Rehabilitation Management Plan

Woodlawn Mine Tarago

(Out for Consultation, as required by MP 07_0143)

Document Review/Change History

Date	Review Change Summary Created, Reviewed, Changed or Obsolete	Revision No.	Authors	
			Reviewed by	Approved by
01/05/2022	Created to comply with Resource Regulator new form and way template. Replaced C&M MOP.	A	ZR	ZR
30/05/2024	Reviewed to incorporate revised final landuse & landform design arising from S240 Notice program of works. Separated from former rehabilitation and vegetation management plan	1	KC	AVN
31/10/2025	General update	2	KC	AVN

Summary table

Aspect	Details	
Name of mine	Woodlawn Mine Tarago	
RMP commencement date	August 2022	
RMP revision dates and version numbers	As per first page	
Mining Leases	**Lease No**	**Expiry**
	S(C&PL)L 20	16 November 2029
Name of lease holder	Tarago Operations Pty Ltd	
Date of submission	31/10/2025	

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Glossary

Acronym	Definition
ACM	Asbestos Containing Material
AMD	Acid Mine Drainage
AS/NZS	Australian/New Zealand Standard
AWT	Alternative Waste Technology
C&M	Care and Maintenance
CCC	Community Consultative Committee
CMCP	Conceptual Mine Closure Plan
DEVELOP	Develop Global Limited
DPHI	Department of Planning, Housing and Infrastructure
DPI – Water	Department of Primary Industries - Water
DRG	Division of Resources and Geosciences (now NSW Resources Regulator)
EA	Environmental Assessment
EFA	Ecosystem Function Analysis
EMS	Environmental Management
EPA	Environment Protection Authority
EPL	Environment Protection Licence
ED1	Evaporation Dam 1
ED2	Evaporation Dam 2
FLRP	Final Landform and Rehabilitation Plan
GM LEP 2009	Goulburn Mulwaree Local Environmental Plan 2009
Heron	Heron Resources Limited
Infigen	Infigen Energy Limited
ISO	International Organization for Standardization
LFA	Landscape Function Analysis
LGA	Local Government Area
LTA	Less Than Adequate
MBT	Mechanical Biological Treatment
MP 07_0143	Project Approval MP 07_0143, as modified
MOP	Mining Operations Plan
NAF	Non-Acid Forming
NSW	New South Wales

Acronym	Definition
OEH	Office Environment and Heritage
PAF	Potentially Acid Forming
PFAS	Per- and polyfluoroalkyl substances
RCE	Remediation Cost Estimate
REMP	Rehabilitation and Environmental Management Plan (replaced with RMP)
RMP	Rehabilitation Management Plan
RRE	Resource Recovery Exemption
RRO	Resource Recovery Order
RWRD	Rehabilitated Waste Rock Dump
SML20	Special Mining Lease 20 (alternative reference to S(C&PL)L 20
TARPs	Trigger Action Response Plan
TDN	Tailings Dam North
TDS	Tailings Dam South
TDW	Tailings Dam West
TOP	Tarago Operations Pty Ltd
Tri Origin	Tri Origin Minerals Ltd
TSF	Tailings Storage Facility
TSF4	Tailings Storage Facility 4
Veolia	Veolia Environmental Services Pty Ltd
WAL	Water Access Licence
WOO	Woodlawn Organic Output
WRDAM	Waste Rock Dam
WRP	Woodlawn Tailings Reprocessing Project
WUP	Woodlawn Underground Project

1. INTRODUCTION

1.1. History of operations

Mining at Woodlawn Mine Tarago (Woodlawn Mine) began in 1978 with the extraction of ore to produce copper, lead and zinc concentrates under mining tenement S(C&PL)L 20, also known as SML20. Both open cut and underground mining techniques were employed during the 20 years of continuous operation until March 1998, when the mine prematurely closed due to failure of the operator Denehurst Ltd. At the cessation of operations, the site was not fully rehabilitated, and the landscape remained highly disturbed, including the open cut void, three tailings dams, two evaporation dams, the original processing plant, administration infrastructure and a rehabilitated waste rock emplacement.

Collex, now Veolia Environmental Services Pty Ltd (Veolia), bought the land and surface rights in 1998, and in 2000 secured approval to establish a putrescible waste landfill in the former open cut void. Landfill operations began in 2004 with Veolia receiving an approved amount of waste per year, mostly by rail to the Crisps Creek intermodal south of Tarago. In 2005, Infigen Energy Limited (Infigen) secured approval for the Woodlawn Wind Farm, which includes 23 turbines, 11 of which are located on the ridgeline within the site. In 2021, the Iberdrola Group took over management of the wind turbines.

The operation of the Woodlawn Bioreactor and associated property holdings are covered by a development approval held by Veolia. Their consent covers filling of the historic open pit mine void with waste, utilising Evaporation Dam 1 (ED1) and a portion of the original mine facilities, office and workshop.

In 2004, Veolia produced a final closure Mine Operations Plan (MOP) which set out a timeframe for the rehabilitation of all remaining mine infrastructure and disturbed areas outside those required for the ongoing Bioreactor. In 2005, Veolia amended the MOP to include the use of mixed waste organic material for the rehabilitation of the legacy tailings dams.

In 2006, Tri Origin completed a prefeasibility study into the retreatment of the three tailings dams to recover mineralised material contained within them as well as the feasibility of reopening the underground mine. Subsequent to this, a Bankable Feasibility Study focusing on reprocessing the tailings was completed in early 2008 which demonstrated a commercially viable standalone project. Having purchased the mineral rights to the Woodlawn Project, including the adjacent Exploration Licence 7257, an application was lodged in November 2008 with the then Department of Primary Industries (Mineral Resources) seeking the transfer of S(C&PL)L 20.

Tarago Operations Pty Ltd (TOP) was a fully owned subsidiary of Heron Resources Limited (Heron). Tri Origin Minerals Ltd (Tri Origin, merged with Heron in 2014), received Project Approval (MP 07_0143) to reopen the Woodlawn Mine on 4 July 2013. The approval was obtained under the provisions of Part 3A of the Environmental Planning and Assessment Act 1979 and followed the public exhibition of an Environmental Assessment (EA) document.

Upon transfer of S(C&PL)L 20 to TOP, Heron became responsible for the rehabilitation of all areas outside of Veolia's Bioreactor, Mechanical Biological Treatment Facility, Leachate Treatment Plant and the windfarm operated by Iberdrola.

Heron and Veolia prepared a Deed of Assignment (2011) and a Deed of Cooperation (updated 2017) for the ongoing operation and management of the Woodlawn Site. Under these agreements, Heron became responsible for the ongoing management and rehabilitation of the project site and was legally obligated to Veolia to preferentially use the composted organic material produced by the Mechanical Biological Treatment Facility as was originally approved

by the Resources Regulator in 2005. This is referred to as Woodlawn Organic Output (WOO) and, until May 2025,was used as a substitute substrate material to relieve the subsoil deficit for the tailings dam rehabilitation capping material.

An EA for redevelopment of the Woodlawn Mine was completed and placed on public exhibition between 26 April and 28 May 2012. A total of 17 submissions were received, including 11 from public agencies, 2 from special interest groups (Veolia and Infigen) and 4 from the general public (3 of the public submissions objected to the proposal).

Construction of infrastructure for the Woodlawn tailings reprocessing project (WRP) and Woodlawn underground project (WUP) commenced in 2018 and was completed during 2019. Progressive commissioning of a new processing plant and site infrastructure for the new Woodlawn Mine was completed in late 2019. On 25 March 2020, Heron suspended operations at Woodlawn Mine and the site entered Care and Maintenance (C&M). Heron subsequently entered Voluntary Administration in July 2021.

DEVELOP completed its acquisition of the Project in May 2022 and TOP which holds S(C&PL)L 20 and Environment Protection Licence (EPL) 20821. MP 07_0143 permits the site to carry out mining operations until 31 December 2034.

DEVELOP carried out a program of underground exploration in 2023 to target extensions to the known mineralisation lenses and grow the resource inventory for development of an operational mine plan. Between 2023 and the end of 2024 underground development and other site activities were undertaken in preparation for recommencing operations. Following refurbishment and recommissioning of the existing processing plant, mine and process operations recommenced from March 2025 with the first concentrate leaving site in April 2025.

1.2. Current development consents, leases and licenses

Table 1-1 shows the applicable development consents, leases and licenses granted for the site.

Table 1-1 Development consent, leases and licences

Number	Issue date	Expiry date	Details
S(C&PL)L 20	31/10/1973	16/11/2029	Special (Crown and Private Lands) Lease 20 (known as SML20). Established under the Mining Act 1963.
MP07_0143-PA-17	04/07/2013	04/07/2034	TriAusMin Woodlawn Mine Project Approval
MP07-0143 MOD1	22/04/2016	for the period of the original consent	Modification of the PA for the relocation of Mine Portal and Overland Haul Road
MP07-0143 MOD2	06/07/2017	for the period of the original consent	Site Layout Update
EPL20821	22/09/2023	Next review due 29/03/2027	First issued 29/03/2017
5110694	20/10/2022	20/10/2025	Radiation license
WAL28983	Unknown	Continuous	Held by Veolia under agreement with Tarago Operations, extraction of 600ML/a from Lachlan Ford Belt
WAL42034	17/08/2018	Continuous	Extraction of 0 ML/a from Goulburn Fractured Rock Groundwater Source
WAL42366	17/05/2019	Continuous	Extraction of 400ML/a from Goulburn Fractured Rock Groundwater Source

Woodlawn-1	April 2017	30/06/2025	Dams Safety NSW - Approval to Extract within Woodlawn Notification Area
Woodlawn-2	April 2017	30/06/2040	Dams Safety NSW - Approval to Conduct Hydraulic Mining in Woodlawn South Tailings Dam
Woodlawn-3	16/07/2025	30/06/2040	Dams Safety NSW - Extension of Woodlawn-1

1.3. Land ownership and land use

Woodlawn Mine is located predominantly in the Goulburn Mulwaree Council Local Government Area (LGA), with a small area of the site being in the Queanbeyan-Palerang Council LGA. The mining lease area includes areas designated for IN3 Heavy Industrial use and RU2 Rural Landscape use. Operational areas approved by MP 07_0143 are within IN3 Heavy Industrial zoning only. Historic land use on the site, prior to commencement of the mine in 1978, was grazing. Current land users within the mining lease are Veolia, the wind farm and the mining operation. All land within the mining lease is currently owned by Veolia. Grazing has been, and is expected to continue being, the predominant land use surrounding the mine, or as otherwise approved.

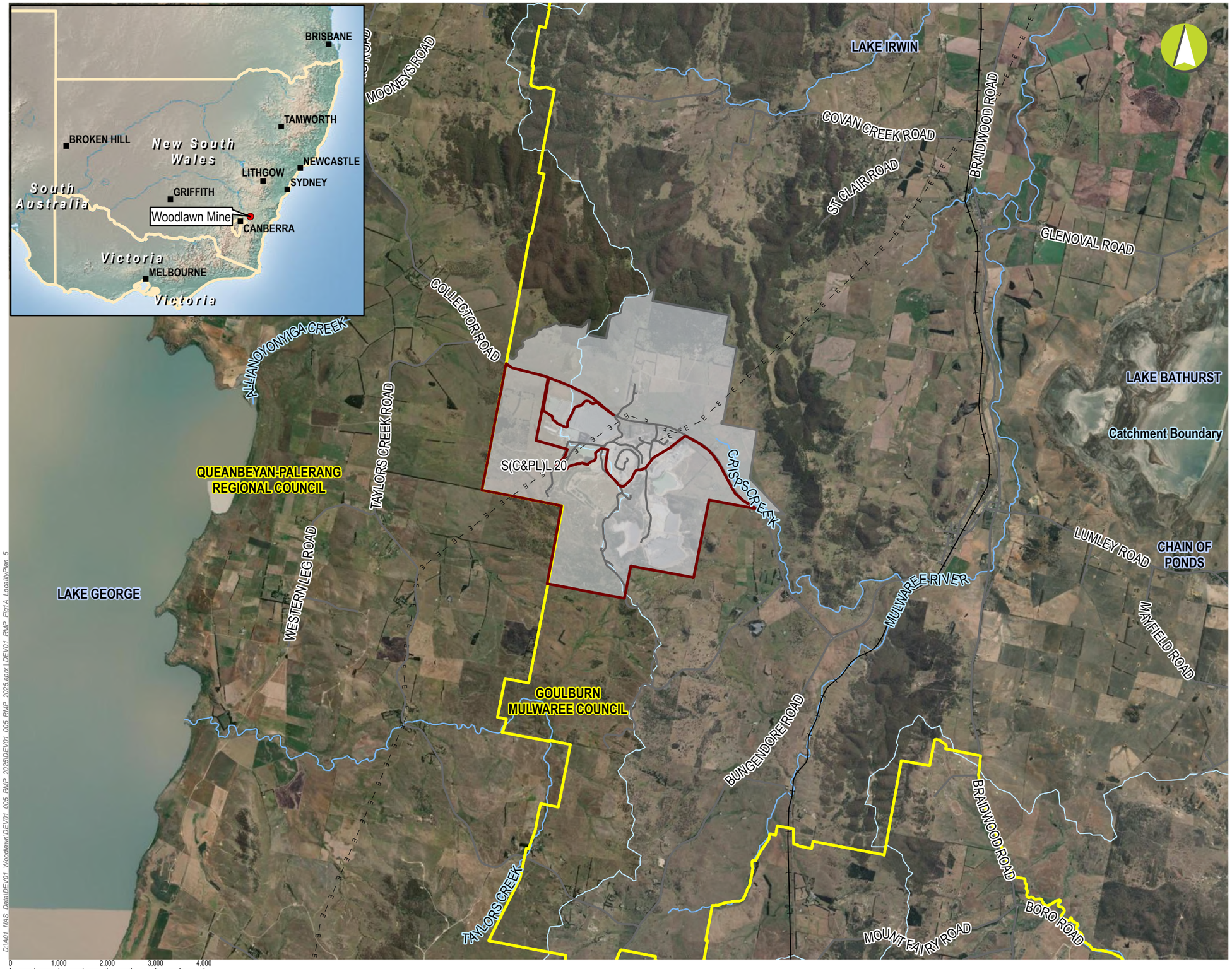
Section 18.3.2 of the 2012 EA states that "*Any future land use would need to be in accordance with the zoning of the Project Site under the Goulburn Mulwaree Local Environmental Plan 2009 and Mulwaree Local Environmental Plan 1995, or equivalent legislation, at the end of the Project*". It further states "*At this stage, it is envisaged that the final land capability and land use would be agricultural lands (suitable for grazing) and areas of native vegetation that are compatible with surrounding vegetation systems*". The contradictory nature of these statements, due to grazing not aligning with the zoning of the site, is discussed in the final land use options assessment in **Section 2.2**.

Table 1-2 provides an overview of land tenure in the general area. Land ownership, land use, vegetation communities, and other relevant features are shown in **Figures 1A – 1D**.

Table 1-2 Land tenure

Lot	DP	Ownership	Within / Adjacent to Mining Lease
6	DP114586	Freehold	Adjacent
23	DP754919	Freehold	Adjacent
86	DP754919	Freehold	Within
92	DP754919	Freehold	Within
70	DP754919	Freehold	Within
4	DP534616	Freehold	Adjacent
75	DP754919	Freehold	Adjacent
88	DP754919	Freehold	Within
74	DP754919	Freehold	Adjacent
66	DP754919	Freehold	Adjacent
1	DP180491	Freehold	Within
25	DP754919	Freehold	Within
8	DP534616	Freehold	Within
3	DP534616	Freehold	Adjacent
9	DP534616	Freehold	Within

Lot	DP	Ownership	Within / Adjacent to Mining Lease
90	DP754919	Freehold	Within
35	DP754919	Freehold	Adjacent
95	DP754919	Freehold	Within
12	DP114586	Freehold	Adjacent
16	DP754919	Freehold	Within
57	DP754919	Freehold	Adjacent
68	DP754919	Freehold	Within
1	DP126600	Freehold	Within
54	DP750056	Freehold	Adjacent
21	DP827588	Freehold	Within
20	DP827588	Freehold	Within
94	DP754919	Freehold	Within
14	DP754919	Freehold	Within
5	DP830765	Freehold	Within
69	DP754919	Freehold	Within
30	DP754919	Freehold	Within
1	DP241092	Freehold	Within
4	DP830765	Freehold	Within
33	DP754919	Freehold	Within
34	DP754919	Freehold	Within
17	DP754919	Freehold	Within
96	DP754919	Freehold	Within
87	DP754919	Freehold	Within
7001	DP1029633	Crown	Adjacent
145	DP750056	Freehold	Adjacent
103	DP750033	Freehold	Adjacent
12	DP754919	Freehold	Adjacent
13	DP754919	Freehold	Adjacent
21	DP754919	Freehold	Adjacent
91	DP754919	Freehold	Within
97	DP754919	Freehold	Within
6	DP830765	Freehold	Within
259	DP754894	Freehold	Adjacent
131	DP750056	Freehold	Adjacent
1	DP1179305	Freehold	Within
2	DP1179305	Freehold	Within



LEGEND

- Project Approval Boundary
- Local Government Area
- Railway
- Roads
- Electricity Transmission Line
- Water Courses
- Catchment Boundary

Current Authorisations

- S(C&PL)L 20

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Source: Project Approval Boundary, Final Landform and Current Authorisations from Woodlawn Mine (2025). Roads, watercourses and electricity transmission lines from LPI (2024). Aerial imagery from ESRI

Woodlawn Mine Tarago

Figure 1A
Locality Plan

Mine name	Woodlawn Mine Tarago
Plan name	Woodlawn Mine Tarago
Year of anticipated relinquishment	TBA following Portal Submission
Data theme submission ID No.	TBA following Portal Submission
Spatial Reference	GDA2020 MGA Zone 55
Plan date (date created)	11/07/2025

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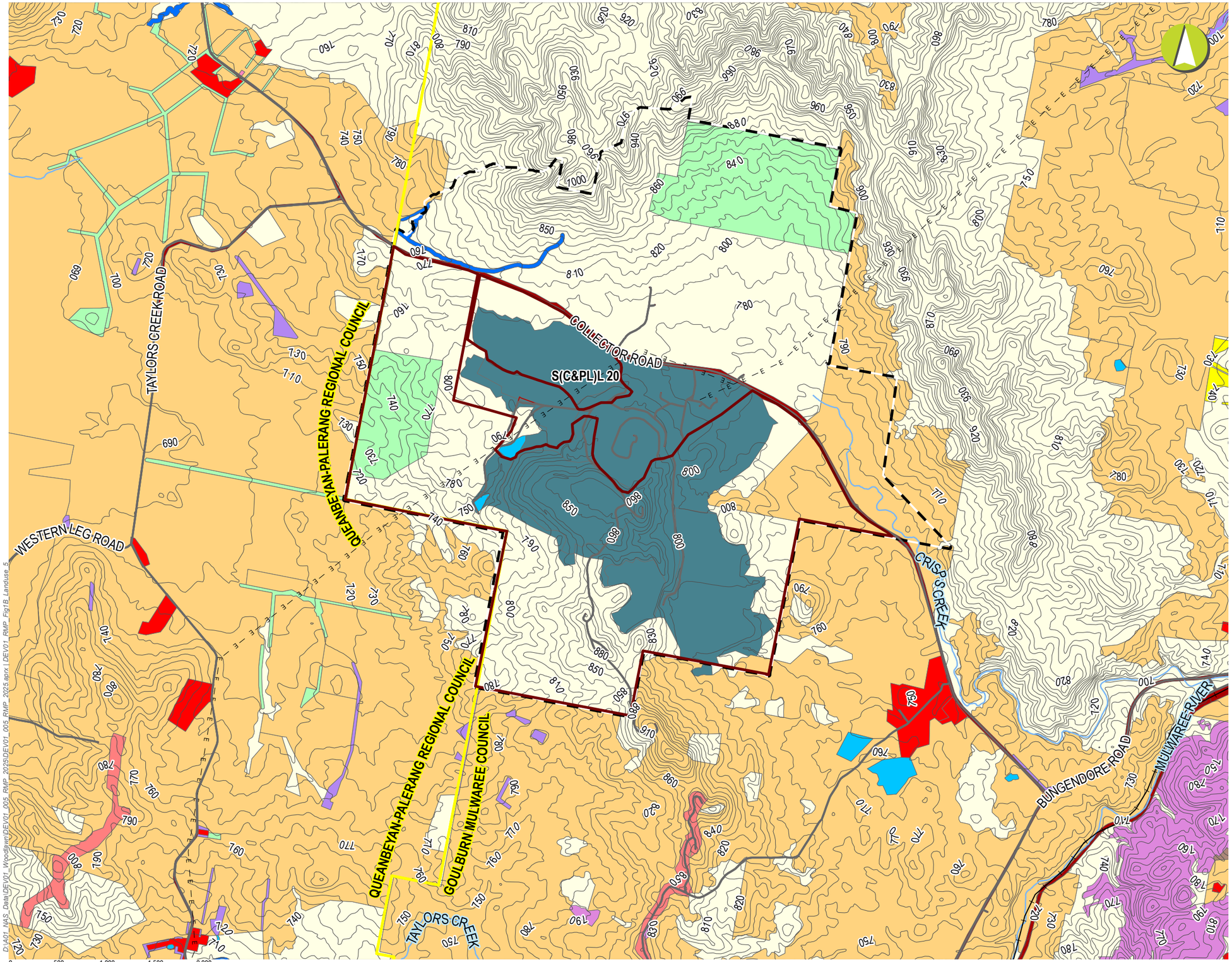

