Whitehaven

To:	Department of Environment, Tourism, Science and Innovation	**From:**	Whitehaven Daunia Pty Ltd
Attn:	Ben Byrd	**Date:**	5 June 2026

RE: Information request for the application to amend EPML00561913 – Response

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Dear Ben,

The purpose of this document is to address the Information Request (IR) relating to the application to amend the Environmental Authority (EA) EPML00561913 for the Daunia West Infrastructure Project (the Project).

The EA amendment was submitted by Whitehaven Daunia Pty Ltd (Whitehaven) to the Department of Environment, Tourism, Science and Innovation (DETSI) on 11 December 2025. The application reference number is A-EA-AMD-100993886 and is relevant to the Mining Leases (MLs) ML 1781, ML 70115, ML 70116 and ML 700085. A formal IR notice was issued by DETSI on 12 February 2026.

Responses to each of the requested items related to the EA Amendment Application are listed in '*Attachment 1: Information Requested for EA Amendment'.* The revised Supporting Documentation including technical assessments have been provided as part of this submission.

An associated Progressive Rehabilitation and Closure Plan (PRCP) Amendment Application and Change Application Request was submitted for the Project on 23rd April 2026. An updated IR notice for the Project incorporating the PRCP Amendment Application was issued by DETSI on 8th May 2026. The revised PRCP Documentation including technical assessments and an updated PRCP Schedule has been included as part of this submission.

Responses to each of the requested items related to the PRCP Amendment Application are listed in '*Attachment 2: Information Requested for PRCP Amendment'.*

We trust that the updated information addresses the DETSI IR, and that DETSI can proceed with assessing the application.

Kind regards,

Brendan Dillon
Approvals – Manager

Attachment 1: Information Requested for EA Amendment

#	Matter	Information Requested	Response	Reference to Update in Supporting Document
	General			
1	The department did not receive a revised '*Environmental Authority Amendment Supporting Document*' (SLR 2025) ('supporting document') with the change request received on 23 April 2026. A revised supporting document must be provided which removes all contradictions between the supporting document and the PRCP schedule amendment application materials. This includes, but is not limited to: • Replacement of statements discussing the future 'PRCP amendment application' or similar with descriptions of the joint application the subject of the change. • Where relevant, citation / reference to the PRCP schedule amendment materials to avoid contradiction. For example, Section 4.0 Rehabilitation cites Table E1 – Rehabilitation Requirements of the EA, which has now been superseded by the PRCP Schedule and is the subject of the PRCP schedule amendment materials. In addition, the application materials now include potentially overlapping appendices between the original application and the amended PRCP (e.g., groundwater impact assessment, and groundwater modelling report vs the PRPC hydrogeology report). It is unclear how these competing appendices should interact, and this must be clarified in a revised supporting document and all contradictions removed. Note: where the information request items below require clarification or further information in relation to contents or technical studies which have been relied upon to inform the PRC Plan and its appendices, the PRC Plan and appendices must be amended to address the matters raised.	Provide a revised supporting document which: (a) Reflects the joint nature of the application and (b) Includes the necessary references to the PRCP schedule amendment materials where these supersede the information previously provided. (c) Clarifies the intent of the various appendices and describe interactions between appendices where these overlap. Note: Ensure that any clarification or further information provided in response to the below items is reflected in the PRC Plan and the relevant appendices.	The Supporting Document has been revised throughout to reflect the joint nature of the application with the proposed PRCP.	Supporting Document.
2	Section 3.2.1 Introduction of the Environmental Authority Amendment Supporting Document: Daunia West Infrastructure Project ('supporting document') (SLR 2025a, p. 42) states: *The Project Area and disturbance footprint is shown in Figure 3-9. The Project Area spans 504 hectares (ha), of which, 325 ha is comprised of the direct disturbance footprint. Approximately 61 ha of the OOPD is located on the existing DNM ML, ML 1781.* However, this is later contradicted in Section 3.2.3.1 Out-of-Pit Dump which states: *The OOPD footprint is proposed to disturb 363 ha, a portion of which (61 ha) will be located on the existing and authorised ML 1781.* This inconsistency is noted to carry across to various appendices (e.g., Appendix G – Soil and Land Resources Assessment Report, etc). Furthermore, the supporting document does not describe the maximum extent of disturbance proposed and authorised for the existing mining activities. In the absence of this information, the department is unable to precisely specify the relevant area subject to the amendment application.	Provide the following: (a) Clarification regarding the proposed extent of disturbance for the Project disturbance footprint. (b) Clarification of the proposed and authorised extent of disturbance for the existing mining activities. (c) Revised supporting document and appendices which consistently describe the extent of disturbance. (d) Spatial data for all disturbance domains for the site, inclusive of the existing domains and proposed Project disturbance domains. (e) A table which clearly itemises the disturbance domains for both the existing and proposed disturbance footprint (e.g., OOPD, haul roads, access roads, mine affected water dams, clean water dams, etc) and the proposed disturbance footprint of each domain.	a) The proposed extent of the disturbance footprint for the Project disturbance footprint is 305 hectares (ha). b) There is no proposed change to the extent of authorised disturbance for the **existing** mining activities. An increase in the ROM rate is proposed, which does relate to existing mining activities on ML 1781. However, this does not reflect a change in mining activities or extent of mining disturbance, rather it is the result of an increase in the intensity of existing mining activities. No existing mining activities are currently authorised within the Project Area, and as such, no extent of disturbance is currently authorised. The proposed extent of disturbance for the Project is provided in Figure 1-3 of the Supporting Document. c) Please refer to attached Supporting Document. d) Spatial data for disturbance domains are attached. e) The table below itemises the disturbance domains for the existing and proposed footprint.	(a) Not applicable. (b) Not applicable. (c) Supporting Document. (d) Daunia Mine - DNM_Disturbance Domain_GDA2020Zone55 Project - DWIProject_Disturbance Domain_GDA2020Zone55 (e) Table provided in adjacent column.

<table>
<tr><th>#</th><th>Matter</th><th>Information Requested</th><th>Response</th><th>Reference to Update in Supporting Document</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><th>Existing disturbance domains</th><th>Proposed disturbance domains</th></tr>
<tr><td>• Access roads
• Active pit
• Cleared
• Coal stockpiles
• Drains
• Excised land
• Exploration
• Haul roads
• Industrial area
• Laydown area
• Process water dams
• Raw water dams
• Recontoured
• Rejects
• Seeded
• Spoil
• Topsoil stockpile – Out of Pit
• Topsoil stockpile – In Pit
• Topsoil stripped
• Topsoiled</td><td>• Haul roads (9 ha in total. Approximately 4.5 ha of the haul road overlaps with the out of pit dump)
• Out of pit dump (282 ha)
• Sediment dam (4 ha)
• Mine affected water dam (14 ha)</td></tr>
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</td><td></td></tr>
<tr><td>3</td><td>The volumes of waste material and rate of deposition into the proposed OOPD does not appear to have been quantified in the supporting document.</td><td>Clarify the:
(a) Total volumes of spoil and waste coal to be deposited within the OOPD; and,

(b) Annual rate of deposition within the OOPD.</td><td>a) The total volume of spoil and waste coal to be deposited within the OOPD is 86,354,000 m^3
b) The annual deposition into the proposed OOPD is provided in Table 3-8 of the Supporting Document.</td><td>Supporting Document; Table 3-8.</td></tr>
<tr><td>4</td><td>In relation to proposed amendment to formalise the Run-of-Mine (ROM) rate, the EA does not currently prescribe a maximum ROM tonnage per annum. The CG's evaluation report states that the Daunia Mine comprises of 'an open cut coal mine on Daunia Mining Lease (ML 1781) generating up to 5.6 mtpa run of mine (ROM) to produce approximately 4 mtpa of product coal for the export market' (p. 12).

While the existing ROM and coal production rates are not described in the body of the supporting document provided with the amendment application, Appendix G - Noise and Vibration Assessment states that the site 'produces up to 6.1 million tonnes per annum (Mtpa) of Run-of-Mine (ROM) coal and has a production capacity of 4.9 Mtpa of product metallurgical coal'.

On the basis of the above information, the extent of existing and previously approved ROM rate is unclear, and the terminology of formalising the ROM rate of 6.5 Mtpa via the current amendment requires clarification. In addition, the proposed product coal output up to 5.2 Mtpa as described in section 3.1.5 of the supporting document appears inconsistent with the previously authorised and assessed levels.</td><td>(a) Provide confirmation in regards to the approvals in place which explicitly authorise the current ROM rates and production capacity, and proposed ROM rates and production capacity.

(b) Clarify the intent of the described formalisation of the ROM rate of 6.5 Mtpa via the current amendment.</td><td>a) As noted by the DETSI, the version of environmental authority EPML00561913 (EA) that is currently approved and the versions of the EA that are now superseded do not identify the authorised tonnes of ROM coal to be extracted from the Daunia Coal Mine.

WHC acknowledges the DETSI's observation that historic application material, such as the Coordinator General's Evaluation Report to the EIS, identified that the Daunia Coal Mine would generate up to 5.6 Mtpa of ROM coal (noting in the CG's report, the reference was made specifically in the context of operations carried out on ML1781 only). The identified ROM rate accorded with the operations for the Daunia Coal Mine at the time the EIS was prepared, and even in subsequent years before operations at the mine were optimised as part of the previous operator's mine planning, and now WHC's ongoing mine planning processes.

The CG's report and the other application material which refers to the ROM rate of 5.6 Mtpa are not 'approvals' that are in place to expressly authorise ROM rates and production capacity.

There is presently no maximum limitation on ROM coal imposed by EA conditions for the Daunia Coal Mine at this time.

b) Having regard to the above, WHC considers it appropriate and desirable as the new operator of the Mine to formally identify an authorised ROM rate in the EA conditions, and is seeking by</td><td>Not applicable.</td></tr>
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#	Matter	Information Requested	Response	Reference to Update in Supporting Document
			way of the amendment application, that maximum limitation to be set at 6.5 Mtpa to account for the proposed approval of the Daunia West Infrastructure Project. This represents a minor, incremental increase to the 5.6 Mtpa figure that is stated in the historic application material for operations previously assessed by the DETSI for the Daunia Coal Mine. The impacts associated with the incremental increase to the ROM coal extraction rate are negligible and have been appropriately addressed for the DETSI's assessment as part of the application material for the Project. WHC considers the formal recognition of the ROM rate in the EA is beneficial for the operator and the DETSI insofar as it removes any ambiguity and gives WHC a clear authorisation to extract up to 6.5 Mtpa of ROM coal. Formal recognition of the ROM rate will also align the EA with other contemporary environmental authorities for mining operations.	
5	Figure 3-17 and 3-18 provide an illustration of the access road to the OOPD extending over land that is not the subject of MLA 700085.	Clarify the location of the proposed haul roads and clarify the access provisions pursuant to the *Mineral Resources Act 1989* where these extend over land that is not subject to the MLA.	The proposed haul roads are located entirely within the Mining Lease Application Area (MLA 700085). Figure 3-17 and Figure 3-18 have been updated to reflect this.	Supporting Document; Figure 3-17; Figure 3-18.
6	Section 10.9.5 describes 'temporary or sacrificial mining voids'.	Provide clarification regarding whether these mine voids are situated in the Project area.	Temporary or sacrificial mining voids are located within the existing DNM MLs as authorised. There will be no mining voids located within the Project Area.	Supporting Document; Section 10.9.5.
	Air Quality			
7	Section 8.2.1 and 8.4 of the supporting information report describe that air quality limits exceedance at the Olive Downs Homestead will be managed under a non-residency agreement. However, this is not listed as a management measure in Section 8.5. In addition, Appendix F – Air Quality Assessment has assessed 15 years of operation; however, Section 3.2.3.1 Out-of-Pit Dump of the supporting information report states '*The life of the OOPD is approximately seven (7) years (up to and including rehabilitation)*'.	(a) Provide an update in relation to the status of the non-residency agreement. (b) Revise the management measures to ensure it is clear that the implementation of a non-residency agreement is proposed as a management measure. (c) Clarify the proposed life of operations for the project and reasons for this inconsistency in the years assessed in Appendix F.	a) The non-residency agreement for the Olive Downs Homestead is continuing to progress in a positive manner. A recent meeting was held with the landholder on 2nd April 2026. The meeting provided an opportunity to discuss the status of the agreement, address key matters, along with confirming the next steps. Engagement with the landholder remains constructive, and discussions are ongoing to support the finalisation of the agreement. b) Management measures revised to include non-residency agreement. c) Clarification of proposed life of operations versus assessment years included within Appendix F.	a) Not applicable. b) Supporting Document; Section 7.5. c) Appendix F; Section 4.2.

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8	The ROM rates considered in Appendix F – Air Quality Assessment are not explicitly stated; therefore, the department is unable to verify if the emissions considered incorporate the proposed ROM and production rates. In addition, Section 4.2 of Appendix F identifies two mining scenarios for the Project that have been assessed: • "*Project Without (BAU [Business as Usual]) Case: The mining of DNM as permitted under current mining approvals; and* • *Project With (BAU) Case: The mining of DNM including the Project.*" It is understood that the Business as Usual (BAU) dust management practices have been considered, and therefore both scenarios are modelled using the same emission factors and assumed dust management practices. The Project refers to mining including the proposed out of pit spoil dump. AED (2025, p. 11) state that '*Detailed mine schedule and haulage model output was provided by WHC In both cases.*' However, Appendix F – Air Quality Assessment does not detail the mine operations for either scenario or specify how they differ.	(a) Clarify the ROM and production rates modelled in Appendix F – Air Quality Assessment. (b) Describe how mine operations vary from current operations in both scenarios to assist in interpreting the results.	a) Additional detail on the ROM and production rates modelled have been included in the Air Quality Assessment. b) Additional explanation on how mine operations vary from current operations included in Air Quality Assessment.	a) Appendix F; Section 4.2. b) Appendix F; Section 4.2.
9	Table A Air Quality Assessment Objectives and Table 2: Summary of Air Quality Assessment Objectives of Appendix F – Air Quality Assessment adopt air quality objectives for PM2.5 from the former version of the Environmental Protection (Air) Policy 2019. However, please note that the Environmental Protection (Air) Amendment Policy 2024, Part 3 Amendments commencing on 1 January 2025, amended the air quality objectives for PM2.5 in the EPP(Air). Accordingly, the objectives in the EPP (Air) for annual average PM2.5 concentration was reduced from 8µg/m3 to 7µg/m3 and the objective for 24 hour averaged PM2.5 concentration was reduced from 25µg/m3 to 20µg/m3.	(a) Provide a revised air quality assessment which provides modelling for PM2.5 concentration using the most recent EPP (Air) objectives. (b) Clarify how the amended PM2.5 objective impacts the results and conclusions regarding predicted PM2.5 exceedances for the project.	a) The Air Quality Assessment has been revised to provide modelling for PM2.5 concentration using the most EPP (Air) objectives. b) The Air Quality Assessment has been amended to include results from the revised modelling of PM2.5 concentration using the most EPP (Air) objectives.	a) Appendix F. b) Appendix F.

