

Comparison of the mitigation measures set out in the draft risk treatment plans (RTPs) and the updated Mitigation Register

Water Quality and Hydrology Risk Treatment Plan

Identifier	Risk controls set out in the draft RTPs (Tabled Documents 199 – 202) ¹	EES Attachment H Mitigation Register	Comment	Updated Mitigation Register (Tabled Document 505) ²	Kalbar further response to reconcile mitigations in the draft RTPs and Tabled Document 505
Surface water (Table 7-1)					
SW01	Surface water will be extracted from the Mitchell River in line with the conditions, timings, and limits detailed in any licence issued by Southern Rural Water.	Surface water will be extracted from the Mitchell River in line with the conditions, timings, and limits detailed in any licence issued by Southern Rural Water.	Same		
SW02	The design and placement of infrastructure in the project area will consider potential for flow accumulation and increased flood risk.	The design and placement of infrastructure in the project area will consider potential for flow accumulation and increased flood risk, and associated prevention measures.	Same in substance		
SW03	Mine contact water from outside of the mine void or tailings dam that is retained in water management dams will be offset by releasing the same volume of fresh water from the fresh water storage dam. Water will be released downstream of the project area (to the Perry River catchment) or directly to the	Mine contact water from outside of the mine void, temporary TSF or process water dams that is retained in water management dams will be offset by releasing the same volume of water from the freshwater storage dam. Water will be released downstream of the project area (to the Perry River catchment) or directly to the	Same in substance		SW03 should be updated to remove reference to the temporary TSF as this is no longer proposed.

¹ The mitigation measures set out in the draft risk treatment plans are primarily contained in Table 7-1 of each plan, noting that the water risk treatment plan also contains mitigation measures in Table 7-2.

² Note that the mark ups shown in this column reflect the mark ups shown in Tabled Document 505. If there is nothing set out, it means that there is no change proposed to the mitigation measure set out in EES Attachment H.

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	Mitchell River via the pipeline from the freshwater dam.	Mitchell River via the pipeline from the freshwater storage dam.			
SW04	<p>A Water Risk Treatment Plan will be developed and implemented to minimise discharge of stormwater from the construction areas.</p> <ul style="list-style-type: none"> SW04a: Surface runoff will be directed around or away from areas of land disturbance, stockpiles, embankments or nearby sensitive areas, where practicable. SW04b: Runoff that comes into contact with construction areas will be captured by surface water management infrastructure and directed to sedimentation dams. If required, water treatment (i.e., alum, gypsum or hydrated lime) will be used to drop suspended sediment levels in the stormwater. SW04c: Erosion within gullies will be controlled using primary and secondary sediment traps constructed at appropriate sites. SW04d: Catchment water onsite will be retained to approximately 3.3% annual-exceedance-probability. 	<p>A surface water and groundwater sub-plan will be developed and implemented to minimise discharge of stormwater from construction areas. The sub-plan will include measures such as:</p> <ul style="list-style-type: none"> Directing surface runoff around or away from areas of land disturbance, stockpiles, embankments or nearby sensitive areas, where practicable. Capturing runoff (via surface water infrastructure) that comes into contact with construction areas and directing it to sedimentation dams. If required, flocculant treatment (i.e., alum, gypsum or hydrated lime) will be used to reduce suspended sediment levels in the stormwater. Controlling erosion within gullies using primary and secondary sediment traps constructed at appropriate sites. Retaining water on site from the contributing catchment to 	<p>Similar, except for the specified spill frequencies and this is more specifically addressed in SW11.</p>	<p>A surface water and groundwater sub-plan will be developed and implemented to minimise discharge of stormwater from construction areas. The sub-plan will include measures such as:</p> <ul style="list-style-type: none"> Directing surface runoff around or away from areas of land disturbance, stockpiles, embankments or nearby sensitive areas, where practicable. Capturing runoff (via surface water infrastructure) that comes into contact with construction areas and directing it to sedimentation dams. If required, flocculant treatment (i.e., alum, gypsum or hydrated lime) will be used to reduce suspended sediment levels in the stormwater. [a PAM flocculant will be used] Controlling erosion within gullies using primary and secondary sediment traps constructed at appropriate sites. 	<p>No change needed, consolidated mitigations supersede the draft RTP.</p>