LEGEND

- Project Approval Boundary
- Local Government Area
- Railway
- Roads
- Electricity Transmission Line
- Water Courses
- Contour (5m)

Current Authorisations

- S(C&PL)L 20

NSW Land Use

- 1.2.0 Managed resource protection
- 1.3.0 Other minimal use
- 2.1.0 Grazing native vegetation
- 3.1.0 Plantation forests
- 3.2.0 Grazing modified pastures
- 3.3.0 Cropping
- 3.4.0 Perennial horticulture
- 5.2.0 Intensive animal production
- 5.4.0 Residential and farm infrastructure
- 5.6.0 Utilities
- 5.7.0 Transport and communication
- 5.8.0 Mining
- 6.2.0 Reservoir/dam
- 6.3.0 River

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Source: Project Approval Boundary, Final Landform and Current Authorisations from Woodlawn Mine (2025). Roads, watercourses and electricity transmission lines from LPI (2024). NSW DCCEEW NSW 2017 Landuse 1.5

Woodlawn Mine Tarago

Figure 1B
Land Use

Mine name	Woodlawn Mine Tarago
Plan name	Woodlawn Mine Tarago
Year of anticipated relinquishment	TBA following Portal Submission
Data theme submission ID No.	TBA following Portal Submission
Spatial Reference	GDA2020 MGA Zone 55
Plan date (date created)	23/06/2025

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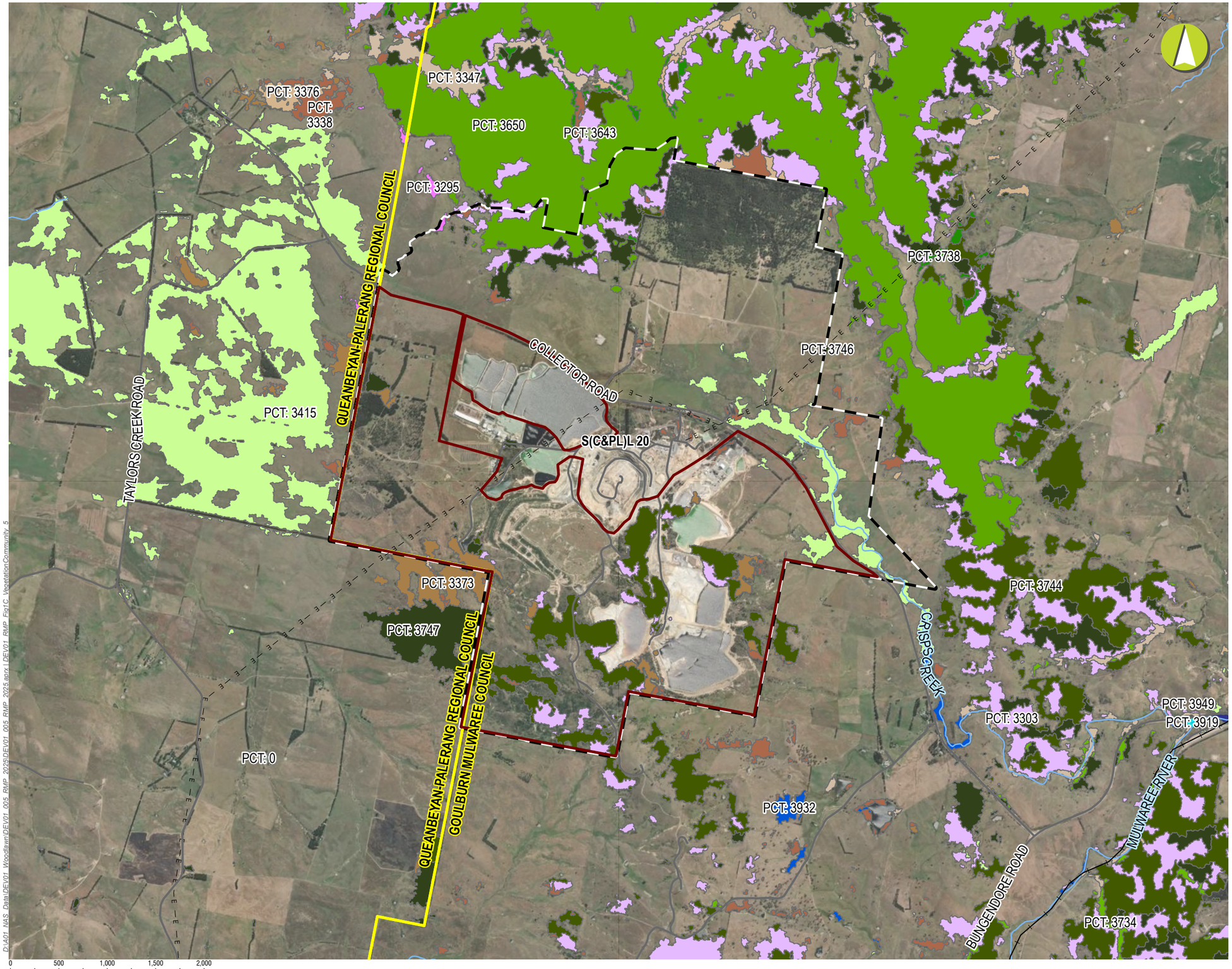

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DEVELOP

LEGEND

- Project Approval Boundary
- Local Government Area
- Railway
- Roads
- Electricity Transmission Line
- Water Courses

Current Authorisations

- S(C&PL)L 20

Vegetation Community

- PCT 3295: Crookwell-Taralga Basalt Grassy Forest
- PCT 3303: Central Tableland Ribbon Gum Sheltered Forest
- PCT 3338: Goulburn Tableland Frost Hollow Grassy Woodland
- PCT 3347: Southern Tableland Creekflat Ribbon Gum Forest
- PCT 3373: Goulburn Tableland Box-Gum Grassy Forest
- PCT 3376: Southern Tableland Grassy Box Woodland
- PCT 3415: Southern Tableland Red Grass-Spear Grass Grassland
- PCT 3643: Bungonia Tableland Silvertop Ash-Stringybark Forest
- PCT 3650: Goulburn-Lithgow Ranges Silvertop Ash Forest
- PCT 3734: Central Tableland Dry Slopes Stringybark-Box Forest
- PCT 3738: Goulburn-Lithgow Tableland Hills Grassy Forest
- PCT 3744: Palerang Hills Peppermint Dry Shrub Forest
- PCT 3746: Southern Tableland Snow Gum-Candlebark Shrub Forest
- PCT 3747: Southern Tableland Western Hills Scribbly Gum Forest
- PCT 3919: Southern Highlands Wet Swamp Heath
- PCT 3932: Central and Southern Tableland Swamp Meadow Complex
- PCT 3949: Southern Highlands Sand Swamp Sedgeland

Source: Project Approval Boundary, Final Landform and Current Authorisations from Woodlawn Mine (2025). Roads, watercourses and electricity transmission lines from LPI (2024). NSW DCCEEW SVTM C2.0.M2.1

Woodlawn Mine Tarago

Figure 1C
Vegetation Communities

Mine name	Woodlawn Mine Tarago
Plan name	Woodlawn Mine Tarago
Year of anticipated relinquishment	TBA following Portal Submission
Data theme submission ID No.	TBA following Portal Submission
Spatial Reference	GDA2020 MGA Zone 55
Plan date (date created)	23/06/2025

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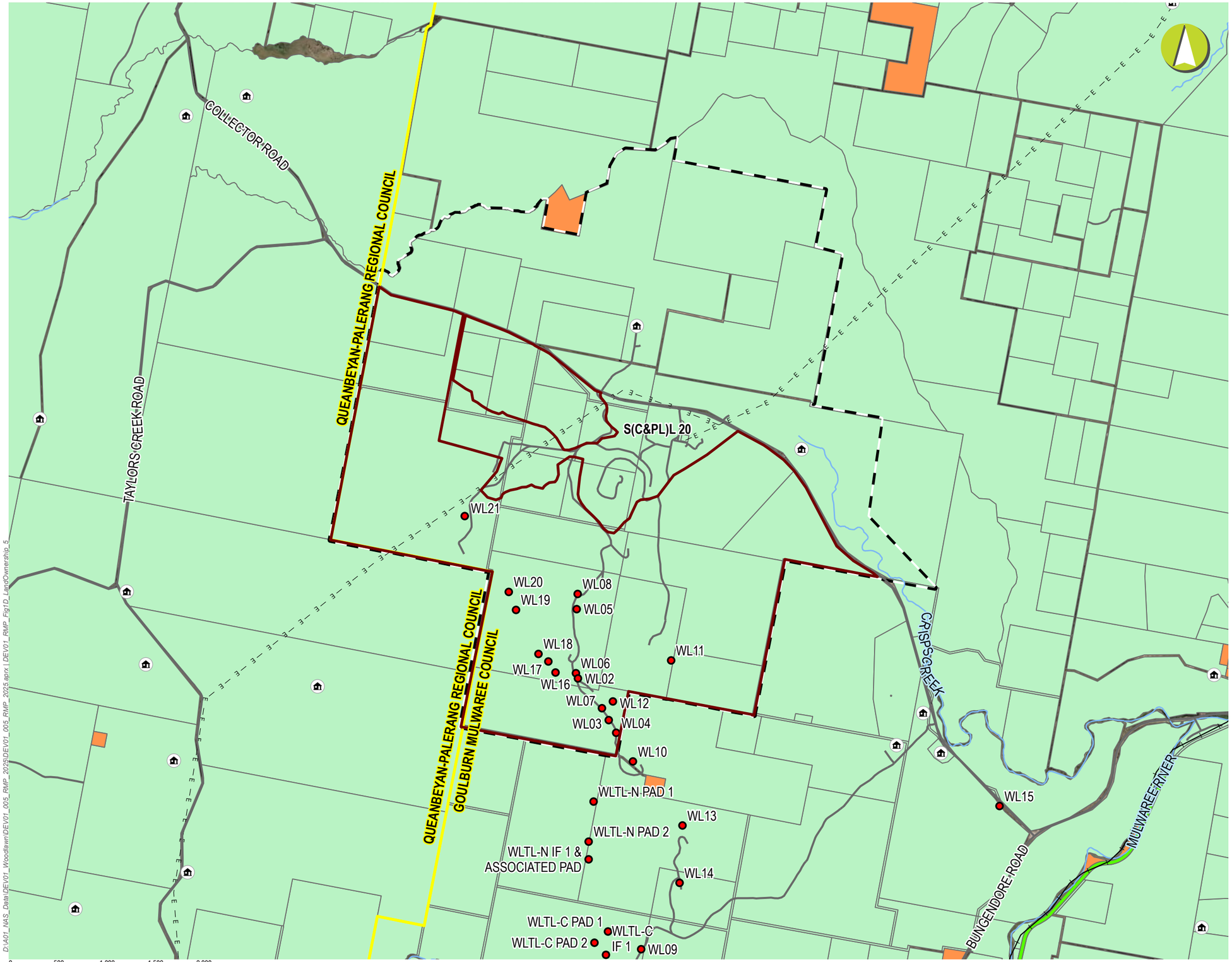

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LEGEND

- Project Approval Boundary
- Local Government Area
- Railway
- Roads
- Electricity Transmission Line
- Water Courses
- Neighbouring Residences
- AHIMS Sites

Current Authorisations

- S(C&PL)L 20

Land Tenure

- Freehold Land
- Crown Land

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Source: Project Approval Boundary, Final Landform and Current Authorisations from Woodlawn Mine (2025). Roads, watercourses and electricity transmission lines from LPI (2024). NSW Spatial Services, Heritage NSW

Woodlawn Mine Tarago

Figure 1D
Land Ownership

Mine name	Woodlawn Mine Tarago
Plan name	Woodlawn Mine Tarago
Year of anticipated relinquishment	TBA following Portal Submission
Data theme submission ID No.	TBA following Portal Submission
Spatial Reference	GDA2020 MGA Zone 55
Plan date (date created)	23/06/2025

2. FINAL LAND USE

2.1. Regulatory requirements for rehabilitation

Conditions in MP 07_0143, S(C&PL)L 20 and other relevant documents that specifically relate to final land use and rehabilitation are listed in **Table 2-3**, which includes reference to where each condition is address within the Rehabilitation Management Plan (RMP), what the condition relates to, and the timing of each condition.

The rehabilitation risk assessment (**Section 3**) identified an action to confirm responsibility for rehabilitation and closure of Evaporation Dam 1 (ED1), Cowley Hill (a historic mining area within the lease) and other historic operational areas.

ED1 has been excluded from the RMP on advice from the NSW Resources Regulator in May 2025, as it is managed by Veolia and, therefore, the responsibility for the final rehabilitation and closure of the facility rests with them

DEVELOP will consult with the Department of Planning, Housing and Infrastructure (DPHI) and NSW Resources Regulator to confirm responsibility on historic mining operations areas and include further detail in future RMPs and Forward Programs.

Table 2-3 Regulatory requirements relating to rehabilitation

Document	Condition	Requirement	Area	Timing	Where Addressed
MP 07_0143 MOD 2	Schedule 4, Condition 20	**Vegetation Management Plan** The Proponent shall prepare and implement a Vegetation Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with OEH and submitted to the Secretary for approval prior to commencing construction; (b) describe how the additional 71 hectares of revegetation area (shown in Appendix 3) would be integrated with the overall rehabilitation of the site; (c) describe the short, medium, and long term measures that would be implemented to: • manage the remnant vegetation and habitat on the site and in the revegetated area/s; and • implement revegetation, including detailed performance and completion criteria; (d) include a detailed description of the procedures to be implemented for: • minimising the impacts on fauna on site, including pre-clearance surveys; • enhancing the quality of existing vegetation and fauna habitat; • restoring native vegetation and fauna habitat on the revegetated area through focusing on assisted natural regeneration, targeted vegetation establishment and the introduction of fauna habitat features, including establishing and maintaining bat habitat for the Eastern Bent-wing Bat and Yellow-bellied Sheathtail-bat; • establishing a revegetation planting density that is consistent with the rehabilitation objectives in Table 2 of Schedule 3; • maximising the salvage of resources within the approved disturbance area – including vegetative and soil resources – for beneficial reuse in the rehabilitation of the site; • collecting and propagating seed; • bushfire management;	Whole site	Life of Mine	Vegetation Management Plan

Document	Condition	Requirement	Area	Timing	Where Addressed
		• controlling weeds, feral pests, erosion and access to the revegetation areas; and (e) include a seasonally-based program to monitor and report on the effectiveness of these measures, and progress against the detailed performance and completion criteria; and (f) include details of who would be responsible for monitoring, reviewing and implementing the plan.			
MP 07_0143 MOD 2	Schedule 4, Condition 21	**Progressive Rehabilitation** The Proponent shall carry out rehabilitation of the site progressively, that is, as soon as reasonably practicable after disturbance. All reasonable and feasible measures must be taken to minimise the total area exposed for dust generation at any time. Interim rehabilitation strategies shall be employed when areas prone to dust generation cannot be permanently rehabilitated until later in the project life. *Note: It is accepted that some parts of the site that are progressively rehabilitated may be subject to further disturbance at some later stage of the project.*	Whole site	Life of mine	**Section 6.1**
MP 07_0143 MOD 2	Schedule 4, Condition 22	**Rehabilitation Management Plan** The Proponent shall prepare and implement a Rehabilitation Management Plan for the project to the satisfaction of the Director- General. This plan must:	Whole site	Life of mine	This document
		(a) be prepared in consultation with the DRG, EPA, DPI – Water, WaterNSW and Council;	Whole site	Life of mine	**Section 4.2**
		(b) be submitted to the Secretary for approval prior to carrying out mining operations on the site;	Whole site	Prior to carrying out operations	Approved 12/05/2017
		(c) be prepared in accordance with any relevant DRG guideline;	Whole site	Life of mine	This document

Document	Condition	Requirement	Area	Timing	Where Addressed
		(d) outline the procedures to be implemented to achieve the rehabilitation objectives in Condition 6 of Schedule 3;	Whole site	Life of mine	**Section 6**
		(e) outline the operational procedures (including testing, monitoring and performance criteria) used to verify the ongoing suitability of the compost material to be used in rehabilitation;	Tailings dams	N/A	**Section 6.2.3**
		(f) include detailed designs for the short term and long term rehabilitation of tailings and evaporation dams, including surface water management and capping design which takes into account total predicted settlement;	Tailings dams and Evaporation Dam (D2)	Life of mine	**Section 6.2.3**
		(g) include detailed performance and completion criteria for evaluating the performance of the rehabilitation of the site;	Whole site	Life of mine	**Section 4**
		(h) describe the measures that would be implemented to ensure compliance with the relevant conditions of this approval, and address all aspects of rehabilitation including mine closure, final landform, and final land use; and	Whole site	Life of mine	This document
		(i) include a program to monitor, independently audit and report on the ongoing effectiveness of the measures and progress towards the detailed performance and completion criteria.	Whole site	Life of mine	**Section 8.3**
Environmental Assessment TriAusMin Woodlawn Project, Volume 1 – Final, April 2012	18.3.1 Rehabilitation Objectives	The rehabilitation objectives for the Project are to produce a final landform that would: • be undertaken progressively throughout operations • be physically and chemically stable • be suitable for its future intended use • be aesthetically consistent with the pre-existing and surrounding landforms • not pose an ongoing environmental threat or liability • allow drainage systems to remain functional and stable under extreme rainfall events • be in accordance with agency requirements and best management guidelines • be sufficiently flexible to accommodate outcomes from research and changes in Project operations.	Whole site	Life of mine	**Section 4**

Document	Condition	Requirement	Area	Timing	Where Addressed
Statement of Commitments (Submissions Report TriAusMin Woodlawn Project, September 2012)	1C	A Rehabilitation and Environmental Management Plan (REMP) would be prepared to manage impacts on the environment during the operation phase, and following mine closure. This would replace the existing Mining Operations Plan for the Project Site. As a minimum the REMP would cover: • surface and groundwater management (prepared in conjunction with the water management strategy and water management plan for the Project Site) • geotechnical investigations (prepared in conjunction with the geotechnical works program described in SoC 4B) • traffic and transport management • waste management • air quality management • noise and vibration management • flora and fauna management • visual and landscaping • hazard and risk management • Mine Closure Plan • rehabilitation measures. In regard to rehabilitation measures, the REMP would be generally consistent with the description in Chapter 18 of this EA and would be prepared with consideration of existing and approved Veolia rehabilitation activities	Whole site	Life of Mine	Replaced by RMP and other management plans required by MP 07_0143
Mining Regulation 2016 Schedule 8A	5	**Rehabilitation to occur as soon as reasonably practicable after disturbance** The holder of a mining lease must rehabilitate land and water in the mining area that is disturbed by activities under the mining lease as soon as reasonably practicable after the disturbance occurs.	Whole site	Ongoing	**Section 6.1**
Mining Regulation 2016 Schedule 8A	6	**Rehabilitation must achieve final land use** (1) The holder of a mining lease must ensure that rehabilitation of the mining area achieves the final land use for the mining area.	Whole site	Ongoing	**Section 2.2**

Document	Condition	Requirement	Area	Timing	Where Addressed
		(2) The holder of the mining lease must ensure any planning approval has been obtained that is necessary to enable the holder to comply with subclause (1). (3) The holder of the mining lease must identify and record any reasonably foreseeable hazard that presents a risk to the holder's ability to comply with subclause (1).			
Mining Regulation 2016 Schedule 8A	10	**Rehabilitation management plans for large mines** (1) The holder of a mining lease relating to a large mine must prepare a plan (a rehabilitation management plan) for the mining lease that includes the following— (a) a description of how the holder proposes to manage all aspects of the rehabilitation of the mining area, (b) a description of the steps and actions the holder proposes to take to comply with the conditions of the mining lease that relate to rehabilitation, (c) a summary of rehabilitation risk assessments conducted by the holder, (d) the risk control measures identified in the rehabilitation risk assessments, (e) the rehabilitation outcome documents for the mining lease, (f) a statement of the performance outcomes for the matters addressed by the rehabilitation outcome documents and the ways in which those outcomes are to be measured and monitored.	Whole site	Ongoing	This document
Mining Regulation 2016 Schedule 8A	12	**Rehabilitation outcome documents** (1) The holder of a mining lease must prepare the following documents (the rehabilitation outcome documents) for the mining lease and give them to the Secretary for approval— (a) the rehabilitation objectives statement, which sets out the rehabilitation objectives required to achieve the final land use for the mining area, (b) the rehabilitation completion criteria statement, which sets out criteria, the completion of which will demonstrate the achievement of the rehabilitation objectives, (c) for a large mine, the final landform and rehabilitation plan, showing a spatial depiction of the final land use.	Whole site	Ongoing	**Section 4 and Section 5**

Document	Condition	Requirement	Area	Timing	Where Addressed
		(2) If the final land use for the mining area is required by a condition of development consent for activities under the mining lease, the holder of the mining lease must ensure the rehabilitation outcome documents are consistent with that condition.			
Mining Regulation 2016 Schedule 8A	13	(1) The holder of a mining lease must prepare a program (a forward program) for the mining lease that includes the following— (a) a schedule of mining activities for the mining area for the next 3 years, (b) a summary of the spatial progression of rehabilitation through its various phases for the next 3 years, (c) a requirement that the rehabilitation of land and water disturbed by mining activities under the mining lease must occur as soon as reasonably practicable after the disturbance occurs. (2) The holder of a mining lease must prepare a report (an annual rehabilitation report) for the mining lease that includes— (a) a description of the rehabilitation undertaken over the annual reporting period, (b) a report demonstrating the progress made through the phases of rehabilitation provided for in the forward program applying to the reporting period, (c) a report demonstrating progress made towards the achievement of the following— (i) the objectives set out in the rehabilitation objectives statement, (ii) the criteria set out in the rehabilitation completion criteria statement, (iii) for large mines—the final land use as spatially depicted in the final landform and rehabilitation plan. …. (4) The holder of the mining lease must give the forward program and annual rehabilitation report to the Secretary.	Whole site	Annually	**Section 11.2**

2.2. Final land use options assessment

As discussed in **Section 1.3** above, Section 18.3.2 of the 2012 EA states that "*Any future land use would need to be in accordance with the zoning of the Project Site under the Goulburn Mulwaree Local Environmental Plan 2009 and Mulwaree Local Environmental Plan 1995, or equivalent legislation, at the end of the Project*" and that "*At this stage, it is envisaged that the final land capability and land use would be agricultural lands (suitable for grazing) and areas of native vegetation that are compatible with surrounding vegetation systems*".

