist in the assessment of the application, as set out below.

The notification period is 15 business days, with the closing date being the day that is after the end of the notification period. The approved form for public notification is available on the DSDILGP's website.

Public notification will commence within 10 business days of providing this information response to DSDILGP. Public notification will be via the Courier Mail for a total notification period of 15 days, with the closing date being the day that is after the end of the notification period.

Response to issue item 1 – Assessment application details, RIDA Report

Clarify the total mapped SCL within Lot 101 on SP310393, the property subject to this application, as per the Department of Resource SCL trigger map.

The total mapped SCL, as per the Department of Resource (DoR) SCL trigger map, within Lot 101 on SP310393, is 3,306 ha. This is as described within Table 7, page 29 of the Revised RIDA Report (Attachment A). This includes mapped SCL that is not subject to the SCL Assessment. Not all mapped SCL, as per the DoR SCL trigger map, within Lot 101 on SP310393 is subject to the SCL Assessment.

The total mapped SCL, as per the DoR SCL trigger map within the 'SCL Assessment Area' on Lot 101 on SP310393, is 1,973.54 ha. This is as described in Table 1, page 3 of the Revised RIDA Report

(Attachment A). The 'SCL Assessment Area' represents the 'Project Site' within Lot 101 on SP310393, and is the area subject to assessment within the Revised SCL Assessment Report (Attachment B).

Based on the findings of the Revised SCL Assessment Report (Attachment B), of the 1,973.54 ha of mapped SCL within the 'SCL Assessment Area' on Lot 101 on SP310393, 1,439.13 ha is considered to represent verified SCL and 534.41 ha is considered to represent non-SCL area.

As described within Table 7, page 29 of the Revised RIDA Report (Attachment A), the 'Proposed Activity Footprint' covers approximately 20.4 ha (35 m wide corridor for approximately 6.02 km) (0.62% of the SCL on the property), comprising:

- 13.45 ha considered to represent verified SCL (0.41% of the SCL on the property)
- 6.96 ha considered to represent non-SCL area (0.21% of the SCL on the property).

The differences between the 'Project Site', 'Proposed Activity Footprint' and 'SCL Assessment Area', are described in Section 2.2, page 5 of the Revised RIDA Report (Attachment A).

Response to issue item 2 – SCL Assessment report

(a) Confirm ESP and Ca:Mg for Map Units 2, 6, 10, 11 and 14 as summarised in the SCL Assessment Report, as the values appear to be reversed in the Report's tables compared to laboratory certificates.

Response to action (a)

The map unit descriptions and analytical data of the Revised SCL Assessment Report (Attachment B), have been reviewed and updated to reflect the ESP and Ca:Mg for the described map units as identified in the laboratory certificates included within Appendix E of the report.

Australian Soil Classification of Map Unit polygons have been reviewed and amended where required. For Map Unit 2, ESP and Ca/Mg ratio amendments have been made to Tables 3-13, 3-14 and 3-15 of the Revised SCL Assessment Report (Attachment B). Review of the soil profile (PSA) and ESP results have updated the map unit 2 ASC to Sodosol. All other map units have been reviewed.

(b) Provide further evidence to support the inconsistencies between the surface photographs showing that there is potentially a cracking vertosol (non-rigid soil), soil classification and laboratory particle size distribution for N5, N8, N9, N24, N25, N26, N27, 32-SCL, 80-SCL.

Response to action (b)

The soil particle size analysis (PSA) was assessed against the Marshall soil texture chart as per the National Committee on Soil and Terrain (NCST) (2009) for the sites in the Revised SCL Assessment Report (Attachment B). Based on this assessment and soil chemistry results for each site, further evidence is provided for the following sites to support soil classification:

- N5 / N9 – PSA indicates clay % below 35% on surface and therefore not throughout, surface is not cracking, soil classification is not vertosol. Refer to Attachment B, Table 3-33.
- N8 - PSA indicates clay % below 35% on surface and therefore not throughout, surface is not cracking, soil classification is not vertosol. Refer to Attachment B, Table 3-5.
- N24 / N25 - PSA indicates clay % marginally below 35% on surface, surface is not cracking (by definition of at least 5mm), soil classification is not considered a vertosol. Refer to Attachment B, Table 3-80.
- N26 - PSA indicates clay % marginally below 35% on surface and therefore not throughout, surface has minor crust but not cracking (not by definition of at least 5mm), soil classification is not considered a vertosol. Refer to Attachment B, Table 3-132.
- N27 / 32-scl / 80-scl - PSA indicates clay % below 35% on surface and therefore not throughout, surface has minor cracking (not by definition of at least 5mm) and cracking is not consistent, soil classification is not considered a vertosol. Refer to Attachment B, Table 3-40.

(c) Revise all sites and define which ones are cracking according to (NCST, 2009) to clearly determine which soils are rigid and non-rigid. This will enable a reliable Australian Soil Classification to be assigned to all sites. Any changes to the current report classifications will need to be reflected in any revised Restoration Plan.

Response to action (c)

All detailed and check site surfaces fieldnotes and photos have been reviewed, with necessary amendments made (no track changes recorded). Please refer to Appendix A and B of the Revised SCL Assessment Report (Attachment B). Reference to the RPI Regulation (2014) and The Australian Soils Classification, Third Edition (2021), has been included where required.

The Revised SCL Assessment Report (Attachment B) has been reviewed and updated to provide better accuracy and reduce inconsistencies regarding the type of soils per site, particularly regarding rigid and non-rigid soils. The updates include revision of detailed and check sites to clearly identify cracking soils as defined within the NCST, 2009. Updates to the Revised SCL Assessment Report (Attachment B) have been incorporated into the Revised Restoration Plan (Attachment C).

(d) Confirm or clarify why sample depths do not match laboratory depths for N37, sampling appears to have occurred across horizon boundary of A11/A12 (report Appendix A surface horizon is 0.0-0.04, report table is 0.00-0.10 and laboratory certificate is 0.0-0.1). Additionally, samples recovered at non-standard depths 0.55-0.65m and 0.75-0.85m are not reflected in Table 3-31.

Response to action (d)

Sample depths have been reviewed. A11 horizon depth boundary has been amended in the SCL Assessment Report (Attachment B) and Appendix A of that report, to 0.00-0.05m. No sampling across a horizon has been undertaken. Refer to Attachment B, Table 3-90.

Samples were recovered for Site N9 at those non-standard depths based on horizons encountered. Based on pH exceedance from 0.55-0.65mbgl to 1.0m, the sample depths are considered acceptable. Refer to the Revised SCL Assessment Report (Attachment B), Table 3-36.

(e) Confirm or clarify why sample depths do not match laboratory depths for N9 (report Appendix A surface horizon is 0.0-0.09, report table is 0.00-0.10 and laboratory certificate is 0.0-0.05).

Response to action (e)

The sample depth and laboratory certificate have been amended to present N9-0.0-0.09. Discrepancy was due to a typo. Refer to the Revised SCL Assessment Report (Attachment B), Table 3-36.

(f) Clarify why non-standard sample depths were chosen for analysis at sites N19, N25, N26 and 102-SCL as descriptions of horizon depths (Appendix A) do not appear to have required them, e.g., at N26 a sample was taken at 0.83-0.9m from a horizon described as extending from 0.33-0.9m.

Response to action (f)

Review of the following sites have been undertaken and updated in the Refer to the Revised SCL Assessment Report (Attachment B):

- N19 – soil profile ends at 0.95mbgl, not 1.00m. Typo error has been corrected. Sample selected to capture analysis at end of borehole.
- N25 – 0.22-0.30 was a typo error. Typo error has been corrected to 0.20-0.30 in laboratory certificate.

- N26 – sample 0.83-0.90 was a typo error. Typo error has been corrected to 0.80-0.90 in laboratory certificate.

A review has been undertaken for site 102-SCL for both mound and depression. Five samples were collected within the horizons, including key depths 0.20-0.30 and 0.50-0.60.