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	<ul style="list-style-type: none"> SW04e: All site drains will be designed and profiled to reduce water flow velocity, to reduce erosion. 	<p>approximately the 10% annual-exceedance-probability.</p> <ul style="list-style-type: none"> Designing and profiling all site drains to reduce water flow velocity and erosion. 		<ul style="list-style-type: none"> Retaining water on site from the contributing catchment via water management dams to approximately the 10% annual-exceedance-probability. [spill frequencies addressed more specifically in SW11 below] Designing and profiling all site drains to reduce water flow velocity and erosion. 	
SW05	Freeboards on the fresh water storage dam, process water dam and sedimentation ponds will be maintained to allow for storm events and high rainfall periods, in accordance with relevant licence, permit and approval requirements.	Freeboards on the water storage dam, process water dam and sediment ponds will be maintained to allow for storm events and high rainfall periods, in accordance with relevant licence, permit and approval requirements.	Same in substance		
SW06	Where infrastructure, such as dams and haul roads, are to be installed on or in close proximity to a watercourse, these areas will be inspected for nearby stream bed instability prior to construction	Areas will be inspected for nearby stream bed instability prior to construction where infrastructure such as water storages and haul roads are to be installed on or close to a watercourse.	Same in substance		
SW07	If required, bed instability should be addressed through appropriately designed grade controls, such as the use of rock chutes.	If required, bed instability will be addressed through appropriately designed grade controls, such as the use of rock chutes.	Same in substance		
SW08	All stream bed instability areas should be inspected prior to, and annually during construction to	All stream bed instability areas within and immediately downstream of the project area will	Same in substance		

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	ascertain a rate of movement and potential risks posed to mine infrastructure.	be inspected prior to, and annually, during construction to determine movement rates of unstable areas and potential risks posed to mine infrastructure.			
SW09	Surface water management infrastructure designed to capture run- off (and eroded sediments) will be maintained until such a time that vegetation is sufficiently established to control landscape erosion.	Surface water management infrastructure designed to capture runoff (and eroded soils) will be maintained until vegetation is fully established and stabilising the landscape.	Same in substance		
SW10 / RH 23	Stockpile slope angles will be constructed as low as practicable and seeding or mulch materials and contour ripping will be strategically used to stabilise stockpiles, prevent runoff and minimise erosion.	Stockpile slope angles will be constructed as low as practicable; and seeding or mulch materials and contour ripping will be used to stabilise stockpiles, prevent runoff and minimise erosion of soils.	Same in substance		
SW11	A daily water balance approach will be applied to dam design to achieve a probability of spillway activation of once per 100 years on average (1% average-exceedance probability) for Perry River catchments, and three times per 100 years on average (3.3% average-exceedance probability) for Mitchell River catchments.	A daily water balance approach will be applied to dam design to achieve a probability of spillway activation of once per 100 years on average (1% average-exceedance probability) for Perry River catchments, and three times per 100 years on average (3.3% average-exceedance probability) for Mitchell River catchments.	Same		

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SW12	The design, construction and operation of the freshwater storage dam will follow the Australian National Committee on Large Dams (ANCOLD) Guidelines on the Consequence Categories for Dams (October 2012 – or subsequent revisions).	The design, construction and operation of the freshwater storage dam will follow the Australian National Committee on Large Dams (ANCOLD) Guidelines on the Consequence Categories for Dams.	Same in substance	The design, construction and operation of the freshwater storage dam and water management dams will follow the Australian National Committee on Large Dams (ANCOLD) Guidelines on the Consequence Categories for Dams.	
GW04	Limited quantities of chemical will be stored on site. Any hazardous materials, such as laboratory chemicals, will be stored in designated areas in accordance with their safety data sheets.	Limited quantities of chemical will be stored onsite. Any hazardous materials, such as laboratory chemicals, will be stored in designated areas in accordance with their safety data sheets.	Same		
GW11	Spills of fuels or chemical will be managed in accordance with requirements set out in the Spill Response and Clean-up Procedure.	Spills of fuels or chemicals will be managed in accordance with requirements set out in the Spill Response and Clean-up Procedure.	Same		
GW05	Handling of concentrated flocculant and any hazardous materials will be done in accordance with safety data sheet recommendations.	Handling of concentrated flocculant and any hazardous materials will be done in accordance with safety data sheet recommendations.	Same		
GW12	Hazardous materials will be transported in accordance with the Australian Code for the Transport of Dangerous Goods by Road and Rail (National Transport Commission, 2018).	Hazardous materials will be transported in accordance with the Australian Code for the Transport of Dangerous Goods by Road and Rail (National Transport Commission, 2018).	Same in substance		The mitigation measure should require compliance with the code currently in force (i.e. Edition 7.7, 2020)