Section 4.4.1 of the 2012 EA identifies the "*Woodlawn Site*" as being SML 20, which is a reference commonly used for S(C&PL)L 20 but which relates to a larger area than the Project Approval boundary. Section 4.4.1 of the 2012 EA clearly articulates that "*The Project does not include any development on the Woodlawn Site that is zoned under RU2 Rural Landscape*".

DEVELOP considers that the proposed final land use outlined in the 2012 EA, being agricultural lands suitable for grazing, is inconsistent and incompatible with both the zoning in place at the time the EA was prepared (**Figure 2**) and the current zoning of the site as E5 Heavy Industrial (formerly IN3 Heavy Industrial) under the Goulburn Mulwaree Local Environmental Plan 2009 (GM LEP 2009), shown on **Figure 3**.

The objectives of the E5 Heavy Industrial zone are:

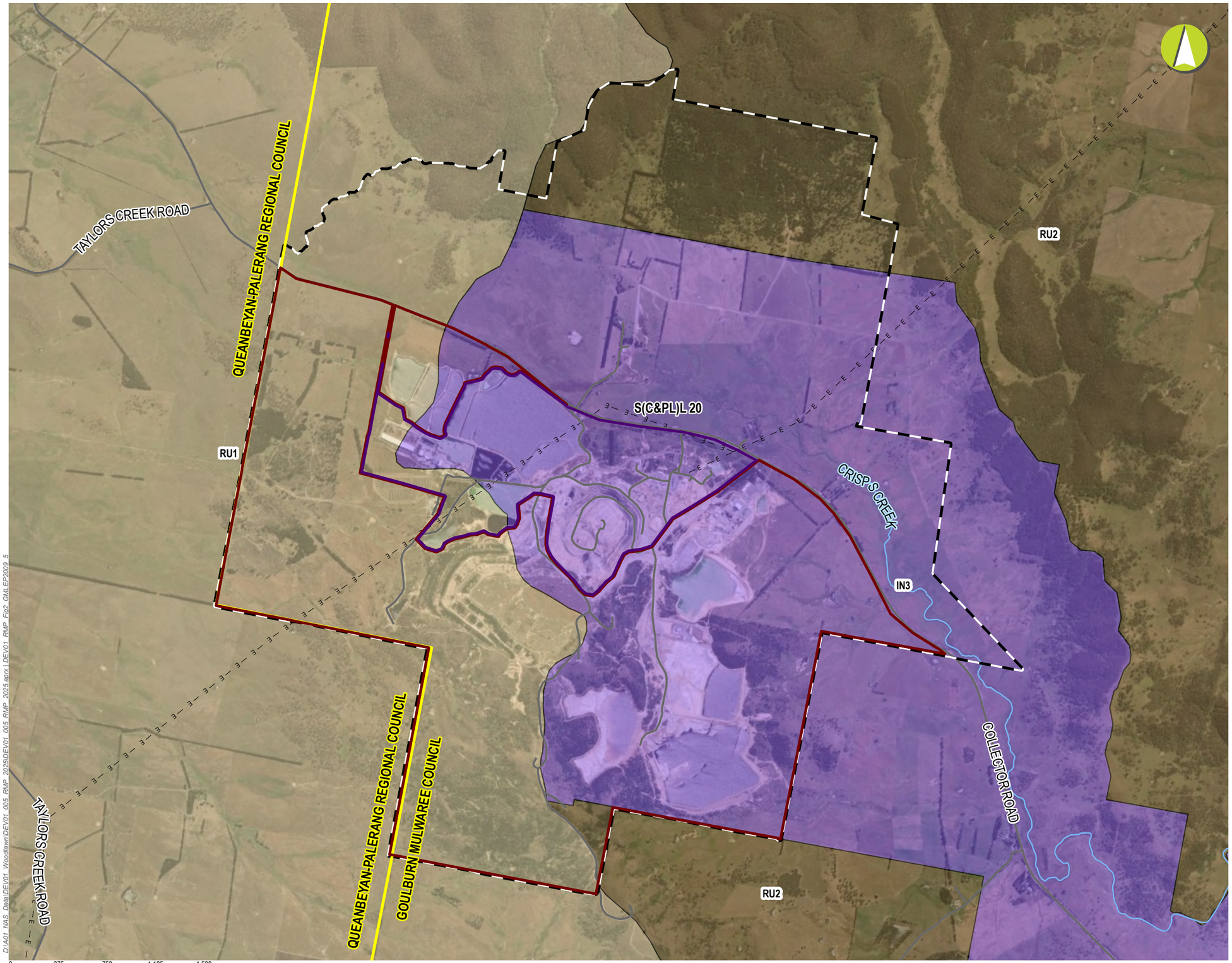
- To provide areas for industries that need to be separated from other land uses.
- To ensure the efficient and viable use of land for industrial uses.
- To minimise any adverse effect of industry on other land uses.
- To encourage employment opportunities.
- To recognise and provide for the diverse demands and implications of industry, warehousing, transport and servicing activities and ancillary land uses.

A final land use of grazing-based agriculture does not align with these objectives. It does not support or complement heavy industrial activities, nor does it represent a land use that optimises the strategic industrial capacity of the zone. As such, DEVELOP intends to review the final land use strategy to align it with the intended function and objectives of the E5 zoning under the GM LEP 2009, in line with the 2012 EA commitment for future land use to be in accordance with zoning.

In accordance with the rehabilitation objectives in MP 07_0143, the final landform and rehabilitation plan (**Section 5**) shows the site, excluding areas such as water storage and retained infrastructure, being rehabilitated to native ecosystem. The rehabilitation approach for different areas of the site is discussed further in **Section 6**.

DEVELOP will undertake a comprehensive final land use options assessment as part of its site closure planning. This assessment will identify the most appropriate final land use and landform, which aligns with:

- Current development approvals and any subsequent modifications or new approvals;
- The site's zoning under applicable planning instruments;
- Existing and future land ownership arrangements; and
- Opportunities for beneficial reuse that deliver long-term value to stakeholders and the community.



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LEGEND

- Veolia Operations Area
- Project Approval Boundary
- Roads
- Water Courses
- Electricity Transmission Line
- Local Government Area

Current Authorisations

- S(C&PL)L 20

2012 EA Zoning

- IN3 - Heavy Industrial
- RU1 - Primary Production
- RU2 - Rural Landscape

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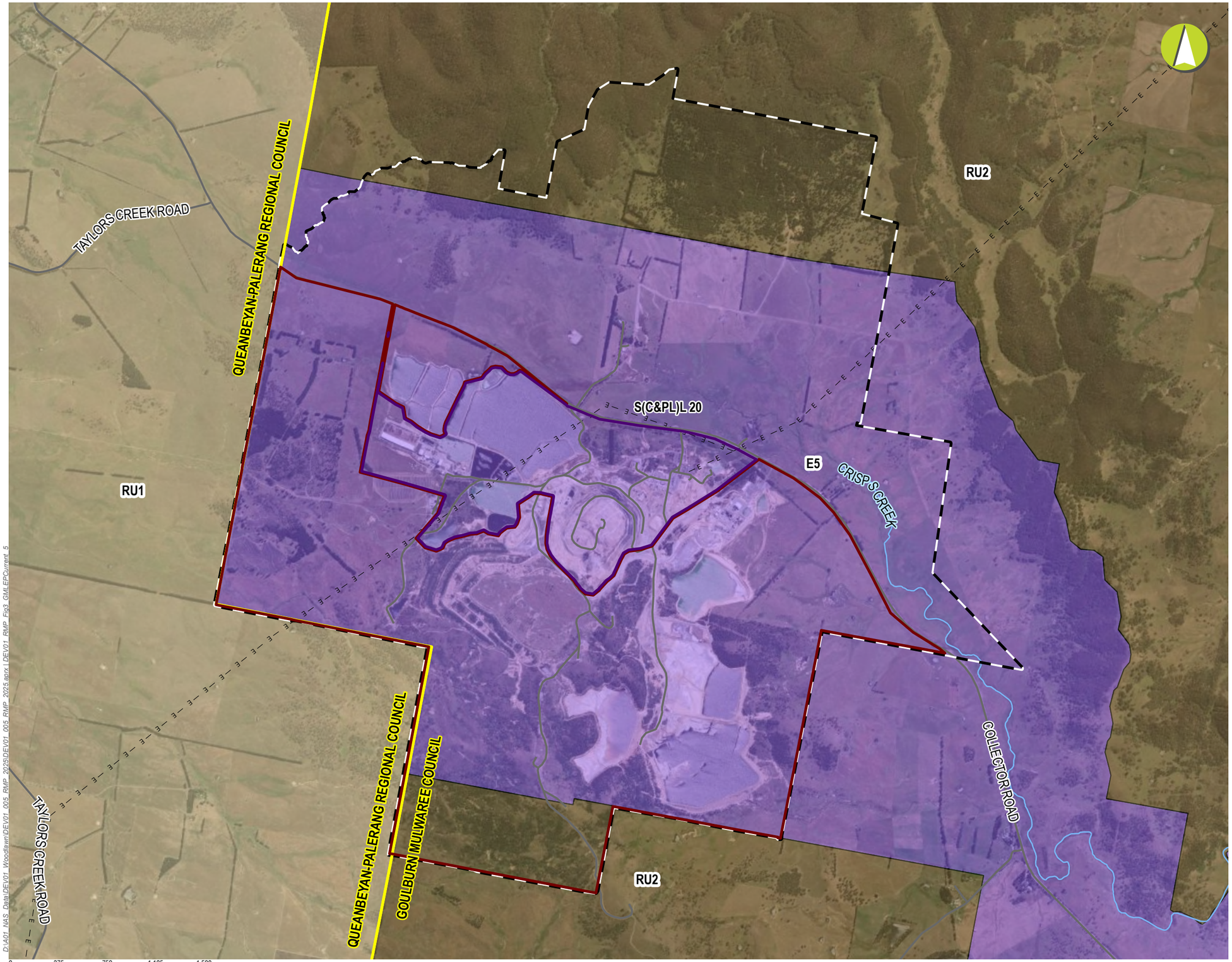
Sheet Size : A3

Source: Project Approval Boundary, Current Authorisations from Woodlawn Mine (2025). Roads, watercourses and electricity transmission lines from LPI (2024), EPI - NSW Spatial Services. Aerial imagery from ESRI

Woodlawn Mine Tarago

Figure 2
Goulburn Mulwaree
Local Environmental Plan 2009
2012 EA Zoning

Mine name	Woodlawn Mine Tarago
Plan name	Woodlawn Mine Tarago
Year of anticipated relinquishment	TBA following Portal Submission
Data theme submission ID No.	TBA following Portal Submission
Spatial Reference	GDA2020 MGA Zone 55
Plan date (date created)	18/07/2025



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LEGEND

- Veolia Operations Area
- Project Approval Boundary
- Roads
- Water Courses
- Electricity Transmission Line
- Local Government Area

Current Authorisations

- S(C&PL)L 20

Current EPI Land Zoning

- E5 - Heavy Industrial (Previously IN3)
- RU1 - Primary Production
- RU2 - Rural Landscape

Source: Project Approval Boundary, Current Authorisations from Woodlawn Mine (2025). Roads, watercourses and electricity transmission lines from LPI (2024), EPI - NSW Spatial Services. Aerial imagery from ESRI

Woodlawn Mine Tarago

Figure 3

Goulburn Mulwaree

Local Environmental Plan 2009

Current EPI Land Use Zoning

Mine name	Woodlawn Mine Tarago
Plan name	Woodlawn Mine Tarago
Year of anticipated relinquishment	TBA following Portal Submission
Data theme submission ID No.	TBA following Portal Submission
Spatial Reference	GDA2020 MGA Zone 55
Plan date (date created)	18/07/2025

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DEVELOP is reviewing the current Project Approval and considering the possibility of modification(s) to clarify rehabilitation and post mining landform and land use requirements. Any modifications to the approval will result in updates to the RMP and Forward Program.

2.3. Final land use statement

The final land use is outlined in **Section 2.2** and is depicted spatially on the final landform and rehabilitation plan (**Section 5**).

2.4. Final land use and mining domains

Final land use and mining domains to be considered in the preparation of RMPs are specified in the NSW Resources Regulator's Form and Way: Rehabilitation management plans for large mines (2021) and are summarised in **Table 2-4**.

The domain codes that are not applicable to Woodlawn Mine are in grey text and have been included in the table for context.

Table 2-4 Final land use and mining domains specified in the RMP Form and Way

Final land use domain	Code	Mining Domain	Code
Native ecosystem	**A**	**Infrastructure area**	**1**
Agricultural – grazing	B	**Tailings storage Facility**	**2**
Agricultural – cropping	D	**Water management area**	**3**
Rehabilitation biodiversity offset area	C	**Overburden emplacement area**	**4**
Industrial	E	**Active mining area (open cut void)**	**5**
Water management areas	F	**Underground mining area (SMP)**	**6**
Water storage (excluding final void)	**G**	**Beneficiation facility**	**7**
Heritage area	H	Other	8
Infrastructure	**I**		
Final void	J		
Other	K		

2.4.1. Final land use domains

The final land use domains for the site are defined in **Table 2-5** and shown on the final landform and rehabilitation plan discussed in **Section 5**.

Table 2-5 Final land use domains

Code	Final land use domain	Description
A	Native ecosystem	Refers to the rehabilitated waste rock dump (RWRD) and core shed area.
G	Water storage Area	The RWRD dam that will continue to be used to manage runoff from the RWRD.

I	Infrastructure	Infrastructure, predominantly access tracks, that will be retained beyond closure of the site for use by Veolia and/or the wind farm.

2.4.2. Mining domains

The mining domains for the mine are defined in **Table 2-6**.

Table 2-6 Mining domains

Code	Mining Domain	Description
1	Infrastructure area	Administration buildings Haul road and Light Vehicle Access Road Processing Plant ROM pad and skyway Power lines Car park Sewerage Treatment Plant Explosive storage Paste plant Ventilation shafts Dewatering bore
2	Tailings storage facility	Tailings Dam North (TDN) Tailings Dam South (TDS) Tailings Dam West (TDW) Tailings Storage Facility 4 (TSF4)
3	Water management area	Waste Rock Dam (WRDAM) Sediment dams Storm water diversion drains Pipeline infrastructure Pollution Control Dam and Process Dam ED2
4	Overburden emplacement area	Legacy waste rock dump Waste rock dump
5	Active mining area (open cut void)	Box cut and mine portal
6	Underground mining area (SMP)	Extraction Plan area
7	Beneficiation facility	Mill and associated infrastructure

3. REHABILITATION RISK ASSESSMENT

A rehabilitation risk assessment was undertaken on 12 March 2022, facilitated by SPS Solutions. The objective of the risk assessment was to risk assess the identified rehabilitation and closure risks for the mine in accordance with:

- Rehabilitation Risk Assessment Guideline (NSW Resources Regulator 2021)
- AS/NZS ISO 31000:2018 Risk management Guidelines

As part of initial mine closure planning for the site, DEVELOP undertook a mine closure risk assessment in October 2024. Utilising the Bowtie methodology, the risk assessment focussed on environmental risks associated with mine closure, including life of mine considerations and key rehabilitation phases.

The relevant outputs of this mine closure risk assessment were subsequently used in June 2025 to fully revise the rehabilitation risk assessment for the RMP to align it with the requirements of the Rehabilitation Risk Assessment Guideline (NSW Resources Regulator 2021).

A summary of the risks identified, associated controls and how they have been addressed in this RMP is presented in **Appendix 1**. The key themes identified include:

- Risks associated with past and present mining activities, infrastructure, site access and related hazards.
- Materials and waste management.
- Implementing effective rehabilitation strategies, meeting closure criteria and achieving desired post-mining land uses.
- Stakeholder engagement, community expectations, future responsibilities and changes in standards or obligations.
- Land use considerations, including post mining land use and interactions with adjacent land users.

Residual risks will be considered in future risk assessments, where sufficient information is available for their identification and evaluation.

In the context of mine closure, residual risk refers to the level of risk that remains after the implementation of all planned rehabilitation and closure activities, including engineering controls, landform design, revegetation, and other mitigation measures. These risks represent potential long-term environmental, safety, or land use impacts that could persist post-closure and may require ongoing monitoring, maintenance, or management. Future assessments will aim to identify, quantify, and document residual risks to support appropriate risk treatment strategies and inform stakeholder engagement, relinquishment planning, and post-closure obligations.

4. REHABILITATION OBJECTIVES AND REHABILIATION COMPLETION CRITERIA

4.1. Rehabilitation objectives and rehabilitation completion criteria

The principal rehabilitation objective of Woodlawn Mine is to create a safe, stable and non-polluting final landform. Section 18.3.1 of the 2012 EA stated that the rehabilitation objectives for the site are to produce a final landform that would:

- Be undertaken progressively throughout operations;
- Be physically and chemically stable;
- Be suitable for its future intended land use;
- Be aesthetically consistent with the pre-existing and surrounding landforms;
- Not pose an ongoing environmental threat or liability;
- Allow drainage systems to remain functional and stable under extreme rainfall events;
- Be in accordance with agency requirements and best management guidelines;
- Be sufficiently flexible to accommodate outcomes from research and changes in operational activities.

A number of rehabilitation objectives for Woodlawn Mine are prescribed in the Project Approval (MP 07_0143 Schedule 3, Condition 6, Table 2, reproduced in **Section 2.1**). Three of the rehabilitation objectives from MP 07_0143 are not included in **Table 2-3** as they do not relate to final land uses specified in the NSW Resources Regulator's Form and Way: Rehabilitation management plans for large mines (2021).

Notwithstanding the above, they are discussed below to address the requirements of Schedule 4, Condition 22(d) of MP 07_0413:

- **Underground workings** – No measurable subsidence effects on the Woodlawn Landfill, evaporation dams and tailings dams on the site.
    - Subsidence is managed and monitored in accordance with the Extraction Plan required by MP 07_0143.
- **Revegetation area** – Establish at least 71 hectares of the Western Tablelands Dry Forest vegetation community shown in Appendix 3 (of MP 07_0143).
    - The revegetation area is not an area requiring rehabilitation as a result of mining related disturbance, and is therefore not included as a final land use in **Table 4-7** or in the final landform and rehabilitation plan (**Section 5**). The Vegetation Management Plan, required by Schedule 4, Condition 20 of MP 07_0143, outlines the revegetation plans for this area.
- **Community** – Minimise the adverse socio-economic effects associated with mine closure.
    - Socio-economic impacts will be addressed in the Conceptual Mine Closure Plan (CMCP) and will be a key consideration in any future modifications to the site's approvals.

