



Queensland
Government

Department of
**State Development,
Infrastructure and Planning**

Our ref: D25/26977

24 February 2025

The Ensham Joint Venture
C/- Mr Dan Reynolds
Chief Executive Officer
Sungela Pty Ltd
email: dan.reynolds@thungela.com

Dear Mr Reynolds

REQUIREMENT NOTICE

RPI25/003 The Ensham Joint Venture – Life of Mine Extension Zone 1 Ensham

(given under section 44 of the *Regional Planning Interests Act 2014*)

I refer to the assessment application which was properly made on 10 February 2025 under section 29 of the *Regional Planning Interests Act 2014* (RPI Act). The application is seeking a regional interests development approval (RIDA) for resource activity: mining and other resource activities (not petroleum and gas) for the Life of Mine Extension Zone 1 Ensham project in the priority agricultural area and strategic cropping area.

Application details

Applicant	The Ensham Joint Venture
Project	Life of Mine Extension Zone 1 Ensham
Description	Drill pads to support existing underground coal mining
Area of regional interest	Priority Agricultural Area (PAA) and Strategic Cropping Area (SCA)
Proposed disturbance area	PAA – 0.96ha, SCA – 0.96ha

Site details

Real property description	Lot 2 CP911010, Lot 8 TT345, Lot 6 TT309, and Lot 7 TT309
Local government area	Central Highlands Regional Council

Information Requirement

Pursuant to section 44 of the RPI Act, you are advised that further information is required to assist in the assessment of the application against the assessment criteria contained in the RPI Act and the Regional Planning Interests Regulation 2014 (RPI Regulation).

The further information required is detailed in **Attachment A**.

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The period within which the required information must be provided is a maximum of three months from the date of this notice. Should it be necessary, an extension to this period may be requested. Another requirement notice may be issued if the response to the initial notice does not supply sufficient information to adequately assess and decide upon the application, or in response to matters raised in a submission.

Public notification requirement

Pursuant to section 34(4) of the RPI Act, it has been determined that the application requires notification. The reason for the decision is that the delegate for the chief executive has determined that it is in the public interest for the application to be publicly notified. In accordance with section 35 of the RPI Act, you are required to:

- publish a notice about the application '*at least once in a newspaper circulating generally in the area of the land*' as prescribed in section 13 of the RPI Regulation
- where not the owner of the land, give the owners of the land notice about the application.

Please provide proof of delivery of notice about the application to landowners to RPIAct@dSDLGP.qld.gov.au

Public notification must be undertaken within 10 business days of providing the response to the requirement notice to the Department of State Development, Infrastructure and Planning (DSDIP). The notification period is 15 business days after the notice about the application is first published, with the closing date being a day that is after the end of the notification period.

The approved form for public notification is available on DSDIP's website at [rpi-regional-interests-dev-approval-template.doc \(live.com\)](#)

Please provide a copy of the notice as it appears in the newspaper circulating generally in the area to RPIAct@dSDLGP.qld.gov.au

You are also referred to the RPI Act Statutory Guideline 06/14 Public notification of assessment applications at [RPI Act - Statutory Guideline 06/14 \(windows.net\)](#) for further information.

If you require any further information, or have any queries, please contact Mr Darren Brewer, Manager – Appeals and Regional Interests, Planning Group, DSDIP on (07) 3452 7472 or by email at RPIAct@dSDLGP.qld.gov.au who will be pleased to assist.