(g) Clarify the rigid/non-rigid status of sites N24 and N25 in Map Unit 11. Both are described as having cracking surfaces and N25 appears to be exhibiting vertic properties in photographic evidence provided.

Response to action (g)

The two sites N24 and N25 (as well as N23, part of the Map Unit) were reviewed against vertic properties (R.F. Isbell, 2021). GT Environment conclude that site N24 is marginally close to being a vertosol, however on review of the surface, the cracking observed is not consistent with the definition. It is more than likely a thin crust than consistent cracking on the surface however the solum is not 35% throughout.

Refer to the Revised SCL Assessment Report (Attachment B), Section 3.11, page 54.

(h) Provide further evidence of the presence/absence of SCL in Map Unit 14. Provide clarity about the SCL status of sites 9-SCL and 97-SCL as they are not discussed in the SCL Assessment Report.

Response to action (h)

Further fieldwork has been undertaken within Map Unit 14 to support the accuracy of site information.

For Map Unit 14, site 97-SCL was inspected causing the northern boundary of the Map Unit to be moved south of the site 97-SCL. Additional detailed check sites (augured more than 0.3 metres (m)) were conducted to confirm the boundary of Map Unit 14. Upon review, site 97-SCL indicated that the site was part of Map Unit 6 and the boundary of Map Unit 14 was incorrect. This has been amended with the site now used as a Map Unit polygon boundary site.

Site 9-SCL has been identified as a sub-dominant soil type in an area less than 10 ha. Upon inspection of site 9-SCL a transect was carried out that aggregated the eastern portion of the site to be part of Map Unit 14 and the western portion form part of Map Unit 13. Detailed check sites were also undertaken which defined a new boundary for Map Unit 14 and Map Unit 13.

Subsequent to the fieldwork completed for Map Unit 14, no further site or laboratory analysis was deemed necessary. The newly gathered fieldwork data was considered sufficient in order to update spatial data and figures.

Refer to the Revised SCL Assessment Report (Attachment B), Section 3.14, page 66.

Response to issue item 3 – Map Unit 6

- (a) Confirm the extent of compliant SCL and non-compliant SCL within Map Unit 6, focusing the additional analytical sites within the area depicted in Figure 1. All Map Units still need to conform with the required site density of Table 3 of the RPI Act Guideline 08/14.
- (b) If additional areas of SCL (more than 10 ha) and Map Units are identified within Map Unit 6, provide additional analytical sites to confirm the SCL compliance of the remaining areas of the Map Unit.

Response to actions (a) and (b)

Map Unit 6 was re-assessed based on the area and surrounding areas. Refer to the Revised SCL Assessment Report (Attachment B), Section 3.6, page 32.

Map Unit 18 containing site 77-scl as well as five additional detailed sites were assessed during the fieldwork, with two of those sites being analysed. Sites were observed to be a black dermosol and

grouped together. The extent of the compliant SCL within Map Unit 18, which includes Site 77-SCL was mapped at 5.6 ha, which is less than 10 ha based on surrounding check, detailed and non-SCL compliant analytical sites. Refer to the Revised SCL Assessment Report (Attachment B), Section 3.18, page 83. Please refer to Figure 1 for reference.