Table 4-7 provides details of the draft rehabilitation objectives and rehabilitation criteria for each of the applicable final land use domains. This has been prepared in line with the NSW Resources Regulator's Guideline: Form and way for rehabilitation objectives statement, rehabilitation completion criteria statement and final landform and rehabilitation plan for large mines (2024) and Guideline: Rehabilitation objectives and rehabilitation completion criteria (2023). The RMP will be updated when these are approved by the NSW Resources Regulator.

Table 4-7 Draft rehabilitation objectives and completion criteria

Final land use domain	Mining domain	Spatial References	Draft Rehabilitation Objective	Draft Performance Indicator	Draft Completion Criteria	Draft Justification / Validation Methods
Native Ecosystem	Infrastructure Area, Tailings Storage Area, Water Management Area, Overburden Emplacement Area, Active Mining Area, Beneficiation Facility	A1 A2 A3 A4 A5 A7	Landform that is commensurate with surrounding natural landform	Survey of rehabilitated landform to verify final landform construction in accordance with Final Landform and Rehabilitation Plan Indicators that surface water management structures are functioning as designed	Survey verifies final landform complies with final landform construction in accordance with Final Landform and Rehabilitation Plan Minimal erosion that would not require moderate to significant ongoing management and maintenance works	As constructed surveys
			The final landform is stable for the long-term and does not present a risk of environmental harm downstream / downslope of the site or a safety risk to the public/stock/native fauna	Visual - indicators of erosion and land instability Visual - indicators that surface water management structures are functioning as designed Measured – erosion rates from field trials and or surveys on both target analogue sites (representative of final land use) and rehabilitated profiles (tonnes / ha) Measured - Survey of rehabilitated landform to verify final landform construction in accordance with Final Landform and Rehabilitation Measured - survey of rehabilitated landform to specifically monitor settlement and/or material loss via erosion Modelled – long term erosional stability (e.g. Landform Evolution Modelling) to verify the long-term stability of rehabilitated landform Modelled – long term geotechnical stability (e.g. stability analysis) to verify the long-term stability of rehabilitated landform	Visual- minimal erosion that would not require moderate to significant ongoing management and maintenance works. Visual – no signs of land instability such as mass movement. Visual - no areas of active gully erosion. Visual - no evidence of tunnel erosion. Visual – no evidence of active scour likely to compromise surface water management structure. Survey verifies final landform complies with final landform construction in accordance with Final Landform and Rehabilitation Plan. Survey verifies that settlement and/or material loss is within predicted limits and will not compromise final landform drainage via differential settlement.	Before and after photos, rehabilitation monitoring reports, as constructed surveys, erosion surveys, independent geotechnical reports (where required) and or erosion modelling reports (where required) that indicate long-term stability of rehabilitated landform. Depending on the nature, scale and risks associated with a specific site, stability will need to be evaluated over a number of years (e.g. 5 years)
			Rehabilitation contains species characteristic of Western Tablelands Dry Forest vegetation community	Native plant species are characteristic of the target vegetation community	Native plant species are characteristic of the target vegetation community	Rehabilitation monitoring reports
			The risk of bushfire and impacts to the community, environment and infrastructure has been addressed as part of rehabilitation	Appropriate bushfire hazard controls (where required) have been implemented	Bushfire controls implemented	Statement provided and before/after photos
			There is no residual soil contamination on site that is incompatible with the final land use or that poses a threat of environmental harm	Waste material and/or visible contamination areas on site surface	There are no visible signs of contamination following the removal of plant, equipment and materials All rubbish/ waste materials removed from site	Statement provided and before/after photos
Native Ecosystem	Infrastructure Area, Tailings Storage Area, Water Management Area, Beneficiation Facility	A1 A2 A3 A7	All infrastructure that is not to be used as part of the final land use is removed to ensure the site is safe and free of hazardous materials	Removal of all services (power, water, communications) that have been connected on the site as part of the operation	All utility infrastructure removed	Statement provided, utility service disconnection record / notification
			All infrastructure that is to remain as part of the final land use is safe, does not pose any hazard to the community	Potential hazards (e.g. electrical, mechanical) have been effectively isolated and secured Infrastructure is in a condition (e.g. structural, electrical, other hazards) that is suitable for the intended final land use	Hazards isolated and secured Formal acceptance from the subsequent landowner that infrastructure is in a condition that is suitable for the intended final land use in accordance with formal agreement	Statement provided by suitably qualified engineer Formal acceptance from landowner
Native Ecosystem	Tailings Storage Facility, Overburden Emplacement Area	A2 A4	Runoff water quality from mine site meets the requirements of the Project Approval and Environment Protection Licence and does not present a risk of environmental harm	Water quality parameters from Project Approval and Environment Protection Licence	Water quality discharged from rehabilitated site meets specifications in Project Approval and Environment Protection Licence	Water quality monitoring reports

Final land use domain	Mining domain	Spatial References	Draft Rehabilitation Objective	Draft Performance Indicator	Draft Completion Criteria	Draft Justification / Validation Methods
Native Ecosystem	Tailings Storage Facility	A2	Residual waste materials stored on site (e.g. tailings and other wastes) will be appropriately contained / encapsulated so it does not pose any hazards or constraints for intended final land use	Visual - indicators of erosion and land instability Visual - indicators that surface water management structures are functioning as designed Measured – erosion rates from field trials and or surveys on both target analogue sites (representative of final land use) and rehabilitated profiles (tonnes / ha) Measured - Survey of rehabilitated landform to verify final landform construction in accordance with Final Landform and Rehabilitation Measured - survey of rehabilitated landform to specifically monitor settlement and/or material loss via erosion Modelled – long term erosional stability (e.g. Landform Evolution Modelling) to verify the long-term stability of rehabilitated landform Modelled – long term geotechnical stability (e.g. stability analysis) to verify the long-term stability of rehabilitated landform	Visual – verification that capping, type and placement consistent with design Visual – no areas of unexpected seepage Survey verifies that capping placement consistent with design and settlement and/or material loss is within predicted limits and will not compromise final landform drainage via differential settlement Quality assurance records verify capping constructed and in accordance with design specifications relevant to site risks and target final land use	Photos, rehabilitation monitoring reports, as constructed surveys, quality assurance records for construction, erosion surveys, independent geotechnical reports (where required), groundwater/surface water monitoring reports The structural integrity of the infrastructure and capping has been inspected by a suitably qualified engineer and determined to be suitable and safe as part of the intended final land use and water material adequately contained
Water Storage (Excluding Final Void)	Water Management Area	G3	The final landform is stable for the long-term and does not present a risk of environmental harm downstream / downslope of the site or a safety risk to the public/stock/native fauna	Visual - indicators of erosion and land instability Visual - indicators that surface water management structures are functioning as designed Measured – erosion rates from field trials and or surveys on both target analogue sites (representative of final land use) and rehabilitated profiles (tonnes / ha) Measured - Survey of rehabilitated landform to verify final landform construction in accordance with Final Landform and Rehabilitation Measured - survey of rehabilitated landform to specifically monitor settlement and/or material loss via erosion Modelled – long term erosional stability (e.g. Landform Evolution Modelling) to verify the long-term stability of rehabilitated landform Modelled – long term geotechnical stability (e.g. stability analysis) to verify the long-term stability of rehabilitated landform	Visual- minimal erosion that would not require moderate to significant ongoing management and maintenance works Visual – no signs of land instability such as mass movement Visual - no areas of active gully erosion Visual - no evidence of tunnel erosion Visual – no evidence of active scour likely to compromise surface water management structure Survey verifies final landform complies with final landform construction in accordance with Final Landform and Rehabilitation Plan Survey verifies that settlement and/or material loss is within predicted limits and will not compromise final landform drainage via differential settlement	Before and after photos, rehabilitation monitoring reports, as constructed surveys, erosion surveys, independent geotechnical reports (where required) and or erosion modelling reports (where required) that indicate long-term stability of rehabilitated landform Depending on the nature, scale and risks associated with a specific site, stability will need to be evaluated over a number of years (e.g. 5 years)
Infrastructure	Infrastructure Area	I1	Landform that is commensurate with surrounding natural landform	Survey of rehabilitated landform to verify final landform construction in accordance with Final Landform and Rehabilitation Plan Indicators that surface water management structures are functioning as designed	Survey verifies final landform complies with final landform construction in accordance with Final Landform and Rehabilitation Plan Minimal erosion that would not require moderate to significant ongoing management and maintenance works	As constructed surveys
			The final landform is stable for the long-term and does not present a risk of environmental harm downstream / downslope of the site or a safety risk to the public/stock/native fauna	Visual - indicators of erosion and land instability Visual - indicators that surface water management structures are functioning as designed Measured – erosion rates from field trials and or surveys on both target analogue sites (representative of final land use) and rehabilitated profiles (tonnes / ha) Measured - Survey of rehabilitated landform to verify final landform construction in accordance with Final Landform and Rehabilitation Measured - survey of rehabilitated landform to specifically monitor settlement and/or material loss via erosion Modelled – long term erosional stability (e.g. Landform Evolution Modelling) to verify the long-term stability of rehabilitated landform Modelled – long term geotechnical stability (e.g. stability analysis) to verify the long-term stability of rehabilitated landform	Visual- minimal erosion that would not require moderate to significant ongoing management and maintenance works Visual – no signs of land instability such as mass movement Visual - no areas of active gully erosion Visual - no evidence of tunnel erosion Visual – no evidence of active scour likely to compromise surface water management structure Survey verifies final landform complies with final landform construction in accordance with Final Landform and Rehabilitation Plan Survey verifies that settlement and/or material loss is within predicted limits and will not compromise final landform drainage via differential settlement	Before and after photos, rehabilitation monitoring reports, as constructed surveys, erosion surveys, independent geotechnical reports (where required) and or erosion modelling reports (where required) that indicate long-term stability of rehabilitated landform Depending on the nature, scale and risks associated with a specific site, stability will need to be evaluated over a number of years (e.g. 5 years)

Final land use domain	Mining domain	Spatial References	Draft Rehabilitation Objective	Draft Performance Indicator	Draft Completion Criteria	Draft Justification / Validation Methods
			There is no residual soil contamination on site that is incompatible with the final land use or that poses a threat of environmental harm	Waste material and/or visible contamination areas on site surface	There are no visible signs of contamination following the removal of plant, equipment and materials All rubbish/ waste materials removed from site	Statement provided and before/after photos
			All infrastructure that is not to be used as part of the final land use is removed to ensure the site is safe and free of hazardous materials	Removal of all services (power, water, communications) that have been connected on the site as part of the operation	All utility infrastructure removed	Statement provided, utility service disconnection record / notification
			All infrastructure that is to remain as part of the final land use is safe, does not pose any hazard to the community	Potential hazards (e.g. electrical, mechanical) have been effectively isolated and secured Infrastructure is in a condition (e.g. structural, electrical, other hazards) that is suitable for the intended final land use	Hazards isolated and secured Formal acceptance from the subsequent landowner that infrastructure is in a condition that is suitable for the intended final land use in accordance with formal agreement	Statement provided by suitably qualified engineer Formal acceptance from landowner

4.2. Rehabilitation objectives and rehabilitation completion criteria - stakeholder consultation

Since taking over the site in May 2022, DEVELOP has undertaken consultation with a range on stakeholders on various aspects and is committed to continuing this consultation work with key government and community stakeholders during mining operations and closure at Woodlawn.

A copy of this version of the RMP has been provided to the following stakeholders for consultation, as required by MP 07_0143:

- NSW Resources Regulator
- NSW Environment Protection Authority (EPA)
- NSW Department of Primary Industries – Water (DPI – Water)
- Water NSW
- Goulburn Mulwaree Council

In addition to the consultation discussed above, the following stakeholders have been consulted in relation to the rehabilitation objectives and completion criteria:

- Veolia (landholder)
- Community Consultative Committee (CCC)

A consultation log for matters applicable to the RMP is provided in **Appendix 2**.

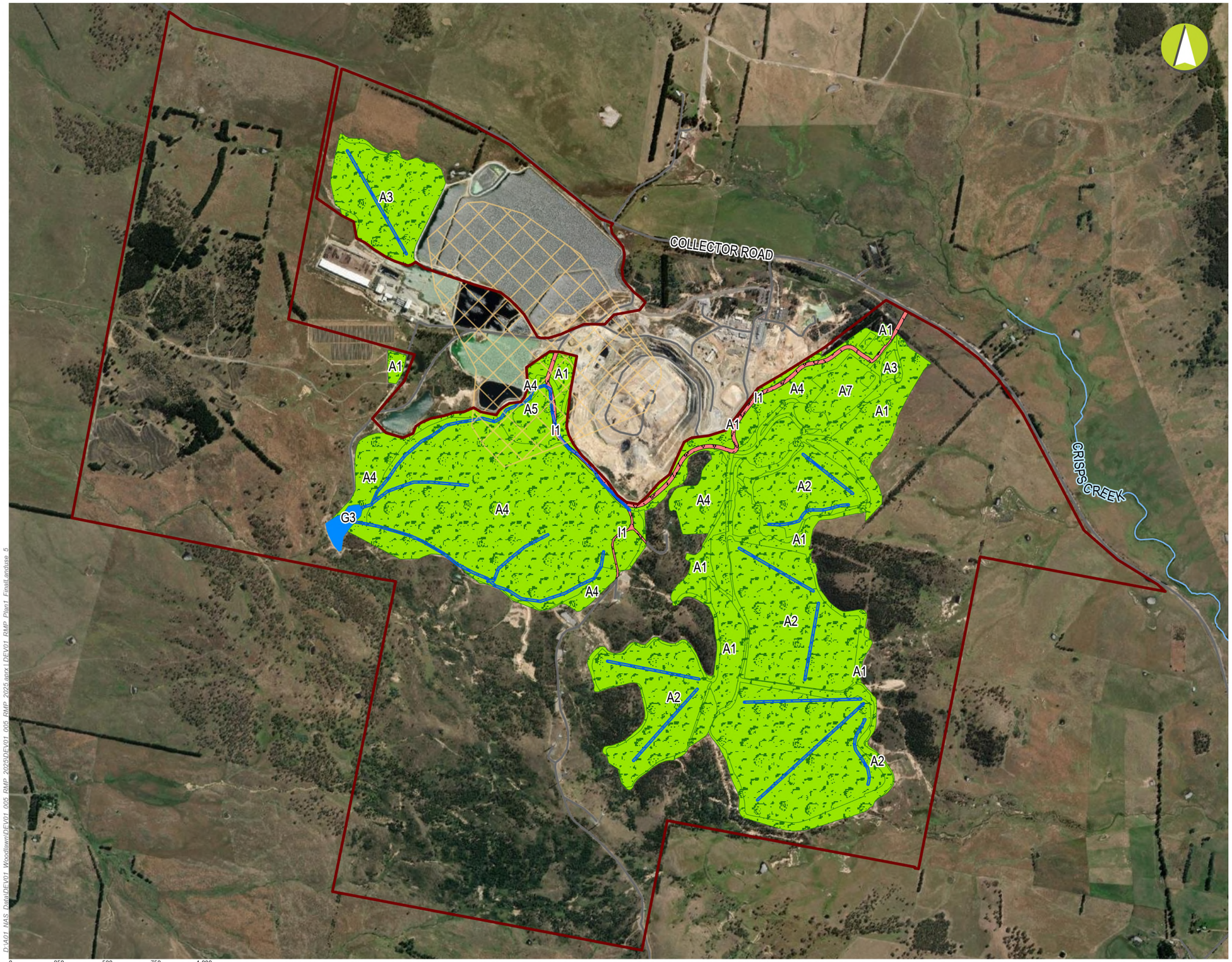
5. FINAL LANDFORM AND REHABILITATION PLAN

5.1. Final landform and rehabilitation plan – electronic copy

The Final Landform and Rehabilitation Plan is presented as two sub plans:

1. Plan 1: Final Landform Features
2. Plan 2: Final Landform Contours

As discussed in **Section 2.1**, ED1 has been excluded from the RMP, including the FLRP, on advice from the NSW Resources Regulator in May 2025, as Veolia retains responsibility its final rehabilitation and closure.



0 250 500 750 1,000 m

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LEGEND

- Project Approval Boundary
- Roads
- Water Courses
- Surface Expression Area

Final Landform Features

- Drainage Design

Final Landuse Domain

- Domain A: Native Ecosystem
- Domain G: Water Storage (Excluding Final Void)
- Domain I: Infrastructure

Woodlawn Mine Tarago

Final Landform Features
Plan 1

Mine name	Woodlawn Mine Tarago
Plan name	Woodlawn Mine Tarago RMP
Year of anticipated relinquishment	TBA following Portal Submission
Data theme submission ID No.	TBA following Portal Submission
Spatial Reference	GDA2020 MGA Zone 55
Plan date (date created)	28/10/2025

Source: Project Approval Boundary, Final Landform and Current Authorisations from Woodlawn Mine (2025). Roads, watercourses and electricity transmission lines from LPI (2024). Aerial imagery from ESRI

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Sheet Size : A3

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LEGEND

- Project Approval Boundary
- Final Landform Contours (5m)
- Roads
- Water Courses

Current Authorisations

- S(C&PL)L 20

0 250 500 750 1,000 m

Scale: 1:20,000

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Source: Project Approval Boundary, Final Landform and Current Authorisations from Woodlawn Mine (2025). Roads, watercourses and electricity transmission lines from LPI (2024). Aerial imagery from ESRI

Woodlawn Mine Tarago

Final Landform Contours
Plan 2

Mine name	Woodlawn Mine Tarago
Plan name	Woodlawn Mine Tarago RMP
Year of anticipated relinquishment	TBA following Portal Submission
Data theme submission ID No.	TBA following Portal Submission
Spatial Reference	GDA2020 MGA Zone 55
Plan date (date created)	23/06/2025

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6. REHABILITATION IMPLEMENTATION

6.1. Life of mine rehabilitation schedule

The current life of mine rehabilitation schedule is presented in **Section 6.1**.

The RMP Form and Way document states that this section should describe the rehabilitation schedule over the life of the mine, from the commencement of the RMP until lease relinquishment. The life of mine rehabilitation schedule must include a series of plans illustrating the proposed mine layout and sequence of progressive rehabilitation across the leasehold area at a minimum of five-yearly intervals until completion of mining and achievement of the final land use. For mines where there is limited mine rehabilitation over extended periods of time (e.g. underground mines) these plans can be provided with longer intervals (e.g. for underground mines this could be every 10 years during operations).

Detailed mine planning is completed annually and outlines proposed mining/disturbance and rehabilitation areas. Detailed figures will be prepared as part of the Annual Rehabilitation Report and Forward Program, with these outlining activities over the next three years. Beyond that, the site is working on detailed mine planning, but the information is not as detailed (conceptual), hence it has not been included in this RMP.

Further, Schedule 4, Condition 21 of MP 07_0143 and Schedule 8A, clause 5 of the Mining Regulation 2016 requires DEVELOP to carry out rehabilitation of the site progressively, that is, as soon as reasonably practicable after disturbance. DEVELOP will assess the opportunities for progressive rehabilitation over the life of the mine, including the review of final landform and land use discussed in **Section 2.2**.

Table 6-8 Life of mine rehabilitation schedule

Phase	Schedule	Status
Construction and commissioning	Until 2025	Complete
Active mining	2025 - 2034	Commenced
Decommissioning	On completion of mining operations at Woodlawn	Not commenced
Landform establishment	Ongoing throughout the life of mine as areas are deemed to be no longer required for operational purposes	Not commenced
Growth medium development	Ongoing throughout the life of mine as areas are deemed to be no longer required for operational purposes	Not commenced
Ecosystem and land use establishment	Ongoing throughout the life of mine as areas are deemed to be no longer required for operational purposes	Not commenced
Ecosystem and land use development	Ongoing throughout the life of mine as areas are deemed to be no longer required for operational purposes	Not commenced
Rehabilitation completion (sign-off)	2034 onwards	Not commenced

6.2. Phases of rehabilitation and general methodologies

The sequence of actions required to rehabilitate disturbed areas to achieve the final land use are classified into conceptual stages referred to as phases of rehabilitation. These phases are:

- Active mining
- Decommissioning
- Landform establishment
- Growth medium development
- Ecosystem and land use establishment
- Ecosystem and land use development
- Rehabilitation completion (sign-off)

6.2.1. Active mining phase

Soils and Materials

The soils on site are comprised of shallow lithosols on the crests, red podzolic soils on upper and side slopes and moderately deep yellow podzolic soils on the mid to lower slopes. The lower slopes and drainage lines are poorly drained solodic soils prone to seasonal waterlogging and erosion. The topsoil is typically shallow, hardsetting and infertile. There is no further requirement to strip topsoil as all clearing for infrastructure and development has been completed.

