

	RVAC Comments
Refine definition and incorporation of rehabilitation domains	<p>Suggestion: Define rehabilitation domain as a physical area or aspect with similar rehabilitation activities and objectives. Example list of domain could then be Voids , Morwell river diversion, Ash disposal and overburden dumps (excludes area within voids), Infrastructure offices and roads, Surface water (whole of site), Groundwater (whole of site), Land undisturbed by mining.</p> <p>Comment: The document currently define rehabilitation domain must on a physical area and defines aspects are for whole of site environmental consideration. By using the rehabilitation domain definition above the rehabilitation domain then provide a link between end land uses, rehabilitation activities and the objectives and closure criteria. This provide cohesion through the document to clarify how the closure criteria will deliver a landform capable of supporting the end land use(s). The rehabilitation domain can be update and or broken into sub domain in the future. This also set up a structure to allow for relinquishment of discrete area of the site in the future.</p>
Refine rehabilitation objectives	<p>Suggestion: (1) Group objective against rehabilitation domain. (2) For each domain consider the landform and proposed land use(s) to confirm all objectives have been capture ( for surface water domain objective will be site specific but cover whole of site but for the void their will be site and domain specific.) This should help identify some missing objective. (3) Review wording of objective to ensure they are state an aim/desired outcome</p> <p>Comment: Currently the rehabilitation objectives in table 6-2 are linked to the closure principle by aspects. There appear to be some gaps such as developing an objective(s) for groundwater and ground movement outside of voids. Review and refine wording of objective to make sure it is setting an expectation and not describing an activity e.g. "Exposed coal is managed appropriately to manage the risk of fire in the long term." doesnt say what the aim or objective for managing exposed coal re-phrase to something like " Long term management requirement for exposed coal leave the risk of fire from exposed coal similar to surrounding land fire risk"</p>
Refine Closure Criteria in DMRP	<p>Suggestions: (1) Group closure criteria against rehabilitation domain and objectives with a number system. (2) Remove measurement and time columns. (3) Review and update closure criteria to be SMART.</p> <p>Comment: Because the objective table is separate to the closure criteria and one is linked to aspects and the other to landuse it difficult to corollate the table and be confident all objective have closure criteria and that the closure criteria if met support the vision and proposed land uses. The measurement and time columns can be removed, they are not required to demonstrate criteria are SMART. SMART is about making sure each criteria can be clearly interpreted. e.g. if a criteria is about doing something such as build drainage as per surface water drainage design - if met this is inherently time bound as it is done or not. Its specific and measurable (assuming design is detailed) etc</p> <p>Not all of the closure criteria are SMART suggestion reviewing and updating. For example "No gullies greater than 30cm erosion depth. Rilling trend improving." The first sentence is SMART the second is not.</p>
Add detail and clarity to knowledge gaps and implementation plan	<p>Suggestion: (1) Expand the table in milestones section 14.2 The level of detail should show activities, assessments designs and approvals need to implement the proposed activities these should be time bound (either by date or activity). (2) Consider numbering knowledge gaps and approval and or bringing into implementation chapter. (3) Knowledge gap need to address the purpose and outcome of each gap</p> <p>Comment: The implementation plan need to convey how the rehabilitation plan is feasible to implement where and how knowledge gap will be address and be a piece to hold the licensee accountable for progressing rehabilitation planning. Recognise that too much detail would be prescriptive so more detail on what is needed and known to be need in the coming 3-5 is appropriate.</p>
Opportunities to reduce volume of DMRP to provide a more concise document	<p>Suggestion: (1) Review the technical studies chapter to provide more concise summaries</p> <p>Comment: Appreciate there is a balance between too much and not enough and there is personal judgment in what to include in some aspects. Having said that i think there is definitely an opportunity to reduce the volume of the technical studies chapter. It is reasonable to assume technical reviewers will read the supporting or appendicised report and that the DMRP is a summary. For example the 8.3 the groundwater assessment appear to be a whole summary report within the DMRP. Aspect that should be summarised in the DMRP in regards to assessments are purpose, methodology, assumptions and findings/recommendation. Aspect like the regional setting for a modelling can be left in the report.</p>