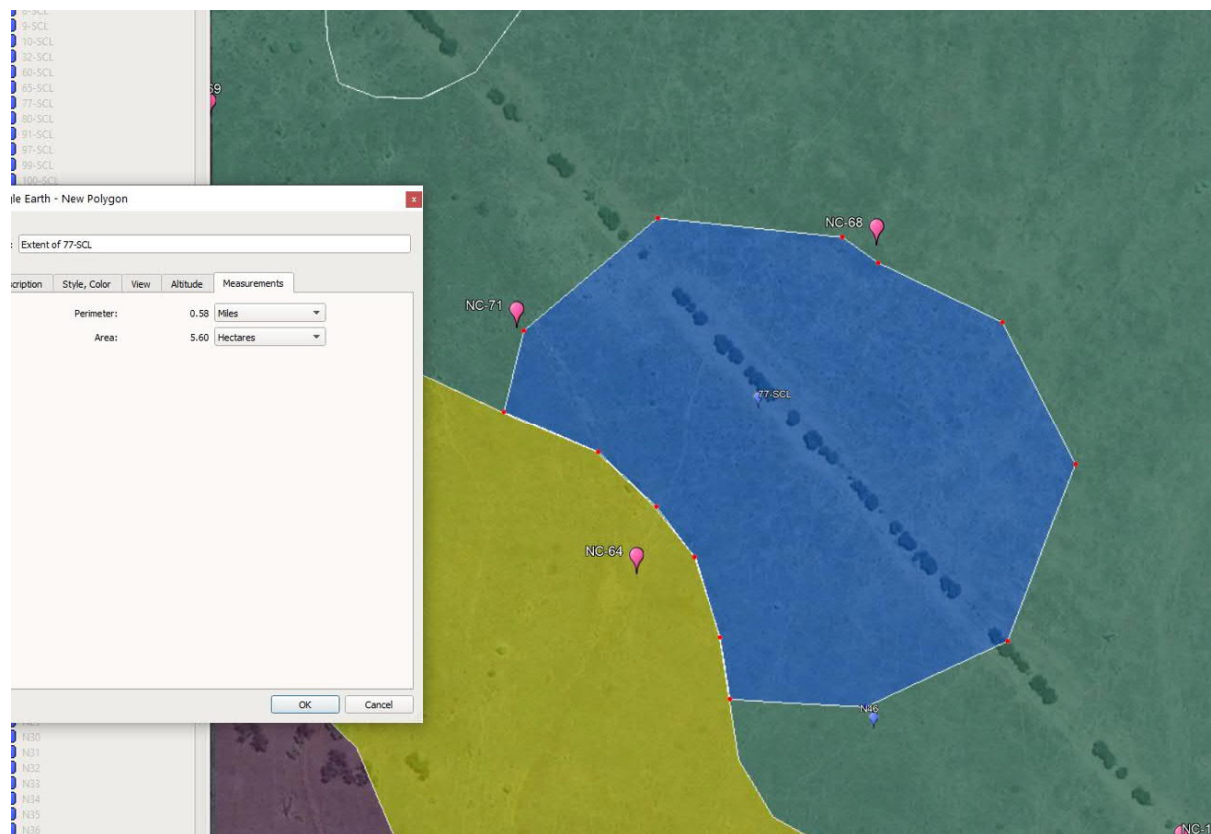


Figure 1 - 77-SCL

Map Unit 19 was located to the north of Map Unit 18 and consists of a dark self-mulching, cracking clay soil. Refer to the Revised SCL Assessment Report (Attachment B), Section 3.19, page 88.

Map Unit 20 was located to the west, south west of Map Unit 18 consisting of a dark self-mulching clay soil. Refer to the Revised SCL Assessment Report (Attachment B), Section 3.20, page 92.

Two sub-dominant soil types were observed less than 10 ha and aggregated into adjacent Map Unit polygons. This included a microrelief located to the south east of Map Unit 20 and texture contrast loam soil located in north east of Map Unit 6.

All other Map Unit boundaries were reviewed and Map Unit boundaries amended where required.

Response to issue item 4 - LiDAR DEM

Provide a LiDAR DEM for the assessment area to enable a more accurate assessment of the soil boundaries (only if already in existence for the assessment area).

Limited LiDAR DEM for the assessment area is available (covering only a very small portion of the SCL Assessment Area). The limited nature of the existing LiDAR DEM is unlikely to assist with the assessment of the soil boundaries.

Response to issue item 5 – Assessment against required outcome 3 (RO3), RIDA Report

Provide an assessment of the proposed activity against RO3, to demonstrate the proposed activity will not result in a material impact on SCL in SCA.

A detailed assessment has been undertaken against RO3, as included within Table 7, page 29 of the Revised RIDA Report (Attachment A).

Overall, the proposed activity is not considered to result in a material impact on strategic cropping land. The proposed activity is temporary in nature, has been minimised to the greatest extent possible, has been appropriately located (adjacent to existing infrastructure) and is consistent with the envisaged land use for the locality and region based on the regional policies and plan.