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		Rail (National Transport Commission, 2017) ³ .			
GW06	Hazardous waste will be removed from site by a licensed contractor for treatment or disposal in an approved facility in accordance with the requirements.	Hazardous waste will be removed from site by a licensed contractor for treatment or disposal in an approved facility in accordance with licence and regulatory requirements.	Same in substance		
GW08	Inductions and training will be provided to all relevant project personnel on the safe storage, handling and transport of dangerous goods and in emergency management.	Inductions and training will be provided to all relevant project personnel on the safe storage, handling and transport of dangerous goods and in emergency management.	Same		
TE26	Bundling for the fuel storage area (fuel farm) will be in accordance with Australian Standard 1940:2017 (Standards Australia, 2004). The capacity (i.e., bund height), storage, stormwater control and maintenance, and operation of banded areas will comply with EPA liquid storage and handling guidelines (EPA, 2018).	Bundling for the fuel storage area (fuel farm) will be in accordance with Australian Standard 1940:2004 (Standards Australia, 2004) ⁴ . The capacity (i.e., bund height), storage, stormwater control and maintenance, and operation of banded areas will comply with EPA bunding guidelines (Environment	Same in substance	Bundling for the fuel storage area (fuel farm) will be in accordance with Australian Standard 1940:2004 (Standards Australia, 2004) ⁶ . The capacity (i.e., bund height), storage, stormwater control and maintenance, and operation of banded areas will comply with EPA bundling guidelines-liquid storage and	The mitigation measure should be updated to refer to the AS currently in force (i.e. 1940:2017, 2017).

³ National Transport Commission. 2017. Australian Code for the Transport of Dangerous Goods by Road and Rail. Edition 7.5. National Transport Commission. Melbourne, Victoria.

⁴ Standards Australia. 2004. AS 1940:2004. The Storage and Handling of Flammable and Combustible Liquids. Standards Australia. Sydney, New South Wales.

⁶ Standards Australia. 2004. AS 1940:2004. The Storage and Handling of Flammable and Combustible Liquids. Standards Australia. Sydney, New South Wales.

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		Protection Authority Victoria, 2015) ⁵ .		handling guidelines (Environment Protection Authority Victoria, 20152018) ⁷ .	
TE41	Areas used for handling and/or storage of hazardous materials will be appropriately bunded and contain spill response equipment.	Areas used for handling and/or storage of concentrated flocculent and hazardous materials will be bunded appropriately to avoid spilled or stored material reaching the surrounding environment and will contain spill response equipment.	Same in substance		
SW21	Rainfall runoff water from vehicle workshops, vehicle service areas and refuelling areas will be captured and directed to an interceptor trap to extract hydrocarbons, prior to it being discharged to the drain and sump network. The trap will be emptied of hydrocarbons routinely by a licensed contractor for disposal offsite at a license facility.	Rainfall runoff water from vehicle workshop floors, vehicle service areas and fuelling areas will be captured and directed to an interceptor trap to extract hydrocarbons, prior to treated water being discharged to the drain and sump network. The trap will be emptied of hydrocarbons routinely by a licensed contractor for disposal offsite at a licensed facility.	Same in substance		

⁵ Environment Protection Authority Victoria. 2015. Bunding Guidelines. Publication 347.1. Environment Protection Authority Victoria, Southbank, Victoria.

⁷ Environment Protection Authority Victoria. 20152018. [Bunding Guidelines- Liquid Storage and Handling Guidelines](#) Publication 347.1-1698 Environment Protection Authority Victoria, Southbank, Victoria.

