GREAT LATROBE PARK
LATROBE VALLEY

Contact –
0408 598 410
PO Box 146,
Newborough 3825
www.glp.org.au

LET'S COMMUNICATE

15 August 2025

Introduction:

This document is prepared in response to the call for public comments on Energy Australia Yallourn's Declared Mine Rehabilitation Plan (DMRP), which was opened to public comment for the period 18 June 2025 to 18 August 2025. GLP is accordingly herein commenting on actions that EA Yallourn propose to commit to in achieving Safe, Stable and Sustainable outcomes and proposed future land uses within Mine Licences MIN 5003, MIN 5216 and MIN 5304.

Background:

GLP earlier requested of EA Yallourn a summary of their proposed commitments regarding mine rehabilitation. This has raised the following:

Chapter 4 Regulatory Context - notably sections 4.2, 4.3, 4.6

- Question: Do EAY intend to monitor themselves against all of table 4-4: Summary of Guidance Documents for Yallourn Rehabilitation?

Chapter 6 Rehabilitation Vision and Objectives - notably Table 6-2 which defines the objectives
Overarching Closure Principles, Safe, Aspect Infrastructure

Comments*:* GLP would like to see a process of public engagement prior to removal of any or all infrastructure for aspects that may be of value in post rehabilitation (repurposed) land use. This would be made easier with a repurposing plan identified prior to demolition.

- The reference to "Downstream hydrological performance is improved during the closure and rehabilitation phase through to post closure compared to baseline." is unclear.
- "Overburden material will not become a source of problematic mine drainage in the future." What is meant by the term problematic remains unclear?
- Watercourses – "Surface runoff or seepage from the rehabilitated mine site does not have an unacceptable impact on downstream receptors." To whom is it unacceptable?

Chapter 9 Post Mining Landform and Land use - notably Figure 9-2 which specifies the post mining land uses.

- Comment: As the founding site of the SECV, GLP would like to see EAY investigate potential for capturing the history of its operations in such a manner that memorializes this history and the people who have offered service to the State. Ideally this would be conducted in conjunction with the State who owned the business for 75 years. An appropriate outcome may be a tourist attraction that captures this history and the pride that once existed. Please help protect this history.

Chapter 10 Community and Stakeholder Engagement - refers to the Community and Stakeholder Engagement Plan which is in the appendix. Section 1.5 has a table that lists the regulatory obligations for what we must complete. 10.1 Introduction – "*… The CSEP is founded on the principle that timely provision of information, complete transparency, strong relationships with stakeholders and regular engagement with communities is critical to the successful delivery of the rehabilitation of the mine and minimising potential impacts on the community and stakeholders."*

- Comment: Claiming "complete transparency" and seeking community support for acquiring such a large volume of water whilst providing the community with only 1 alternative i.e. fill to RL +37m AHD seems at variance and unlikely to build community trust. At some point EAY should provide a logical argument as to why Lake Yallourn requires a certain volume of water.

Chapter 11 Risk Identification and Management - notably Table 11-10 which lists the actions from the risk assessment.

- Comment: There are 11 pages of risks that have been assessed. If you really want public input you need to provide a summary of the most significant risks through a new smaller table or a colour scheme in the existing table. Otherwise, this is too much information for the public to absorb (especially after wading through the previous 400 pages).

Chapter 12 Key Activities and Design Considerations – the listed activities will become commitments once the DMRP is approved.

- Comment: It is GLP's view that the DMRP should not be approved until after options analysis has been disclosed and all logical arguments run. It is considered that this version of the DMRP has done little to improve community trust or confidence on where these processes are taking the Latrobe Valley

12.3 *Morwell River Diversion – Page 425 - "The key design objectives for a rehabilitated MRD are:*
• Remediate the MRD so that it can carry all environmental flows and design flood flows, throughout all phases of rehabilitation and the design intent period.
• Transform the MRD from a river diversion to a Rural Levee to support the above objective."

- Comment: GLP would like to know what is the long term (>100 year) vision for the MRD and what is the design intent period?

Figure 12-2 MRD rehabilitation design sketch – typical cross-sections.

- Comments: There is considerable grass planting on both internal and external areas of the MRD from which presumably animals will be excluded from grazing due to potential damage. If so, is there a very long-term maintenance plan or plantings proposed?

Figure 12-3 MRD rehabilitation design sketch – spillway and long section- Page 429 –

- Comment: Longitudinal sections indicate the LFC will be up to 3 m below Lake level. Why is this required?

Supporting Comments:

Approval of DMRP's will be determined by Earth Resources Regulation (ERR). GLP would argue that the benchmarks identified should have already been the subject of public consultation so that transparency could be ensured. Given outstanding technical questions, we propose that that approval of the DMRP should not occur until after answers to these many technical questions are provided to the public.