As described within the Revised Restoration Plan (Attachment C), the proposed activity will ultimately be removed and the land subject to the area of impact of the Proposed Activity Footprint will be restored to its pre-activity condition.

Response to issue item 6 – Supporting information of the Restoration Plan

- (a) Provide all supporting information referred to in the Restoration Plan, and include:
- 1) maps identifying the location of the field sites used to collect data.
 - 2) maps identifying the location of the footprint of disturbance at a local and property level scale, stockpiling locations over the 30-year period including relevant map layers and associated GPS points i.e. The Department of Resources' SCL Trigger Map and proposed Trigger Map
 - 3) all laboratory analysis of soil data in the rehabilitation plan. This can form part of the Appendix as required.

Response to action (a)

The Revised Restoration Plan (Appendix C) has been updated to include Figure 1, page 30 which depicts the location of the field sites and the Proposed Activity Footprint/disturbance footprint of the proposed powerline. Further the Revised Restoration Plan (Attachment C) references and attaches the Revised SCL Assessment (Attachment B).

As described in section 4.2.1, page 10 of the Revised Restoration Plan (Attachment C), the proposed activity does not require stockpiling of soils. Section 4.2.1, page 10 of the Revised Restoration Plan (Attachment C) has been updated with further details on the proposed activity, consistent with the Revised RIDA Report (Attachment A). Section 4.2, page 9 of the Revised Restoration Plan (Attachment C) details the maximum anticipated extent of disturbance or temporary impact.

As much detail as currently available has been provided to inform the assessment, including conservative assumptions where necessary. The level of detail provided on the proposed activity in this section of the Restoration Plan was provided to the department via email prior to finalisation of the restoration plan.

As described in section 3.4.1, page 8 of the Revised Restoration Plan (Attachment C), all laboratory analysis and data is included within the Revised SCL Assessment Report (Attachment B) which is also included within Appendix A of the Revised Restoration Plan (Attachment C).

- (b) Update Table 4 to be consistent with any updated mapping, and fix errors and inconsistencies between the SCL Assessment Report and the Restoration Plan.

Response to action (b)

Table 12 (former Table 4), page 17 of the Revised Restoration Plan (Attachment C) has been updated to be consistent with the updated mapping and the inconsistencies identified by DSDILGP. Table 12, page 17 of the Revised Restoration Plan (Attachment C) is consistent with the mapping and findings of the Revised SCL Assessment Report (Attachment B).

- (c) Provide the limitation values and subclass rules for the land management options that have been used to formulate Table 4 and specify which specific crops have been assessed in the land suitability assessment.

Response to action (c)

Section 4.3.1, page 14 of the Revised Restoration Plan (Attachment C) details the limitation values and subclass rules used for land management options provided in Tables 7-12, ensuring adherence to the methodology documented in the Guidelines for Agricultural Land Evaluation in Queensland (DSITI & DNRM 2015).

Table 7, page 15 of the Revised Restoration Plan (Attachment C) specifies the crops assessed in the soils and land suitability assessment, including all thirteen crops nominated from the Regional Frameworks including barley (dryland), chickpea (dryland), cotton (furrow irrigated), Maize (dryland), millet (dryland) mungbean (dryland), oat (dryland), safflower (dryland), sorghum (dryland), soybean (dryland) sunflower (dryland) Triticale (dryland) and wheat (dryland).

(d) Confirm the extent of the actual disturbance footprint (i.e., roads, temporary and permanent which may cause compaction) for installation and removal of the powerline to ensure that the footprint does not extend into compliant SCL (outside of the disturbance footprint).

Response to action (d)

The Proposed Activity Footprint relevant to this assessment application is a 35 m wide corridor approximately 6.02 km long with a total area of 20.4 ha. The Proposed Activity Footprint is located within the SCL trigger map, which is the area required for the construction and operation of the proposed activity. The Proposed Activity Footprint sits adjacent to and follows the alignment of existing easements that traverse the SCA; directly abutting the westernmost existing easement.