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10	Appendix E of Appendix F – Air Quality Assessment states '*Results should not be interpreted as being indicative of environmental outcomes as operations will be required to modify activities in order to comply with the site's current and/or future EA Conditions. Instead, an increase in the predicted number of days for which BAU dust management strategies may be insufficient to ensure compliance with EA requirements*' (AED 2025, p. 39). The results presented in Appendix E of Appendix F predict that the mine will contribute to air quality objectives being exceeded, at sensitive receptors, for dust deposition PM10 and PM2.5. In this context, 'business as usual' refers to dust mitigation strategies that are common practice such as watering haul roads etc as identified in section 4.3 of Appendix F and included in the modelling as controlled emission factors as detailed in 'Table 15: Emission Factors Used to Develop the Emissions Inventories (continued)'. Appendix F takes the analysis beyond business as usual to examine how operational changes will reduce the risk of air quality objectives being exceeded. 'Table 19: Mine Contribution to the Average Monthly Average Dust Deposition (mg/m²/day)' in Appendix F provides an estimate of the key sources of dust predicted to impact on receptor R1 (Olive Downs Homestead). This type of model output is unconventional from CALPUF as it is usually implemented and is useful for identifying risks, in this case dust generated by waste rock handling. 'Table 32: Project With (BAU) Case - Mitigation Scenarios' of Appendix F describes modelled scenarios where loading, hauling and dumping of waste material are curtailed during high risk days and the analysis concludes that: *In general, results suggest that with the exception of exceedance days driven by significant wind erosion associated with the scale of the disturbance footprint, the range of mitigation measures available to site to inform day-to-day operations, will in general be sufficient to adequately manage operational dust risk associated with DNM mining operations in isolation of other significant dust emission sources* (AED 2025, p. 51). Appendix F – Air Quality Assessment does not define 'high risk days' or the triggers that would be needed to determine when activity needs to be curtailed and there are no recommendations on how this information should be implemented.	(a) Define 'high risk days'. (b) Detail the triggers that will be used to determine when site activities need to be curtailed, and how this information will be implemented in management of air emissions from the proposed activities.	a) 'high risk day' has been defined in table notes where appropriate. b) Additional statement added to Section 6 detailing the triggers that will be used to determine when site activities will be curtailed, and how this information will be implemented in the management of air emissions from the proposed activities.	a) Appendix F; Table 32. b) Appendix F; Section 6.
	Terrestrial and Aquatic Ecology			
11	The application relies upon ground-truthed remnant vegetation to inform the assessment of impacts on remnant vegetation and prescribed environmental matters that are matters of state environmental significance (MSES). However, the application does not indicate whether a request has been submitted to the Queensland Herbarium for a formal mapping amendment. In the absence of the mapping correction, the department is unable to take into consideration impact assessment based on ground-truthing in isolation.	Confirm if the ground-truthed data relied upon in the application materials has been submitted to the Queensland Herbarium for formal mapping amendment, and the status of any such mapping amendment. If the application materials have not been submitted to the Queensland Herbarium, seek assessment and amendment to the State mapping via the Assessment kit attached. This request will need to be addressed as soon as practicable to not delay decision stage.	An application to amend State vegetation mapping has been submitted to the Queensland Herbarium on 28th May 2026 via the DETSI Minerals Business Centre.	Not applicable.

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12	The supporting document notes that Category B ESAs (Endangered RE (remnant)) are mapped within 200 m of the disturbance footprint including: • Endangered RE (Category B ESA) within the Project Area approximately 480 m southeast of the disturbance footprint (RE 11.3.1). • Endangered RE (Category B ESA) approximately 500 m southwest of the disturbance footprint (RE 11.4.9). SLR (2025, p. 225) state that '*a 1 km buffer has been applied to the ground-truthed REs 11.3.1 (approximately 45 ha of ESA buffer for all patches of RE 11.3.1) and 11.4.9 (56.4 ha of RE 11.4.9 buffer) for protection. These buffers intersect the southern boundary of the disturbance area (Figure 12-7). This site-specific EA application is submitted for the new ML, and therefore, standard conditions and associated buffers are not applicable to the Project.*' Upon review of Figure 12-7, the buffer is assumed to be the area demarcated in transparent pink hatch with dashed boundary; however, this is not included in the legend of the Figure. In addition, the statement that RE 11.3.1 is approximately 480 m southeast of the disturbance footprint (RE 11.3.1) conflicts with the fact that haul road disturbance is situated immediately adjacent to an area of ground-truthed RE 11.3.1. Furthermore, the statement that a 1 km buffer has been applied for protection conflicts with the disturbance proposed within these buffers and the later statement that this does not apply with consideration to the nature of the application being related to a site-specific EA.	Provide an updated supporting document and appendices which: (a) Include a figure legend for the proposed buffer to Category B ESAs. (b) Accurately describe the location of Category B ESA in proximity to the proposed disturbance. (c) Accurately describe the proposed buffer extents that will be maintained for protection of the ESAs. (d) Describe the management measures that will be implemented to protect impacts (including indirect) to the RE 11.3.1 immediately adjacent to the haul road.	a) The proposed buffer to ESAs has been removed from Figure 12-8 of the Supporting Document as a site-specific EA will be submitted for the ML Application, therefore this 1 km buffer is not applicable to the Project. b) Text has been updated to reflect the ESA immediately adjacent to the haul road. c) No proposed buffers have been included in the MLA, as the site-specific EA will address the ESAs. d) General management measures have been included in Section 6.0 of Appendix B of the Supporting Document, and Section 12.6 of the Supporting Document to mitigate impacts on RE 11.3.1 immediately adjacent to the haul road. Detailed management measures will be discussed in the site-specific EA.	a) Supporting Document; Figure 12-8. b) Supporting Document; Section 12.4.2.2. c) Not applicable. d) Supporting Document; Section 12.6. Appendix B; Section 6.0.
13	It is noted that a *Vegetation Management Act 1999* (VMA) wetland is situated in a small portion of the ML in the vicinity of the proposed haul road. In addition, based on current State mapping, regulated vegetation within 100m of the wetland is mapped as an MSES regulated vegetation.	(a) Clarify the extent of impacts, including both direct and indirect impacts, to these mapped wetland features and remnant vegetation within 100m of the wetland. (b) Clarify the proposed measures for mitigation of impacts to these wetlands and MSES regulated vegetation within 100 m of the wetlands. (c) As per item ((10)), if ground-truthed data is used to inform impacts to these matters, confirm the status of the Queensland Herbarium formal mapping amendment.	a) The mapped wetland features and remnant vegetation within 100m of the wetland have been added to the desktop assessment results, and are discussed in Section 7.2.1 of Appendix B, and Section 12.7.2.1 of the Supporting Document. b) General management measures have been included in Section 6.0 of Appendix B and Section 12.6 of the Supporting Document to protect impacts against the wetland and regulated vegetation with 100m of the wetland. c) A sentence has been added stating ground-truthed vegetation mapping has been submitted to the QLD herbarium for formal mapping amendment.	a) Supporting Document; Section 12.7.2.1. Appendix B; Section 7.2.1. b) Supporting Document; Section 12.6. Appendix B; Section 6.0. c) Supporting Document: Section 12.7.2.3.
14	The supporting document states that the 'aquatic ecology assessment identified two MSES waterways providing fish passage within the disturbance footprint', and Table 12-3 describes 'one green (low impact) waterway and one amber (moderate impact) waterway runs through the Project Area and disturbance footprint'. Appendix A – Aquatic Ecology Assessment describes that '*the section of waterway that requires permanent waterway barrier works put in place is mapped as having moderate (amber) risk to fish passage*'. However, Appendix A indicates that only reaches of the green mapped unnamed waterway, subject to proposed infilling, were included in the impact and offset calculations. In relation to the amber waterway, Appendix A – Aquatic Ecology Assessment states that the 'consequence of impact from permanent crossings of waterways to aquatic ecology receptors is moderate, because the impact would comprise a long-term harm to non-sensitive aquatic ecological receptors'.	Clarify why sections of amber (moderate impact) waterway subject to the permanent crossing should not be included in the calculations of impact and offset for fish passage. Ensure that the response specifically addresses the criteria outlined in Section 10.1 of the department's Significant Residual Impact Guideline for the section of amber waterway.	The amber reach of the unnamed waterway proposed for permanent waterway crossings (WWBW) is located downstream of the section of waterway that is to be removed. This has been clarified in Section 6.2.5 of Appendix A. Accordingly, the potential impacts associated with the permanent WWBW do not occur within the same reach that is to be infilled and are therefore not considered in offset calculations. WRM undertook an assessment of catchment loss, as well as changes to flow magnitude, frequency, and duration resulting from the removal of the upstream reach of the green waterway within the Project Area. The assessment found that, although the Project is expected to reduce mean annual flow within the catchment by approximately 36%, the associated loss of catchment area and flow magnitude would result in negligible changes to flow frequency and duration within the remaining reach of the unnamed waterway.	Appendix A; Section 6.2.5; Section 6.2.7; Table 6-4.

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	Further information is required to understand the basis for excluding the amber (moderate impact) waterway from the SRI considerations for fish passage.		It was therefore concluded that the removal of the green reach within the Project Area will not significantly affect downstream hydrology and, consequently, will not have a significant impact on the amber reach of the unnamed waterway. Section 6.2.7 of Appendix A further notes that significant alterations to downstream flow patterns can disrupt aquatic ecological processes, including breeding and migration of aquatic biota. However, waterways within the Project Area are ephemeral and flow only during and following significant rainfall events. The release of mine-affected water (MAW) will occur in accordance with existing EA conditions, including approved release volumes. While removal of the upstream reach will result in an approximate 36% reduction in mean annual flow, this change will not materially affect the frequency or duration of flows in the downstream reaches (WRM 2025). Natural flow patterns will be maintained, and the reduction in flow magnitude is not expected to significantly impact runoff or hydrological connectivity within the unnamed waterway. Impacts to flows in the Isaac River are expected to be negligible. The consequence of downstream hydrological change is considered low, as flow frequency and duration remain consistent with baseline conditions. Flow regimes are primarily governed by rainfall-runoff processes, which will continue to be supported through clean water diversion infrastructure, where feasible, in accordance with the site Water Management System (WRM 2025). Any MAW releases will comply with existing EA criteria. Overall reductions in flow magnitude are not expected to affect ecologically relevant aspects of hydrological connectivity, and no discernible changes to flows in the Isaac River are anticipated. The likelihood of downstream flow change is considered moderate due to the permanent reduction in flow magnitude; however, as other key flow characteristics (frequency and duration) remain unchanged, the overall impact is not considered significant. Table 6.4 of Appendix A has been updated to address the criteria outlined in Section 10.1 of the Department's Significant Residual Impact Guideline, including assessment of potential impacts to the amber (moderate impact) reach where ADR-compliant WWBW are proposed.	
15	Connectivity is not described in detail in the application materials; however, in the context of habitat for prescribed environmental matters (PEMs), Appendix B - Terrestrial Ecology Assessment Report indicates that 'the Project Site is isolated from larger patches of known habitat for this species and does not provide a clear connectivity corridor to surrounding habitats'.	Provide the outputs from a Landscape Fragmentation and Connectivity (LFC) tool analysis to enable a desktop assessment of potential SRIs relating to connectivity. Where SRIs to connectivity are identified, provide clarification regarding the specific REs that will be affected, and mapping to illustrate the extent of impacts.	Outputs from the LFC tool have been included in Section 7.2.2 of Appendix B and Section 12.7.3 of the Supporting Document.	Appendix B; Section 7.2.2. Supporting Document; Section 12.7.3.