Overall, there is a deficit of topsoil and subsoil available for rehabilitation of the mining domains at Woodlawn. Actions identified in the rehabilitation risk assessments include undertaking an audit of historic soil stockpiles and the development of a site-wide materials balance which will assist DEVELOP in understanding the quantum of any topsoil or growth medium deficit and in implementing measures to source alternate materials, where required. Further trials will be considered to investigate the suitability of alternative growth media or capping strategies to address this deficit.

However, a potential shift in final land use in the future toward an industrial outcome would significantly reduce the overall demand for topsoil material. Such a land use would typically require less vegetative cover and would place lower emphasis on soil profile reconstruction, thereby easing the material requirements associated with ecological rehabilitation scenarios.

Flora

There are no known threatened species on site and no further clearing or disturbance of vegetated areas is anticipated.

To support the successful establishment of vegetation during rehabilitation, a range of management controls will be implemented. Where native ecosystem re-establishment is planned, locally sourced provenance seed will be used to promote ecological integrity and improve rehabilitation outcomes. Additional measures identified in the rehabilitation risk assessment to assist in vegetation establishment include:

- Retaining seed quality records from suppliers.
- Reviewing and improving weed management processes.

- Developing and implementing a site-wide monitoring and maintenance program for rehabilitation and closure.

These controls are aimed at enhancing the effectiveness of rehabilitation activities to promote long-term success in meeting closure objectives.

The Vegetation Management Plan also outlines management, monitoring and reporting requirements in relation to vegetation at the site.

The rehabilitation risk assessment identified that non-mining-related land use activities and projects have resulted in disturbance of existing rehabilitated areas. To mitigate this risk, a designated works area plan will be prepared and implemented across the site. This plan will define approved operational zones for ancillary activities and projects, helping to prevent unintentional disturbance of completed rehabilitation and support the long-term stability and integrity of rehabilitated land.

Fauna

Given the level of previous land clearing, there is little remaining natural habitat for fauna. In its present condition, it provides only marginal foraging habitats for transient species such birds and bats which was evident by the conclusions made in the EA and as summarised below. Other dominant fauna species on site are eastern grey kangaroos, common wombat and echidna.

Native and pest species will be monitored and managed in accordance with the Vegetation Management Plan.

Rock/overburden emplacement

Potential Acid Forming (PAF) waste rock found in the underground mining areas will be managed in accordance with the Waste Rock Management Plan. Usage and handling of the material will be carefully controlled throughout the mine life to so that acid generating wastes are controlled and to determine if practical separation of the non-acid forming (NAF) and PAF material can occur. If so, the material will be managed such that suitable acid consuming and/or NAF material surrounds any PAF rock, or the waste rock will be co-deposited with paste fill in the mined out stopes or placed in a managed temporary stockpile and then rehandled so that it is encapsulated within the tailings dams.

Legacy waste rock emplacement. During previous mining of the Woodlawn open cut, more than 80 million tonnes of waste rock was placed in the legacy waste rock dump over an area of approximately 92ha. The waste material comprised primarily rhyolite, welded tuff, tuffaceous shale and dolerite. Considerable amounts of pyrite were also present in certain rock units, and sulphur levels from bulk samples have been measured at 6 to 7%.

The dump has been fully rehabilitated by the previous operators of the mine using a compacted clay seal to eliminate water infiltration and then revegetated. Biosolids were successfully applied to the rehabilitated waste emplacement in 1998 as part of the rehabilitation undertaken at the time.

As noted in the NSW Resources Regulator Audit undertaken on 7 November 2019 (Observation of Concern number 2) there are some areas of the rehabilitated waste rock dump, particularly on the western face that have eroded with some vegetation failure. Ongoing monitoring/assessment will be undertaken, with rectification works planned/scheduled, as required.

Several actions have been identified in the rehabilitation risk assessment to assist DEVELOP in improving the management of the legacy waste rock emplacement. A key action includes a project to map the historic emplacement of PAF material. This mapping will support a better understanding of geochemical risks and enable an informed assessment of whether material within the emplacement can be safely reused in rehabilitation activities—such as a cover medium for the tailings dam—or if additional management controls are required.

In addition to the PAF mapping project, several further actions have been identified to assist in the broader management of PAF material at the site. These include:

- Developing a PAF management procedure that incorporates systems for the identification, tracking, and documentation of PAF material movements.
- Preparing a comprehensive stockpile management plan to guide the placement, handling, and utilisation of overburden materials.
- Reviewing and updating the Waste Rock Management Plan so that it reflects current operational practices and aligns with closure objectives.

Collectively, these measures are intended to strengthen the control of geochemical risks, enhance material handling efficiency, and support stable, safe, and sustainable long-term rehabilitation outcomes.

Waste management

Wastes will be managed as summarised in **Table 6-9**.

Table 6-9 Waste management

Waste type	Storage	Removal
General waste	Covered bins	Regularly collected and taken off-site by a licensed waste contractor
Waste oils and greases	Bunded areas within workshop	Licensed waste contractor and disposed/recycled off-site
Batteries and tyres	Marked storage area within the workshop area	Licensed waste contractor and disposed/recycled off-site
Scrap steel / metal	Designated areas	Scrap metal recycler as required
Paper / cardboard	Covered bins	Regularly collected and taken off-site by a licensed recycling contractor
Used reagent and chemical containers	Designated areas	Regularly collected and taken off-site by a licensed waste contractor or supplier
Tailings	Tailings dams	A component of the tailings will be used to produce a paste to backfill completed stopes or areas requiring stabilisation underground. Excess tailings will be disposed of in either the existing tailings dams once reprocessed or in TSF4.

Geology and Geochemistry

Rehabilitation risks associated with the geochemical composition of tailings and waste rock during rehabilitation operations include:

- Short or long-term generation of leachate with low pH or elevated metal composition resulting in environmental damage and requiring active management.
- Contamination of surface materials resulting in environmental damage and requiring active management.
- Limitation of the success of revegetation programs as a result of adverse impact on growth media chemistry.

The presence of potential PAF rock will be managed according to the Waste Rock Management Plan and has been considered in the capping design of tailings rehabilitation.

In addition to the action and priorities identified above, DEVELOP proposes to undertake a geochemical assessment that will be completed as part of closure planning to determine any further risks and identify mitigation measures that could be considered at the site.

Material prone to spontaneous combustion

The ore, waste rock and process residues do not contain the mineral contents capable of supporting spontaneous combustion. There is no historical evidence or records of spontaneous combustion associated with mining operations at Woodlawn.

Material prone to generating acid mine drainage

The rehabilitated waste rock emplacement continues to discharge into the designated waste rock dam. Acid water collected in the waste rock dam is pumped back into tailings or evaporation storage dams on an as required basis.

Schedule 4, Condition 3 of MP 07_0143 requires that within 5 years of the date of the approval a passive system to treat seepage from the existing Waste Rock Dump be identified and implemented. The site has completed this action and identified that a passive system is not appropriate for the situation. DEVELOP will investigate suitable alternative options for long term management of leachate from the RWRD, as discussed further in **Section 9.2.1**.

To support the overall management of materials prone to generating acid mine drainage, the rehabilitation risk assessment identified the following key actions to be completed:

- Mapping of historical placement of PAF material using aerial photography, GIS analysis, field investigations, and targeted sampling and geochemical testing.
- Developing a formal procedure for the identification, use, and tracking of PAF material across the site.
- Undertaking a comprehensive geochemical assessment to improve understanding of material behaviour and inform management decisions.
- Assessing the feasibility of preferential identification and handling of PAF and NAF materials to maximise beneficial reuse during rehabilitation.
- Investigating material movement between EPLs to support regulatory compliance and inform future rehabilitation staging.
- Preparing a stockpile management plan to protect and prioritise NAF material critical for rehabilitation cover systems; and
- Reviewing and updating the Waste Rock Management Plan to reflect current knowledge, operational practices, and closure planning requirements.

Ore beneficiation waste management (reject and tailings disposal)

At the completion of processing of the ore the remaining material, namely tailings, would be transferred to a thickener to recover process water for reuse within the processing plant. The thickened tailings slurry would be pumped to TSF4 or mixed with cement and used as paste fill underground.

TSF4 has been constructed in accordance with the project approval. There are 2 subsequent lifts approved which will be progressed when operationally required. TSF4 and all tailings dams on site will be maintained in accordance with the Dam Safety Management System and each dams' respective Operation and Maintenance Plan.

DEVELOP will undertake the following actions identified in the rehabilitation risk assessment to support improved tailings management and integration with closure planning

- Consider the pyrite float circuit for production of material that may be able to be used in closure.
- Review the Pastefill Management Plan, including review of the material to be used in paste filling to identify whether it will require use of NAF material that could otherwise be used in rehabilitation.

Erosion and sediment control

Final construction activities that required earthworks at the Woodlawn Mine site were completed during 2019. The drains and batters parallel to the haul road have been progressively stabilised. Coir logs and rock was placed in drains to minimise erosion. All drains will continue to be monitored and maintained on an ongoing basis in accordance with the Water Management Plan.

Erosion monitoring will be included in the rehabilitation monitoring program.

Ongoing management of biological resources for use in rehabilitation

There is a limited volume of topsoil stockpiled on site. Where there is topsoil stockpiled it will be managed so that vegetation growth promotes biological activity and hence ongoing viability of the stockpiled material. Weed control over stockpiled material will be ongoing.

The depth of topsoil placed for rehabilitation will be determined on a case-by-case basis considering site-specific conditions, intended final land use, and the characteristics of available growth media.

Seed harvesting from native species from analogue sites on the mining lease and surrounding area will be carried out for germination and raising of seedlings of endemic species suitable for rehabilitation and the revegetation area will be undertaken. Seedlings will be raised on site or obtained from commercial outlets and local Landcare or equivalent organisations where appropriate.

Detailed planning and scheduling will be undertaken well in advance of rehabilitation activities to forecast species requirements based on rehabilitation staging, align collection and propagation timelines with seasonal conditions, and coordinate with suppliers to secure appropriate provenance material.

No further disturbance of natural areas is anticipated, however, treefall will be preserved either in situ or relocated if appropriate to provide habitat for native fauna.

Mine subsidence

The approved underground mine plan does not extend beyond land owned by Veolia or outside the S(C&PL)L 20. The underground mining method includes reinforcement of the existing mine accesses and increase the stability of the project site relative to current conditions. Underground work is excluded from a zone surrounding the old void to mitigate against potential connectivity that could result in increased water, leachate or gas flow into the underground mine or other impacts to the surface infrastructure as a result of underground mining.

The existing mine void/bioreactor liner was designed and approved to act as a barrier to limit connectivity impacts and is expected to continue playing a key role in mitigating these impacts, even with the exclusion zone in place. However, its long-term effectiveness will continue to be evaluated as part of ongoing monitoring and assessment programs.

Mine subsidence will continue to be monitored in accordance with the requirements outlined in the Woodlawn Mine Extraction Plan.

Management of potential cultural and heritage issues

Based on Aboriginal and European Heritage surveys undertaken for the EA, there are no Heritage items that will be impacted by the Project or as a result of any proposed activities outlined in this RMP. Should any items of significance be discovered, the Woodlawn Heritage Management Plan provides appropriate management, mitigation, conservation and protection of both Aboriginal and non-Aboriginal heritage items identified on the site.

Exploration activities

S(C&PL)L 20 permits exploration activities within the lease area. Any future exploration works will be subject to relevant approvals. Prior to any exploration activity commencing appropriate permitting must be completed. The permit must consider environmental, heritage and relevant regulatory obligations and management measures to mitigate and minimise potential impacts.

The rehabilitation risk assessment identified the need to prepare a register of all drill holes on site, including surface exploration holes and service boreholes. DEVELOP will undertake this task as part of future mine closure planning activities. The register will support the identification of outstanding rehabilitation obligations and allow all drill holes to be appropriately rehabilitated.

6.2.2. Decommissioning

The key processes and activities required for decommissioning and demolition of built infrastructure to achieve final land is outlined below. Where appropriate decommissioning of redundant infrastructure may be carried out progressively over the life of the operation. There are some items which will be required by Veolia to continue its Bioreactor operation. These include internal access tracks and haul roads, power lines, telecommunications, and other dam structures which will be incorporated into the overall site water management system.

As specified in the form and way further detail regarding decommissioning and demolition activities will be required in the annual rehabilitation report and forward program for any plant and/or infrastructure which is proposed to be decommissioned in the three-year forward program or has been in the past year.

Site security

Site security during and following decommissioning will be implemented to so that public access is prevented for the purpose of public safety in close consultation with other land users. Additionally, vulnerable rehabilitation areas will be secured and/or monitored, where appropriate, to prevent any inappropriate access.

The following actions, as identified in the rehabilitation risk assessment will be considered during mine closure planning to support site security and long-term safety:

- Reviewing site fencing and signage to confirm they are appropriate, clearly visible, and effective in deterring unauthorised access post-closure.
- Constructing or reinforcing windrows in areas identified as key access points at risk of unauthorised vehicle access.

These measures will contribute to the safe transition of the site to its final land use and help prevent interference with rehabilitated areas.

Infrastructure to be removed or demolished

In accordance with MP 07_0143, Schedule 3, Condition 6, all infrastructure is to be decommissioned and removed, unless otherwise agreed with the Secretary. Hence, the RMP is focussed on achieving the requirements contained in the Project Approval. Infrastructure not required for post mining land use may include:

- Services – electricity, water supply, telecommunications not required by Veolia;
- Buried services may be left in-situ unless they pose a threat to the post mining land use. Where buried services are retained or not required by Veolia the location will be surveyed and mapped for subsequent land holders;
- Concrete footings and pads and inert construction material will be broken up and buried within the overburden, tailings dams or used for rehabilitation as appropriate;
- Roads, carparks and hardstand areas will be removed unless required by Veolia;
- Water management infrastructure will be reviewed prior to closure and in view of the interoperability with Veolia any obsolete infrastructure will be removed; and
- Buildings not required by Veolia will be demolished or sold and removed from site using approved contractors.

As part of mine closure planning, infrastructure that may be complementary to, or supportive of, future industrial land use will be reviewed and assessed for potential retention.

A demolition plan will be developed as part of mine closure planning, which will be informed by asset register and site services plan.

Buildings, structures and fixed plant to be retained

Any proposal to retain infrastructure will be subject to detailed justification and must be approved by the NSW Resources Regulator and the Department of Planning, Housing and Infrastructure. A detailed mine closure plan will be developed prior to mine closure in consultation with Veolia so their ongoing requirements are also met.

This may include buildings, hardstand areas, access roads, utility connections, or other assets that align with the intended post-mining land use objectives.

Infrastructure to be retained will be documented in the RMP and closure planning documentation.

Management of carbonaceous/contaminated material

In accordance with Schedule 3, Condition 6 of MP 07_0143, the site is to be rehabilitated to ensure it is safe, stable and non-polluting.

Contamination assessments will be undertaken to identify and quantify the nature, extent, and distribution of any contaminated materials across the site and inform the development of appropriate management, remediation, or mitigation measures to allow the site to be suitable for the intended post mining land use.

Hazardous materials management

Due to existing management measures implemented for hydrocarbon transport, handing and storage, it is not expected that hydrocarbon contaminated areas would present a risk to rehabilitation. Unless otherwise detailed in the Conceptual Mine Closure Plan the above ground fuel storage tank will be removed as part of decommissioning activities.

A hazardous materials assessment will be undertaken as part of mine closure planning to identify, assess, and manage potential risks. This assessment will address materials such as radiation sources, per- and polyfluoroalkyl substances (PFAS), asbestos-containing materials (ACM), and polychlorinated biphenyls (PCBs). The outcomes will inform the safe removal, treatment, or containment of hazardous materials in accordance with regulatory requirements.

Underground infrastructure

All underground infrastructure will be decommissioned and, unless otherwise agreed with the Secretary, will be removed such that it does not pose a risk to the environment or to public safety.

As part of mine closure planning, all underground entries will be permanently sealed for long-term stability and safety. The mine will be sealed in accordance with the NSW Resources Regulator and MP 07_0143 requirements.

6.2.3. Landform establishment

The final shaped landform will be constructed in accordance with the final landform and rehabilitation plan. Rehabilitation will be undertaken progressively, generally commencing as soon as practicable following the completion of mining related activities. As the site operates as an underground mine, ongoing surface disturbance is limited, and as such, opportunities for progressive rehabilitation may be constrained and will be undertaken where practicable within the available disturbance footprint.

Water management infrastructure

To meet the rehabilitation objectives of the Project Approval, the post mining water management infrastructure will be designed to be hydraulically and geomorphologically stable, with long term erosion and sediment controls in place.

The rehabilitation risk assessment identified several actions aimed at strengthening water management during closure planning and post-mining transition. These include:

- Reviewing the site water balance to confirm alignment with closure objectives and post-mining land use requirements.
- Preparing as-built plans for the site's water management infrastructure to support ongoing water control and monitoring.

- Implementing and verifying erosion control structures in revegetated areas to reduce sedimentation and protect rehabilitation works.
- Reviewing surface water infrastructure to determine which components may be retained or decommissioned post-closure.
- Reviewing water licensing requirements for both operational and post-closure phases.
- Engaging with Dams Safety NSW to understand and meet requirements for the de-registration of prescribed dams, where applicable.
- Reviewing the role and scope of the Engineer on Record, ensuring responsibilities are clearly defined for closure and post-closure phases.
- Investigating long-term management options for leachate from the RWRD.
- Assessing the risk posed to DEVELOP from ammonia in groundwater, originating from a non-mining-related source, and evaluating appropriate risk mitigation measures.

These actions will assist DEVELOP to understand and effectively manage water-related risks through the closure process and into the post-mining phase.

The Water Management Plan will be reviewed and updated, as required, to consider these aspects, where appropriate.

Final Landform construction: general requirements

The box cut final void and other areas of the Woodlawn Mine footprint will be rehabilitated as per the Final Landform and Rehabilitation Plan. The landform design includes (where relevant) surface water management structure requirements (including spillways) meeting appropriate hydrological projections. Geomorphological landform design incorporates characteristics of the existing surrounding topography and proposed final land use into the final landform design.

As identified in the rehabilitation risk assessment, as built surveys (including ITPs) of completed landforms will be prepared by a competent person to demonstrate that the final landform is consistent with approval requirements (e.g. RLs and slope match the final landform in the RMP).

Final landform construction: reject emplacement areas and tailings dams

The 2012 EA includes two options for rehabilitation of the tailings dams, as follows:

- **Option 1** - Placing alternating layers of composted organic material sourced from Veolia's proposed Alternative Waste Technology (AWT) Facility (i.e. WOO), rock material sourced from on-site, and a final growing media layer over the surface area of the tailings dams.

- **Option 2** - Construction of a 2m cap using a combination of NAF waste rock and excavated soil as the growing media layer.

Option 2 was proposed to be used only if either Option 1 proved unsatisfactory during its trial phase, or the timing of the rehabilitation program does not fit with the supply of WOO.

A Resource Recovery Order (RRO) and Resource Recovery Exemption (RRE) had been in place for Veolia's Waste Organic Output (WOO) product, allowing for its beneficial reuse under specified conditions until their expiry in May 2025.

In addition, an initial review of the trials involving the use of WOO did not demonstrate a strong case for its continued application in rehabilitation. Concerns were raised about the potential for unintended impacts due to contaminants present in the WOO, which could compromise soil quality or pose risks to human health and the environment. These contaminants had the potential to constrain or limit the site's suitability for its intended final land use, making WOO an unsuitable option moving forward. In addition, the NSW Resources Regulator has raised concerns regarding the organic dominant composition of WOO, which compromises its ability to support a safe and stable landform, further supporting a move away from its use in tailings dam capping designs.

Given the outcomes of the WOO trials, the expiry of the relevant RRO and RRE, and concerns regarding potential contaminants and comprised structural integrity and their respective impact on final land use, DEVELOP will progress with Option 2 as the preferred approach to sourcing rehabilitation material and site closure planning.

Schedule 4, Condition 22 of MP 07_0143 requires DEVELOP to outline the operational procedures (including testing, monitoring and performance criteria) used to verify the ongoing stability of the compost material to be used in rehabilitation. This is no longer applicable given the cessation of use of WOO.

The same condition also requires inclusion of detailed designs for the short term and long-term rehabilitation of tailings and evaporation dams, including surface water management and capping design which takes into account total predicted settlement. These requirements will be addressed when the tailings capping design is updated, with additional information provided, when available, in subsequent updates of the RMP.

To facilitate this, DEVELOP intends to investigate the suitability and volume of material in the RWRD as a possible source for the NAF. A review of historic reports indicates that the RWRD contains more than 80 million tonnes of waste rock, comprising various rock types and sizes. The 2012 EA states that approximately 2,000,000m^3 of material would be required to rehabilitate the tailings dam with a 2m cap. Based on a conservative density estimate of 1.8 tonnes/m^3, there is approximately 44,400,000m^3 of material in the RWRD. This significantly exceeds the volume required for tailings dam rehabilitation and would allow for selective handling of materials. This would also allow for buttressing of Tailings Dam North (TDN), Tailings Dam South (TDS), Tailings Dam West (TDW) and TSF4 embankments to make them long-term safe and stable.