Yours sincerely



Phil Joyce
**A/Executive Director
Innovation and Assessment
Planning Group**

Encl. Attachment A

ATTACHMENT A

Information required for assessment against PAA and SCA criteria – Schedule 2, Parts 1 and 4 of the Regional Planning Interests Regulation 2014

1.	<p><u>Issue:</u></p> <p>It is noted that SLR’s report states on pages 16 and 47 that a Conduct and Compensation Agreement (CCA) has not been signed with Cowal Agricultural Holding Pty Ltd. However, it is noted in the Administrative Advices section for the Title Deed for Lot 8 on TT345 that a CCA was lodged on 20 December 2024 (Note: it is not clear whether this is court ordered or voluntary).</p> <p><u>Actions:</u></p> <p>Please confirm whether the applicant has a voluntary agreement in place with this landholder of Lot 8 on TT345. If no voluntary agreement has been reached, please provide detail on what reasonable steps the applicant has undertaken in this regard. Accordingly, SLR’s report is to be updated as required to address this matter.</p>
2.	<p><u>Issue:</u></p> <p>The title deeds provided in support of the application do not indicate that CCAs have been lodged over Lots 6 or 7 on TT309. However, the response to item (g) in the table on page 47 of SLR’s report maintains that there are voluntary agreements with four of the five landholders. This is an important inconsistency.</p> <p><u>Actions:</u></p> <p>Please confirm whether the applicant has voluntary agreements in place with the landholders for Lots 6 and 7 on TT309.</p>
3.	<p><u>Issue:</u></p> <p>It is noted that the RIDA application form nominates both Sungela Pty and Bowen Investment (Australia) Pty Ltd as joint venture partners. However, only contact details for Sungela have been provided.</p> <p><u>Actions:</u></p> <p>Please provide confirmation from Bowen Investments (Australia) Pty Ltd that Sungela Pty Ltd can act on its behalf as the applicant for this application.</p>
4.	<p><u>Issue:</u></p> <p>Please provide confirmation of the extent and uses of the properties that are subject to the application.</p> <p><u>Actions:</u></p> <p>Update SLR’s report as necessary to address this matter.</p>

5.	<p><u>Issue:</u></p> <p>Confirmation is required of the extent of the impact of the proposed surface activities – expressed as an area, and a percentage of the area – of land used for any PALU, on the properties, the area (i.e., Sunwater’s Nogoia Mackenzie scheme) and the region (i.e., the priority agricultural area (PAA)) the subject of the application.</p> <p><u>Actions:</u></p> <p>Update SLR’s report as necessary to address these matters.</p>
6.	<p><u>Issue:</u></p> <p>No details are provided in SLR’s report as to Lot 6 on TT309. This lot appears to have been cropped and is identified in Figure 8 as cropped, and also in Sentinel imagery.</p> <p><u>Actions:</u></p> <p>Please provide confirmation as to the use of Lot 6 on TT309 and update SLR’s report accordingly to this end.</p>
7.	<p><u>Issue:</u></p> <p>It is noted that the Subsidence Management Plan references RIDA trigger levels that are subject to RIDA RPI22/002. However, it is unclear how this plan is pertinent to the current application, given that it does not appear to address PAA assessment criteria and may need to address impacts which may not be covered by a voluntary agreement with a landholder?</p> <p>Further, in Appendices D and E (the Peer Review Letters), it is noted that the <i>“report does not specifically describe the nature of overlying land use other than the presence of the Nogoia River and Anabranch”</i>. Moreover, they do not discuss the nature of the overlying land use, or include any reference to priority agricultural land use, priority agricultural area, agriculture, agricultural, farming, cultivation, crop, crops, cropping, irrigation, agronomic, agronomy, or economic.</p> <p><u>Actions:</u></p> <p>Please update SLR’s report and supporting materials to address these matters.</p>
8.	<p><u>Issue:</u></p> <p>It is unclear how the applicant substantiates that there would be no impacts on the ability to undertake any priority agricultural land use (PALU). It appears there are no supporting agronomic impact assessments of the potential impacts from subsidence to farming activities, or economic assessment of impacts to farming business provided. This includes:</p> <ul style="list-style-type: none"> a) what the consequences are if there are agronomic impacts and/or economic impacts resulting from subsidence; b) what is the probability of this happening (including during and post mining – and including at a time after the tenure and EA are surrendered/forfeited); and