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16	'Table 17-1 Proposed additions to Table E3 of the EA' in the supporting document describes only predicted impacts to PEMs which are MSES. As per section 10 of the Environmental Offsets Act 2014 (EO Act), a PEM includes Matters of National Environmental Significance (MNES), MSES, and Matters of Local Environmental Significance (MLES). Section 2.3 of the supporting document indicates that a referral for assessment of the Project under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) is proposed. However, no clarification regarding the nature and extent of matters being referred has been included in the supporting document. Under contemporary conditioning, the department's preferred approach is to tabulate all likely SRIs to PEMs whether offsetable under the EO Act or other legislation such as the EPBC Act. The department will also seek to include mapping in the EA which provides a clear illustration of the extent of proposed impacts to each PEM that is an MSES.	Provide the following: (a) Clarification of the protected matters, and nature and extent of impacts to protected matters, that are being referred for assessment under the EPBC Act. (b) A revised table of SRIs inclusive of all PEMs as per the definition contained in s. 10 of the EO Act. (c) A figure / map for each PEM that is an MSES which clearly depicts the proposed impact area extents. These figures are proposed to be inserted into the amended EA.	a) Table 7-1 has been included in Section 7.0 of Appendix B to include extent of impacts to all PEMs. Table 12-6 has been included in Section 12.7 of the Supporting Document to include extent of impacts to all PEMs. b) Table 7-1 has been included in Section 7.0 of Appendix B to include extent of impacts to all PEMs. Table 2-6 has been included in Section 12.7 of the Supporting Document to include extent of impacts to all PEMs. c) Maps for the five MSES have been included in Section 7.0 of Appendix B and Section 12.7.2 of the Supporting Document.	a) Appendix B; Table 7-1. Supporting Document; Section 12.7. b) Appendix B; Table 7-1. Supporting Document; Section 12.7. c) Appendix B; Section 7.0. Supporting Document; Section 12.7.2.
17	'Section 12.4.2.2 Terrestrial flora' of the supporting document, and 'Section 4.3.3 TEC' of Appendix B – Terrestrial Ecology Assessment indicate that 'the Brigalow TEC occurs within the Project Area approximately 13 m to the south of the disturbance footprint's haul road, noting that no direct impacts to the Brigalow TEC are likely as long as suitable management is implemented (e.g. sediment control). Section 7.1.4.8 of Appendix B refers to 'preparation and implementation of a project specific erosion and sediment control plan' as a mitigation measure for the Brigalow TEC. No information is presented regarding specific details for this ESC plan, or when it will be implemented.	Provide further information regarding details of the ESC Plan and timing of implementation.	Additional erosion and sediment control measures have been included in Section 6.0 of Appendix B, and Section 12.6 of the Supporting Document.	Appendix B; Section 6.0. Supporting Document; Section 12.6.
18	'Section 6.2.7 Changes to Downstream Hydrology' of Appendix A - Aquatic Ecology Assessment Report indicates the potential for indirect effects on MSES through the loss of downstream flow from the un-named creek is expected to be mitigated through clean water diversion infrastructure where feasible, citing (WRM 2025). No specific information regarding the proposed clean water diversion infrastructure is provided in Appendix A or the supporting document.	Provide a summary of the planned water diversion infrastructure for indirect effects on MSES in both the Aquatic Ecology Assessment Report and the supporting document, accompanied by an explanation of how this infrastructure will mitigate the loss of downstream flow.	The clean water diversion infrastructure will be implemented in accordance with the site's existing Water Management System. The risk to downstream flows has been assessed in Section 6.2.5 of Appendix A and updated accordingly. Section 6.2.5 of Appendix A has been revised to clarify that the proposed permanent waterway barrier works (WWBW) associated with the haul road are located downstream of the reach of waterway proposed for removal and have been assessed for potential impacts within this section. Section 6.2.7 of Appendix A has also been updated to state that significant alterations to downstream flow patterns can disrupt aquatic ecological processes, including breeding and migration of aquatic biota. However, waterways within the Project Area are ephemeral and flow only during and following significant rainfall events.	Appendix A; Section 6.2.5; Section 6.2.7.
19	The southern reaches of the site are mapped as containing areas of State, State habitat for EVNT taxa, and Local or Other Values for 'biodiversity significance'. No information is presented in the application materials to confirm how these matters have been considered, or what impact hierarchy will be applied for minimising long term impacts (e.g., through reinstatement of connectivity through rehabilitation and selection of appropriate PMLUs).	Clarify how 'biodiversity significance' matters mapped over the site have been considered including where relevant the proposed offset strategy, and how impacts to these matters will be mitigated. Provide further consideration of how any potential impacts to the matters have been considered in the context of the 'Standard Criteria' prescribed at Schedule 4 of the EP Act.	Mapping of biodiversity significance has been provided in Section 4.5.3 of Appendix B and Section 12.4.1 of the Supporting Document. Proposed mitigations measures have been discussed in relevant sections. Mapping of biodiversity significance has been provided in Section 4.5.3 of Appendix B and Section 12.4.1 of the Supporting Document. Proposed mitigations measures have been discussed in relevant sections.	Appendix B; Section 4.5.3. Supporting Document; Section 12.4.1.

#	Matter	Information Requested	Response	Reference to Update in Supporting Document
	Surface Water			
20	The supporting document and Appendix C - Surface Water Assessment indicated that there will be one additional mine-affected water ('MAW') dam (ref. PW MAW Dam) to capture mine affected water runoff from the OOPD. No information is provided on the consequence category for this structure, or whether the proposed structure falls under an exemption for a regulated structure in accordance with the department's Manual for assessing consequence categories and hydraulic performance of structures.	Provide a consequence category assessment of the proposed MAW dam in accordance with the department's *Manual for assessing consequence categories and hydraulic performance of structures*. Alternatively, provide justification should this structure fall under an exemption as per the Manual.	Section 8.5.2 of Appendix C has been updated to provide a Preliminary Consequence Category Assessment for proposed sediment and MAW dams. This includes the evaluation of potential failure scenarios (overtopping, dam break and seepage) and assigning regulatory status and risk levels to each dam, with recommendations for further detailed assessment at the design stage.	Appendix C; Section 8.5.2; Appendix F.
21	The application does not propose any changes to the current EA release conditions. WRM (2025) and HydroBalance (2025) state in relation to controlled releases that, during extreme wet climatic conditions (1%ile), up to 1,690 ML may be released in the 2029 financial year. It is unclear if this controlled release volume relates to the site holistically, or if this relates to controlled releases from the Project area only. Furthermore, Section 7.7 of the *Water Balance Assessment Report* (HydroBalance 2025) states that both PW Sed Dam and the mine-affected water dam (PW MAW Dam) could potentially flow directly to the receiving environment. PW MAW Dam is expected to, during extreme wet climatic conditions (1%ile), discharge between 30 ML and 215 ML of annual overflows via uncontrolled releases. In accordance with condition F2 of the existing EA, release of mine-affected water to waters must only occur from the authorised release point, RP1. It is therefore unclear how compliance with the existing EA conditions will be maintained under the proposed scenario which anticipates up to 215 ML of uncontrolled discharges from the proposed MAW dam. It is noted that Section 5.3.4 Uncontrolled discharges of Appendix C describes uncontrolled discharges from PW Sediment Dam and does not describe any uncontrolled discharges from the PW MAW Dam. The reasons for this inconsistency with the *Water Balance Assessment Report* (HydroBalance 2025) findings are unclear.	(a) Clarify how compliance with the existing EA will be upheld noting the releases described in the Water Balance (b) Assessment Report (HydroBalance 2025). Clarify the proposed controlled release volumes for the Project specifically, including a breakdown of the proposed releases from each of the dams (PW Sediment Dam and PW MAW Dam). (c) Clarify reasons for the consistencies between the WRM (2025) and HydroBalance (2025) assessments and make any necessary corrections to ensure consistency across all documents.	a) Section 8.4 of Appendix C describes the erosion and sediment control (ESC) measures and MAW management infrastructure proposed for the Project. This includes the construction and operation of new sediment and MAW dams, and outlines how these measures integrate with existing site water management systems. b) Section 8.6 of Appendix C details the risk of uncontrolled water releases from the site and outlines mitigation measures (engineering controls, operational procedures, monitoring, and contingency storage). c) Any inconsistencies between WRM (2025) and HydroBalance (2025) have now been rectified. Documents have been revised accordingly.	a) Appendix C; Section 8.4. b) Appendix C; Section 8.6. c) Not applicable.
22	Assessments of surface water quality are not Project specific, with the supporting document and appendices presenting findings based on historical broader site monitoring. Section 10.4.4 Stored Water Quality of the supporting document describes electrical conductivity (EC) and pH only for stored water quality for existing dams only for based on data as at 30 June 2024 and 2025. No information is presented to confirm the anticipated expected quality of releases of contaminants of all potential and/or proposed sources not limited to the uncontrolled and controlled releases and runoff waters.	Provide analysis of the expected quality of releases of contaminants of all potential and/or proposed sources (including both uncontrolled and controlled releases to surface waters) from the Project including both: (a) Point sources (including controlled or uncontrolled discharges, and stormwater run-off). (b) Diffuse sources (such as seepage from the OOPD).	Sections 2.5.5 and 2.5.6 of Appendix C provide an assessment of water quality during controlled releases, including analysis of monitoring results for key analytes, demonstrating that dilution within the receiving environment mitigates potential impacts associated with MAW releases	Appendix C; Section 2.5.5; Section 2.5.6.
23	The sodium trigger level under existing EA Table F3 (Release Contaminant Trigger Investigation Levels) is "TBA", and no change has been proposed via the current amendment application. The department considers that a sodium trigger level should be proposed via the current amendment to ensure the minimisation of impacts to the environment and must be informed by a consideration of historical and predicted release water quality, target dilution from background flow and relevant receiving environment water quality objectives.	Propose a relevant sodium trigger value for the release. This value should consider historical and predicted release water quality, target dilution from background flow and relevant receiving environment water quality objectives.	Section 2.4 of Appendix C and Section 10.2.2 of the Supporting Document assess the need for a sodium trigger value for water releases, review relevant guideline values, and recommend appropriate benchmarks, along with guidance for future monitoring and compliance.	Appendix C; Section 2.4. Supporting Document; Section 10.2.2.

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24	Daunia Mine's current EA authorises releases to Isaac River via New Chum Creek. Another three neighbouring mines are also authorised to release in New Chum Creek, two upstream from Daunia's RP1 (Millennium Coal Mine and Red Mountain Infrastructure CHPP), and one downstream (Poitrel Coal Mine). In the application, there is no indication that mines coordinate the timing of their releases to prevent any cumulative impacts, therefore it is possible that all four mines could be releasing simultaneously, suggesting a high risk of cumulative impact. Section 8.7 (WRM 2025) indicate that "*a detailed cumulative impact assessment, including sediment and water releases from other mining operations in the Upper Isaac River catchment, is not considered necessary*". The following example is highlighted in the application "*During the 2023–24 reporting period, 27% of coal mines in the Fitzroy Basin participated in the FRREMP program, with 25 authorised releases recorded. The total salinity load discharged in the Upper Isaac sub-basin was approximately 21 tonnes, primarily during high-flow events. When considering potential discharges from these operations under current release rules, the overall reduction in catchment area and associated streamflow is relatively minor.*" This statement refers to the Fitzroy Regional Receiving Environment Monitoring Program (FRREMP). In 2023-24, Daunia Mine was participating in the FRREMP but the neighbouring mines joined in 2025. There were very few coal mine releases in 2023-24 due to unfavourable hydrological conditions (relatively dry year). Evidence based on a single year is insufficient to demonstrate the potential for cumulative impact for the increased release volume proposed in this amendment. Daunia mine does not currently contribute any data to the FRREMP. In addition, the FRREMP does not cover sediment sampling in local proximity to the mines, therefore the risk of sediment impact needs to be appropriately mitigated at the source for Daunia mine to be meeting their REMP obligations. In addition, the supporting document states that 'In 2019, the *Environmental Protection Regulation 2019* (EP Reg) was amended to include Section 41AA. The aim of Section 41AA is to achieve no net decline in water quality in the surface water basins that feed into the Great Barrier Reef. Since June 2021, all new or expanding projects that potentially impact the waters for the Great Barrier Reef are required to provide information about their Dissolved Inorganic Nitrogen and Total Suspended Solids load. This Project has been assessed against the Guideline – Environmental Protection Act 1994: Reef discharge standards for industrial activities (DES, 2022) based on relevant information required for this EA Amendment Application to address Section 41AA of the EP Reg. The assessment also considers the provisions of the Water Act and subordinate legislation mentioned above and is provided in Chapter 10.0.' However, the details of the surface water assessment have not been sufficiently provided for the department to determine that there is no residual impact due to an increase in fine sediments or dissolved inorganic nitrogen from any releases resultant or additional for the Project.	(a) Provide additional information regarding how the potential risk of cumulative impact from multiple simultaneous mine discharges in New Chum Creek is proposed to be addressed, with clear actions proposed to mitigate this risk. (b) Assess the relevance of the current FRREMP design with regards to the proposed amendments and identify any potential risks of impact not covered by the current monitoring network, including sediment dam releases to other tributaries of the Isaac River. (c) Confirm that, as a result of the proposed amendment there is no residual impact due to an increase in fine sediments or dissolved inorganic nitrogen being released, in accordance with the reef discharge standards for industrial activities (DES 2022) and section 41AA of the EP Reg.	a) The controlled release of MAW at DNM is authorised under the existing EA. The Project is not requiring a change to the controlled release strategy. Accordingly, the Project is not predicted to increase the risk of cumulative impacts from multiple simultaneous mine water discharges to New Chum Creek beyond that already considered and managed under the existing EA. b) The controlled release of MAW at DNM is authorised under the existing EA. The Project is not requiring a change to the controlled release strategy. The DNM is part of the FRREMP. As the Project does not alter the existing controlled release strategy, the current FRREMP remains applicable.Surface water monitoring locations associated with the FRREMP relative to DNM are shown Figure 10-5 of the Supporting Document. c) The controlled release of MAW at DNM is authorised under the existing EA. The Project is not requiring a change to the controlled release strategy. An assessment of the Project against reef discharge standards for industrial activities has been included in Section 8.9 of Appendix C.	a) Not applicable. b) Not applicable. c) Appendix C; Section 8.9.
25	Table 10-2 Mine water storage inventory and capacity of the supporting document indicates that 3 current MAW dams (Dam 1, Dam 2, Dam 5) are "non-regulated". These make up a cumulated total storage capacity of 1145 ML, which is significant.	(a) Clarify what "non-regulated" means in this case and how this differs to "regulated" dams described in Table 10-2 of the supporting document. (b) Confirm whether there are any potential seepage pathways from these dams, and measures in place to control potential seepage.	a) "Non-regulated" means the dams do not meet the criteria for a regulated structure under the Queensland *Environmental Protection Act 1994* and DETSI regulatory framework, based on the assessed low consequence category. The preliminary consequence category assessment found that the Project dams pose low risk to human life, low environmental harm, and low economic loss. Therefore, they are not classified as regulated structures and do not trigger the additional regulatory requirements.	a) Appendix C; Section 8.5. b) Appendix C; Section 5.1; Section 8.6.3.