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SW22	Water draining from in-pit tailings will be managed using sumps and underdrains to capture and reuse seepage.	The temporary TSF will be constructed using engineered cells with lined walls. Water will be managed using a decant system, sumps and drains to capture and reuse seepage.	The RTP version has been updated to reflect the fact that the TSF is no longer pursued.	The temporary TSF will be constructed using engineered cells with lined walls. Water will be managed using a decant system, sumps and drains to capture and reuse seepage. [TSF not pursued]	Update as per RTP version which is applicable even though the TSF is no longer pursued.
SW23	The project will recover and reuse water where practicable (such as run-off from ore stockpiles and water recovered from the in pit tailings storage) and optimise operations to maximise water use efficiency.	Water will be recovered and reused where practicable (such as runoff from ore stockpiles and supernatant water from the temporary TSF and tailings areas within the mine voids).	Similar, except for the requirement to maximise water efficiency in the RTP version.	Water will be recovered and reused where practicable (such as runoff from ore stockpiles and supernatant water from the temporary TSF and tailings areas within the mine voids).	Update as per RTP version (i.e. add the words “and optimise operations to maximise water use efficiency”).
SW24	Where practical, undisturbed water will be diverted around disturbance areas to prevent clean surface water from entering the site and becoming contaminated.	Water running off undisturbed ground will be diverted around disturbance areas where practicable.	Same in substance		
SW25	Wastewater from ablutions and the office will be treated with a wastewater treatment system. There will be sufficient capacity to cater for the operations workforce and visitors.	-	Missing in the EES version		SW25 should be included in the consolidated mitigation register but will only apply to the ML area, not the SCO area.
SW26	All waste excluding septic waste will be removed from site and disposed of by licensed contractors.	-	Missing in the EES version		SW26 should be included in the consolidated mitigation register.
SW27	Waste hydrocarbons will be stored in suitable containers for removal from	-	Missing in the EES version		SW27 should be included in the consolidated mitigation register but will

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	the mine site for disposal at either an EPA-approved hydrocarbon waste site or a recycling depot.				only apply to the ML area, not the SCO area.
SW28	-	Surface water will be managed through an adaptive management strategy that includes trigger levels for surface water quantity and quality that determine when remedial action is required (in consultation with affected stakeholders).	Missing in draft RTP		No change needed, consolidated mitigations supersede the draft RTP.
SW29	Permanent and long-term drains and bund walls will be topsoiled and vegetated with suitable vegetation as soon as possible	-	Missing in the EES version		SW29 should be included in the consolidated mitigation register but will only apply to the ML area, not the SCO area.
SW30	Appropriate outlet scour protection will be placed on all stormwater outlets, chutes, spillways and slope drains to dissipate flow energy and minimise risk of soil erosion.	Appropriate outlet scour protection will be placed on all stormwater outlets, chutes, spillways and slope drains to dissipate flow energy and minimise risk of soil erosion.	Same		
SW32	Mine contact water management dams within the Perry River catchment will be emptied as a priority over those located in the Mitchell River catchment to reduce potential water quality impacts to the Perry River catchment.	Mine contact water management dams within the Perry River catchment will be emptied as a priority over those located in the Mitchell River catchment to reduce potential water quality impacts from a spillway discharge to the Perry River catchment.	Same in substance		

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SW33	If during successive storm events water management dams are required to be drawn down at a rate greater than can be achieved by the process water demand, mine contact water will be treated at a rate of 24 ML/day prior to discharge to the freshwater dam. Mine contact water will be treated to a level that is acceptable for discharge to the Mitchell River.	If during successive storm events, water management dams are required to be drawn down at a rate greater than can be achieved by the process water demand, mine contact water will be treated at a rate of 24 ML/day prior to discharge to the freshwater storage dam. Mine contact water will be treated to meet licence requirements prior to discharge offsite.	Same in substance		
SW34	Revegetate ephemeral drainage gullies in areas downstream of future mining activities prior to operations commencing to mitigate current instability and to increase stability of landscape during and post mining.	Ephemeral drainage gullies will be revegetated in areas downstream of future mining activities prior to operations commencing to increase landscape stability and specifically mitigate: <ul style="list-style-type: none"> • Effects of a moderate increased flow velocity downstream of the mine operations and the final landform. • Potential effects of tunnel erosion downstream of the mine void boundary where soil treatment is not planned. • Effects of sediment starvation by reducing sediment transport and encouraging deposition. 	Same in substance		