	<p>c) what the potential future use of the area is if subject to subsidence that unreasonably or intolerably impacts on use of the area to undertake any PALU.</p> <p><u>Actions:</u></p> <p>Provide discussion on the risks and consequences of potential subsidence to agronomic and economic interests and values. Update SLR's report accordingly to address these matters.</p>
9.	<p><u>Issue:</u></p> <p>The application material has not detailed how the applicant will proceed with the proposed underground mining activities if impacts from subsidence occur, and if so, what mitigation measures are proposed to ensure there are no ongoing or lasting adverse effects to the land, as well as the area, and region, to be able to undertake any PALU, that are subject to the application.</p> <p><u>Actions:</u></p> <p>SLR's report is to be updated as necessary to address this matter.</p>
10.	<p><u>Issue:</u></p> <p>It is noted that the SLR report has addressed the RPI Regulation regarding the SCA, yet has addressed the statutory guideline statements in section 7.1 of the SLR report for the PAA aspects. The assessment report should have addressed the RPI Regulation regarding PAA, as they are the current relevant assessment provisions for the PAA.</p> <p><u>Actions:</u></p> <p>The applicant is requested to address the RPI Regulation for PAA. SLR's report is to be updated as necessary.</p>
11.	<p><u>Issue:</u></p> <p>It is unclear how the applicant has determined the PALU or otherwise within the project area.</p> <p><u>Actions:</u></p> <p>Provide the material referenced in section 5.2 of SLR's report, and process used, including the methodology, data and sources, and assumptions used to determine PALU or otherwise, for the 10-year period of 2015 to 2024. Update SLR's report as necessary to address these matters.</p>
12.	<p><u>Issue:</u></p> <p>Section 5.0 of the SLR report details that there is a small area of dryland Leucaena on Lot 2 CP911010 within the PAA. However, it is noted that Queensland Land Use Mapping Program (2017) details this as grazing irrigated modified pastures. This land use is detailed in the Central Queensland Regional Plan as PALU. Sentinel imagery also indicates that this area may have been cropped up to five times since 2017.</p>

	<p><u>Actions:</u></p> <p>Please provide confirmation of the land use of the abovementioned area. It also appears that additional grazing irrigated modified pastures (for Leucaena) occurs just to the north of the boundary of the PAA (that area is detailed in Figure 10). Update the SLR report as necessary to address this matter.</p>
13.	<p><u>Issue:</u></p> <p>It is noted that SLR's report states that the drill pads have been strategically located to avoid the most productive areas of PALU. However, insufficient information has been provided to support that statement.</p> <p><u>Actions:</u></p> <p>Update the SLR report to address this matter; including:</p> <ul style="list-style-type: none"> a) confirmation as to how the applicant determined the productivity of the land where disturbance is proposed; and b) detail what alternative sites were investigated, and why the alternative sites were not suitable.
14.	<p><u>Issue:</u></p> <p>It is noted that the extent of surface impacts from access and construction activities has not been detailed, including any temporary impacts to PALU during construction - as well as indirect impacts to PALU during operation of the pads (with the footprint of each advised to be no more than 80 by 20 metres). For example, will raised planting rows, catch drains, irrigation infrastructure, access tracks, laydown areas, etc. need to be realigned to address potential impacts to everyday farming activities (such as restricted ability to operate machinery such as tractors with booms near flaring infrastructure located on the pads)?</p> <p>It appears that pad #4 in part overlays an irrigation head ditch/supply ditch/channel (as captured in the overview photo for BH26 in Appendix B), as well as the location of furrow siphons/inflow pipes over a header. Further, it appears that pad #2 overlays headlands, furrow pathways, and may prevent access to and the use of a track in an area adjacent to irrigation infrastructure.</p> <p><u>Actions:</u></p> <p>Update the SLR report as necessary to address this matter, with attention to detailing the exact area of impact. Key issues to be addressed include:</p> <ul style="list-style-type: none"> a) changes to the conduct of the PALU (e.g., can existing farm equipment (such as a harvester or a tractor with a boom sprayer) continue to be used to undertake the PALU; b) will the farmer be required to replace or retrofit equipment to undertake the PALU post impact; c) changes to the yield quantity or quality (e.g., likely to be a reduction in yield quantity because of, for example, increased competition by weeds for soil nutrients or waterlogging resulting from changes to the direction of a run to accommodate a resource activity, and is there likely to be a