The maximum anticipated disturbance relates to the full extent of the Proposed Activity Footprint, covering approximately 20.4 ha (35 m wide corridor for approximately 6.02 km) (0.62% of the SCL on the property), comprising:

- 13.45 ha verified SCL (0.41% of the SCL on the property)
- 6.96 ha non-SCL area (0.21% of the SCL on the property).

Notwithstanding, impacts are expected to be much less with the large majority of impacts expected to occur in relation to the construction and maintenance of powerline poles and access tracks. This is outlined in detail within Section 4.3, page 19 of the Revised RIDA Report (Attachment A). These concentrated works within the Proposed Activity Footprint within Lot 101 on SP310393 are estimated to be approximately:

- 1.64 ha within verified SCL
- 0.86 ha within non-SCL.

Section 4.2.1, page 10 of the Revised Restoration Plan (Attachment C) has been updated with further details on the proposed activity, consistent with the Revised RIDA Report (Attachment A). Section 4.2, page 9 of the Revised Restoration Plan (Attachment C) details the maximum anticipated extent of disturbance or temporary impact. The Proposed Activity Footprint (purple overlay) is depicted in Figure 1, page 30 of the Revised Restoration Plan (Attachment C).

As much detail as currently available has been provided to inform the assessment, including conservative assumptions where necessary. The level of detail provided on the proposed activity in this section of the Restoration Plan was provided to the department via email prior to finalisation of the restoration plan.

The exact placement location of powerline poles cannot be confirmed at this stage; however, a worst-case scenario quantity and total disturbance area is provided.

(e) Update Table 7, and incorporate more accurate recommendations regarding land degradation issues, particularly erosion, compaction, and salinity. An Erosion and Sediment Control Plan designed by a suitably qualified and experienced person which outlines proposed measures during the construction and operation phases of the disturbance is recommended as a component of the Restoration Plan.

Response to action (e)

Table 16, section 4.4.5, page 23 of the Revised Restoration Plan (Attachment C) has been updated to include more accurate recommendation particularly where ripping of topsoils and subsoils will be undertaken. Section 4.4.7, page 25 of the Revised Restoration Plan (Attachment C) includes the preparation of an ESCP by a suitably qualified and experienced person.

Response to issue item 7 – Site Environment of the Restoration Plan

For each of the sites referred to as pre-clear reference sites, consider including in section 3 a summary of the following from the field data collected and lab analysis:

- (a) terrain, landform, and slope
- (b) site lithology
- (c) current land use
- (d) previous site disturbance and modification
- (e) site and soil hydrology
- (f) soil surface condition
- (g) vegetation and groundcover, including crops
- (h) microrelief
- (i) soil depth (including depths >1 metre)
- (j) soil profile descriptions, incl. for each horizon or layer.

Section 3.4.1, page 7, Table 2 of the Revised Restoration Plan (Attachment C) has been updated to include a summary of site-specific attributes for the soil mapping units (SMUs) referred to as pre-clear or pre-activity sites, to better understand the condition of the land. As per the RPI Act Statutory Guideline 09/14, the pre-clear / pre-activity site conditions are described with the inclusion of the following:

- terrain, landform, and slope
- site lithology
- current land use
- previous site disturbance and modification
- site and soil hydrology
- soil surface condition
- vegetation and groundcover, including crops
- microrelief
- soil depth (including depths >1 metre)
- soil profile descriptions, incl. for each horizon or layer.

Response to issue item 8 – Soil Mapping Units of the Restoration Plan

Include in the Restoration Plan, representative maps and GPS data where each of the polygons were taken from.

Note: Consider referring to the field data in support of the soil types noted in this section for each of the polygons referenced.

Section 3.4, page 6 of the Revised Restoration Plan (Attachment C) has been updated to include Table 3 – Survey data for pre-clear reference sites. Further the Revised Restoration Plan (Attachment C) references and attaches the Revised SCL Assessment (Attachment B).

Soil Mapping Units are depicted in Figure 1, page 30 of the Revised Restoration Plan (Attachment C).