As indicated above, mapping and investigation works are proposed to be undertaken within the RWRD to improve understanding of material composition, including the presence and distribution of PAF material, and to inform future rehabilitation and management strategies at the site.

It is intended that as part of the closure planning for the site, subject matter expert(s) will be engaged to assist in classifying the material, determining its suitability and developing a suitable capping design for a possible industrial post mining land use.

The rehabilitation risk assessment identified several key actions to manage potential risks associated with the tailings storage facilities (TSFs). These actions include:

- Conducting a gap analysis of the outcomes from the independent engineering review of the TSF complex to identify any outstanding issues or improvement opportunities
- Reviewing and updating the tailings dam capping design, considering the cessation of the use of Waste Organic Output (WOO) and alkaline product inputs; and
- Assessing the WOO trial outcomes to determine whether any components of the trial may be suitable for incorporation into future rehabilitation programs.

DEVELOP will progress these actions to support the review of the final landform and post-mining land use, as outlined in **Section 2.2**, and to determine an appropriate and effective tailings capping design that meets long-term stability, environmental, and land use objectives.

Final landform construction: final voids, high walls and low walls

Given the site is an underground mine, there will be no final void, high or low walls associated with the mining operations. The existing box cut will be backfilled to approximately the same level as the surrounding land surface using material stockpiled onsite to the site. The existing legacy open cut mine void is presently being utilised by Veolia as a Bioreactor. Veolia retains the obligation for rehabilitation of the void in accordance with their Project Approval.

All final landform slopes will be designed to meet the requirement outlined in Schedule 3, Condition 6 of the Project Approval, whereby all rehabilitated slopes are to be less than 10 degrees and free draining. Dam walls are permitted to have a final slope of up to 18 degrees.

The final overburden landform will be designed to integrate with the surrounding landscape, with batters and slopes designed to minimise erosion risk and promote long-term stability.

Construction of creek/river diversion works

No creek/river diversion works will be required to meet the post mining land use objectives.

6.2.4. Growth medium development

Following removal of infrastructure from designated areas, the surface will be reshaped and prepared with appropriate base growth media to support rehabilitation. Where possible, surrounding inert (NAF) spoil will be pushed across exposed areas to provide growth medium. Any deficiencies will need to be supplemented from material stockpiled on site or from off-site sources noting there is a site deficiency of stockpiled topsoil. Given the known deficiency of stockpiled topsoil at the site, any shortfall in suitable materials may need to be supplemented from other on-site reserves or sourced externally.

Where rehabilitation and land forming have been completed, soil ameliorants such as gypsum, lime, fertiliser and bio-solids may be applied prior to planting of quick germinating pioneer vegetation species, mainly exotic pasture grasses, which will be established with the aim of stabilising the soil surface and stimulating nutrient cycling as soon as possible. It is possible that spray-grass or equivalent methods will be used to rapidly stabilise areas deems vulnerable to erosion. Subsequently a diverse selection of endemic native tree and shrub species will be established from seed sourced on-site.

As identified in the rehabilitation risk assessment, DEVELOP will prepare a materials balance to evaluate the types and volumes of materials required and available to support site rehabilitation. This assessment will inform the strategic use and sourcing of growth media and guide the implementation of effective rehabilitation practices.

Key components of the materials balance will include:

- A review of historical soil stockpiles to identify their location, approximate volume, and soil quality
- Identification of alternative growth media, if native topsoil resources are insufficient.
- Establishment of an ongoing testing program to assess the suitability of rehabilitation materials.
- Development of a plan to improve the condition and performance of stockpiled material, where needed.

- The application of appropriate soil ameliorants during site preparation to enhance growth media quality.

In addition, site-specific and domain-specific requirements for rehabilitation techniques and processes will be determined so they align with final land use objectives and completion criteria.

6.2.5. Ecosystem and land use establishment

Areas to be returned to native ecosystem will be revegetated with plant species characteristic of the Western Tablelands Dry Forest vegetation community. Vegetation will be established using a combination of direct seeding or the selective use of tubestock grown from locally collected seed, and other minimal disturbance techniques. The species selected will be domain specific. For example, only grass species will be used on the tailings dams where it is not appropriate to establish tree species.

Irrigation or supplementary watering for the tubestock may be necessary during periods of prolonged dry weather and will be utilised if required during plant establishment phase. Application of suitable soil ameliorants will occur should periodic soil test results indicate deficiencies.

Weed and pest animal control will be ongoing and fencing will be considered if browsing by feral and/or native animals detrimentally constrains vegetation development.

The Vegetation Management Plan includes further detail on revegetation practices.

6.2.6. Ecosystem and land use development

DEVELOP will prepare and implement a monitoring and maintenance program to support the rehabilitation and closure phases of the site. This program will include activities designed to assess performance against closure objectives, identify emerging issues, and guide adaptive management.

Maintenance activities on the rehabilitated areas (including historical rehabilitation) will be determined by the outcomes of the rehabilitation monitoring programs and inspections as detailed in **Section 8**.

- Weed control to reduce impact from weeds on vegetation establishment.
- Feral animal control.
- Stock exclusion fencing where necessary.
- Erosion control and repair.
- Drainage management.
- Re-seeding and replanting where mortality or poor successional development occurs.
- Fertiliser or soil amendments as necessary.
- Supplementary watering, if necessary to aid germination and/or establishment of vegetation.
- Maintaining access tracks

Any maintenance activities are recorded and tracked through to completion.

6.3. Rehabilitation of areas affected by subsidence

No areas are expected to be affected by subsidence. Subsidence during mining operations is managed and monitored in accordance with the Extraction Plan.

7. REHABILITATION QUALITY ASSURANCE PROCESS

A rehabilitation quality assurance process will be developed which includes the implementation of ITPs that outline how quality control will be managed throughout each phase of rehabilitation. These ITPs will establish clear procedures for monitoring, verification, and documentation of key rehabilitation processes.

A database will be established to store historic and future records, including associated spatial data, to allow traceability, inform ongoing management, and support regulatory reporting requirements.

Indicative control measures for each of the rehabilitation phases designed to eliminate, minimise or mitigate risks towards achieving final land use are identified in the following sections.

7.1. Active Mining

- Periodic inspections of mine operational areas to verify rehabilitation objectives detailed in the Project Approval are achieved.
- Maintenance work to prevent or repair erosion around site.
- Weed control on stockpiles.
- Rehabilitation trial work and progressive rehabilitation in areas relinquished from operational status.
- Develop and maintain a materials and soils balance for capping material.
- Stockpiled material to be signposted, quarantined and managed in accordance with best practice to preserve its long-term viability.
- Waste rock emplacement area management including sampling and testing for Acid Mine Drainage (AMD) in accordance with the Waste Rock Management Plan.
- Develop and maintain a register of contaminated sites.
- Where possible, remove any legacy asbestos material in accordance with appropriate disposal guidelines.
- Commission geomorphological studies for final landform development over disturbed areas consistent with objectives outlined in EA.
- Carry out environmental and subsidence monitoring as detailed in the Woodlawn Environmental Management Strategy and associated documentation.

7.2. Decommissioning

- Confirm infrastructure to be demolished is no longer required for use by Veolia for the Bioreactor or the surrounding farming operation prior to demolition.
- Prior to demolition, confirm no heritage approvals are required.
- Evaluate infrastructure for the presence of hazardous substances prior to demolition.
- Manage waste in accordance with relevant waste stream legislation.
    - Redundant plant and equipment to be sold for reuse, scrap recycle or disposed of at an authorised landfill facility.
    - All concentrate and hazardous material to be removed and contaminated areas remediated.

  - Storage tanks containing hazardous material to be removed (sale or disposal at an authorised facility).
  - Sewerage treatment system and network to be removed.
  - Remove any remaining legacy asbestos material, radiation devices and hydrocarbons.
  - Remove bituminous carpark, roads, concrete and footings.
- Obtain demolition reports to confirm infrastructure has been removed.
- Photographic record to be retained of all demolition.
- Disconnection records for obsolete utilities.
- Retained infrastructure to be surveyed and recorded on a plan for future land holders or land use. In addition, retained infrastructure is to be assessed by a suitably qualified person to:
  - Determine the structural integrity of the infrastructure, and
  - Identification of short and long-term risks to public safety and the environment.
- Identify and implement controls to address potential residual risks and modes of failure associated with retained buildings and or fixed plant.
- Storage areas and hardstands to be assessed for potential contamination including hydrocarbons, concentrate residues etc. Remediation to be undertaken.
- Soil and water monitoring to confirm contaminated areas have been remediated or removed.
- Remove underground infrastructure:
  - Remote equipment including powerlines to remote shafts, ventilation infrastructure, services boreholes and pipeline to be removed or sealed.
  - Seal mine openings. Seals to be designed, supervised and verified by a suitably qualified expert. As-constructed drawings to be prepared to verify mine seals have been constructed in accordance with design.
  - Undertake a hydrological assessment and develop a groundwater management strategy to mitigate post-mining discharge via underground workings. The assessment is to be carried out in consultation with Veolia to confirm discharge from the bioreactor via the underground workings is managed to the satisfaction of the EPA.
  - Obtain any approvals, if required, for any anticipated post-mining discharges.

7.3. Landform Establishment

During the landform establishment phase, a program of data collection, surveying, and plan development will be carried out to allow the objectives of the approved final land use and landform to be achieved and sustainable. These objectives are guided by the objectives in MP 07_0143.

The design and implementation of landform establishment activities are be informed by measurable completion criteria, with performance evaluated through data collection, survey, and monitoring.

7.4. Growth Medium Development

During the growth medium development phase, a register will be established and maintained to document all materials used in the development of growth media. This register will include details of the material's source, type, volume, and relevant physical and chemical characteristics.

In addition, ITPs will be kept to track site disturbances, the application of soil ameliorants and weed control activities.

A soil testing program will be implemented to confirm that the growth medium is suitable for vegetation establishment and long-term plant survivability. This will include analysis of nutrient availability, pH, salinity, and assessment of potential phytotoxicity. The results of this testing will guide further amendments, planting decisions, and adaptive management practices to optimise rehabilitation outcomes.

7.5. Ecosystem and Land Use Establishment

Records for all planting activities and ongoing monitoring undertaking during the ecosystem and land use establishment phase will include:

- Planting /sowing date.
- Species mix.
- Source of seed (site harvest or commercial), including seed quality information from the seed supplier to verify compliance with rehabilitation specifications.
- Seeding application rate.
- Tubestock planting rate.
- Soil chemical results and application of soil amendment / fertiliser.
- Mortality and replacement records.
- Plant tissue phytotoxicity.
- Weed management.
- Supplementary watering in revegetation areas if seasonal and soil moisture conditions indicate.
- Surface and groundwater monitoring.
- Pest control and management of native fauna grazing impacts on rehabilitation.

7.6. Ecosystem and Land Use Development

The monitoring program during the ecosystem and land use development stage will remain consistent with that carried out during the establishment phase, unless advised otherwise by an ecologist. Ongoing periodic monitoring and documentation will include inspections of vegetation condition, erosion features, and the presence of weeds to assess rehabilitation performance and identify any areas requiring corrective action.

Monitoring will be aligned with the approved closure criteria to demonstrate that rehabilitation activities are progressing as intended and that the site is tracking toward achievement of the approved final land use outcomes.

In support of this, DEVELOP will review the current weed monitoring program, including the frequency of monitoring, the qualifications and performance of service providers, and records

of weed management activities. This review will allow weed control efforts to remain effective and appropriate for site conditions.

8. REHABILITATION MONITORING PROGRAM

8.1. Analogue site baseline monitoring

The primary monitoring program utilised at Woodlawn Mine for environmental monitoring to date across the domains and of rehabilitation areas has been Landscape Function Analysis (LFA). The LFA process and underlying principles is further described in the Vegetation Management Plan required under Schedule 4, Condition 20 of MP 07_0143. Permanent transects have been established across the site which includes analogue comparison sites. The analogue sites have been selected to provide data on the long-term goal for the revegetation areas.

Selection of analogue sites within the mining lease representing various plant communities is not achievable given the history of disturbance. Therefore, analogue sites outside the mining lease area have been selected to be monitored regularly. In addition, there is also some experimental data on the Western Tablelands Dry Forest which will also be used in the development of an appropriate database for the purposes of determining the final community structure and floristics.

8.2. Rehabilitation establishment monitoring

The current LFA monitoring program will be reviewed by DEVELOP and, where necessary, realigned to allow consistency with the approved closure and rehabilitation criteria, as well as the post-mining land use objectives, to accurately assess progress toward final land use outcomes and regulatory compliance.

Results of this program will be reported in the Annual Review (for MP 07_0143) and the Annual Rehabilitation Report (for S(C&PL)L 20).

Erosion monitoring will now also be incorporated into future rehabilitation monitoring programs to address the risk of unstable landforms as identified in the rehabilitation risk assessment. This risk relates to potential erosion and/or mass movement issues that may result from inappropriate landform design or inadequate quality assurance during construction.

In addition, an assessment of the effectiveness of deep ripping in rehabilitation areas will be undertaken to evaluate its role in enhancing water infiltration, reducing runoff, and supporting vegetation establishment.

8.3. Measuring performance against rehabilitation objectives and rehabilitation completion criteria

Schedule 4, Condition 22(i) of MP 07_0143 requires the site to include a program to monitor, independently audit and report on the ongoing effectiveness of the measures and progress towards the detailed performance and completion criteria. Monitoring and reporting for the NSW Resources Regulator is undertaken via the Annual Rehabilitation Report, Forward Program and when seeking relinquishment. Additional actions specific to the requirements of MP 07_0143 will be in line with Schedule 6, Condition 4 Annual Review and Schedule 4, Conditions 9 and 10 Independent Environmental Audit.

9. REHABILITATION RESEARCH, MODELLING AND TRIALS

9.1. Current rehabilitation research, modelling and trials

Woodlawn has previously conducted rehabilitation trials utilising an industrial waste alkaline product and Woodlawn Organics Outputs (WOO) from the Veolia Mechanical Biological Treatment (MBT) facility under Resource Recovery Exemption (RRE) and Resource Recovery Order (RRO). The RRE and RRO for the WOO product has expired. The RRE and ROO for the alkaline product expired in July 2025. An application to support the extension of the RRE and RRO for the alkaline product has been submitted by the supplier. The status of this is unknown. At this stage, Woodlawn will not be continuing rehabilitation trials with either product.

No other rehabilitation research, modelling and/or trials are currently being conducted however future trails will be considered where they align with the outcomes of more detailed closure review and planning for the site. These will be included in any future updates of the RMP. The site is focussed on reducing the volume of water held in the tailings dams which will assist with any future rehabilitation trials in these areas.

9.2. Future rehabilitation research, modelling and trials

9.2.1. RWRD dam

At the completion of original open cut mine the waste rock, approximately 80 million tonnes of rock created a dump that was subsequently rehabilitated. This exists on site as the Rehabilitated Waste Rock Dump (RWRD). The RWRD leaches low pH metal rich water which is captured by the WRDAM which and is transferred to Evaporation Dams.

Schedule 4, Condition 3 MP 07_0143 requires DEVELOP to identify an appropriate passive treatment system which can be implemented to provide long term treatment of acid leachate without the need for active management such as pumping. The implementation of the passive treatment system needs to be functional and operational prior to final mine closure.

Following investigations started by the previous operator, DEVELOP has determined that a passive treatment system would not be suitable given the close proximity of this feature to the mining lease boundary, the variability of inflows with evaporation often exceeding rainfall and the fact that the site does not currently have an approved discharge license or associated discharge point. The Resources Regulator also raised concerns in July 2019 with the previous operator on the effectiveness and the long-term maintenance regime for the passive treatment system which had been previously proposed. As such, alternative management options will be pursued. These may include the partial or complete removal of the RWRD to eliminate the source of acid leachate. Recovered material could potentially be reused in site rehabilitation, particularly for tailings dam capping, as discussed in **Section 6.2.3**.

To support decision-making, DEVELOP will engage subject matter experts to assess these and other potential long-term management strategies as part of a wider assessment of the investigation and use of the overburden material in the rehabilitation of the site.

10. INTERVENTION AND ADAPTIVE MANAGEMENT

The Trigger Action Response Plan (TARP) in **Table 10-10** identifies the proposed contingency strategies in the event of unexpected variations or impacts to rehabilitation outcomes. The TARP outlines key identified risks, their trigger, proposed mitigation measures and evidence to verify actions have been implemented to manage identified risks.

Results of any future rehabilitation research and trials will be integrated into any updates of the TARP, where relevant, to continually improve rehabilitation practices. Integration will be on a case-by-case basis.

Table 10-10 Trigger Action Response Plan

Rehabilitation Threat	Trigger Levels	Actions to be Implemented	Evidence
All infrastructure that is not to be used as part of the final land use has not been removed to ensure the site is safe and free of hazardous materials	Inspection indicates that not all infrastructure has been removed	Suitably qualified professionals and/or utility providers to be engaged to remove infrastructure	Statement provided, utility service disconnection record / notification
Infrastructure that is to remain as part of the final land use is not safe and poses a hazard to the community	Inspection indicates that not all hazards have been isolated and secured in infrastructure that is to remain as part of the final land use	Suitably qualified professionals and/or utility providers to be engaged to isolate/removal hazards and render safe	Statement provided, utility service disconnection record / notification
Landform design does not meet final approved landform	Survey or inspection identifies deviation from the Final Landform and Rehabilitation Plan (FLRP)	Engage qualified contractor to undertake earthworks to rectify non-conformance. Update relevant QA records	Certified as-constructed survey, photographic documentation, QA verification log
Rehabilitation does not contain species characteristic of the Western Tablelands Dry Forest vegetation community	Species characteristic of the Western Tablelands Dry Forest vegetation community are not present	Undertaken revegetation of the native ecosystem area with species characteristic of the Western Tablelands Dry Forest vegetation community	Rehabilitation monitoring reports
Rehabilitation is compromised due to residual waste materials stored on site (e.g. tailings and other wastes) not being appropriately contained / encapsulated, posing hazards or constraints for the intended final land use	Tailings dam capping not constructed in accordance with engineering design Unacceptable levels of erosion and/or settlement	Suitably qualified professionals to be engaged to advise on measures to rectify issues Implement suggested actions	Photos, as constructed surveys, quality assurance records for construction, erosion surveys, independent geotechnical reports (where required), groundwater/surface water monitoring reports

Rehabilitation Threat	Trigger Levels	Actions to be Implemented	Evidence
Runoff water quality does not meet the requirements of the Project Approval and Environment Protection Licence and poses a risk of environmental harm	Water quality results exceed the requirements of the Project Approval and Environment Protection Licence	Suitably qualified professionals to be engaged to investigate and advise actions to rectify issues Implement suggested actions	Water quality monitoring reports
The final landform is not stable for the long-term and presents a risk of environmental harm downstream / downslope of the site or a safety risk to the public/stock/native fauna	Landforms have not been constructed to design	Suitably qualified professionals to be engaged to assess the landform to determine if it is stable or requires modification and if other structural repairs are required	As constructed surveys, geotechnical reports, photos
The risk of bushfire and impacts to the community, environment and infrastructure has not been addressed as part of rehabilitation	Bushfire hazard controls (where required) have not been implemented	Fire breaks, where they exist, to be maintained Reduce fuel loads in vegetated areas where vegetation is sufficiently established to support such activities	Site inspections, photos, meteorological data
There is residual soil contamination on site that is incompatible with the final land use or that poses a threat of environmental harm	Soil sampling results indicate contamination in excess of levels required for final land use or that pose a threat of environmental harm	Engage a contamination professional to assess the site and advise on remediation measures Implement suggested remediation measures and reassess contamination levels	Contamination reports. Site Audit Statement prepared by EPA Accredited Auditor (where required)
Rehabilitation outcomes are not progressing toward closure criteria	Monitoring results show deviation from performance trends or closure trajectory	Undertake root cause analysis and update rehabilitation strategy or design Consult with regulators as required	Updated monitoring reports, consultation records, revised rehabilitation schedule

11. REVIEW, REVISION AND IMPLEMENTATION

11.1. Review and revision of the RMP

In accordance with Clause 11 of Schedule 8A of the Mining Regulation 2016, DEVELOP will amend this RMP in the following circumstances:

(a) to substitute the proposed version of a rehabilitation outcome document with the version approved by the Secretary – within 30 days after the document is approved.

(b) as a consequence of an amendment made under clause 14 to a rehabilitation outcome document – within 30 days after the amendment is made.

(c) to reflect any changes to the risk control measures in the prepared plan that are identified in a rehabilitation risk assessment – as soon as practicable after the rehabilitation risk assessment is conducted.

(d) whenever given a written direction to do so by the Secretary – in accordance with the direction.