	<p>reduction in yield quality because of, for example, increased traffic on tracks causing dust and reduced photosynthesis);</p> <ul style="list-style-type: none"> d) changes in farm inputs (e.g., will fertiliser be required following redistribution of topsoil stockpiled for the period of disturbance; e) will soil compaction from increased traffic lead to increased tillage of the soil to restore soils structure and reduce surface erosion); f) changes in operations (e.g., will this limit the ability of the landholder to adopt new management practices or to be able to use the land to undertake another PALU); and g) changes in the asset base (e.g., will there be a reduction in the market value of the property, is the utility of key infrastructure retained?). <p>It is also necessary for the report to consider the proposed activities in the context of direct impacts (e.g., a drill pad and adjacent areas that may no longer be cropped) and indirect impacts (e.g., the balance of the field/property on which production must be increased to mitigate direct impacts) on PALU.</p>
15.	<p><u>Issue:</u></p> <p>It is not clear as to the scope and extent of underground mining activities for which approval is sought in this application. No figures have been provided. Confirmation is required of the location, depth, and area of underground mining activities subject of this application.</p> <p><u>Actions:</u></p> <p>Update the SLR report as necessary to address this matter, with attention to detailing the exact area of underground mining activities.</p>
16.	<p><u>Issue:</u></p> <p>Further to item 15 above, the application fee paid by the applicant in respect of PAA impact seems to not consider PAA areas likely to suffer an impact on the surface of the land from subsidence caused by proposed underground mining activities. The PAA fee paid to date is for impacts to an area of less than 30ha. However, the total area of PAA which could be potentially impacted from underground mining activities is considered by the department to be greater than 100ha. In this regard, it is noted that SLR's Report states, "<i>low levels of subsidence (typically less than 40 mm) are predicted</i>" and "<i>predicted subsidence levels which would be less than natural soil movement</i>" and Appendix F (the SMP) details potential subsidence impacts to "<i>agricultural infrastructure including laser levelled irrigation paddocks</i>".</p> <p><u>Actions:</u></p> <p>Further to item 15, please re-consider and comment upon the impact to PAA and the PAA application fees payable relative to the area of impact. Additional fees for the PAA component will apply for impacts greater than 30ha.</p>

17.	<p><u>Issue:</u></p> <p>Spatial files provided appear to detail 354 instances where the location of proposed underground mining activities (features) exceed the boundaries of Mining Lease Application 700061 (i.e. the resource authority over the Zone 1 area).</p> <p><u>Actions:</u></p> <p>Confirmation is required as to the extent and the location of the proposed underground mining activities which are the subject of this application. Update SLR's report and the spatial files as necessary to address this matter.</p>
18.	<p><u>Issue:</u></p> <p>Further to item 17, additional information is required in relation to the use of irrigation channels (and catchment drains) throughout the project area. If the landholder uses this key agricultural infrastructure to store water, as well as to transport it, there may be policy concerns over the application of the RPI Act regarding restricted land provisions under the Land Access Code - Queensland's land access laws as provided in the <i>Mineral and Energy Resources (Common Provisions) Act 2014</i>. That is, with respect to the restricted area around particular features (being the area within the lateral distance of 50 metres from a water storage facility, as well as of 200 metres from permanent buildings such as a residence), in instances where there is no voluntary agreement with the landholder. If the restricted provisions apply, it appears that this may have a material impact on the extent and operation of the proposed underground activities.</p> <p><u>Actions:</u></p> <p>Please provide clarification (from the landholder) regarding the use of irrigation channels (and catchment drains) throughout the project area. Address the aspects raised above as part of the response.</p>
19.	<p><u>Issue:</u></p> <p>No shapefiles were provided of the locations of the detailed sites (prefix BH) or the check sites(prefix CH) detailed on Figure 5 in Appendix B.</p> <p><u>Actions:</u></p> <p>Provide shapefiles for all BH and CH sites detailed in Appendix B's Figure 5 and Appendix A Detailed Profile Descriptions and Appendix B Check Site Descriptions.</p>
20.	<p><u>Issue:</u></p> <p>There is uncertainty regarding the land use detailed in BH27. The photo indicates that cropping is undertaken at that location on Lot 6 on TT309.</p> <p><u>Actions:</u></p> <p>Please provide confirmation of the land use, as referenced above.</p>