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SW35	An adaptive management strategy will be implemented, based on water quality and quantity monitoring results, to determine whether offset water that would typically be returned to the Mitchell River may be directed to ephemeral drainage gullies in a controlled manner.	An adaptive management strategy will be implemented, based on water quality and quantity monitoring results, to determine whether offset water that would typically be returned to the Mitchell River may be directed to ephemeral drainage gullies in a controlled manner.	Same		
SW36	Aquatic and riparian vegetation will be established in minor waterways between water management dams and major receiving waterways to reduce potential water quality impacts from the release of mine contact water.	Aquatic and riparian vegetation will be established in minor waterways between the water management dams and major receiving waterways to reduce potential water quality impacts from release of mine contact water.	Same		
SW37	Natural surface water drainage courses will be re-routed to avoid post-mining landforms, where practicable.	Natural surface water drainage courses will be re-routed to avoid post-mining landforms, where practicable.	Same		
SW38	Surface water ponding on post-mining landforms will be avoided, where practicable, through appropriate slope profile design and topsoil treatments.	Surface water ponding on post-mining landforms will be avoided, where practicable, through appropriate slope profile design and topsoil treatments.	Same		
SW39	The downhill side of containment structures, such as surface water drains and road batters, will undergo soil conditioning and be spread with topsoil and	The downhill side of containment structures, such as surface water drains and road batters, will undergo soil conditioning and be spread with topsoil and	Same		

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	revegetated as soon as practicable to minimise erosion and sediment laden runoff.	revegetated as soon as practicable to minimise erosion and sediment laden runoff.			
SW40	Sediment traps and dams will be cleaned at regular intervals, and following storm events and high rainfall events, to maintain the efficiency of the infrastructure.	Sediment traps and dams will be cleaned at regular intervals, and following storm events and high rainfall events, to maintain the efficiency of the infrastructure.	Same		
SW41	-	Riparian vegetation will be retained where possible to maintain aquatic ecosystem habitat and prevent sedimentation of watercourses.	Missing in draft RTP		No change needed, consolidated mitigations supersede the draft RTP.
SW42	-	Access tracks and roads will be regularly maintained and clearly marked to prevent establishment of secondary tracks and reduce soil erosion; existing roads will be used where practicable.	Missing in draft RTP		No change needed, consolidated mitigations supersede the draft RTP.
SW43	-	-	Missing in the draft RTP and the EES version	Surface water monitoring and management will be carried out in accordance with an approved Water Risk Treatment Plan (forming part of the Work Plan).	No change needed, consolidated mitigations supersede the draft RTP.
SW44	-	-	Missing in the draft RTP and the EES version	Water discharges will be undertaken in accordance with conditions imposed in a development licence issued by EPA.	No change needed, consolidated mitigations supersede the draft RTP.

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SW45	-	-	Missing in the draft RTP and the EES version	In order to limit the risk of impacts arising due to nitrogen or phosphorus in discharged water, treated water from the Dissolved Air Flotation (DAF) circuit will not be released to the Mitchell River when daily Mitchell River water flows are less than 50 ML/day. [In response to recommendations made by Jarrah Muller in TN013 No.53]	No change needed, consolidated mitigations supersede the draft RTP.
SW46	-	-	Missing in the draft RTP and the EES version	The DAF plant will be tested at least to annually confirm operability during low rainfall periods when it is not in active use. [In response to recommendations made by Jarrah Muller in TN013 No.58]	No change needed, consolidated mitigations supersede the draft RTP.
SW47	-	-	Missing in the draft RTP and the EES version	In preparation for the licence application to SRW and the Development Licence Application, Kalbar in consultation with key stakeholders will assess potential impacts on farm dams and where a potential impact is identified, identify options for delivery mechanisms of offset water.	No change needed, consolidated mitigations supersede the draft RTP.