GLP sees that sustainability in the context of mine rehabilitation is "*meeting the requirements of safety and stability with the minimum of human intervention and resource input for the long-term*." This has implications on what the water level needs to be as the higher the water level the greater the on-going evaporation and make up requirements. As such, the "trade-off "of increased stability of the MRD and batters versus the height of Lake Yallourn needs to be better defined. Our challenge to EAY is to demonstrate these aspects simply for the public to understand.

GLP also considers the artesian aquifer waters to be a resource of potentially greater benefit than surface water. There is no reference to the temperature profile of the artesian waters currently pumped by EAY and seeks EAY's insights into sustainable yields and uses of this resource. GLP also believes that the public would benefit from a table showing lake surface areas and water volumes by RL in m AHD. Whether that is contained in the DMRP or the EES is for Yallourn and Regulators to determine.

Specific Comments:

The Executive Summary contained within the DMRP, although broadly supported by GLP, is primarily an aspirational statement rather than an Executive Summary per se.

Under Section 8.3.2.5 Mine Scale Hydrogeological Conceptualisation, *page 170 Concept Water Balance,*

> Question; does not EAY also discharge Power Station water via the Saline Waste Outfall Pipeline?

Page 172 Groundwater Levels & Flow Directions,

- Comment*:* Mr Chris Fraser, formerly a Senior Manager, with the SECV, presented a paper to a Canadian Conference where it was stated that the M1/MFAS aquifer started with a head of RL 61. This is confirmed in a document prepared by Robin Friday, of Golder and Associates, in Fig 3 of the report entitled Report to SECV, Review of Aquifer Dewatering at Morwell Open Cut dated 6 July 1990. Pre-mining levels of the M2/TFAS at Morwell Open Cut remain unknown but this system became interconnected to the M1/MFAS around 1972. This means that the M2/TFAS is unlikely to rise much above the M1/MFAS due to likely substantial leakage between the 2 units, both naturally and due to the thousands of boreholes that interconnect them.

Under Section 8.3.4.1 Yallourn Mine Rehabilitation Scenarios, Page 207.

- Comment: GLP believe that the number of scenarios modelled is too limited. GLP also expects that EAY would identify the RL of natural balance assuming that runoff is allowed to accumulate, supported by artesian dewatering until sufficient weight is applied that pumping can cease. This RL will also have consequential effects on MRD and batter stability and likely water quality – but these should be modelled and published so that a holistic view can be formed on the volume and value of water involved. Similarly, a sensitivity scenario should also be modelled and published e.g. RL +32m AHD. GLP considers these to be the minimum number of scenarios to be considered and presented.

8.3.5 Findings – Hydrogeological Conceptual Model, Page 210

- Comment: There is no provision of sensitivity testing and advice on which parameters the results are most sensitive to or discussion on how reliable the data is on those key parameters. This is true for all of the modelling presented within the document.

Page 210 "*The best rehabilitation option for groundwater recovery and passive management is the full pit lake. However, this will be supported by ongoing pumping during filling and decommissioning of pumping bores once the filling has been completed*."

- Comment: These installations may have a potential broader community benefit which should be investigated before they are decommissioned. GLP expects EAY to make financial provision for future decommissioning if they were deemed of value to the community.

8.37 Findings – Findings – Hydrogeological Conceptual Model,
Page 214 "*When the pit lake reaches the full lake level of RL 37 m, the weight of water above the mine floor becomes sufficient to counter the upward aquifer pressure, rendering ongoing depressurisation unnecessary for achieving weight balance*."

- Comment: The possibility that pumping can cease earlier should be included as part of the sensitivity analysis. GLP acknowledges that there may be sensitivities to what is occurring outside of EAY's boundary but we believe blanket treatment of the artesian resource in this manner lies against the interests of the Latrobe Valley and all Victorians. GLP's view is that appropriate monitoring of borehole and piezometer networks can provide adequate warning of any need to increase artesian pumping. GLP believes that minimising extraction of artesian ground water is critical for several reasons:

    1. Protection of the heat value within the artesian ground water resource,
    2. To minimise difference between the increasing surface water level within the mine void and the artesian water levels because of the potential to promote water movement between the water bodies when large differentials in head exist.
    3. The same argument applies with surface ground settlements being larger when artesian water levels are lower, and
    4. If large differences in head exist when pumping eventually ceases the rebound in artesian water levels is likely to result in rebound of ground levels creating potential for instability, particularly under the MRD, years after rehabilitation has ceased.