21.	<p><u>Issue:</u></p> <p>The land use detailed in the summary for BH32 details pasture as the dominant land use. Confirmation is required that this is not irrigated modified pasture. On the basis of the information currently provided, it appears that the location of the site BH32 is within a centre point irrigation system and is mapped in Figure 10 in SLR’s report as land used for agriculture. Further, the nature of the pasture detailed in the photo may suggest it is supported by irrigation activities.</p> <p><u>Actions:</u></p> <p>Please provide confirmation of the land use, as referenced above.</p>
22.	<p><u>Issue:</u></p> <p>The locations of CH44 and CH 47 could not be determined on Figure 5.</p> <p><u>Actions:</u></p> <p>Please confirm that the abovementioned sites are detailed on Figure 5; otherwise, provide an updated Figure that demonstrates the location of these two sites.</p>
23.	<p><u>Issue:</u></p> <p>The overall application fee has been calculated on the basis of above ground surface disturbance only and is a total of \$14 543.20 (i.e., combined PAA and SCA fee schedule). The SCA fee schedule of 6,860.00 fee units is for impacts to areas of less than 30ha. As the total area of SCA which could be potentially impacted from underground mining activities is greater than 30ha, it is unclear if the application is only seeking approval for surface impacts associated with built surface infrastructure.</p> <p><u>Actions:</u></p> <p>Confirm whether the application will apply only to the areas of the SCA impacted by the flares (0.96ha approximately). Confirm whether the application and approval sought applies to the remaining areas of the underground mine where bord and pillar mining is proposed. Additional fees for the SCA component will apply for impacts greater than 30ha.</p>
24.	<p><u>Issue:</u></p> <p>The applicant has stated that Required Outcome 2 does not apply as the activity is being carried out on multiple properties, and that there is no material impact on the SCA.</p> <p>It is unclear if the prescribed solution for (a) has been addressed for the landholdings that are not priority agricultural land use (PALU) of the priority agricultural area (PAA) where there is no landholder agreement.</p> <p>As per the RPI Regulation, a property (SCL), in a strategic cropping area means-</p> <p>a) <i>A single lot; or</i></p>

	<p>b) <i>Otherwise –all the lots that are owned by the same person or have 1 or more common owners and-</i></p> <ul style="list-style-type: none"> i. <i>Are managed as a single agricultural enterprise; or</i> ii. <i>Form a single discrete area because 1 lot is adjacent, in whole or part, to another lot in that single discrete area (other than for any road or watercourse between any of the lots).</i> <p><u>Actions:</u></p> <p>Address all prescribed solutions for Required Outcome 2 for the SCA. This is to be limited to the areas of the application that are confirmed as the non-PALU areas of the PAA and any areas of the SCA outside of the PAA.</p>
25.	<p><u>Issue:</u></p> <p>The supporting material for the application states that there will not be a permanent impact on strategic cropping land (SCL) and that it will be returned to its pre-activity condition using rehabilitation.</p> <p>Statutory Guideline 09/14 states:</p> <p><i>For land to be restored to pre-activity condition, it will require an adequate restoration to the former or original condition of the land, including the productive capacity of the land. It does not simply mean ‘revegetated’, ‘rehabilitated’ or ‘reclaimed’ which are all commonly used terms under other state government permit and approval processes.</i></p> <p>Guideline 09/14 also states ‘...information requirements for demonstrating land will be restored to pre-activity condition will be best presented through a detailed restoration plan’.</p> <p>Other than the land resource assessment report to establish pre-activity condition, an agricultural suitability assessment, and the subsidence management plan, there is insufficient evidence (e.g., formalised in a restoration plan, as required by the Statutory Guideline 09/14) to support that the land can be restored to its pre-activity condition at the end of the mining operations (40 years), as required by prescribed solution (d) (i).</p> <p>The option of a mitigation condition has not been proposed (prescribed solution (d) (ii)) for the areas around the flares.</p> <p><u>Actions:</u></p> <p>Please address the following:</p> <ul style="list-style-type: none"> a) Confirm permanent impact of all areas of the application that are confirmed as non-PALU areas of the PAA and any areas of the SCA outside of the PAA. b) Provide sufficient information to address requirements of the Prescribed Solution (d)(i), including a fully costed and peer reviewed restoration plan for the non-PALU areas of the PAA and any areas of the SCA outside of the PAA.