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SW48	-	-	Missing in the draft RTP and the EES version	A site water balance will be maintained. It will incorporate weather data, monitoring and all material sources of loss and input including seepage and evaporation from tailings.	No change needed, consolidated mitigations supersede the draft RTP.
Groundwater (Table 7-2)					
GW01	The freshwater dam and contingency water storage dams will be constructed with engineered liners to reduce infiltration to groundwater.	The freshwater and contingency water storage dams will be constructed with an engineered liner to reduce infiltration to groundwater.	Same in substance		
GW02	Groundwater will be extracted from the Latrobe Group aquifer in line with the conditions, timings, and limits detailed in a licence issued by Southern Rural Water.	Groundwater will be extracted from the Latrobe Group Aquifer in line with the conditions, timings, and limits detailed in a licence issued by Southern Rural Water.	Same		
TE26	Bunding for the fuel storage area (fuel farm) will be in accordance with Australian Standard 1940:2017 (Standards Australia, 2004). The capacity (i.e., bund height), storage, stormwater control and maintenance, and operation of	Bunding for the fuel storage area (fuel farm) will be in accordance with Australian Standard 1940:2004 (Standards Australia, 2004) ⁸ . The capacity (i.e., bund height), storage, stormwater control and maintenance, and operation of	Same in substance	Bunding for the fuel storage area (fuel farm) will be in accordance with Australian Standard 1940:2004 (Standards Australia, 2004) ¹⁰ . The capacity (i.e., bund height), storage, stormwater control and maintenance, and	The mitigation measure should be updated to refer to the AS currently in force (i.e. 1940:2017, 2017).

⁸ Standards Australia. 2004. AS 1940:2004. The Storage and Handling of Flammable and Combustible Liquids. Standards Australia. Sydney, New South Wales.

¹⁰ Standards Australia. 2004. AS 1940:2004. The Storage and Handling of Flammable and Combustible Liquids. Standards Australia. Sydney, New South Wales.

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	bunded areas will comply with EPA liquid storage and handling guidelines (EPA, 2018).	bunded areas will comply with EPA bunding guidelines (Environment Protection Authority Victoria, 2015) ⁹ .		operation of bunded areas will comply with EPA bundling guidelines-liquid storage and handling guidelines (Environment Protection Authority Victoria, 2015 2018) ¹¹ .	
GW04	Limited quantities of chemical will be stored on site. Any hazardous materials, such as laboratory chemicals, will be stored in designated areas in accordance with their safety data sheets.	Limited quantities of chemical will be stored onsite. Any hazardous materials, such as laboratory chemicals, will be stored in designated areas in accordance with their safety data sheets.	Same		
GW05	Handling of concentrated flocculant and any hazardous materials will be done in accordance with safety data sheet recommendations.	Handling of concentrated flocculant and any hazardous materials will be done in accordance with safety data sheet recommendations.	Same		
GW06	Hazardous waste will be removed from site by a licensed contractor for treatment or disposal in an approved facility in accordance with the requirements.	Hazardous waste will be removed from site by a licensed contractor for treatment or disposal in an approved facility in accordance with licence and regulatory requirements.	Same in substance		
TE41	Areas used for handling and/or storage of hazardous materials will	Areas used for handling and/or storage of concentrated flocculent and hazardous materials will be	Same in substance		

⁹ Environment Protection Authority Victoria. 2015. Bunding Guidelines. Publication 347.1. Environment Protection Authority Victoria, Southbank, Victoria.

¹¹ Environment Protection Authority Victoria. ~~2015~~[2018](#). [Bunding Guidelines- Liquid Storage and Handling Guidelines](#) Publication ~~347-1-1698~~ Environment Protection Authority Victoria, Southbank, Victoria.