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			Therefore, the dams do not require formal regulation as "regulated structures", instead they will be managed under the site's Water Management Plan (WMP), ESCP and EA conditions. b) Seepage pathways are acknowledged in Section 5.1 and Table 5.1 of Appendix C. These pathways will be effectively managed through engineered design consistent with ANCOLD standards, Australian Rainfall and Runoff (ARR), the International Erosion Control Association (IECA) guidelines, and relevant Queensland Government guidance. Mine-affected water will be contained within the site water management system, supported by monitoring and operational controls to ensure that any impacts remain localised and compliant with Environmental Authority (EA) requirements. Additional mitigation measures are outlined in Section 8.6.3.	
26	The proposed amendments will increase the volume of sediment water that needs to be contained and managed. Table 10-4 of SLR 2025 further indicates that sediment water refers to "*Surface water runoff from areas that are disturbed by mining operations (including out-of-pit waste rock emplacements). This runoff does not come into contact with coal or other carbonaceous material and may contain high sediment loads but does not contain elevated level of other water quality parameters (e.g. EC, pH, metals, metalloids, non-metals). This runoff must be managed to ensure adequate sediment removal prior to release to receiving waters.*" There is no further information about whether the sediment water is regularly tested to confirm that sediment dams are not containing MAW (or confirming their efficacy). WRM (2025) indicate that "*Water from each catchment is assessed to determine whether it should be managed as stormwater or MAW*". Considering that these dams contain runoff from out-of-pit waste rock emplacements, there is a possibility that the sediment dams may become affected during the life of mine.	(a) Describe the methods employed to assess whether sediment water should be managed as stormwater or MAW. (b) Indicate the water quality objectives used to determine if sediment dams may contain MAW. (c) Propose a monitoring procedure and sampling frequency to confirm "sediment water" quality during their operation.	a) The classification of sediment water is undertaken in accordance with the erosion and sediment control framework (Section 4.7.4 of Appendix C), which includes identification of catchment disturbance, verification of contact with disturbed mining areas, assessment of mixing with mine-affected water sources, and evaluation of water quality against background conditions. Where runoff has not mixed with MAW and meets the definition of sediment water, it is managed as stormwater. Where contamination is identified or EA definitions of MAW are met, water is managed as mine-affected water. b) Water quality objectives applied to this assessment are defined in Section 2.3 and Table 2.2 of Appendix C and are derived from ANZG (2020) and the EPP (Water) 2019. Key parameters include electrical conductivity, pH, turbidity/suspended solids, sulphate, metals and total dissolved solids. Exceedance of these objectives or evidence of mining-related contamination is used to inform classification of sediment dam water as MAW. c) Monitoring of sediment dams will be undertaken in accordance with Section 4.7.6 of Appendix C and the site WMP,. Monitoring results will be assessed against the applicable water quality objectives to confirm that sediment water remains appropriately classified, with reclassification to MAW where exceedances or contamination are identified.	a) Appendix C; Section 4.7.4. b) Appendix C; Section 2.3. c) Appendix C; Section 4.7.6.

#	Matter	Information Requested	Response	Reference to Update in Supporting Document
27	The application documents include various maps and tables of proposed water storages, suggesting that up to four new water storages are proposed (PW Sed Dam, PSD, PM AWD, PW MAW Dam). While their naming convention suggests that two will be containing MAW and the other two will contain sediment water, 'Figure 4.1 Proposed MAW Storages' contained in WRM (2025) suggests that all four proposed storages are to contain MAW. WRM indicate that "*The construction of the PW MAW Dam is necessitated by the Pandora Pit expansion intersecting with Dam 5 and is required regardless of the OOPD proposal as part of the Project. The PW MAW Dam will intercept MAW from catchment currently draining to Dam 5. Dam 5 is scheduled for decommissioning in 2031 due to the expansion of Pandora Pit.*". It is not clear what runoff will be contained in the other two dams PSD and PM AWD and if they may overflow to the nearby unnamed tributary. It appears that all current on site water storages at DNM contain MAW. The four proposed new storages are not yet online.	(a) Provide a map of all sediment dams (existing and proposed), a description of the runoff they are proposed to collect, and the location of their designated release or spill points. (b) Clarify if this current amendment application includes the construction of PSD and PM AWD which are outside of the Project Site footprint.	a) The locations of all sediment dams are presented in Figure 4.2 of Appendix C, with supporting layout context provided in Figure 4.1, and coordinates and catchment classifications detailed in Table 4.4. The sediment dams are designed to capture runoff from disturbed areas, such as the OOPD. This runoff is classified as sediment water and predominantly contains elevated suspended solids but does not typically exhibit the chemical characteristics of mine-affected water (Sections 3.4 and 4.7 of Appendix C). Sediment dams do not function as licensed release points. Instead, treated water is discharged via engineered spillways following sediment settlement, consistent with ESC design standards (Section 4.7.5 of Appendix C). Discharges occur to local drainage features that ultimately connect to the Isaac River catchment (Section 2.1.4 of Appendix C). b) The current amendment application does not include the construction of the P Sediment Dam (PSD) or the P MAW Dam. As described in Section 4 and Table 4.1 of Appendix C, these structures form part of the existing Daunia operations and would be developed independently of the Project. The Project relates specifically to the introduction of the PW Sediment Dam and PW MAW Dam associated with the proposed OOPD, with no expansion of the existing mine-affected water footprint or changes to licensed release points.	a) Appendix C; Figure 4.2; Section 3.4; Section 4.7; Section 2.1.4. b) Appendix C; Section 4.
28	'Section 5.5.1 Dust suppression' of Appendix B Operational Water Balance contained in Appendix C indicates that dust suppression water is sourced from MAW storages (including Dam 2, Dam 8, the Eastern backbone pipeline and the Western backbone pipeline). No information is presented to confirm how run off of mine-affected waters used for dust suppression will me managed to prevent impacts to environmental values.	Confirm how runoff from areas receiving MAW for dust suppression will be captured again in MAW storages, or otherwise managed to prevent any potential runoff reaching receiving waters and other environmental values (e.g. wetlands and remnant vegetation adjacent to the haul road).	Section 3.4 and Section 3.5 of Appendix C state that runoff from areas receiving MAW for dust suppression is classified and managed as MAW in accordance with Section 3.4. Runoff is directed via graded surfaces, diversion drains and bunding to MAW storages or in-pit containment as part of the mine water management system. Runoff from MAW-treated areas is not permitted to discharge via ESC structures and is retained onsite to prevent impacts to receiving waters, wetlands and adjacent remnant vegetation (Sections 4.7 and 8.6.1 of Appendix C). The management of MAW used for dust suppression is specifically addressed in Section 8.4.1 of Appendix C, with monitoring and trigger-based controls provided under Sections 5.2 and 8.11 of Appendix C to ensure ongoing compliance with EA requirements.	Appendix C; Section 3.4; Section 8.4.

#	Matter	Information Requested	Response	Reference to Update in Supporting Document
29	Flood modelling presented in Section 10 of the supporting document and Appendix C – Surface Water Assessment shows direct hydraulic interaction between floodwaters and the proposed OOPD. Model results indicate velocities >2 m/s under the 0.1% AEP and approximately 2–3 m/s (locally >3 m/s) under the PMF along extended sections of the OOPD, with flood depths exceeding 4.5m adjacent to the WRD under both events (PMF depths not fully quantified). PMF modelling also shows changes in flow behaviour and spatial patterns of the flood event, including along the right bank of the Isaac River, with potential for erosion, geomorphic change and vegetation impacts. No combined hydraulic–geotechnical assessment has been provided for the OOPD under rare or extreme floods. The modelling adopts a fixed-bed approach and does not assess erosion, scour, progressive slope failure or the effects of repeated flood loading. Sodic and potentially dispersive spoil materials may further increase erosion susceptibility. On this basis, the information provided does not demonstrate that the OOPD will remain stable or non-polluting when exposed to flooding. While the revised landform reduces flood risk to the Pandora void, it transfers flood exposure to the proposed OOPD and effects the Isaac River floodplain. Section 10.8.2 of the supporting document and Section 7.4.4 of Appendix C conclude that impacts under the 0.1% AEP are not expected to be material; however, PMF impacts are not equivalently assessed. Accordingly, PMF-related flood risk and associated failure mechanisms have not been demonstrated and require further assessment to confirm landform stability and avoidance of environmental harm. PMF modelling results presented in Appendix E - Flood Modelling Results of Appendix C indicate velocity increases along the right bank of the Isaac River (>3 m/s), which may increase erosion risk. Further information is required to enable the department to understand how potential changes in flood behaviour associated with the interaction between floodwaters and all relevant Project structures interacting with the Isaac River and New Chum Creek will be managed to prevent environmental harm to the Isaac River, New Chum Creek and their associated floodplains and receiving environments. The *Water Act 2000* requires protection of watercourse integrity, landforms that alter flood velocities, flow paths or erosion processes may constitute interference with flow and create compliance risks where floodplain stability is affected. Accordingly, as modelling indicates PMF-related changes in flood behaviour, assessment of erosion, geomorphic response, vegetation impacts and sediment mobilisation is required to demonstrate that the Project will not unlawfully interfere with the flow of water or adversely affect the physical integrity of the watercourse. The submitted assessment does not demonstrate that the Isaac River floodplain will remain stable without adverse effects on bed and bank stability under PMF conditions.	Provide further information including: (a) Details of how flood-related erosion, scour and structural instability risks associated with the proposed OOPD have been avoided or mitigated, with specific consideration of rare and extreme flood events, including the PMF, having regard to: i. hydraulic loading on OOPD batters and toes; \ ii. potential progressive instability mechanisms; and iii. spoil material properties, including sodicity and dispersion susceptibility. (b) A risk-based assessment of flood behaviour under events up to and including the PMF, identifying: i. changes in flow behaviour and spatial patterns associated with interaction between floodwaters and structure; ii. resulting erosion, geomorphic response, vegetation impacts and sediment mobilisation; and iii. the likelihood and consequences of these effects on the Isaac River floodplain. (c) Proposed mitigation and management measures to prevent flood-related impacts to the OOPD, the Isaac River and New Chum Creek floodplains, and their receiving environments, including erosion, geomorphic change and sediment mobilisation.	a) Further detail has been provided in Appendix C on how flood-related erosion, scour and structural instability risks associated with the proposed OOPD have been avoided or mitigated. b) A risk-based assessment of flood behaviour under events up to and including the PMF has been included in Appendix C. c) Additional mitigation and management measures have been proposed within Appendix C.	a) Appendix C; Section 8.4. b) Appendix C; Section 8.2. c) Appendix C; Section 8. Supporting Document; Section 10.9.

#	Matter	Information Requested	Response	Reference to Update in Supporting Document
	Noise and Vibration Assessment			
30	Section 9 and Appendix I – Noise and Vibration Assessment describe potential noise emissions including sources from the proposed activities on the new tenure and the existing mine. Appendix I states that no resource extraction and therefore no blasting will be undertaken within the proposed MLA area. No information is provided to confirm whether the rates of blasting will remain consistent with the existing operations under the proposed formalised ROM rate of 6.5 Mtpa, or whether this will require an increased blasting rate. While the magnitude of potential noise impacts is considered broadly in Appendix I – Noise and Vibration Assessment, the appendix and supporting document do not provide an explicit risk assessment using the likelihood and consequence rating methods to qualify risks associated with noise and blasting. Appendix I – Noise and Vibration Assessment makes reference to a non-residency agreement to mitigate noise and air exceedances modelled at the Olive Downs Homestead, which is understood to be under negotiation at the time of application.	(a) Provide confirmation as to whether there will be any changes to the rates of blasting at the site to support the proposed ROM rate of 6.5 Mtpa. Where additional blasting is proposed, provide a revised Noise and Vibration Assessment (and supporting document) which considers the additional blasting requirements and subsequent emissions. (b) Provide a risk assessment using the likelihood and consequence rating methods to qualify risks associated with noise and blasting impacts. (c) As per the earlier request item, provide an update in relation to the status of the non-residency agreement.	a) There will be no blasting undertaken in the Project Area. Blasting (and associated noise and vibration) will not change at DNM because of the Project. The Supporting Document has been updated to include this information. b) A risk assessment to qualify risks associated with noise and blasting impacts has been included within the Supporting Document. c) The non-residency agreement for the Olive Downs Homestead is continuing to progress in a positive manner. A recent meeting was held with the landholder on 2nd April 2026. The meeting provided an opportunity to discuss the status of the agreement, address key matters, along with confirming the next steps. Engagement with the landholder remains constructive, and discussions are ongoing to support the finalisation of the agreement.	a) Supporting Document; Section 2. b) Supporting Document; Section 9.5. Appendix I; Table 6-4. c) Not applicable.
	Greenhouse Gas			
31	The FullCAM model has been applied to estimate greenhouse gas emissions from vegetation clearing. While the methodology is overall reasonable and conservative, it is noted that the disturbance footprint contains two distinct vegetation types: 308.1 ha of non-remnant vegetation and 16.26 ha of remnant 'Of Concern' RE 11.3.3 (refer to 'Section 12.4.2.2 Terrestrial flora' and Figure 12-7 of the supporting document). Only the former area was included in the FullCAM modelling. As remnant vegetation may have a higher carbon mass intensity, its exclusion may result in a material underestimation of emissions. Additionally, the template selected in 'Table 15-4 FullCAM inputs' of the supporting document should be '*HIR NFMR and Avoided Clearing Methods – greater than 500 mm*' rather than '*less than 500 mm*'. This appears to be a typographical error, as the results remain consistent with the '*greater than 500 mm*' methodology. Diesel consumption during the construction phase could be a major emissions source. However, it is unclear whether the emissions during the construction phase were considered. In 'Table 15-10 Estimated changes in DNM's annual GHG emissions due to the Project' of the supporting document, the Scope 3 emissions from Oils and Greases appear inconsistent with the activity data. For example, the total reduced Scope 3 emissions from Oils and Greases should be 249 t CO2-e (356 kL*38.8 GJ/kL*18.8/1,000 t CO2-e/GJ) instead of 238 t CO2-e.	(a) Provide justification for excluding emissions from the remnant vegetation area and, if necessary, update the FullCAM model to include this part to ensure a complete emissions inventory. (b) Provide justification for the exclusion of diesel consumption during the construction phase or update the emissions inventory to include the construction phase. (c) Review and update the relevant calculations where required to address this matter raised.	a) The approach used to estimate vegetation clearing related emissions was very conservative and is expected to overestimate actual emissions. To address this concern however, an additional FullCAM run was performed to estimate a worst case (i.e. maximum) carbon density for previously undisturbed vegetation and emissions estimated for a 16 ha affected area. These additional emissions have been added to emissions inventory and the relevant text updated. The typographical error in the FullCAM template name has also been corrected. b) The diesel consumption for stationary fuel use, which covers consumption by off-road mining equipment such as excavators, haul trucks, dozers and graders, includes the use of this existing equipment during the construction phase of the Project. This has been clarified in the GHG assessment and no changes to the emission estimates is required. c) The calculation has been updated. There is a very slight additional decrease in Scope 3 emissions estimated, however this is not material to the findings of the assessment and the conclusions are unchanged.	a) Supporting Document; Section 14.3.4.1. b) Supporting Document; Section 14.3.4.2. c) Supporting Document; Section 14.4.1.