Page 214 "it is highly likely that the groundwater levels in the confined aquifer would ultimately recover to levels above the RL 37 m pit lake level. This means the pit lake would act as a local sink to the groundwater system over the long term, with seepage of small quantities of groundwater occurring under the influence of small upward vertical hydraulic gradients.

- Comment: GLP agrees with this.

8.7.2.5 Design Hydrologic Likelihood vs AEP,
Page 246 – "*the hydrologic flow estimation approach has focused on storm parameters for events up to 1:10,000 AEP*"

- Comment: On page 236 the MRD and Latrobe River design criteria were set at 1:2,000 ARI. There has been no attempt to rationalise adoption of these differing standards, especially as the more costly fix may have the lower design standard. There should be some justification provided especially as the SECV adopted 1:10,000 ARI for streams and conducted sensitivity for PMF. Modelling of PMF should be undertaken to understand the likely consequences as these are likely to be faced by these structures at some time in the future even if it is after EAY have vacated the site.

8.7.2.6 Types of Down Batter Drains and Liner Systems,
Page 247 – "*The design of each down batter drain is unique as each drain needs to consider a specific combination of*:"

- Comment: This also needs to include underlying coal joint orientation and degree of joint activation as these are important aspects to consider.

Table 8-12: WB/WQ Modelling Scenarios Page 260

- Comment: No sensitivity analyses regarding fill levels or water quality.

8.8.3.1.4 Top Up Water,
Page 273 – "*The relatively narrow concept operating level of lake (i.e. 1m) results in the need to periodically top-up the pit from external water sources*."

- Comment: Rationale for operating range set to 1m?

Page 273 – "*The catchments adopted within this modelling (as per above) constitute a 30% decrease in catchment area when compared to previous rehabilitation plans. This is mainly due the perceived practicality and requirements to implement diversions into the pit. By increasing the catchment area that is reporting the pit, the requirements for top of water would be reduced*."

- Comment: GLP's definition of sustainability is supportive of increasing local catchment and reducing water take from Latrobe River dams. Taking water locally makes no difference to the Gippsland Lakes but does reduce monitoring and future top-up costs, so why the 30% reduction?

Table 8-24: Model estimated pH for the YTF and YEF pits for Scenario 2 after application of solubility controls and atmospheric equilibrium. Page 275 –

- Comment: Does the current pH of Lake Placid capture some of these iron rich waters?

Table 8-25 - Summary of model estimated TDS and major ion water qualities for each of the project scenarios at select years. Page 276 –

- Comment: There are other appropriate standards to compare results rather than just Livestock Drinking Water

8.11.3 *Findings, Page 323 –*

- Comment: Given that +17m lake level achieves weight balance, water above this level is being requested to offset batter profiling and batter stabilization works. Given the State is seeking to charge for water access maybe it may be less expensive to conduct the physical work. Accordingly, GLP seeks to understand arguments in pursuing only 1 option i.e. fill to RL +37m.

8.12.3 *Findings - MRD Stability, Page 342 –*

- Comment: This discussion is silent on possible impacts from artesian aquifer rebound. If artesian aquifer rebound is progressively allowed to occur by maintaining aquifer levels just below increasing lake water levels, floor rebound is likely to counteract collapse settlement. The current proposal of continuing to operate artesian dewatering until sudden cessation will increase stress loadings of the materials increasing the chance of instability.

10.1 *Introduction,*
Page 371 – "*The CSEP is founded on the principle that timely provision of information, complete transparency, strong relationships with stakeholders and regular engagement with communities is critical to the successful delivery of the rehabilitation of the mine and minimising potential impacts on the community and stakeholders*."

- Comment: This document does not provide complete transparency. GLP is prepared to support a well-argued and well-supported case for rehabilitation. This document does not provide that well-argued and well-supported case. There are too many unanswered questions starting with why only 1 case has been analysed.

Chapter 15 Monitoring and Maintenance

- Comment*:* Contains sound processes and understanding for the various phases that rehabilitation entail.

Conclusion:

Great Latrobe Park thanks Energy Australia Yallourn for the opportunity to provide input to this matter. It was pleasing to see the proactive trialing of solutions for future learnings and the comprehensive monitoring that is planned to be undertaken. GLP acknowledge and support these positive aspects of the DMRP.

Whilst the matters under consideration are complex, we encourage EAY to find better and more concise ways to present this information for public digestion.

Persuasive arguments for why the mine void needs to be filled to RL +37m AHD are not provided in this document and ongoing failure to provide any alternative details and provide coherent and logical arguments to support EAY's position risks damaging public confidence in EAY's public standing. It also, raises questions about motives and ultimately social licence to operate. We therefore encourage EAY to provide more robust evidence to support its position.

We would be happy to provide any further details to clarify our response.

Sincerely,

Nina Burke
President Great Latrobe Park