The lease holder must ensure the RMP remains current and relevant to ensure it defines the rehabilitation outcomes to be achieved in relation to the mining area and sets out the strategy to achieve those outcomes.

Whenever any foreseeable hazard is identified that presents a risk to achieving the rehabilitation objectives, the rehabilitation completion criteria and the final landform and rehabilitation plan a review of the rehabilitation risk assessment and RMP is to be carried out.

Further, and in accordance with MP 07_0143, DEVELOP will review, and if necessary revise, the RMP within three months of:

(a) the submission of an annual review under Schedule 6, Condition 4 of MP 07_0143;

(b) the submission of an incident report under Schedule 6, Condition 7 of MP 07_0143;

(c) the submission of an audit under Schedule 6, Condition 9 of MP 07_0143; or

(d) any modification to the conditions of MP 07_0143 (unless the conditions require otherwise).

11.2. Implementation

The following personnel will have responsibility for the review, revision and implementation of the RMP:

- General Manager - Accountable for overall environmental performance of the operations at Woodlawn. Responsible for availability of resources to implement rehabilitation activities outlined in the RMP and for all employees receiving training as appropriate on matters relating to the RMP.
- Environment and Compliance Superintendent - Responsible for the implementation of the RMP and for reporting of any non-compliances. Responsible for meeting monitoring and reporting obligations and for reporting progress in the annual reports.
- All workers - Required to follow any directions from site management for activities to be carried out in accordance with the RMP.

DEVELOP will prepare Forward Programs and Annual Rehabilitation Reports in accordance with Schedule 8A of the Mining Regulation 2016 and submit them to the NSW Resources Regulator. These documents will outline rehabilitation progress, planned activities, and demonstrate compliance with regulatory obligations.

12. CLOSURE PLANNING

DEVELOP is committed to preparing a CMCP as a component of its life-of-mine planning framework. This commitment reflects DEVELOP's recognition of the importance of early, proactive closure planning to integrate environmental, social, and economic considerations into the mine's operational strategy.

The CMCP will provide a structured, forward-looking roadmap for achieving a safe, stable, and sustainable post-mining landscape that aligns with regulatory expectations, stakeholder values, and the intended final land use. The plan will be reviewed and updated over time to respond to changes in the mine plan, closure risks, and stakeholder input.

The primary objectives of the CMCP are to:

- Establish a strategic vision for closure that aligns with the intended post-mining land use(s), planning instruments, and stakeholder expectations.
- Delineate key closure domains and identify appropriate rehabilitation outcomes for each domain.
- Identify knowledge gaps, material risks, assumptions, and uncertainties that are to be addressed through ongoing studies, engagement, and adaptive planning.
- Promote progressive rehabilitation, using closure principles and outcomes to inform operational decisions from the earliest phases.
- Support compliance with relevant legislative and policy instruments.
- Enable continuous improvement through structured review, monitoring, and stakeholder feedback.

The CMCP will include the following core components:

- Site Description and Closure Domains - A detailed description of the mine layout, infrastructure, disturbance areas, and domain boundaries (e.g. tailings storage facilities, waste rock emplacements, haul roads, infrastructure zones). Each domain will be mapped with proposed land use objectives and rehabilitation strategies.
- Final Land Use Objectives - Articulation of preferred and feasible land use(s) post-closure, including potential alternative uses. Considerations will include:
    - Existing land use zoning (e.g. E5 – Heavy Industrial)
    - Environmental constraints and opportunities
    - Stakeholder input
- Long-term land capability and tenure.
- Conceptual Landform and Rehabilitation Strategies - Broad-scale landform design concepts and surface treatments, erosion control methods, and revegetation approaches appropriate to each domain. These will incorporate:
    - Principles of geotechnical stability and hydrological function
    - Use of native or industry-suitable vegetation
    - Materials handling and placement concepts (e.g. cover system design, use of NAF material)
- Closure Risks and Assumptions - Preliminary identification of closure-related risks such as:
    - Potential for AMD
    - Soil contamination

  - Stability of landforms
  - Deficits in growth media or rehabilitation materials

- Technical Assessments and Research Needs - Summary of further studies needed to inform detailed closure planning, including:
  - Geochemical characterisation
  - Groundwater and surface water modelling
  - Tailings dam capping
  - Rehabilitation methods
- Stakeholder Engagement Strategy - A preliminary engagement plan describing how stakeholders including government regulators, local communities, and neighbouring landholders will be engaged to inform closure objectives and rehabilitation criteria.
- Closure Provisioning and Costing Framework - High-level strategy for estimating closure liabilities and funding provisions, aligned with the company's financial assurance strategy and updated as new information becomes available.
- Closure Planning Governance - Development of a Mine Closure RACI (Responsible, Accountable, Consulted, Informed) matrix to allocate roles and responsibilities for closure-related activities.
- Approvals and relinquishment strategy.
- Health and safety considerations.

DEVELOP intends to prepare and implement a corporate closure standard to embed closure planning within its broader environmental management and business risk framework. This will require that LOM planning integrates closure assumptions and that closure risks and opportunities are identified, monitored and addressed proactively.

The timing of development and implementation of the CMCP and corporate closure standard is to be determined, however, is expected to take some time given the site complexities noted in this RMP. The CMCP will be an internal document that is a site initiative rather than a specific requirement of MP 07_0143 or the Mining Act. Relevant information from the CMCP, once development, may be included in the RMP to address MP 07_0143 and/or Mining Act requirements, as appropriate.

Appendix 1 Rehabilitation Risk Assessment Summary

Risk	Controls	Actions	Where Addressed in this RMP
Active Mining			
Uncertainty around the agreed (or approved) post mining landform and/ land use.	Project Approval outlines obligations for post mining land use	Review the existing PMLU obligations	Section 2.1
	RMP	Review and update RMP	This document
	ROBJs, FLRP, Completion Criteria	Review ROBJs, FLRP and Completion Criteria Confirm responsibility for rehabilitation and closure of ED1, Cowley Hill and other historic mining areas	This document Section 2.1
	Approvals review and modification	Review approvals and consider the possibility of modifications	Section 2.2
	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
Uncertainty around what the closure criteria are for the site	Project Approval outlines our obligations for post mining land use	Review the existing PMLU obligations	Section 2.1
	RMP	Review and update RMP	This document
	ROBJs, FLRP, Completion Criteria	Review ROBJs, FLRP and Completion Criteria	This document
	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
Inadequate resources for mine closure and rehabilitation planning and execution	Corporate Mine Closure Standard	Develop a Corporate Mine Closure Standard	Section 12
	Engagement of SMEs to assist with the development of the Conceptual Mine Closure Plan	Engagement of Subject Matter Experts (SMEs)	Section 12
	LOM planning process to include closure planning updates in line with JORC and/or any corporate developed mine closure standard	Amend the existing LOM planning processes to include mine closure planning (risks and opportunities)	Section 12
	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
Unclear roles and responsibilities in the rehabilitation and closure project results in LTA progress or poor quality outputs	Mine Closure Project RACI	Prepare a Mine Closure RACI in the Conceptual Mine Closure Plan	Section 12
LTA Stakeholder Engagement which results in limited support for the preferred PMLU options	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
	Land Use Zoning is Industrial (E5)		
	Site Engagement Strategy to include mine closure	Mine Closure Stakeholder Engagement Plan	Section 12
	Corporate Mine Closure Standard	Develop a Corporate Mine Closure Standard	Section 12
	CCC		
	Newsletter		
	RMP	Review and update RMP	This document
LTA assessment and mitigation of the social impacts relating to closure of the mine	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
	Corporate Mine Closure Standard	Develop a Corporate Mine Closure Standard	Section 12
	Socio-economic Impact Assessment included as part of closure planning	Socio-Economic Impact Assessment	Section 12
LTA corporate standards around closure expectations	Corporate Mine Closure Standard	Develop a Corporate Mine Closure Standard	Section 12
	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
Insufficient budget available to prepare and implement the Conceptual Mine Closure Plan	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
	Internal closure preparedness schedule and costing to inform the budget process [internal provision]	Develop an internal closure cost provision to align with the approved conceptual mine closure plan.	Section 12
	Corporate Mine Closure Standard	Develop a Corporate Mine Closure Standard	Section 12
	The DEVELOP Budget approval process		
	LOM planning process to include closure planning updates in line with JORC and/or any corporate developed mine closure standard	Amend the existing LOM planning processes to include mine closure planning (risks and opportunities)	Section 12
Poor records, ITP and document management systems for closure	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
	Corporate Mine Closure Standard	Develop a Corporate Mine Closure Standard	Section 12
	Develop a document management process for rehabilitation and closure	Develop an internal database for records and GIS that relates to closure	Section 7
	LiDAR and spatial data (GIS)	Review the GIS capability to record and use spatial data collected by the site	Section 7
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
	RMP	Review and update RMP	This document
	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12

Risk	Controls	Actions	Where Addressed in this RMP
LTA understanding around the potential residual risk elements that present a long term liability to the business	Corporate Mine Closure Standard	Develop a Corporate Mine Closure Standard	Section 12
	Risk assessments to consider residual risks	Consider residual risks in rehabilitation and mine closure risk assessments	Section 3
	Engagement of SMEs to assist with the development of the Conceptual Mine Closure Plan	Engagement of Subject Matter Experts (SMEs)	Section 12
	RMP	Review and update RMP	This document
LTA monitoring and maintenance programs in place or not aligned to preferred PMLU	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
	Corporate Mine Closure Standard	Develop a Corporate Mine Closure Standard	Section 12
	RMP	Review and update RMP	This document
	ROBJs, FLRP, Completion Criteria	Review ROBJs, FLRP and Completion Criteria	This document
	EFA monitoring program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	WOO trial data collected	Review the existing WOO trial to identify what aspects from the trial could be used in future rehab programs (if any)	Section 9
	Existing site monitoring program which is documented in MPs	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
Public safety risk of access to/ interaction the mine site	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
	Corporate Mine Closure Standard	Develop a Corporate Mine Closure Standard	Section 12
	Public Safety Risk Assessment will be undertaken as part of the Conceptual Mine Closure Plan	Public Safety Risk Assessment	Section 12
	Access agreement in place with wind farm project which includes controls around site access and safety		
LTA consideration of Aboriginal heritage items during rehabilitation and closure execution [including consultation with the key stakeholders]	Heritage Management Plan	Heritage Management Plan	Section 6.2.1
	Site Engagement Strategy to include mine closure	Mine Closure Stakeholder Engagement Plan	Section 12
	RMP	Review and update RMP	This document
LTA consideration of other (European) heritage items during rehabilitation and closure execution (including consultation with the key stakeholders)	Existing European heritage management plans at both sites.	Heritage Management Plan	Section 6.2.1
	Site Engagement Strategy to include mine closure	Mine Closure Stakeholder Engagement Plan	Section 12
	RMP	Review and update RMP	This document
LTA consideration of the water licenses during the mine closure process	DEVELOP holds a 400ML groundwater allocation	Review water licencing requirements for during and post closure	Section 6.2.3
	Approvals and Relinquishment Strategy	Approvals and Relinquishment Strategy	Section 12
Uncertainty around the long term management of the Vegetation Offset Area	78ha assigned as revegetation area	Review the approval requirements for the revegetation area for lease relinquishment.	Section 2.2
	RMP	Review and update RMP	This document
The requirement to bring ameliorants (alternatives) to site may exceed the allowable truck movements - Ore is prioritised over rehab materials	Consent current controls truck movements (but may be an issue once concentrate is trucked)	Review approvals and consider the possibility of modifications	Section 2.2
	Modify consent to allow more truck movements where required	Truck movements - Consider a modification to the Project Approval to permit transport of rehabilitation materials to site.	Section 2.2
Less than adequate management of Potential Acid Forming (PAF) materials during past and future operations that may result in AMD issues	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
	Investigation of possible unknown PAF storage using Aerial photos, GIS and field investigations - testing and mapping	Historical PAF mapping	Section 6.2.1
	Site procedure/policy for use of PAF material on site or by Veolia (including in the WRD Management Plan)	Develop a PAF procedure	Section 6.2.1
	RMP	Review and update RMP	This document
	Geochemical assessment	Geochemical Assessment	Section 6.2.1
LTA consideration of past records that can inform the rehabilitation and mine closure process going forward	Internal review of available records are identifying relevant closure and rehab related documents	Review of existing records	Section 7
Insufficient funding for rehabilitation activities	RCE submitted to the Resources Regulator		
	DEVELOP has alternate income streams that support the business and its ability to execute closure		
	Rehabilitation progression committed to in the Forward Program	Update the Forward Program to reflect achievable rehabilitation milestones across all land use domains	Section 2.1 and Section 2.2

Risk	Controls	Actions	Where Addressed in this RMP
Clearing in adverse seasonal and weather conditions when salvaging biological resources	Studies have identified that there are minimal biological resources in the remainder of the land to be mined		
	Pre-clearance survey & Approval		
Inappropriate management/disposal of waste	Waste managed by a licensed contractor		
Less than adequate erosion and sediment control management during active mining (prior to rehabilitation).	Progressive rehabilitation of disturbed land	Works Schedule	Section 12
	Construction of erosion control devices such as diversion banks and sediment retention dams as necessary		
	Regular inspection of water management infrastructure		
Loss of biological and habitat resources (e.g. subsoil, topsoil, vegetative material, seed bank, rocks etc.) through clearing, salvage and handling practices during mining.	Pre-clearance survey & Approval		
Contamination or off site impacts to surface or groundwater both during mining and post closure	Implementation of the approved Water Management Plan which includes TARPs	Review and update the Water Management Plan	Section 6.2.3
	Enclosed water management system	Review the Water Management System	Section 6.2.3
	Inspection system on dams		
	Groundwater Assessment as part of closure planning	Closure Groundwater Assessment	Section 12
	Surface Water assessment as part of closure	Closure Surface water assessment	Section 12
	Contamination Assessment as part of closure	Closure Contamination Assessment	Section 6.2.2
	All surface water structures are designed by experienced engineers - construction has been signed off by the engineer		
External land use activities / projects disturbing existing rehabilitated areas	Designated mining and work areas across the site	Designated works area map	Section 6.2.1
	Project and future land use(s) will require Consent and the impacts associated will be part of the application	Post Mining Land Use Assessment	Section 2.2
	Pre-clearance survey & Approval		
Decommissioning			
LTA asset register results on poor asset management, retention, transfer or sale or poor scope on the decommissioning and demolition of assets	Asset register in place (fixed and mobile plant)	Develop Assets Register	Section 12
	Infrastructure asset register in place	Develop Assets Register	Section 12
	Site services plan	Site Services Plan	Section 12
LTA assessment of the decommissioning and demo requirements for the sites (including retention of assets)	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
	Corporate Mine Closure Standard	Develop a Corporate Mine Closure Standard	Section 12
	Demolition and Decommissioning Plan - including early works opportunities	Demolition Plan + costings	Section 6.2.2
	WHS plan specific to demolition for each item Acknowledge the new WHS risks in closure and allow the site plan to manage through RA	WHS standards for closure	Section 12
Removal of an asset has an unintended off site impact to a third party (eg. providing power off site)	Develop a register of key assets linked to site	Develop Assets Register	Section 12
	Develop consultation strategy with asset owners or users	Non-site owned assets register	Section 12
	Site Engagement Strategy to include mine closure	Mine Closure Stakeholder Engagement Plan	Section 12
Loss of legal trafficable access to site or to enable closure activities to occur	Veolia Cooperation Deed	Cooperation Deed - Consider future closure risks and opportunities within the Cooperation Deed and how to mitigate these. Undertake consultation with key stakeholders as part of the site closure planning.	Section 2.2
	Project Approval		
	Mining Lease		
	Site Engagement Strategy to include mine closure	Mine Closure Stakeholder Engagement Plan	Section 12
Failure to identify and rehabilitate exploration and other drill holes	Drill hole register of bores and rehabilitation status	Drill hole register	Section 6.2.1 and Section 6.2.2
LTA planning on what surface water features that will be retained at closure	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
	Identify water infrastructure that will be required during and post closure	Retained surface water infrastructure review Investigate the long term management of leachate from the RWRD	Section 6.2.3

Risk	Controls	Actions	Where Addressed in this RMP
	Map and plans showing the water infrastructure as built	As built data	Section 6.2.3
LTA planning for waste generation from decommissioning and demolition resulting in increased costs and/or environmental impact	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
	Waste Management Plan	Waste management plan	Section 12
	Veolia are next door (which provides and efficient option for waste disposal)		
Areas of land contamination are not identified resulting in unplanned costs or off site impacts	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
	Contamination investigations to identify and quantify locations, types and quantities of contamination and implementations of measures to manage contamination	Contamination Assessments	Section 6.2.2
LTA assessment of Hazardous Materials (PFAS, asbestos, radiation sources, PCBs, etc) resulting in resulting in increased costs and/or environmental impact	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
	Hazard Materials Assessment	Hazardous Materials Assessment	Section 6.2.2
	Radiation devices registered	Develop a disposal strategy for any radiation sources	Section 6.2.2
Legacy waste disposal areas are identified on site (TSF, old STP, landfills, etc) resulting in resulting in increased costs and/or environmental impact	Contamination investigations to identify and quantify locations, types and quantities of contamination and implementations of measures to manage contamination	Contamination Assessments	Section 6.2.2
Public safety risks due to less than adequate site security during decommissioning, closure	Areas being decommissioned are fenced and signposted	Site fencing and signage review	Section 6.2.2
	Slopes are constructed in accordance with approvals	Confirm final slope designs meet approved closure criteria	Section 2.2
Inadvertent or Unauthorised access to site	The site is currently fenced and to protect trespassers from mining hazards		
	Signs on rehabilitation areas	Install clear and durable signage around all rehabilitation areas indicating restricted access, potential hazards, and rehabilitation in progress	Section 6.2.2
	Windrows in some areas preventing vehicle access	Identify key access points at risk of unauthorised vehicle entry and construct or reinforce windrows using available material to physically restrict access, then record locations in the site access control register.	Section 6.2.2
Less than adequate sealing of mine entries	Mine Sealing Assessment	Mine Sealing Assessment	Section 6.2.2
Landform Establishment			
LTA design of final landform slopes and dam walls	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
	Establishment of a preferred final landform design (WRD, TSFs, etc) to make sure they are long term stable and can then be taken forward into the mine closure planning for the site.	Final Landform Review	Section 2.2
	Project Approval requirements (Table 2)	Final Landform Review	Section 2.2
	Engineering Inspection by Engineer on record	Review the Engineering on Record role and scope	Section 6.2.3
	Independent Engineering review of the TSF complex including Failure Mode Analysis, etc	Gap analysis on Independent Report Outcomes	Section 6.2.3
	Dam Safety Committee Consultation and engagement	Engage with Dams Safety NSW to understand what additional work might be required to satisfy them such that any prescribed dams can be de-registered at, or prior to, closure to limit ongoing risk or liability to DEVELOP.	Section 6.2.3
	RMP	Review and update RMP	This document
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Closure groundwater modelling relies on poor assumptions and inputs that could result in unplanned impacts to groundwater levels and/or quality	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
	Groundwater Assessment	Groundwater Assessment for closure	Section 12
	Investigation into ammonia levels in groundwater resulting from Veolia operations.	Assess risks to DEVELOP from ammonia in ground water	Section 6.2.3
	Groundwater Monitoring	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
Other Constraints (space, creeks, ML, approval limits) result in the site not achieving the approved landform profile	Exiting landforms are not within the areas approved	Disturbance footprint review Review approvals and consider the possibility of modifications	Section 2.2
	Consent boundaries are mapped and understood by site.	Review the existing project boundaries	Section 2.2
	An ability to purchase land that is related to the mining operations	Review options to purchase land	Section 2.2
	RMP	Review and update RMP	This document
Surface water infrastructures (diversions, clean water drains, etc) fails or results in long term maintenance requirements	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
	Review of the current surface water infrastructure that needs to be retained and review the design parameters to make sure they are long term stable	Retained surface water infrastructure review	Section 6.2.3
	Engineering Inspection by Engineer on record	Review the Engineering on Record role and scope	Section 6.2.3