#	Matter	Information Requested	Response	Reference to Update in Supporting Document
	Groundwater			
32	*Section 11.5 Numerical Modelling of the supporting document* The modelling from 2008 to 2042 allows for recharge from the Isaac River to the Isaac River Alluvium. In the period 2008 to 2041, the model predicts periods when groundwater from the alluvium is higher than the Isaac River level and will drain back into the Isaac River. The post-mining modelling (i.e., 2042 onwards) does not allow for recharge from the Isaac River to the Isaac River Alluvium. 'Section 11.5.6 Isaac River' of the supporting document indicates that this is a result of the length of the stress periods used in the post-mining modelling. The approach to the post-mining modelling (i.e., no recharge from the Isaac River) results in lower predicted groundwater levels in the alluvium at equilibrium than what is likely to occur. Hence it will also result in lower predicted movement of groundwater from the alluvium back into the river. While the post-mining modelling predicts increased groundwater levels in the Isaac River Alluvium (up to 4 m in places) as a result of increased recharge to the proposed OOPD, when compared to post-mining modelling without the OOPD, the predicted groundwater levels in the alluvium are still more than 2 m below the river channel. In reality, (and in conflict with the modelling) drainage of groundwater from the alluvium back to the Isaac River, as is predicted prior to 2041, is likely to persist in the post-mining landscape, particularly where additional recharge to the OOPD provides additional water in the alluvium, which is likely and predicted by the modelling. Therefore, the post-mining modelling approach of not allowing recharge from the Isaac River to the alluvium is understood to influence the modelling results and presents a potential weakness in the modelling. An additional concern is that, during higher rainfall events, there will be greater recharge to the OOPD over shorter time periods. These high recharge events would require shorter stress periods (than the long stress periods currently in the post-mining model) to assess the impacts on groundwater levels under, and adjacent to, the OOPD and the movement of that groundwater towards the river where the post-mining modelling currently allows for no recharge from the river and hence underestimates alluvial groundwater levels adjacent the river. In combination, this appears to render the post-mining modelling ineffective in determining potential drainage of water from the OOPD to the river particularly in periods following river flow and high rainfall events.	Provide all of the following: (a) Further justification for the exclusion of the recharge from the Isaac River to the Isaac River Alluvium in the post-mining model (i.e. 2042 onwards). (b) Advice on what limitations the approach of applying average recharge over long post-mining stress periods (the length of which doesn't appear to be clearly identified in the reporting) has on understanding the impacts of short term high recharge events on the OOPD. (c) Describe what limitations the outcome of (b) places on the predicted impacts of the OOPD on the Isaac River Alluvium and the Isaac River, post-mining.	a) The Isaac River stage in the model is active until 2113 (end of mining for the entire Bowen Basin model). As the stress periods are yearly until 2113, using an average stage for years of significant flow is appropriate. From 2113 onward, stress period lengths increase to 50 years (to enable efficient running of the model through the long post mining period). Applying a River Stage, during the very long post mining stress periods would lead to unrealistic amount of recharge over these periods. As such, the model conceptualisation considered that post mining, the long term recharge to the alluvium from episodic Isaac River flows is small enough regionally, compared to direct rainfall recharge, to be ignored. b) Stress Period (SP) lengths have been added to Table 4-1 of Appendix E. Intense rainfall events are likely to result in greater runoff / erosion and possibly seepage from the toe of the OOPD, but not necessarily proportionally higher recharge to the underlying strata/sediments. Some periods of higher recharge (applied as a proportion of total rainfall), and flow in the Isaac are simulated through to 2113. Such events would result in greater recharge to the alluvium adjacent to the Isaac River which may temporarily slightly retard the migration of seepage from the OOPD to the west. Not modelling short periods of high recharge is considered unlikely to materially change the longer term groundwater impacts based resulting from long term average conditions. c) Limitations are only for extreme events: Short term impacts may occur in the alluvium/regolith between the OOPD and the Isaac River. In the Isaac River alluvium, the associated extent of flooding would likely dilute and drive contaminated groundwater downward. The impact of high and low river stage on vertical flow in the Isaac River Alluvium is discussed in Section 4.1.8.3 of Appendix E. The limitation of the model with regard to limited ability to represent seasonality in recharge or short term extreme events over the long term is not considered likely to have a significant material effect on the off site migration of seepage from the OOPD.	a) Not applicable. b) Appendix E; Table 4-1. c) Appendix E; Section 4.1.8.3.

#	Matter	Information Requested	Response	Reference to Update in Supporting Document
33	*Section 11.6 Particle Tracking of the supporting document* The results of the particle tracking appear to directly conflict with the modelling predictions of the impacts on water levels in model layers 1 (alluvium) and 2 (higher level alluvium and tertiary), refer Section 11.5 of the supporting document. Whilst the modelling results, as presented in supporting document Figures 11-14 and 11-15, indicate the additional recharge on the OOPD will result in increases in water level of up to 4 and 5 m in layers 1 and 2 near the Isaac River, the particle tracking does not. The text associated with the particle tracking states in part that: only seepage from the very western margin of the OOPD is likely to migrate away from DNM and the Pandora Pit void, however the downward vertical hydraulic gradient in this area results in this groundwater remaining within the deep Permian coal measures and not entering the shallow unconsolidated strata (model Layers 1 and 2) in the range of the water table. There is no detailed discussion of these major differences between the predictions presented in Figures 11-14 and 11-15, and those of the particle tracking and why they occur. This appears to be a weakness in the model report. It is further noted that the particle tracking appears to indicate predicted movement of groundwater in the deeper units, off lease. It is not clear what impact that will have, if correct. The supporting document concludes that *'the Project will not significantly affect ecohydrological functions. Groundwater mounding beneath the OOPD will increase water availability to GDEs but is expected to be balanced by transpiration. No changes to existing operations are required as a result of the Project*'. However, noting the above seepage, further information is required to understand potential impacts to GDEs, and how these impacts will be mitigated.	(a) Provide discussion in regard to the different predictions presented in Figures 11-14 and 11-15, and the particle tracking in regard to the impact of drainage from the OOPD (not limited to the off-lease predicted movement of groundwater) and the impacts to the various model layers, private bores, Isaac River and GDEs. (b) Clarify how any modelled impacts to receptors and/or the receiving environment will be mitigated.	a) Particle tracking provides a first pass assessment of groundwater migration pathways. The assessment now includes solute transport modelling (with conservative assumptions) which demonstrates solute migration from the OOPD through the shallow alluvial layers although there is still a downward vertical gradient into the underlying coal measures. The solute transport modelling shows the extent and dilution factors for seepage arising from the OOPD after 977 years. The dilution factors and background groundwater quality have been used to calculate total concentrations at receptors within the zone of influence for elements in the spoil leachate data (Appendix D). b) Solute transport modelling indicates that impacts from the OOPD are low and do not pose a significant risk to private water supplies or alluvial groundwater. Installation of groundwater monitoring bores to the southwest of the OOPD is however recommended (Section 9 of Appendix D).	a) Appendix D. b) Appendix D; Section 9.0.
34	*Section 11.7.2 Potential impacts on Groundwater Users of the supporting document* There are landholder bores in the area, with the closest to the proposed OOPD reported to be Bore 9 / House bore, although a recent on-site survey appears not to have occurred. From the information available, Bore 9 / House bore is registered bore ref. RN162826 which has a supply of between 1.5 and 4 litres per second. There is no driller's log available for the bore, so it is not clear what geological formation the bore is taking water from, but the supporting document assumes it is the Isaac River Alluvium. This appears to be based on its location. This bore is located about 1 km directly south of the proposed OOPD. 'Table 11-4 Increase in Standing Water Levels at Local Water Supply Bores' of the supporting document predicts an increase in groundwater level at this bore of 4.2 m as a result of increased recharge and drainage from the OOPD. It is therefore assumed that this bore would be impacted by drainage from the OOPD. No information or discussion is presented to enable an understanding of the potential impact of this drainage in regard to water quality in the bore, particularly given this is reported as a domestic bore. The predicted impacts to this bore, and other landholder bores in Table 11-4, appear to be disregarded in the conclusions in Section 11.8 Conclusions' of the supporting document which rely solely on particle tracking results.	Provide advice as to: (a) What the potential impacts are to water quality in all landholder bores, in particular Bore 9/ House bore, as a result of the predicted rise in water level of 4.2 m caused by drainage from the proposed OOPD. (b) Why the predicted impacts to landholder bores were not considered when providing conclusions in Section 11.8. (c) How impacts to this bore will be mitigated.	a) Predicted water quality impacts are presented in Sections 7 and 8 of Appendix D. Solute transport modelling using conservative assumptions indicates that measurable concentrations of solutes from the OOPD may reach the "House Bore" located 1km south of the OOPD but probably not in the operational life of the bore or at concentrations that breach drinking water or livestock watering guideline values. Seepage from the OOPD is not predicted to reach other private water bores at measurable concentrations over the long term (approximately 1000 years). b) The results from the solute transport modelling are considered in the revised risk assessment and the conclusions of the updated Section 11.0 of the Supporting Document. c) Solute transport modelling indicates that impacts from the OOPD are low and do not pose a significant risk to private water supplies or alluvial groundwater. Installation of groundwater monitoring bores to the southwest of the OOPD is however recommended (Section 9 of Appendix D).	a) Appendix D; Section 7.0; Section 8.0. b) Supporting Document; Section 11.0. c) Appendix D; Section 9.0.

#	Matter	Information Requested	Response	Reference to Update in Supporting Document
35	The application form indicates that there will be no changes to the exercise of underground water rights for the project. Section 2.2.1.2 Groundwater of the supporting document indicates that the Project does not propose any groundwater extraction and is not anticipated to impact on groundwater resources. However, as per section 1.1.4 of the department's guideline *Requirements for site-specific and amendment applications—underground water rights* (ESR/2016/3275), examples of proposed amendments which may indicate a change to the exercise of underground water rights include adding a new tenure to the EA, or where there are likely to be different impacts on environmental values. Noting the previously raised potential impacts to environmental values resultant from groundwater mounding and seepage, further information is required to justify why the proposed amendment does not involve a change to the exercise of underground water rights.	Provide further information to support the conclusion that there will be no change to the exercise of underground water rights for the site. Where it is determined that a change to the exercise of underground water rights is likely, provide the mandatory information required under 227AA of the EP Act.	The activities proposed under the EA amendment application at DNM for the construction and operation of the OOPD, the supporting infrastructure, and the increase in ROM rate, will require underground water rights to be exercised. Table 11-1 within the Supporting Document provides the mandatory information required under Section 227A of the EP Act.	Supporting Document; Section 11.2.
36	'Figure 11-17 Predicted Groundwater Outflow to the Isaac River With and Without the OOPD' of the supporting document only extends to the year 2304; however, the recovery model runs to 3019. The reasons for not including years subsequent to 2304 in Figure 11-17 have not been discussed.	Provide a revised Figure 11-17 which captures all modelled years or alternatively provide justification for why this is not required.	There is no Baseflow simulated in the river after 2113. Please refer to response to Item 31.	Not applicable.
37	*Section 11.8 Conclusions of the supporting document* The conclusions presented in Section 11.8 of the supporting document appear to focus on the results of the particle tracking rather than the modelling results presented in Figure 11-14 and 11-15 and Table 11-4. Examples of this sourced from Section 11.8 are extracted below: *Particle tracking demonstrates that groundwater from below the OOPD that does migrate off-site to the south and south-east remains at depth in the Permian coal measures and does not enter the shallow Quaternary and Tertiary sediments along the Isaac River within which groundwater (where present) may be utilised facultatively by terrestrial GDEs therefore will not have an adverse impact on environmental values, and* *Similarly, private bores to the south of the site are screened within the shallow Quaternary and Tertiary sediments along the Isaac River, and will therefore not be affected by groundwater migrating from below the western margin of the OOPD through the underlying Permian coal measures interburden.* The predictions provided in Tables 11-14 and 11-15, and in Table 11-4 appear to contradict these conclusions.	Provide advice as to why the predictions presented in Figures 11-14 and 11-15, and in Table 11-4 were not considered when providing conclusions in Section 11.8 of the supporting document. Alternatively, update section 11.8 to include further conclusions	The assessment now includes solute transport modelling (with conservative assumptions) which demonstrates solute migration from the OOPD through the shallow alluvial layers to the west and south of the OOPD - aligned with the CHM schematic presented in Figure 11-14. The solute transport modelling shows the extent and dilution factors for seepage arising from the OOPD after 977 years. The dilution factors and background groundwater quality have been used to calculate total concentrations at receptors within the zone of influence for elements in the spoil leachate data. The new analysis is carried through the risk assessment and conclusions.	Appendix D; Section 7.0; Section 8.0.