Response to issue item 9 – Assessment application details, RIDA Report

Confirm the correct figures and amend the reports as required.

The total mapped SCL, as per the Department of Resource (DoR) SCL trigger map, within Lot 101 on SP310393, is 3,306 ha. This is as described within Table 7, page 29 of the Revised RIDA Report (Attachment A). This includes mapped SCL that is not subject to the SCL Assessment. Not all mapped SCL, as per the DoR SCL trigger map, within Lot 101 on SP310393 is subject to the SCL Assessment.

The total mapped SCL, as per the DoR SCL trigger map within the 'SCL Assessment Area' on Lot 101 on SP310393, is 1,973.54 ha. This is as described in Table 1, page 3 of the Revised RIDA Report (Attachment A). The 'SCL Assessment Area' represents the 'Project Site' within Lot 101 on SP310393, and is the area subject to assessment within the SCL Assessment Report (Attachment B).

Based on the findings of the Revised SCL Assessment Report (Attachment B), of the 1,973.54 ha of mapped SCL within the 'SCL Assessment Area' on Lot 101 on SP310393, 1,439.13 ha is considered to represent verified SCL and 534.41 ha is considered to represent non-SCL area.

As described within Table 7, page 29 of the Revised RIDA Report (Attachment A), the 'Proposed Activity Footprint' covers approximately 20.4 ha (35 m wide corridor for approximately 6.02 km) (0.62% of the SCL on the property), comprising:

- 13.45 ha considered to represent verified SCL (0.41% of the SCL on the property)
- 6.96 ha considered to represent non-SCL area (0.21% of the SCL on the property).

The differences between the 'Project Site', 'Proposed Activity Footprint' and 'SCL Assessment Area', are described in Section 2.2, page 5 of the Revised RIDA Report (Attachment A).

Table 5 (former Table 2), page 10 of the Revised Restoration Plan (Attachment C) has been updated to ensure consistency with the Revised RIDA Report (Attachment A).

Response to issue item 10 – Proposed Disturbance Activity of the Restoration Plan

Provide:

- (a) designs of the proposed infrastructure as well as proposed laydown areas for the construction of the infrastructure if any of the works falls outside of the transmission corridor
- (b) mapping of the proposed alignment and placement of poles
- (c) provide GPS data, if available, of location of transmission poles
- (d) proposed access routes to and from the site
- (e) likely risks to SCL, including for example, compaction, weed introduction, erosion, mixing of soil profile and any other state or federal values which may be impacted to which an authority applies or is required.

Response to action (a)-(e)

Section 4.2.1, page 10 of the Revised Restoration Plan (Attachment C) has been updated with further details on the proposed activity, consistent with the Revised RIDA Report (Attachment A). Section 4.2, page 9 of the Revised Restoration Plan (Attachment C) details the maximum anticipated extent of disturbance or temporary impact. The Proposed Activity Footprint (purple overlay) is depicted in Figure 1, page 30 of the Revised Restoration Plan (Attachment C).

As much detail as currently available has been provided to inform the assessment, including conservative assumptions where necessary. The level of detail provided on the proposed activity in this section of the Restoration Plan was provided to the department via email prior to finalisation of the restoration plan.

The exact placement location of powerline poles cannot be confirmed at this stage; however, a worst-case scenario quantity and total disturbance area is provided. This is outlined in detail within Section 4.3, page 19 of the Revised RIDA Report (Attachment A).

Access to the Proposed Activity site will be available with the following three options that would be utilised based on convenience and efficiency at the time:

- Via Dysart-Moranbah Road or Saraji Road, which is the main access route to the Saraji mine located to the north of the Project Site, and through to the existing infrastructure easement, or
- Via the existing infrastructure easement from the south of the Project Site where the easement intersects Golden Mile Road, or
- Via the easement crossing Lake Vermont Road to the east of the Project Site.

An additional section (Section 4.2.2, page 14) has been added to the Revised Restoration Plan (Attachment C) to specifically address potential risks to SCL.