	<p>c) Address Prescribed Solution (d)(ii) relating to a mitigation condition if the area around the flares will be permanently impacted (otherwise, the restoration of the flares will need to be adequately addressed in the restoration plan).</p>
26.	<p><u>Issue:</u></p> <p>The soil survey component within Appendix B has a number of deficiencies that need to be addressed if this report is to form a part of the application material to establish pre-activity condition for restoration purposes.</p> <p>While many of these deficiencies, on their own, may seem minor, as a whole they demonstrate a reduced level of confidence in its quality and adequacy.</p> <p><u>Actions:</u></p> <p>Address the matters set out at item 26a – 26d, further below.</p>
26a.	<p><u>Issue:</u></p> <p>The following deficiencies were identified with the soil profile descriptions – note that this list is not exhaustive:</p> <ul style="list-style-type: none"> a) While for an SCL compliance report, classification using the Australian Soil Classification (ASC) is not mandatory, if it is submitted to support a RIDA, it should be free from errors. For example: <ul style="list-style-type: none"> o no vertic properties (structure/fabric) are described for sites classified as Vertosols o other than the surface condition of the vertosols, surface condition does not correlate with the ASCs (e.g., Dermosols do not have a cracking surface condition). o there is no such entity in the ASC as a Self-mulching Black Dermosol, a Crusty Brown Dermosol, or a Eutrophic Grey Vertosol (which was described as having a crusty surface condition) b) An area has been mapped as a Rudosol but no detailed site descriptions are provided. Sites representing this soil map unit (SMU) reviewed from an adjacent earlier study were classified as Rudosols but according to their description appear to be Kandosols. Also note, there is no such entity as a Magnesian Rudosol. A Magnesian Great Group of the ASC should only be given if the supporting analytical data is available. c) Check sites limited only to surface observations do not allow for confirmation of the key attributes of the soil type that influence crop suitability specific for a unique mapping area (UMA) or the soil's ASC. d) An ASC to Suborder is stated for check sites which have no soil profile exposure that will allow for such a classification. e) There are errors in horizon naming; for example Site BH39 (a Vertosol) has been described as having an A2 horizon. However, the described horizon characteristics shows it is a B horizon. This is the same for most other detailed sites described with an A2 horizon. As well, unweathered bedrock is not designated a D horizon (BH30). <i>Note: A2 horizons are rare in Vertosols.</i> f) Detailed sites located on graded roads and headlands adjacent to ditch-heads are not suitable. If following the applicable guidelines as stated, such significant disturbance would be avoided.