#	Matter	Information Requested	Response	Reference to Update in Supporting Document
38	The application indicates that the "*Groundwater mounding beneath the OOPD will migrate outwards towards the Pandora Pit void which will act as a strong local sink for groundwater, and west across the Isaac River*". Mounding up to 5 m is predicted within the Isaac River alluvium. Mounding is also predicted in the Tertiary / regolith "*due to a greater volume of water infiltrating and being retained by the spoil, with increased rates of recharge to the underlying strata*". The application documents (Supporting application and Appendix E) include slightly different versions of the hydrogeological conceptual model (e.g. different layers within the Permian Coal Measures (Rangal Coal Measures and Fort Cooper Coal Measures). The seepage from the OOPD to the south to south-west is suggested through the weathered bedrock layer but not deeper as the groundwater flow direction in the Permian is not shown. In contrast, the documents generally suggest seepage may reach deeper layers. Seasonality (water table level variability) is not represented. SLR (2025) Figure 11-7 (*Daunia Mine Mining Progression*) indicate that the deeper sections of Pandora Pit will only be progressed after 2037. The interpretation of flow direction in the groundwater assessment is largely dependent on the drawdown influence from the pit. The temporal evolution of the pit should be considered in the conceptual model.	(a) Provide an updated hydrogeological model to address uncertainties raised. (b) Provide an assessment of gradual groundwater impacts over time based on the scheduled works proposed, including seasonal considerations. (c) Assess the potential risk of increased groundwater expression in Isaac River at different seasons. Propose relevant shallow groundwater monitoring, including interpretation bores which will be essential to interpret water quality in bores that have previously been dry.	a) The conceptual hydrogeological model is presented in Appendix D which aligns with the revised assessment of impacts including the additional solute transport modelling which shows the movement of seepage from the OOPD off site to the southwest through Layer 2 (older alluvium and regolith) as well as the underlying Fort Cooper overburden (Layer 9). b) Within the model, enhanced recharge is applied over the area of the OOPD from 2028. The stress period length through the calibration period from 1988 to 2024 is 0.3 years, from 2024 onwards yearly stress periods are applied until 2113 when stress period length starts to increase up to 50 years for the remainder of the predictive period. Seasonality is represented for the calibration period and the annual stress periods for the predictive period up to 2113 replicate annual rainfall variations from the historic record, as well as including some periods of flow within the Isaac River. DNM monitoring bore hydrographs presented in Appendix D do not show significant seasonal variations, or much variation in response to longer term climate trends. c) The assessment includes the change (increase) in baseflow to the Isaac River of short durations following the simulation of short periods of flow in the Isaac River which locally increase level in the Isaac River Alluvium close to the channel. The increased groundwater levels in the alluvium / regolith resulting from the increased recharge over the OOPD do not result in groundwater levels at the Isaac River above the elevation of the river channel. New groundwater monitoring bores are recommended to the southwest of the OOPD - locations are presented in Section 9 of Appendix D.	a) Appendix D; Section 6.0. b) Appendix D; Figure 5-6; Figure 5-7; Figure 5-8. c) Appendix D; Section 9.0.
39	'Section 11.8 Conclusions' of the supporting document indicates that the "leachability tests on the waste rock (which, due to their nature are likely to overestimate leachate concentrations with the OOPD), resulted in concentrations below the Water Quality Objectives for Isaac Groundwaters (Zone 34), indicating that seepage from the OOPD does not pose a threat to local groundwater values". The department was not able to locate these comparisons with the Isaac Groundwater (Zone 34) objectives in the supporting document or in Appendix H – Geochemistry Assessment. Based on a comparison with Permian groundwater samples, Appendix E – Groundwater Modelling Report indicates that pH, aluminium (Al), arsenic (As), molybdenum (Mo) and selenium (Se) appeared elevated in the leachate. The pH of the leachate exceeded Isaac groundwater quality objectives (Zone 34). Other contaminants of potential concern identified in the documents (Al, As, Mo, Se) do not have defined water quality objectives for Zone 34 in EHP (2011), therefore they were likely not assessed. Appendix H – Geochemistry Assessment indicates that "*No comparison is made between leachate results and water quality guideline values, such as ANZG (2018) (or the draft ANZG 2023 guidelines), as such a comparison is inappropriate [… because] the soluble element data in this assessment is 'point source' obtained from a finely pulped sample subjected to rigorous and artificial extraction to obtain a concentration approaching 'near maximum'*." This 'near maximum' can still be used to determine the contaminants of concern because there is no authorised release to groundwater.	Provide an assessment of leachate water quality for all potential contaminants of concern against standard guideline values, bore-specific values and/or relevant groundwater quality objectives (where available) to inform the seepage risk assessment.	Section 5.5 of Appendix D presents and discusses groundwater quality data for DNM, waste rock leachability data (taken from Terrenus, 2025), and comparison of this data to relevant guideline values including the WQOs for the Isaac Groundwater Zone 34.	Appendix D; Section 5.5.

#	Matter	Information Requested	Response	Reference to Update in Supporting Document
40	The EA Schedule I1 requires that "*The holder of this environmental authority must not release contaminants to groundwater*". This condition requires that there is no change to groundwater quality from the activities. Modelling indicates a potential risk of seepage from the OOPD to groundwater. The application indicates that "*It is predicted that only seepage from the western edge of the OOPD is likely to migrate off site, and that this groundwater will remain in the deeper coal measures, below the shallow groundwater system hosted in the Quaternary and Tertiary sediments*." The current water quality bore monitoring network in the EA does not include any compliance bore monitoring towards the south to south-west from the mine, and there is no new monitoring bore proposed. While the supporting document and appendices demonstrates that the seepage is expected to be alkaline and unlikely to lead to acidifying the groundwater, an increased groundwater pH itself could pose a risk of toxicity. For example, at very high pH levels (above ~8.5), aluminium can form soluble aluminate ions, which may increase its mobility and potential toxicity in groundwater. Based on the information provided, there is a risk that bioavailable concentrations (and potential toxicity) of all three identified potential contaminants of concern in the leachate study (aluminium, arsenic and molybdenum) and more generally the parameters monitored in groundwater bores listed in the current EA may increase as a result of potential seepage influence. Compliance bores should be proposed at relevant screening depths where seepage is expected to potentially occur downgradient from the OOPD, away from the Pandora Pit.	(a) Based on updated hydrogeological model(s) (refer item (38)), propose relevant compliance bore(s) to monitor the potential impact of the OOPD on groundwater quality (including all potentially relevant screening depths) in the south to south-west direction from the OOPD where the models indicate potential seepage may occur. Display the proposed compliance bore(s) on the updated conceptual model (item (38)). (b) Provide a timeframe for installation and determination of trigger values, as per DES (2021) 'Using monitoring data to assess groundwater quality and potential environmental impacts'. (c) Provide any existing raw data for existing bores using either of the attached raw data spreadsheets (Attachment 3), including any data from local bores not owned by Whitehaven that are referred to in the documents (if available), for the development of appropriate groundwater quality limits for any new compliance bores. (d) For new proposed compliance bore(s) that have insufficient data for the derivation of reliable quality limits, propose interim limits. (e) Identify potential locations for interpretation bores that could be used to support the interpretation of any compliance bores proposed. (f) Provide a figure which depicts the location of all existing monitoring bores, and proposed compliance and interpretation bores resultant from this request for inclusion as an appendix to the EA.	a) Section 9 of Appendix D presents recommendations regarding the provisional location and monitoring objectives of three monitoring mores to the southwest of the OOPD. b) Some of the proposed monitoring bore locations are located off the ML, therefore final locations and the timeframe for installation will be subject to negotiation with the landowners. c) Current groundwater monitoring data from the previous two years has been provided as an attachment to this response. However, the proposed bores are yet to be drilled. Consequently, it is proposed that groundwater quality limits for new compliance bores are determined following two years of regular groundwater sampling and testing of the new compliance bores. This is an accurate method to inform bore-specific limits and is currently implemented in the existing EA under Condition I7, I9 and I11. d) Monitoring locations to the southwest of the OOPD have been proposed. Until they have been installed their suitability as compliance bores cannot be determined. It may be appropriate to install two bores at one or more of these locations if alluvium is dry at the time of drilling - such bores may not be suitable as EA compliance bores. Even interim limits should be established with at least some background groundwater quality for the new locations to ensure these are not breached by background quality. e) Of the locations proposed for additional groundwater monitoring to the southwest of the OOPD, some may become compliance bores, and those that do not would be considered interpretation bores. f) The DNM monitoring bore network is described in Table 5-1 and Figure 5-1 of Appendix D. The proposed location of additional monitoring bores to the southwest of the OOPD is presented in Section 9.0 of Appendix D.	a) Appendix D; Section 9.0. b) Not applicable. c) WHC DNM - A-EA-AMD-100993886-Attachment 3b Data 2 RFI Item 39 - Groundwater Data d) Not applicable. e) Not applicable. f) Appendix D; Table 5-1; Figure 5-1; Section 9.0.
41	The risk assessment methodology presented in 'Table 11-8 Risk Assessment for the Proposed DNM OOPD' appears to detail likelihood and consequence scores which are not independent from each other. An example is described below for clarification; however, this is not exhaustive, and numerous others are present. Table 11-8 of the supporting document assesses that risk to increasing water levels in landholder bores has a Likelihood of 'Possible' as the recharge applied to the OOPD reaching the water table is conservative and therefore it is considered unlikely that the predicted increases will be realised. The Consequence score is assessed as 'Negligible' citing that '*it is considered unlikely that the predicted increases would be fully realised*'. Both therefore appear to be an assessment of the likelihood of the risk event occurring, whereas consequence should reflect the impact or outcome if the risk event occurs.	Provide a revised risk assessment which scores consequence appropriately to reflect the impact or outcome if the risk event occurs.	The risk assessment has been revised in line with the comments regarding consequence and likelihood and in the light of the additional solute transport assessment work.	Supporting Document; Table 11-6; Table 11-8.

#	Matter	Information Requested	Response	Reference to Update in Supporting Document
	Stygofauna Assessment			
42	Section 2.1.2 Field Survey of Appendix J - Stygofauna Values Assessment Report states that Stygofauna survey at seven bores was completed in July 2024 and May 2025 (Table 2-1; Figure 1-1). Upon review of the bores sampled, it is noted that no reference / baseline bores were sampled away from potential impacts from the existing mining operations.	Provide further information on the reasons for not including reference / baseline bores further from the existing mining operations, and confirmation that the reference / baseline bores relied upon are sufficiently representative.	A desktop review of regional data was undertaken to identify potential stygofauna, followed by targeted surveys within and adjacent to the project area. Given the limited geographic range of stygofauna, broader regional surveys were not considered relevant. Seven groundwater bores were sampled on two occasions (14 samples total), meeting the minimum requirements for a Stygofauna Pilot Study.	Appendix J; Section 2.1.2.
43	The headings of 'Table 2-3 Ratings Used to Assess the Consequence of Potential Impacts' indicate that consequence definitions are broadly based on likelihood. As previously noted, consequence should reflect the impact or outcome if the risk event occurs, and should therefore not be defined based on likelihood	Provide a revised risk assessment which scores consequence appropriately to reflect the impact or outcome if the risk event occurs.	Table 2-3 has been updated to accurately reflect the contents of the table.	Appendix J; Table 2-3.
	Soil and Land Resource Assessment			
44	'Section 2.3.1 Sampling Program' of Appendix G - Soil and Land Resource Assessment Report states that 'In total, 5 detailed sites were assessed, of which 4 were lab analysed, and 8 check sites were assessed'. Upon review of Figure 2-1, a total of nine (9) check sites are illustrated, and the location of detailed sites is not indicated in the legend. In addition, Appendix E - Check Site Descriptions of Appendix G excludes C11.	Clarify the number of check sites used and revise the documents accordingly.	Figure 2-1 of Appendix G has been updated to remove Check Site C11.	Appendix G; Figure 2-1.
45	Appendix G states that 'the Project Area PMLU is cattle grazing (see Figure 5-2 Appendix A)' and Figure 5-2 of Appendix G illustrates the entirety of ML 700085 as a grazing PMLU. However, 'Section 4.5.1 Post-mining land use' of the supporting document states that the PMLUs will be comprised of cattle grazing on lower slopes, and woodland habitat on elevated surfaces.	Clarify reasons for this inconsistency and provide revised documents which accurately describe, illustrate and justify the proposed extent and distribution of PMLUs for the Project.	The Supporting Document descriptors of PMLU's have been updated to be in line with Appendix G. Note this is not a change to the PMLU, a descriptor of Woodland PMLU was provided when not relevant to the Project.	Supporting Document; Section 4.5.1.
46	'Table 4-2 Soil Map Units within OOPD' of Appendix G – Soil and Land Resource Assessment Report maps dominant soil type based on an OOPD area of 302 ha only. However, as noted above the area of the OOPD is understood to be larger than this. It is also noted that the land system and soil mapping considered a Project Area of 500 ha only, whereas the extent of ML 700085 is 504 ha.	Provide a revised Soil and Land Resource Assessment Report that accurately maps the land systems and soils within the extent of the disturbance footprint, and broader ML area.	Figures within the Supporting Document and Appendix G have been revised.	Supporting Document Appendix G.

#	Matter	Information Requested	Response	Reference to Update in Supporting Document
47	'Table 4-4 Available Soil Resource Summary for Project Area' of Appendix G – Soil and Land Resource Assessment indicates that topsoil may be derived from a total area of 500ha, while 'Table 4-5 Available Soil Resource Summary for OOPD' proposes to derive material from an area of 302 ha. It is unclear to what extent material outlined in Tabe 4-4 will be available for use in rehabilitation, noting that this exceeds the proposed disturbance footprint within ML 700085 and appears to include undisturbed areas. An OOPD disturbance footprint of 302 ha is shown in Table 4-5, which is less than that described in Section 3.2.3.1 of the supporting document as follows: *The OOPD footprint is proposed to disturb 363 ha, a portion of which (61ha) will be location on the existing and authorised ML 1781.* It is unclear whether the soil resource summary for the OOPD disturbance has accounted for the proposed extent of disturbance described in the supporting document. Please also note the earlier inconsistency matter raised regarding the extent of proposed disturbance, which must be considered in response to this item to ensure consistency. Furthermore, 'Section 7.2.4.2 Revegetation' of Appendix G states that topsoil will be spread at a depth ≥150mm. This is inconsistent with 'Section 4.6.1 Topsoil Management and Surface Preparation' of the supporting document which states that areas will be covered with a nominal ~200 mm of topsoil prior to seeding, later contradicted by 'Table 4-2 Growth media, ameliorant options and surface treatments for Project PMLUs' which describe a range of depths of 100 mm minimum for the Woodland habitat PMLU.	(a) Clarify the volumes of topsoil available for each proposed domain of the Project including the OOPD haul roads / tracks, sediment dam and MAW dam. (b) Clarify the proposed topsoil depths for each PMLU, and provide revised documents which consistently describe the proposed depths. (c) Confirm, with reference to the proposed depth of topsoil respreading, the volumes available for rehabilitation of the Project disturbance, and whether these will provide a surplus or deficit. (d) Where subsoil is proposed to be used, confirm the ameliorations proposed to create suitable growth media with reference to Creating alternate growth media to achieve successful revegetation on Queensland mines: Technical Paper (QMRC)1.	a) Areas and volumes have been updated based on revised disturbance footprints. b) The Supporting Document descriptors of PMLU's have been updated to be in line with Appendix G. Note this is not a change to the PMLU, a descriptor of soil depth relative to the PMLU for Woodlands was provided when not relevant to the Project. c) The areas and volumes have been updated based on revised disturbance footprints. Topsoil required has been calculated based on proposed disturbance area. There will be a surplus of topsoil. d) Please refer to the rehabilitation strategies provided in the PRCP (2026). Stripping of subsoil will not be required. Amelioration of subsoil or use of alternative material for growth media are covered in the PRCP Material Characterisation document.	a) Appendix G; Table 4-4. b) Supporting Document; Section 4.5.1. Appendix G; Section 5.1. c) Appendix G; Table 4-4. d) PRCP.
48	Section 6.1.2.1 and Section 6.1.2.2 of Appendix G do not provide a clear indication as to whether the land suitability classes discussed relate to cropping or grazing. For example, Section 6.1.2.1 states '…*the DNM pre-mining land suitability classes for grazing were predominately Class 2 to 3 with some small areas of Class 4*…'. However, the subsequent paragraph then states '*Based on the work undertaken by SLR in 2021 and 2023, the land suitability assessment for the proposed Project has rated each of the SMU's within the Project (SMU 1) as Class 4 for cropping*'. The heading and data in 'Table 6-2 Pre and Post Mining Land Suitability' furthermore does not clarify if the table relates to cropping or grazing. The above contradictions and lack of specificity are carried over to Section 6.3.1 Land Suitability of the supporting document.	Provide a revised supporting document and appendices which clearly indicates whether the land suitability discussed at Section 6.1.2.1 and 6.1.2.2 of Appendix G, and Section 6.3.1 of the supporting document, relate to cropping or grazing land suitability.	Section 6.0 of Appendix G lists the documents used to evaluate the cropping suitability, Agricultural Land Class and Grazing suitability assessments. The headings of Sections 6.1 and 6.3 of Appendix G have been updated to make this more transparent.	Appendix G; Section 6.0; Section 6.1; Section 6.3.
49	'Table 6-2 Pre and Post Mining Land Suitability' quantifies the changes in land suitability class for a broader Project area of 500 ha only, and does not provide a breakdown of the proposed changes in land suitability area within the direct disturbance footprint. Based on this, it is not possible to understand the pre-mining and post-mining land suitability changes for the disturbance footprint specifically. Please also note the previous item regarding confusion in whether Table 6-1 relates to cropping or grazing which must be addressed. This issue is replicated in Section 6.2.2.2 Post-Mining and corresponding 'Table 6-4 Pre and Post Mining Agricultural Land Class' which similarly do not provide a breakdown of agricultural land class changes for the disturbance footprint specifically.	Provide a revised 'Table 6-2 Pre and Post Mining Land Suitability' and 'Table 6-4 Pre and Post Mining Agricultural Land Class' in Appendix G (and corresponding tables in the supporting document) which include a breakdown of pre- and post-mining land suitability and agricultural land class changes for the disturbance footprint specifically, in addition to the broader project area. Ensure that this addresses the inconsistencies in areas noted in various earlier information request items.	Table 6-2 and Table 6-4 have been revised to include breakdown of the disturbance footprint, and to address inconsistencies.	Appendix G; Table 6-2; Table 6-4.