Response to issue item 11 – Restoration Plan references

Amend references to 'DNRM' and 'DNRME' to the Department of Resource (Resources).

References to 'DNRME' have been amended to Department of Resources (DoR) throughout the Revised Restoration Plan (Attachment C) where necessary. Some guideline references retain former department abbreviations.

Response to issue item 12 – Restoration Milestones, Actions, Estimated Schedule and Cost Estimates of the Restoration Plan

Include in Table 6:

- (a) in the Estimated Time Frame (Months) column, the Restoration Plan should clarify when the associated restoration milestones will commence. For example, are the works proposed to commence once the mining operations associated with an Environmental Authority cease
- (b) evidence as to the source of the estimated costs to ensure costing reflects current rates.
- (c) the proposed interest rate within the estimated costs, indexing to adequately cover costs in 50 years' time
- (d) further information on proposed vegetation restoration reference sites in which rehabilitated vegetation will be restored to. Further information should be included to identify possible reference sites, which will be used to inform when the restoration milestones will be met. This additional information could be included in greater detail in section 4.4.5 Revegetation of the Restoration Plan
- (e) contingency costs if any of the sites are unable to be rehabilitated to their preclear condition.

Response to action (a)-(e):

Table 14 (former Table 6), page 20 and the relevant sections of the Revised Restoration Plan (Appendix C) have been updated to include:

- Estimated commencement of restoration work.
- Commencement month for each milestone, shown in sequence.
- Line item added (in Section 4.4.2, page 20, para 4) stating, *'Estimated costs are based on supplied costs by the client, based on current rates and similar projects. To establish indicative costs for 50 years' time for illustrative purposes, various cost escalation rates can be nominally applied. For example, a 0.8% per annum escalation rate over a 50-year period would equate to an overall cost escalation factor of 40%, which can be applied to the current rates outlined in Table 14 below. This approach is considered to provide a reasonable estimate of future restoration costs, suffice for the purpose of this Restoration Plan'*.

- Link within Table 14 to section 4.4.5, page 22 and Table 15, page 23 which provides a summary of the vegetation observed at the pre-clear reference sites during fieldworks. Reference of vegetation was to be obtained by reviewing land systems information (Story et. al, 1967), however the vegetation is based on returning the disturbed areas to the current land use of grazing, hence forage crops and vegetation recommended.
- Line item added (in Section 4.4.2, page 20, para 5) stating, '*Contingency costs for any sites that are unable to be restored to the pre-activity condition and/or productive capacity shall be 10% of the total cost, calculated for 2020.*'

Response to issue item 13 – Monitoring Program for Restoration Plan

Amend Table 8 to include:

- (a) time frames for the reporting associated with the monitoring. These timeframes need to be auditable
- (b) the sites where the monitoring is to take place. These should be representative of the area
- (c) notification to the Department of Resources when the restoration works are to commence
- (d) Annual monitoring reports to be submitted to the Department of Resources
- (e) Alternate mitigation strategies committed too, if any of the restoration sites are unable to be restored, to their pre disturbance condition.

Response to actions (a)-(e)

Table 17 (former Table 8), page 26 of the Revised Restoration Plan (Appendix C) has been updated to include:

- auditable timeframes where reporting is required
- nominated monitoring sites
- notification requirements
- requirement for annual monitoring reports
- requirement to investigate alternate mitigation strategies if restoration sites are unable to be returned to their pre-activity condition.

It is considered that this response and the updates to the relevant documents adequately address the issues listed in the requirement notice issued by the department on 22 February 2021.

Public notification requirements will be actioned within 10 days of this response for a total notification period of 15 business days.

If you have any questions regarding the attached, please do not hesitate to contact me on the details below.

Yours faithfully



Chris Adamson

Principal Environmental Planner

M +61 466 297 395

chris.adamson@aecom.com

cc Brett Garner, Brett.Garner@bhp.com
Andrew Isaac, andyisaac1@outlook.com

enc Attachment A Revised RIDA Report
Attachment B Revised SCL Assessment report
Attachment C Revised Restoration Plan