	<p>g) There are no descriptions for coarse fragment abundance, or mottle and segregation sizes</p> <p>h) Looking at the better-quality profile photographs, some of the described mottling appear to be more likely smearing of calcareous segregations. If present, actual colour mottles are not as obvious (i.e. distinct) as described.</p> <p>i) The photographs are not of sufficient resolution to read the tape measure to confirm horizon depths and boundaries.</p> <p>j) Where erosion is evident in landscape images provided, it has not been described.</p> <p>k) Permeability and drainage have not been described.</p> <p>l) The site data presented in the land resource survey report conflicts with departmental data for some parts of the stock route (e.g., areas identified as vertosols have been described as dermosols).</p> <p><u>Actions:</u></p> <p>Address all the issues described above. Review and follow the applicable land resource assessment guidelines to ensure all deficiencies are overcome.</p>
26b.	<p><u>Issue:</u></p> <p>The land suitability assessment and Agricultural Land Classification (ALC) provided in Appendix B does not follow the <i>Queensland Land Evaluation Guidelines</i> (DSITI & DNRM 2015) or the applicable regional suitability framework. Some of the major issues are:</p> <p>a) The results of the crop suitability assessment are inconsistent with the <i>Regional Suitability Framework for the Inland Fitzroy and Southern Burdekin area</i>. There is insufficient detail to confirm the results from this assessment, e.g.,:</p> <ul style="list-style-type: none"> o It is stated at S5.1 that eight limitations were used in the suitability assessment. It is also stated at S 5.4 that soil wetness (W) and soil moisture availability (M) were the main limitations concerning the soil in the project. o It is not possible to confirm the limitations or attributes that resulted in class 1-3/4-5 (suitable/unsuitable) cutoffs or that these were applied appropriately. o There is no suitability assessment of individual crops (agricultural land uses) provided in the appendices. o There is no detail or evidence that attempts to justify the conclusion that there is no class 1, 2 or 3 suitable cropping land. <p>b) An Appendix E is included that should provide greater detail of the assessment. However, only summary results are provided that is similar to conclusions given elsewhere in the main body of the report.</p> <p>c) The suitability does not appear to be polygon based.</p> <p>d) There are errors in the Agricultural Land Classes assigned; land with a suitability classification of 4 for any cropping will not have an ALC of A2. Also, there is no such ALC as C4.</p> <p>e) Land with an obvious history of cropping could not be considered unsuitable for any cropping or have an ALC Class C, including land used for irrigated cropping. It is difficult to accept that wetness and moisture availability would be limitations likely to preclude cropping on such land.</p> <p><u>Actions:</u></p> <p>Address all the issues, as described above.</p>

26c.	<p><u>Issue:</u></p> <p>Table 11 and Table 12 includes a table describing available topsoil and subsoil resource.</p> <p>Given the land is SCL, stripping of the soil resource would be a permanent impact, and would be subject to an assessment against RO2 and RO3.</p> <p>The soil resources that comprise SCL are not 'available' for stripping. In addition, stripping of the non-SCL soils is likely to cause significant erosion and should only be undertaken under an erosion and sediment control plan.</p> <p>While the report states that this table is for informative purposes only, it must either be removed from the report or clarified that any mining/stripping of the soil resource would be a permanent impact and would need to be assessed and authorised under a RIDA. It is again stressed that soil resources that comprise SCL are not 'available' for stripping.</p> <p><u>Actions:</u></p> <p>Remove Table 11 and 12 from the report or clarify that any permanent impacts from stripping of soil would need to be assessed and authorised under a RIDA.</p>
26d.	<p><u>Issue:</u></p> <p>A scale of 1:50 000 is not appropriate for the purposes of the land resource assessment undertaken to establish pre-activity condition. For a RIDA, the more relevant guideline is Statutory Guideline 08/14 (along with other supporting guidelines (i.e., the <i>Queensland Soil and Land Resource Information Guideline</i> (DoR 2021) and the Blue Book (McKenzie <i>et al</i> 2008)) that should be used to establish pre-activity condition. The scale required to satisfy the Statutory Guideline 08/14 roughly equates to 1:10 000 scale.</p> <p><u>Actions:</u></p> <p>Address the issue of scale that is required in the 08/14 Statutory Guidelines to establish pre-activity condition for a restoration plan.</p>