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	be appropriately banded and contain spill response equipment.	banded appropriately to avoid spilled or stored material reaching the surrounding environment and will contain spill response equipment.			
GW08	Inductions and training will be provided to all relevant project personnel on the safe storage, handling and transport of dangerous goods and in emergency management.	Inductions and training will be provided to all relevant project personnel on the safe storage, handling and transport of dangerous goods and in emergency management.	Same		
GW09	Waste will be removed from the site and disposed of by licensed contractors (except for septic effluent approved for disposal by irrigation).	Waste will be removed from site and disposed of by licensed contractors (except for septic waste).	Same in substance		
GW10	Waste hydrocarbons will be stored in suitable containers for removal from the mine site for disposal at either an EPA-approved hydrocarbon waste site or a recycling depot.	Waste hydrocarbons will be stored in suitable containers for removal from the project area for disposal at either an EPA-approved hydrocarbon waste site or a recycling depot.	Same in substance		
GW11	Spills of fuels or chemical will be managed in accordance with requirements set out in the Spill Response and Clean-up Procedure.	Spills of fuels or chemicals will be managed in accordance with requirements set out in the Spill Response and Clean-up Procedure.	Same		

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GW12	Hazardous materials will be transported in accordance with the Australian Code for the Transport of Dangerous Goods by Road and Rail (National Transport Commission, 2018).	Hazardous materials will be transported in accordance with the Australian Code for the Transport of Dangerous Goods by Road and Rail (National Transport Commission, 2017) ¹² .	Same in substance		The mitigation measure should require compliance with the code currently in force (i.e. Edition 7.7, 2020)
SW22	Water draining from in-pit tailings will be managed using sumps and underdrains to capture and reuse seepage.	The temporary TSF will be constructed using engineered cells with lined walls. Water will be managed using a decant system, sumps and drains to capture and reuse seepage.	The RTP version has been updated to reflect the fact that the TSF is no longer pursued.	The temporary TSF will be constructed using engineered cells with lined walls. Water will be managed using a decant system, sumps and drains to capture and reuse seepage. [TSF not pursued]	Update as per RTP version which is applicable even though the TSF is no longer pursued.
GW15	Management techniques, such as underdrains, sumps and water recovery pumps will be used to maximise the recovery of water in the mine void tailings containment cells.	Management techniques, such as underdrains, sumps and water recovery pumps will be used to recover water in the mine void tailings containment cells.	Same in substance	Management techniques, such as underdrains, sumps and water recovery pumps will be used to recover water in from the mine void tailings containment cells.	
GW16	The open voids will be progressively backfilled with sand tailings and clay/silt tailings which will then be covered with overburden, subsoil and, in areas other than Grassy Woodland revegetation, topsoil. Revegetation with crop/pasture or native	The open voids will be progressively backfilled with sand tailings and fines tailings and covered with overburden, subsoil and, in areas other than Grassy Woodland revegetation, topsoil. Revegetation with crop, pasture or	Same in substance		

¹² National Transport Commission. 2017. Australian Code for the Transport of Dangerous Goods by Road and Rail. Edition 7.5. National Transport Commission. Melbourne, Victoria.

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	vegetation will be undertaken where required.	native vegetation will be undertaken where required.			
GW17	-	-	Missing in the draft RTP and the EES version	A Groundwater Dependent Ecosystem (GDE) management plan will be developed prior to construction. The plan will include establishment of baseline conditions and periodic monitoring (including eco system health monitoring) at high value GDEs, including the Chain of Ponds in the Perry River catchment. [In response to recommendations made by Joel Georgiou in TN013 No.34 and 35]	No change needed, consolidated mitigations supersede the draft RTP.
GW18	-	-	Missing in the draft RTP and the EES version	Groundwater monitoring and management will be carried out in accordance with an approved Water Risk Treatment Plan (forming part of the Work Plan).	No change needed, consolidated mitigations supersede the draft RTP.
GW19	-	-	Missing in the draft RTP and the EES version	Kalbar will work with SRW to encourage owners of unregistered bores to have their bores licensed. Once registered, those bores will be incorporated into any modelling undertaken as part of the groundwater licence application. [In response to recommendations made by John Sweeney in TN013 No.65]	No change needed, consolidated mitigations supersede the draft RTP.