#	Matter	Information Requested	Response	Reference to Update in Supporting Document
50	Section 6.3.3.1 of the supporting document in relation to grazing land suitability states that '*the dominant limiting criteria in the pre-mining SMU1 and SMU2 was nutrient deficiency, with SMU1 rated as Class 5 and SMU2 as Class 4 based on this criterion*' and that '*results for the pre-mining Grazing Land Suitability Assessment are presented in Figure 6-3*'. However, upon review of Figure 6-3, the entirety of the disturbance footprint for the OOPD is mapped as Land Suitability Class 2 for Grazing, with the exception of a portion of the haul road which is mapped as Class 3.This is inconsistent with the mapping provided at Figure 6-3 of Appendix G, which appears to indicate that the disturbance footprint is primarily land suitability Class 5 for grazing. The department also notes that, in contrast to earlier sections, Section 6.3.3 Grazing Suitability of the supporting document (replicated as Section 6.3 Grazing Suitability of Appendix G) does not provide a breakdown of the pre- and post-mining land suitability classes for grazing and estimated changes/reductions. In addition, the application proposes a PMLU of Grazing on lower slope areas, and Woodland Habitat for elevated slopes. However, no figures have been provided to illustrate the distribution of anticipated post-mining land suitability classes for grazing.	(a) Clarify the reasons for the inconsistency between Figure 6-3 of the supporting document, and Figure 6-3 of Appendix G, and provided update Figures to address any actual inconsistency. (b) Provide a table, consistent with those presented in 'Table 6-2 Pre and Post Mining Land Suitability' and 'Table 6-4 Pre and Post Mining Agricultural Land Class' of Appendix G, which includes a breakdown of the pre- and post-mining land suitability for grazing and estimated changes/reductions for both the: i. Project area as a whole; and, ii. Direct disturbance footprint specifically. (c) Provide a figure which illustrates the post-mining land suitability classes for grazing. (d) Provide revised documents which incorporate the above table and figures demonstrating the pre-mining and post-mining land suitability classes for Grazing.	a) Figure 6-3 of the Supporting Document has been updated to reflect Figure 6-3 of Appendix G. b) Areas and volumes have been updated based on the revised disturbance footprints used in the Supporting Document. c) Figure 6-4 has been included in Appendix G illustrating Post-mining Grazing Suitability. d) Appendix G has been revised to include the tables and figures requested in IR items 49 (a) - (c).	a) Supporting Document; Figure 6-3. b) Supporting Document; Table 6-1. c) Appendix G; Figure 6-4. d) Supporting Document; Section 6.0. Appendix G.
51	Based on review of 'Table 6-7 Pre-mining Grazing Suitability Class Based on SMU 1 and SMU 2 Chemical and Physical Properties' (replicated as Table 6-4 of the supporting document) it appears that, besides elevated slopes in parts of the rehabilitated landform, the sole limiting factor resulting in the land suitability class determination of Class 4 to 5 for the Project was 'Available-P (mg/kg) in 0-0.1 m depth increment'. Table 6-7 of Appendix G (Table 6-4 of the supporting document) indicates that the pre-mining land suitability for all other limitations considered were determined to be Class 1 to 2. Section 6.3.2.2 of Appendix G (Section 6.3.3.2 of the supporting document) states that '*post-mining grazing suitability could be enhanced to Class 4 across the entire disturbance footprint with the addition of high analysis phosphorus fertiliser*'. Where slopes and available P are the limiting factors, and noting that the nutrient deficiency is proposed to be managed through fertiliser addition, further justification is required to enable DETSI to understand why a post-mining grazing suitability Class 4 across the entire disturbance footprint is appropriate.	Provide further information regarding: (a) Why a land suitability better than Class 4 is not appropriate for lower slope areas, noting the proposed amelioration of P levels. (b) The proposed volumes of fertiliser, and feasibility of achieving the P levels required for a better land suitability class. (c) Potential risks and sustainability of such interventions, noting the proximity to receiving waters, and how these will be mitigated.	Pre-mining grazing suitability classes are Class 4 and Class 5. Limitation of Class 4 is soil water storage, and Class 5 is available Phosphorus. Post-mining grazing suitability class to be returned to pre-mining grazing suitability class. a) Although phosphorus deficiency is technically amendable, land suitability classification must reflect sustainable, whole-of-system performance. b) Amelioration of growth media covered in material characterisation of PRCP and outside the scope of the current investigation. c) Refer to item (b).	a) Appendix G; Section 6.3.2.2. b) PRCP. c) PRCP.

#	Matter	Information Requested	Response	Reference to Update in Supporting Document
	Post-mining Land Use and Rehabilitation			
52	PMLUs in the supporting document cite both Woodland Habitat and Cattle grazing (e.g., Section 4.5.1 Post-Mining Land Use). However, the written notice submitted for the change states 'The updated PRCP covers rehabilitation activities associated with the new Out of Pit Dump (OOPD) on ML700085, with the OOPD being rehabilitated to a cattle grazing post mining land-use (PMLU)'. Furthermore, the proposed PRC Plan submitted describes the PMLU for the OOPD as Cattle Grazing. Rehabilitation milestone RM3.7(c) of the proposed PRCP Schedule, which applies to RA2 and RA4 within ML 70008, requires 'no slopes ≥25% gradient. However, Appendix G - Soil and Land Resource Assessment Report in the supporting document states 'Increased slopes in the final landform will reduce the grazing suitability' and indicates that the maximum slope angle of around 3H:1V (≈18°), which is 32.5%. The proposed landforms are therefore unable to achieve a Land Suitability Assessment (LSA) Class of 3 or 4 which require slopes of >10-15% or >15-20% respectively and will not comply with the proposed PRCP Schedule RM3.7(c).	a) Clarify how the Cattle Grazing PMLU will be achieved across all rehabilitation areas based on the outcomes of Appendix G - Soil and Land Resource Assessment Report, replicated in the supporting document, and the slope requirements in RM3.7(c) of the proposed PRCP Schedule. b) Provide application materials consistently describe the proposed PMLUs for all land within ML 700085.	c) Section 4.5.1 of the Supporting Document has been updated to reflect and refer to the proposed Progressive Rehabilitation and Closure Plan (PRCP). d) The Supporting Document has been updated to address inconsistencies with the PRCP.	a) PRCP. b) PRCP.
53	'Section 4.8.2 Rehabilitation Requirements' of the supporting document cites earlier standard completion criteria as contained in the current EA (i.e. for woodland PMLU, >2 trees etc). These criteria do not reflect contemporary rehabilitation criteria, which must include monitoring to current best practice standards (e.g. modified BioCondition), and native ecosystem rehabilitation targeted to a suitable specific RE. As per Item (1), the supporting document must be updated to refer to the PRC Plan materials provided with the change request dated 23 April 2026.	Revise the supporting document to refer to the PRC Plan materials to clarify the proposed rehabilitation requirements.	Rehabilitation of the Project Area will be in accordance with the PRCP Schedule. The Supporting Document has been updated accordingly.	Not applicable.

Attachment 2: Information Requested for PRCP Amendment

#	Matter	Information Requested	Response
1	**Post mine land use** Table 4-1 of the EA amendment supporting document states that woodland habitat will be established on the OOPD batters with cattle grazing on lower gradient areas and haul road verges. It is noted that the proposed PMLUs formed part of a landform options assessment with final allocation of PMLUs to be determined through the PRCP amendment. Section 3.3 of the PRCP states that grazing is predominately planned for lower slope areas with the woodland habitat PMLU to occur on steeper slopes that are unsuitable for grazing. Figure 3-30 of the PRCP shows that the area proposed for the Daunia West Infrastructure Project (DWIP) on MLA700085, which include spoil dumps and infrastructure areas, mapped as having a PMLU that is entirely dedicated to cattle grazing with no areas of woodland habitat. DETSI understands that landholders have requested that grazing areas be maximised and the project disturbance footprint has been reduced to avoid sensitive areas, however, due to the presence of remnant regional ecosystems to the south of the DWIP and along the Isaac River, consideration should also be given to improving habitat value and connectivity in the post mining landscape when nominating PMLUs. If the OOPD is proposed to have steeper slopes, a woodland habitat PMLU may be more appropriate to ensure achievement of the existing PRCP milestones – refer to item 2 next.	Update the PRCP to include more detail about the rationale for nominating a PMLU of cattle grazing for the DWIP and what consideration was given to the current rehabilitation milestone criteria in the PRCP schedule, particularly in relation to the suitability of the slopes proposed for the OOPD in the EA amendment application supporting document, the outcomes of consultation with landholders and the values of the existing environment surrounding the site.	Table 4-1 of the EA amendment supporting document contained an error in describing woodland habitat establishment on OOPD batters. The intended and consistent PMLU for the OOPD, as reflected in the PRC Plan, is cattle grazing and this has been corrected in the EA amendment supporting documentation to ensure consistency with the PRC Plan. The OOPD slopes within the DWIP area are generally ≤10%. A small, localised area on the southern toe of the OOPD (up to approximately 11%) may occur as a result of refinements to the landform footprint to improve performance under extreme flood events. An area in the northeast of the OOPD, at the integration point with the main waste rock dump (WRD), may have localised steeper grades where the two landforms converge; however, this area will be subject to AQP-prepared detailed design in accordance with PRCP Schedule Condition PRCP13, and designed to enable surface water to be safely conveyed through this area to the natural surface. Accordingly, the OOPD landform will be constructed to slopes consistent with the nominated cattle grazing PMLU and relevant PRCP Schedule design criteria. Woodland habitat connectivity was considered in the broader mine closure design context (PRC Plan Section 3.3). However, given the OOPD location, geometry and landholder preference for cattle grazing post-mining land uses, it is not considered suitable for woodland habitat, with connectivity outcomes instead focused on more appropriate areas of the final landform. It should be noted that enhanced woodland habitat connectivity outcomes have been incorporated into Revision 3 of the PRC Plan, through the removal of an infrastructure corridor running northwest/southeast across the woodland habitat PMLU area of the main WRD.
2	**Landform design** It is a requirement of the PRCP schedule that land rehabilitated to a PMLU of cattle grazing must achieve grazing land suitability class 3 or better, or not different from pre-mining if ≥ class 4. This criterion was transitioned into the PRCP schedule because it was approved in the EA for the existing mine. Given that WHC are seeking approval to disturb new areas, consideration should be given to revising the PRCP schedule criteria to reflect current best practice, a reduction in slope gradients (≤10% - ≤15%) and the achievement of at least grazing land suitability class 3 for grazing areas for the DWIP. Section 6.3.3 of the EA amendment supporting document states that the PMLU areas to be rehabilitated to grazing could be improved from the pre-mining land suitability by addressing the nutrient deficiency and water erosion limitations by adding phosphorus fertilizer and reducing the slopes to less than 12%, as all other factors had parameters within Class 1 and Class 2. Section 3.1.4.2 of the EA amendment supporting document states that dumps will be progressively shaped to their final landform based on a maximum overall slope from dump crest to dump toe of 10% prior to being topsoiled and revegetated. However, section 3.2.3.1 states that the OOPD will be designed to a maximum final slope angle of ~18 degrees (i.e. 32.5%) or flatter to ensure long term erosion control and will achieve a factor of safety (FoS) of ~1.3 - 1.5 to ensure permanent stability. The latter does not comply with the rehabilitation milestone criteria for areas with a grazing PMLU (or a woodland habitat PMLU) in the current or proposed PRCP schedule. Table 3-41 (Landform design criteria) of the proposed PRCP indicates that for spoil dumps with a PMLU of cattle grazing, at least 70% of	Update the PRCP to include more detail about the landform design for the OOPD that has been proposed in the EA amendment application and how this will meet the minimum requirements in the PRCP schedule for achieving stable condition. Ensure that any updates provide clear consistency between the adopted PMLU, current best practice and achieves the relevant PRCP milestone criteria, including but not limited to, slope gradients and FoS.	Section 3.2.3.1 of the EA amendment supporting document stated 'the OOPD will be designed to a maximum final slope angle of 18° or flatter….' This statement reflects an earlier conceptual design which is not reflective of the final planned rehabilitated landform for Daunia Mine, as articulated in the PRC Plan. As discussed in the response for Item 1, the final landform slopes are in the order of ≤10-11% for the OOPD and are consistent with the nominated cattle grazing PMLU. Final designs will achieve compliance with PRCP Schedule criteria, including FoS ≥1.5 and erosion stability requirements, and will be confirmed through AQP-prepared detailed design and certification (refer PRC Plan Section 3.6.1.5.4 and PRCP Schedule Conditions PRCP13–PRCP14).