Risk	Controls	Actions	Where Addressed in this RMP
	Surface water monitoring	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
LTA water balance model used in the design of the water management structures	Site Water Balance	Review Site Water Balance	Section 6.2.3
LTA QA/QC process in place or poor record keeping to demonstrate that the constructed landforms meet the approved criteria	QA/QC process around demonstrating that the landforms have been built to the approved design	Develop Closure Compliance ITPs and Records System	Section 7
	Implement a document control and records keeping to demonstrate that works completed as designed [ESF2]	Establish a mine closure document system to retain records of all works undertaken at the site.	Section 7
	Reviewing mining records and sampling to verify that material has been placed as designed [supporting ESF2 forms]	Establish a mine closure document system to retain records of all works undertaken at the site.	Section 7
	RMP	Review and update RMP	This document
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Poor quality runoff from rehabilitated areas	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
	RMP	Review and update RMP	This document
	Surface water assessment	Closure Surface water assessment	Section 12
	Surface water monitoring	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
Long term contamination from seepage water below the TSF dams and pollution control dams	Sediment from the dams to be backfilled into the pit and tested and verified as not contaminated	Retained Surface water infrastructure review	Section 12
	Surface water assessment	Closure Surface water assessment	Section 12
	Groundwater Assessment as part of closure planning	Closure Groundwater Assessment	Section 12
	Contamination investigations to identify and quantify locations, types and quantities of contamination and implementations of measures to manage contamination	Contamination Assessments	Section 6.2.2
	Water monitoring	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
Landform is not consistent with approval documentation resulting in relinquishment requirements not being met	An as built survey (including ITP) of completed landforms will be prepared by a competent person to demonstrate that the final landform is consistent with approval requirements (e.g. RL's and slope match the final landform in the RMP).	Conduct As-Built Landform Survey	Section 6.2.3
	Rehabilitation monitoring	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	RMP	Review and update RMP	This document
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Inadequate decommissioning/removal/augmentation of mine water management infrastructure	Infrastructure to be retained will been identified	Identify Water Infrastructure to Be Retained Post-Closure	Section 12
	Plans to be prepared showing current as built water management system	Prepare As-Built Water Management System Plans	Section 6.2.3
	Identification of water infrastructure to be removed at mine closure	Identify Water Infrastructure to Be Decommissioned or Removed	Section 12
	RMP	Review and update RMP	This document
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
LTA landform design results in final landform that is not consistent with surrounding rehabilitated areas	Final landform design and associated water management design undertaken by suitably qualified engineers	Final landform design to be consistent with surrounding rehabilitated area	Section 6.2.3
	An as built survey (including ITP) of completed landforms will be prepared by a competent person to demonstrate that the final landform is consistent with approval requirements (e.g. RLs and slope match the final landform in the RMP).	Conduct As-Built Landform Survey	Section 6.2.3
	RMP	Review and update RMP	This document
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Unstable landform due to erosion and/or mass movement issues associated with inappropriate design and/or quality assurance during landform construction	Erosion is monitored as part of the rehabilitation monitoring program.	Include erosion monitoring within the rehabilitation monitoring program	Section 8
	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	RMP	Review and update RMP	This document
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7

Risk	Controls	Actions	Where Addressed in this RMP
Less than adequate rehabilitation design and management measures specifically related to capping design for tailings emplacement and embankments	An as built survey (including ITP) of completed landforms will be prepared by a competent person to demonstrate that the final landform is consistent with approval requirements (e.g. RLs and slope match the final landform in the RMP).	Conduct As-Built Landform Survey	Section 6.2.3
	Engineered capping design	Review and update the capping design for tailings dam	Section 6.2.3
	Engineering Inspection by Engineer on record	Review the Engineering on Record role and scope	Section 6.2.3
	RMP	Review and update RMP	This document
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Bare soils present in rehabilitated areas	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Growth Medium Development			
LTA understanding of the PAF/NAF materials balance to achieve suitable rehabilitation outcomes	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
	Drilling and testing pre mining supported by geochemistry assessment	Review the possibility to be able to identify and preferentially handle the PAF and NAF material so that it can be used in rehabilitation.	Section 6.2.1
	NAF and PAF sampling and input into the geological model	Review the possibility to be able to identify and preferentially handle the PAF and NAF material so that it can be used in rehabilitation. Investigate the movement of material between EPLs Develop a stockpile management plan that protects the NAF material that is critical for rehabilitation.	Section 6.2.1
	Tracking material placement against approved dump design and materials management plan	Develop a procedure to track all PAF material as it is moved and used around the site.	Section 6.2.1
	Review aerial photos to determine historical dumping locations of PAF may have occurred	Map the historical PAF placement	Section 6.2.1
	Develop a targetted drilling and testing program to verify historical PAF emplacement in RWRD	Map the historical PAF placement	Section 6.2.1
	Waste Rock Management Plan	Waste Rock Management Plan Review - Review the existing plan to better manage the use and placement of NAF and PAF material in landforms and rehabilitation across the site	Section 6.2.1
Lack of rehabilitation materials required to achieve rehabilitation outcomes	Lack of rehabilitation materials required to achieve rehabilitation outcomes	Rehabilitation design and materials balance	Section 6.2.4
	RMP	Review and update RMP	This document
Lack of rehabilitation topsoil required to achieve rehabilitation outcomes	Mass balance of growth media	Topsoil/Growth Media mass balance	Section 6.2.4
	Pyrite float circuit that can make the tailings neutral rather than the acidic	Consider the pyrite float circuit for production of material that may be able to be used in closure	Section 6.2.1
	RMP	Review and update RMP	This document
Poor stockpiling of topsoil and handling has resulted in loss or impact on the physical properties of the soil	Topsoil stockpile investigation program	Undertake a review of the historical topsoil stockpiles identifying locations and approximate volumes and conduct soil sampling	Section 6.2.4
	Topsoil monitoring program	Review and update RMP	This document
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
LTA understanding of the soil chemical properties results in failure to achieve preferred rehabilitation outcomes	Soil Assessments undertaken during EIS.		
	Topsoil stockpile investigation program	Undertake a review of the historical topsoil stockpiles identifying locations and approximate volumes and conduct soil sampling	Section 6.2.4
	Topsoil monitoring program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
LTA planning and execution of the surface preparation ahead of seeding/planting results in failure to achieve the preferred rehabilitation outcomes	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
	ROBJs, FLRP, Completion Criteria	Confirm responsibility for rehabilitation and closure of ED1, Cowley Hill and other historic mining areas	Section 2.1
	Experienced contractors engaged to complete surface preparation	Engage experienced contractors with fit for purpose equipment to complete surface preparation works in accordance with design.	Section 12
	Scope and technical specifications	Develop Scope and Technical Specifications for Rehabilitation Works	Section 12
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Poor record and document management systems for closure	Conceptual Mine Closure Plan	Develop a Conceptual Mine Closure Plan	Section 12
	Corporate Mine Closure Standard	Develop a Corporate Mine Closure Standard	Section 12

Risk	Controls	Actions	Where Addressed in this RMP
	Develop a document management process for rehabilitation and closure	Develop an internal database for records and GIS that relates to closure	Section 7
	LiDAR and spatial data (GIS)	Review the GIS capability to record and use spatial data collected by the site	Section 7
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Paste fill exceeds leaching guidelines resulting in dolorite (NAF) being diverted to paste fill instead of rehabilitation areas	Complete a review of the material to be used in paste filling to identify whether it will require the use of dolorite	Complete a review of the material to be used in paste filling to identify whether it will require use of the dolorite	Section 6.2.1
	Paste Fill Management Plan	Review of Paste Fill Management Plan	Section 6.2.1
Less than adequate erosion and sediment controls to protect the substrate from surface water runoff and wind exposure whilst a vegetative cover is established	Construction of erosion control devices such as diversion banks and sediment retention dams as necessary	Implement and Verify Erosion Control Infrastructure for Revegetation Areas	Section 6.2.3
	Regular inspection of water management infrastructure		
	Rehabilitation Inspections		
	Erosion monitoring	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Less than adequate weed control techniques during growth medium development phase	Rehabilitation Inspections		
	Weed control		
	Weed inspections	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Soil compaction from closure / rehab activities limiting water infiltration into the soil and limiting seed germination or root growth	Deep ripping to increase water infiltration on rehabilitation surface.	Confirm and Document Effectiveness of Deep Ripping on Rehabilitation Areas	Section 8.2
	Appropriate sized equipment used		
	Soil monitoring	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Poor growth media management practices	Historical stockpile management	Assess and Improve Soil Stockpile Condition and Growth Media Suitability	Section 6.2.4
	Soil monitoring	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Use of inappropriate equipment which results in poor utilisation of existing stockpiled material and poor placement of seed resulting in poor or patchy germination, possible soil compaction or excessively rough surface	Currently fit for purpose mining equipment is used for the placing and bulk shaping of material. Use of contractor owned smaller project specific equipment for the final trimming, spreading of ameliorants and sowing of seed.	Review Equipment Suitability for Final Rehabilitation Works	Section 12
	Scope and technical specifications	Develop Scope and Technical Specifications for Rehabilitation Works	Section 12
	Survey, inspections and reviews of the as built. Approval of the works before leaving site.	Establish As-Built Inspection and Approval Process for Rehab Works	Section 7
	Rehabilitation monitoring	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Insufficient or unsuitable soil in the growth medium layer will result in sub optimal vegetation establishment and growth	Growth media improved using mulch, fertiliser and other soil ameliorants as appropriate.		
	Substitute soil material can be sourced	Identify and Source Suitable Substitute Growth Media	Section 6.2.4
	Rehabilitation monitoring	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Substrate inadequate to support revegetation or agricultural land capability (e.g. lack of organic matter, nutrient deficiency, lack of soil biota, adverse soil chemical properties, exposed hostile geochemical materials, and any other factors impeding the effective rooting depth)	Testing of the subsoils and topsoils (chemical and physical) to understand appropriateness or ameliorants needed	Test Subsoil and Topsoil for Rehabilitation Suitability and Amendment Need	Section 6.2.4
	Ameliorants are spread with the mulch material	Apply Ameliorants with Mulch Material During Soil Preparation	Section 6.2.4
	Rehabilitation monitoring	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Less than adequate soil/materials characterisation undertaken during operations to inform rehabilitation	Testing of the subsoils and topsoils (chemical and physical) to understand appropriateness or ameliorants needed	Test Subsoil and Topsoil for Rehabilitation Suitability and Amendment Need	Section 6.2.4
	Ongoing Testing and analysis of rehabilitation materials on site	Establish Ongoing Testing Program for Rehabilitation Materials	Section 6.2.4

Risk	Controls	Actions	Where Addressed in this RMP
	Rehabilitation monitoring	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Bare soils present in rehabilitated areas	Rehabilitation monitoring	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Ecosystem Establishment			
Poor or inadequate vegetation establishment due to inadequate type/range of species, less than adequate revegetation methodologies (e.g. direct seeding), inappropriate (or no) cover crops, or unsuitable/lack of initial measures adopted to promote establishment (e.g. watering)	Suitable soil preparation considering the location on-site, slope, seed and soil type	Research and develop requirements for suitable and required rehabilitation techniques and processes specific to the sites and/or each rehab domains.	Section 6.2.4
	Species used in the seed mix are representative of the species in the local area.		
	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Weed control program.	Review the current weed program frequency and suppliers + records of any weed management activity -	Section 7.6
	Seed quality assurance (eg germination testing) undertaken by suppliers and records provided to Develop	Seed Quality records - Retain seed quality information from the supplier to verify compliance with rehabilitation specifications.	Section 7.5
	Adequate TARPs in place to rectify quickly	Review and update the TARP to include vegetation establishment aspects such as poor germination, weed and pest management, climatic influences, bushfire and bare soils.	Section 10
Inappropriate equipment damages the seed or inadequately places seed into soil	Use of specialised equipment and service providers for rehabilitation purposes specific to site conditions.	Research and develop requirements for suitable and required rehabilitation techniques and processes specific to the sites and/or each rehab domains	Section 12
Inadequate pest animal control to protect juvenile vegetation	Inspection process for identifying issues pests on newly rehabilitated areas.	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Lack of availability and quality of target species (seed/tube-stock), including genetic integrity	Seed mix has been reviewed to identify appropriate species for the site		
	Seed purchased from reputable supplier.		
	Site understands what seeds/tube-stock are needed each year and budgets and pre-orders to ensure supply	Develop a Conceptual Mine Closure Plan	Section 12
	Seed viability testing certificates provided with seed	Seed Quality records - Retain seed quality information from the supplier to verify compliance with rehabilitation specifications.	Section 7.5
	Identify what the seed requirements are and engage with suppliers ahead of time to ensure that adequate resources are available	Develop a Conceptual Mine Closure Plan	Section 12
Weed infestation associated with introduction and control	Weed control program	Review the current weed program frequency and suppliers + records of any weed management activity -	Section 7.6
	Adequate TARPs in place to rectify quickly	Review and update the TARP to include vegetation establishment aspects such as poor germination, weed and pest management, climatic influences, bushfire and bare soils.	Section 10
Adopting inappropriate or inadequate rehabilitation techniques, including equipment fleet selection	Supervision by trained and competent personnel working to an agreed scope and specifications	Develop Closure Compliance ITPs and Records System	Section 7
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
	Agreed Scope and technical specifications	Develop Closure Compliance ITPs and Records System	Section 7
	Survey, inspections and reviews of the as built. Approval of the works before leaving site	Develop Closure Compliance ITPs and Records System	Section 7
	Rehabilitation reviews conducted by qualified consultants.	Develop Closure Compliance ITPs and Records System	Section 7
Inappropriate revegetation species mix for targeted final land use	Species used in the seed mix are representative of the species in the local area.		
	Site understands the key species outlined in the Consent and uses them in the mix.		
	Species mix is listed in the RMP	Review and update RMP	This document
	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Weather conditions at the time of seeding is recorded on the ITP	Develop Closure Compliance ITPs and Records System	Section 7

Risk	Controls	Actions	Where Addressed in this RMP
Weather and climate influences: Drought resulting in poor or inadequate vegetation establishment	Annual rehabilitation planning process which has the ability to adjust or delay depending on predicted short term weather	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Maintenance and remediation of areas of unsuccessful rehabilitation.	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Adequate TARPs in place to rectify quickly	Review and update the TARP to include vegetation establishment aspects such as poor germination, weed and pest management, climatic influences, bushfire and bare soils.	Section 10
Bushfire killing young / immature plant species	Vegetation management plan in place which considers bushfire management	Refinement or development of plans to consider change in risk profile with rehabilitation activities	Section 10
	Maintenance and remediation of areas of unsuccessful or damaged rehabilitation.	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Adequate TARPs in place to rectify quickly	Review and update the TARP to include vegetation establishment aspects such as poor germination, weed and pest management, climatic influences, bushfire and bare soils.	Section 10
Extreme Rainfall Events	Water Management Structures will be suitably designed in accordance with current design event expectations	Develop a Conceptual Mine Closure Plan	Section 12
	Graded earthen banks are constructed down the slope to control surface runoff.	Develop a Conceptual Mine Closure Plan	Section 12
	Soil is ripped on the contour to promote water infiltration.	Develop a Conceptual Mine Closure Plan	Section 12
	Maintenance and remediation of areas of unsuccessful rehabilitation.	Develop a Conceptual Mine Closure Plan	Section 12
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Adequate TARPs in place to rectify quickly	Review and update the TARP to include vegetation establishment aspects such as poor germination, weed and pest management, climatic influences, bushfire and bare soils.	Section 10
Limited habitat structures for native fauna where required in the PMLU	Where practical and feasible, habitat features removed or re-located during the project such as fallen trees are salvaged and relocated to existing areas of rehabilitation or stockpiled for use in future rehabilitation areas.		
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
Bare soils present in rehabilitated areas	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Adequate TARPs in place to rectify quickly	Review and update the TARP to include vegetation establishment aspects such as poor germination, weed and pest management, climatic influences, bushfire and bare soils.	Section 10
Ecosystem Establishment			
Less than adequate weed and feral animal control of rehabilitation areas	Weed control program	Review the current weed program frequency and suppliers + records of any weed management activity	Section 7.6
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Adequate TARPs in place to rectify quickly	Review and update the TARP to include vegetation establishment aspects such as poor germination, weed and pest management, climatic influences, bushfire and bare soils.	Section 10
Less than adequate environmental monitoring and management of surface water, groundwater, ecology, land capability	Environmental monitoring in accordance with EMS and EPL requirements	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Monitoring to be continued during closure and rehabilitation activities in accordance with licencing requirements	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
Less than adequate rehabilitation maintenance, including re-seeding/planting of rehabilitation areas that may have failed, ongoing fertilizing, repair of fence lines/access tracks, and other general land management activities	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Adequate TARPs in place to rectify quickly	Review and update the TARP to include vegetation establishment aspects such as poor germination, weed and pest management, climatic influences, bushfire and bare soils.	Section 10
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
	Weather conditions at the time of seeding is recorded on the ITP	Develop Closure Compliance ITPs and Records System	Section 7

Risk	Controls	Actions	Where Addressed in this RMP
Weather and climate influences: Drought resulting in poor or inadequate vegetation establishment	Annual rehabilitation planning process which has the ability to adjust or delay depending on predicted short term weather	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Adequate TARPs in place to rectify quickly	Review and update the TARP to include vegetation establishment aspects such as poor germination, weed and pest management, climatic influences, bushfire and bare soils.	Section 10
Bushfire killing young / immature plant species	Vegetation management plan in place which considers bushfire management	Refinement or development of plans to consider change in risk profile with rehabilitation activities	Section 10
	Maintenance and remediation of areas of unsuccessful or damaged rehabilitation.	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Adequate TARPs in place to rectify quickly	Review and update the TARP to include vegetation establishment aspects such as poor germination, weed and pest management, climatic influences, bushfire and bare soils.	Section 10
Extreme Rainfall Events	Water Management Structures will be suitably designed in accordance with current design event expectations	Develop a Conceptual Mine Closure Plan	Section 12
	Graded earthen banks are constructed down the slope to control surface runoff	Develop a Conceptual Mine Closure Plan	Section 12
	Soil is ripped on the contour to promote water infiltration.	Develop a Conceptual Mine Closure Plan	Section 12
	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Adequate TARPs in place to rectify quickly	Review and update the TARP to include vegetation establishment aspects such as poor germination, weed and pest management, climatic influences, bushfire and bare soils.	Section 10
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Poor water quality discharges (e.g. Acid-drainage, high salinity etc.) affecting vegetation establishment	Geochemical assessment	Geochemical Assessment	Section 6.2.1
	Routine water monitoring program.		
	Drainage structures are established on rehabilitation areas.		
	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Adequate TARPs in place to rectify quickly	Review and update the TARP to include vegetation establishment aspects such as poor germination, weed and pest management, climatic influences, bushfire and bare soils.	Section 10
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Inadequate pest animal control to protect juvenile vegetation	Inspection process for identifying issues pests on newly rehabilitated areas.	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Public safety risks due to less than adequate site security during Ecosystem development phase	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
Limited habitat structures for native fauna where required in the PMLU	Where practical and feasible, habitat features such as large hollows identified during the pre clearance surveys area salvaged and relocated to existing areas of rehabilitation or stockpiled for use in future rehabilitation areas.		
	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
Disturbance of established rehabilitation by site activities or by Unauthorised access to the site whilst limited presence on site	Ground disturbance permit required for all disturbance proposed during rehabilitation execution.		
	Windrows in some areas preventing vehicle access to the site	Identify key access points at risk of unauthorised vehicle entry and construct or reinforce windrows using available material to physically restrict access, then record locations in the site access control register.	Section 6.2.2
	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Adequate TARPs in place to rectify quickly	Review and update the TARP to include vegetation establishment aspects such as poor germination, weed and pest management, climatic influences, bushfire and bare soils.	Section 10
Insufficient establishment of target species and limited species diversity	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10

Risk	Controls	Actions	Where Addressed in this RMP
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
	Adequate TARPs in place to rectify quickly	Review and update the TARP to include vegetation establishment aspects such as poor germination, weed and pest management, climatic influences, bushfire and bare soils.	Section 10
Erosion and failure of drainage and water management/storage structure rendering landform unsuitable for post mining landform requirements, or causing downstream impacts	An as built survey (including ITP) of completed landforms will be prepared by a competent person to demonstrate that the final landform is consistent with approval requirements (e.g. RL's and slope match the final landform in the RMP).	Develop Closure Compliance ITPs and Records System	Section 7
	Rehabilitation Monitoring and Maintenance program	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	ITPs and records that demonstrate compliance with closure criteria	Develop Closure Compliance ITPs and Records System	Section 7
	Adequate TARPs in place to rectify quickly	Review and update the TARP to include vegetation establishment aspects such as poor germination, weed and pest management, climatic influences, bushfire and bare soils.	Section 10
Contaminated material remaining on-site causing water contamination during ecosystem development	Water monitoring program and current water management practices	Develop and implement a monitoring and maintenance program for rehabilitation and closure	Section 8 and Section 10
	Contamination investigations to identify and quantify locations, types and quantities of contamination and implementations of measures to manage contamination	Contamination Assessments	Section 6.2.2

Appendix 2 Consultation Log

Date	Form/Agency	Comments and outcomes	Response/how addressed
2025	NSW Resources Regulator NSW Environment Protection Authority (EPA) NSW Department of Primary Industries – Water (DPI – Water) WaterNSW Goulburn Mulwaree Council	RMP out for consultation in accordance with MP 07_0143	
2025	Veolia (landholder) Community Consultative Committee (CCC)	Consultation regarding ROBJs and Completion Criteria	

Appendix 3 Plan Approval