Identifier	Risk controls set out in the draft RTPs (Tabled Documents 199 – 202) ¹	EES Attachment H Mitigation Register	Comment	Updated Mitigation Register (Tabled Document 505) ²	Kalbar further response to reconcile mitigations in the draft RTPs and Tabled Document 505
GW20	-	-	Missing in the draft RTP and the EES version	Predicted process water quality will be reviewed as part of the updated water balance currently in preparation. [In response to recommendations made by John Sweeney in TN013 No.70]	No change needed, consolidated mitigations supersede the draft RTP.
GW21	-	-	Missing in the draft RTP and the EES version	Groundwater modelling will be revised annually with up-to-date monitoring data and site water balance data. Additional modelling iterations will be carried out if monitoring yields results that are materially different to those predicted. Specific triggers for remodelling will be identified in the Water Risk Treatment Plan (forming part of the Work Plan).	No change needed, consolidated mitigations supersede the draft RTP.
GW22	-	-	Missing in the draft RTP and the EES version	That filling of the Perry Gully with overburden and mine tailings be subject to appropriate protection measures reflective of the risks to surface water and groundwater. [In response to EPA Part B submission (Tabled Document 486, paragraph 93)]	No change needed, consolidated mitigations supersede the draft RTP.
GW23	-	-	Missing in the draft RTP and the EES version	The Water Risk Treatment Plan will require visual inspection of the	No change needed, consolidated mitigations supersede the draft RTP.

Identifier	Risk controls set out in the draft RTPs (Tabled Documents 199 – 202) ¹	EES Attachment H Mitigation Register	Comment	Updated Mitigation Register (Tabled Document 505) ²	Kalbar further response to reconcile mitigations in the draft RTPs and Tabled Document 505
				escarpment to the north and east of the mine site on a daily basis.	
GW24	-	-	Missing in the draft RTP and the EES version	Prior to submission of any application to extract groundwater, Kalbar will undertake a further pumping test in accordance with SRW guidelines for a period of more than four days, including monitoring pH, redox, and TDS. Results of the pumping test will be taken into account in subsequent modelling.	No change needed, consolidated mitigations supersede the draft RTP.
GW25	-	-	Missing in the draft RTP and the EES version	In further modelling: <ul style="list-style-type: none"> • Quantify and assess lag period for seepage to report to the water table; • Quantify effect of increased baseflow discharge as a result of mounding on dissolved metals and nutrient concentrations in the Mitchell River; 	No change needed, consolidated mitigations supersede the draft RTP.
GW26	-	-	Missing in the draft RTP and the EES version	Update the Water Risk Treatment Management Plan to include procedures for managing potential Acid Sulfate Soils, including: <ul style="list-style-type: none"> • Sampling procedures for PASS where perched groundwater is encountered; and 	No change needed, consolidated mitigations supersede the draft RTP.

Identifier	Risk controls set out in the draft RTPs (Tabled Documents 199 – 202) ¹	EES Attachment H Mitigation Register	Comment	Updated Mitigation Register (Tabled Document 505) ²	Kalbar further response to reconcile mitigations in the draft RTPs and Tabled Document 505
				<ul style="list-style-type: none"> • Specifying procedures to be undertaken in the event that PASS is encountered. 	
Additional controls (Table 7-3)					
	<p>Additional measures identified in Table 7-3 of the water RTP:</p> <ul style="list-style-type: none"> • Development of a GDE management plan will be prepared prior to construction as part of the biodiversity risk treatment plan and environmental management plan. • The framework for groundwater and tailings management will be addressed in the water quality and hydrology risk treatment plan and the surface water and groundwater management plan. • Additional groundwater monitoring bores will be installed prior to construction in locations agreed by regulators including SRW. • The water quality and hydrology risk treatment plan will be revised to include the 				<ul style="list-style-type: none"> • The GDE management plan is required by GW17 in the consolidated mitigations. • The second and third points will be addressed by the plan required by GW18 in the consolidated mitigations. • Regarding the fourth point, now that the <i>Environment Protection Act 2017</i> and the Environmental Reference Standard made under it have commenced, the acceptance criteria set out in section 6 of the draft water RTP have been updated to refer to the requirements of the Environmental Reference Standard rather than SEPP (Waters).

Identifier	Risk controls set out in the draft RTPs (Tabled Documents 199 – 202) ¹	EES Attachment H Mitigation Register	Comment	Updated Mitigation Register (Tabled Document 505) ²	Kalbar further response to reconcile mitigations in the draft RTPs and Tabled Document 505
	SEPP (Waters) interim objectives for preliminary acceptance criteria and water quality for groundwater. This will then be further updated with groundwater quality objectives that are site specific.				