#	Matter	Information Requested	Response
	slopes are to be ≤20% and at least 50% of slopes are to be ≤15% with no slopes permitted to be >25% for any PMLU. Infrastrastructure areas are to be reshaped and be free draining with all slopes ≤12%. The final landform and erosion modelling presented in the PRCP demonstrates that this design will achieve geotechnical and erosional stability providing the FoS is ≥1.5, an appropriate cover system and minimum vegetation groundcover requirements in the rehabilitation milestone criteria of the PRCP schedule are met.		
3	**Community consultation** It is a requirement of s126C of the EP Act and section 3.5 the PRCP guideline to engage the community in the development of a proposed PRCP and throughout the different stages of the mine's life. Community consultation carried out through the EA and PRCP schedule amendment processes under the EP Act and MR Act should be detailed in the PRCP. The community consultation register included in Appendix 4.4 of the amended PRCP does not refer to any consultation undertaken for the DWIP in relation to the proposed PMLU for this area and potential impacts of the final landform design on downstream landholders and the receiving environment.	Update the PRCP to include details about the consultation that has been undertaken to date and proposed to be carried out for the DWIP with respect to the final outcomes planned for the land.	Whitehaven undertook additional community consultation since the PRCP was submitted on the 9th April 2026, this consultation involved both downstream landholders and other community stakeholders. The additional consultation that has been undertaken is listed below: *Landholders* • 14th May 2026 – In Person Meeting - Jeanette & Alan Williams *Community* • 6th May 2026 – In Person – Issac Regional Council (Mayor and Councillors)
4	**Soil and erosion** Section 3.1.7 of the PRCP states that further soil and land resources assessments were undertaken within the MLA for the DWIP. The results of laboratory analyses showed that soils were moderately dispersive and generally non-sodic topsoil with sodic to high sodic subsoils. The erodibility risk is moderate to high and 'significant' erosion and sediment controls are likely to be required. There is insufficient detail provided in the PRCP to demonstrate that the current proposed erosion controls will be adequate and what additional measures may be required for the OOPD to manage any increased risk. Section 7.7 of the EA amendment supporting document describes the OOPD spoil as mainly NAF with a negligible risk of developing AMD with surface water runoff and seepage being non-saline to slightly saline with low soluble metal/metalloid concentrations. However, the spoil is expected to be sodic to strongly sodic with potential for dispersion and erosion, with a low likelihood of this material being selectively handled. This section states that to control erosion and runoff the mitigation measures will involve designing the final slope angle to a maximum of 18 degrees, with benches constructed at 10-20m lifts and contour drains and drop structures. It is not clear how reshaping the dumps to a final slope angle that is steeper than what is currently approved for spoil in the PRCP schedule is an appropriate strategy for controlling erosion.	Update the PRCP to include more detail about the specific mitigation measures that will be considered for controlling erosion and runoff from the OOPD and how these will ensure that the rehabilitated landform achieves compliance with the milestone criteria in the PRCP schedule.	The OOPD will be rehabilitated to a final landform with slopes in the order of ≤10-11% (refer Item 1), significantly reducing erosion risk relative to the scenario described in the EA supporting document. Erosion and runoff risks are addressed through the PRC Plan landform design, cover system and surface water management framework as described in: • Section 3.6.1.6 (Cover Design); and • Section 3.6.1.7.4 (Water Management Controls). These sections describe the AQP-designed and verified measures to manage erosion risk and ensure compliance with PRCP Schedule criteria (including RM3). No additional measures beyond those already captured in the PRC Plan are required for the OOPD.
5	**Flooding and landform stability** The current rehabilitation milestone criteria in the PRCP schedule for spoil dumps requires appropriate mitigation measures be in place for outer landform slopes that interact with flood waters up to 0.1% AEP as modelled on the closure landform and designed by an AQP to minimise potential instability of the landforms from interaction with flood waters. Section 3.6.1.2.5 of the PRCP states that under 0.1% AEP, shallow low velocity floodwaters are expected to encroach on the toe of the OOPD on the southern side. Peak velocities adjacent to the OOPD are 1.7 m/s under the 0.1% AEP event. Under PMF conditions these increase to velocities typically within the range of 2.1	Update the PRCP to include more detail about the specific mitigation measures that will be considered to ensure that the rehabilitated slopes of the OOPD that interact with high energy flood flows will remain stable long term.	Flood waters are predicted to be shallow and low velocity along the toe of the OOPD under the 0.1% AEP flood event. With the cover conditions described in response to item (4), no further mitigation measures are required. During events rarer than the 0.1% AEP, flood impacts are expected to be widespread and consistent throughout the broader catchment and are not anticipated be any more severe at the toe of the OOPD than other areas of the catchment and therefore do not warrant any additional mitigation measures.

#	Matter	Information Requested	Response
	– 2.8 m/s. A localised area near the southwest corner of the OOPD experiences velocities of up to 3.2 m/s. The OOPD is described as not forming part of the Pandora residual void flood protection landform and presents no risk of erosional instability leading to inundation of the Pandora residual void. Consequently, conditions PRCP16 of the PRCP schedule and rehabilitation milestone criteria 3.13 requiring mitigation of high energy flows (>2.5m/s) against constructed landforms to reduce flow energy, including stabilisation measures, do not apply to the OOPD. Instead RM3.13 will apply, which requires mitigation measures to be in place for outer landform slopes that interact with flood waters up to the 0.1% AEP designed by an AQP to minimise potential instability of these landforms. The PRCP includes insufficient information about how the impacts of high energy flows against the OOPD will be monitored and mitigated.		
6	**Groundwater quality** Section 3.1.2.5.6 of the PRCP states that there is potential for minor seepage from the OOPD and groundwater mounding in the local underlying strata. This seepage may be captured in a toe drain around the OOPD. The higher recharge into the OOPD will create a groundwater mound that will migrate towards the Pandora pit void. Modelling of flow paths through particle tracking indicates that seepage from spoil dumps will largely migrate toward the Pandora residual void NUMA, which will act as a terminal sink. There is limited seepage from the far western margin of the OOPD away from the Pandora residual void that is expected to continue south as shown in Figure 3-31. Seepage quality from the OOPD is not expected to pose a risk to local groundwater values as it will remain at depth in the Permian coal measures and is not expected to enter the shallow aquifers. Leachability tests show that the waste rock poses negligible risk of acid, metalliferous or saline drainage and all results are below WQOs for Isaac groundwaters. WHC have concluded that the risk associated with the off-lease migration of seepage from the OOPD is low. Figure 3-7 of the PRCP shows that Quaternary alluvium associated with the Isaac River is approximately 500m to 1km west of the southern boundary of the mine. Groundwater in the Isaac River Alluvium is extracted by landholder bores. DETSI notes that there are no new groundwater monitoring bores proposed to the south-west of the DWIP to monitor for any potential groundwater contamination or seepage from the OOPD. Additionally, the PRCP states that monitoring bores installed in the alluvium at DNM have been dry since installation, however, bore surveys indicated that there are private groundwater bores in use in the Isaac River alluvium, 4 directly south of the mine with the nearest 'active' domestic supply bore (Bore 9/House bore) within 1km.	Update the groundwater monitoring network as well as Figure 4 and Attachment 8 of the PRCP schedule to include an additional bore(s) around the DWIP as appropriate, as determined by a suitably qualified person, to monitor for potential impacts to groundwater quality from OOPD seepage post mining.	Monitoring locations to the southwest of the OOPD have been proposed by a suitably qualified person. These bores have been identified to monitor for potential impacts to groundwater quality from OOPD seepage post mining. It may be appropriate to install nested bores at one or more of these locations if alluvium is dry at the time of drilling - such bores may not be suitable as EA compliance bores.

#	Matter	Information Requested	Response
7	**Groundwater level** Section 3.6.1.1.3 of the PRCP states that modelled post mining equilibrium groundwater levels indicate that the water table will remain depressed long term because of inwards groundwater flow gradients to the residual voids and evaporation. WHC state that as per condition PRCP17 of the PRCP schedule, an up-to-date groundwater and water balance model will be maintained. The updates will continue to inform predictions of groundwater level and will enable refinement of drawdown and groundwater level predictions in relation to potential impacts to GDEs and third-party bores. With groundwater mounding anticipated as a result of seepage from the OOPD with the proposal for such seepage to migrate to the NUMA, DETSI notes that there are no specific rehabilitation milestone criteria requiring groundwater level to be monitored as part of RM8 to demonstrate that there is no environmental harm being caused off the mining lease from the rehabilitated final landform.	Update the PRCP schedule to include the following additional rehabilitation milestone criteria in RM8 and a table of groundwater level thresholds that must not be exceeded post mining. Groundwater level is monitored quarterly, and all results must not exceed the Level Thresholds outlined in **Attachment 10 – Groundwater level** thresholds, for a minimum of 10 consecutive years.	Groundwater level monitoring will be undertaken in accordance with the Environmental Authority (EPML00561913), which requires quarterly measurement of groundwater levels across the approved monitoring network. The Progressive Rehabilitation and Closure Plan (PRCP) schedule has been updated, specifically within Rehabilitation Milestone 8 (RM8), to incorporate post-mining groundwater level monitoring criteria. These amendments formalise the requirement that groundwater levels are to be monitored quarterly and assessed against the defined threshold criteria. These thresholds are now presented in the updated Attachment 9, which has been retitled from “Groundwater Quality Limits” to “Groundwater Quality and Level Limits” to accurately reflect its contents (negating the need for an Attachment 10). Consistent with the Environmental Authority, specific levels have not been prescribed, with compliance demonstrated through an interpretive assessment of groundwater level trends relative to baseline conditions, and the conceptual hydrogeological model.
8	**Surface water catchments and downstream ecology** Section 3.1.2.6 of the PRCP states that pre-mining water flows from the mining area were transported to the Isaac River via drainage lines and unnamed and unmapped watercourses. Appendix A (Aquatic ecology assessment) of the EA amendment application supporting document states that an unnamed ephemeral waterway traverses the DWIP, which is also bound by an unnamed waterway to the east, the Isaac River to the south, New Chum Creek to the west. Construction of the OOPD, dams and haul road will require infilling of the west branch of the unnamed waterway and a culvert installed over the unnamed waterway. Further aquatic ecology assessments were undertaken for the DWIP, which indicated that these systems are substantially degraded by long term grazing, land clearing, altered flow regimes and erosion. The riparian vegetation was noted to be sparse or absent in the DWIP areas. Section 6.2.7 adds that the permanent removal of the upstream section of the unnamed waterway could have long-term impacts on non-protected components of the environment. Stream flow is related to rainfall runoff so that it is intended that flows be maintained through clean water diversion infrastructure. Appendix C (Surface water management) discusses the final landform topography and catchment areas as they relate to final voids and not the fate of surface water runoff from rehabilitated landforms that will not report to the void sub-catchment area. Figure 3-20 of the PRCP shows that to the south of the confluence of the two unnamed drainage lines that traverse the mine, there are ground-truthed endangered and of concern regional ecosystems (RE11.3.1 and RE11.3.3), a farm dam and wetland along an undisturbed drainage line that flows to the Isaac River. Section 3.6.7.1 of the PRCP states that except for the residual void catchment, the closure landform above natural surface level will be free draining with surface water being conveyed by natural drainage paths reporting to the downstream receiving waters. It is not clear from the PRCP if and how surface water from the rehabilitated final landform will report to this drainage line and what impact this will have on the downstream EVs that may be dependent on the pre-mining flows.	Update the PRCP to include further detail about the surface water catchment areas and flow paths of drainage lines in the rehabilitated final landform and how these interact with or impact the existing waterways surrounding the mine. DETSI recommends consideration be given to revising the PRCP schedule to include the haul road crossing at the DWIP in RA3 so it can be rehabilitated with native riparian vegetation.	The PRC Plan will be updated to include conceptual surface water flows for the post-closure OOPD. Conceptually, surface water runoff from the western side of the rehabilitated OOPD will be directed in a southerly direction via shallow open channels that report to the unnamed drainage line to the southeast of the OOPD. Surface water runoff from the eastern side of the rehabilitated OOPD will be directed to a shallow open channel running between the toes of the OOPD and the Pandora Residual Void flood protection landform. If necessary to safely convey surface water flows, this channel, along with the drainage infrastructure at the integration point between the OOPD and the Main WRD landform to the north, will be designed by an AQP during the detailed design phase for this area of the rehabilitation. This eastern channel will also report to the unnamed drainage line to the southeast of the OOPD. The objective of the OOPD surface water management plan will be to minimise loss of flow to the downstream catchment, compared to flow regimes prior to OOPD construction. Refer to the response to Item (4), temporary erosion and sediment controls will be employed to manage impacts from the OOPD until revegetation establishes and sediment loads reflect those of the surrounding areas not impacted by mining activities. Refer to the response to Item (1), the PMLU for the entire OOPD footprint is cattle gazing as requested by the post mining land manager. Therefore, there are no opportunities for connectivity with woodland habitat within the OOPD footprint. As noted in the response to Item 1, the OOPD is proposed entirely as cattle grazing PMLU in accordance with landholder preferences and landform suitability. There would be little value in attempting to rehabilitate the culvert footprint area as a small, isolated island of riparian PMLU when surrounding areas in all directions have been, and will continue to be grazed post closure. Riparian and woodland habitat connectivity outcomes are instead achieved through the main WRD and adjacent areas, where larger, contiguous areas of habitat can be established (refer Section PRCP Plan Section 3.3 and Figure 3-30). This approach reflects a balanced outcome between landholder expectations, landform constraints and ecological values.

#	Matter	Information Requested	Response
	The section of unnamed drainage line where the culvert is proposed to be constructed is mapped as having a PMLU of cattle grazing in the PRCP, however, consideration should be given to whether it may be more appropriate to rehabilitate this portion of the drainage line with native riparian species (i.e. RA3) to reinstate existing habitat values and improve connectivity between the regional ecosystems along the Issac River and the areas of woodland habitat rehabilitation on the mine site.		