

Implementation and Review

1. Roles and Responsibilities

The DMRP has been developed by the Manager, Technical Services, the ENGIE Hazelwood Rehabilitation Project team, and the Head of Regulation and Compliance, ENGIE ANZ. The DMRP approval process and delivery is oversighted by the General Counsel, ENGIE ANZ, and the Project Director, Hazelwood Rehabilitation Project. This provides both corporate and project level oversight of development and eventual delivery. The DMRP is endorsed for submission, and progress is assessed, by a shareholder steering committee on a monthly basis, and by the Hazelwood Power Partnership on a quarterly basis.

As it pertains to day-to-day delivery, the key positions on site are:

- Manager, Technical Services.
- Senior Site Geotechnical Engineer.
- Project Management team.
- Project package delivery teams.

Notably, the relevant TARPs, Emergency Management Plans and site procedures outline key roles as well as responsibilities.

Employers are expected to exercise reasonable control over hazards/ threats that represent risks to:

- The safety of people at site.
- Public safety.
- Commercial loss.
- Environmental impact.
- Image/reputation impact.
- Mine assets.
- Third party assets.

2. Review of the DMRP

Consistent with the iterative approach to the development of DMRPs under the MRSD Act and MRSD Regulations, it is anticipated that this DMRP will be regularly reviewed (and where necessary, updated) over time as ENGIE Hazelwood:

- **Implements** the rehabilitation works the subject of the DMRP; and
- Undertakes **monitoring** activities to ascertain site conditions in response to those works (during both the active rehabilitation and passive rehabilitation phases).

ENGIE Hazelwood understands that certain updates to a DMRP may require the submission of a formal application to vary the DMRP in accordance with the MRSD Act. The Department Head may also direct ENGIE Hazelwood to apply for a variation of the DMRP, on its own initiative.

2.1 INTERNAL REVIEW AND REPORTING

The DMRP will be stored as a controlled document in the Paradigm Document Management system. This system prompts for periodic document review and updating. The DMRP will be reviewed annually (internally) with the document updated as required.

To ensure this document remains reflective of the activities and risks on site there may be additional triggers for the review of this document. These may include:

- Meeting of each of the key 3 milestones (i.e. operational mine closure, pit lake filling to RL +45m AHD and relinquishment)
- Meeting of closure criteria for an area that results in relinquishment of that land

- Incident investigations identifying a high risk requiring the introduction of new controls or significant modification to existing controls.
- Review of risk assessments identifying additional high risks and critical controls
- Rehabilitation or water retention milestones requiring a review of geotechnical risks. i.e. water retention level approaching RL trigger points

As noted in section 19.1 above, ENGIE Hazelwood must also prepare annual reports in relation to its DMRP under r 57A of the MRSD Regulations. This annual reporting requirement requires ENGIE Hazelwood to (among other things) review the progress of:

- Its rehabilitation activities against the rehabilitation or closure milestones set out within the DMRP; and
- Components of the DMRP that require the submission of additional information.

ENGIE Hazelwood will submit these annual DMRP reports to the Minister for Resources.

Consistent with r 64F(2)(f)(ii) of the MRSD Regulations, ENGIE Hazelwood will also ensure that procedures are in place for implementation, management and review of the risk management plan within the DMRP, including to identify the employees accountable for these tasks.

2.2 EXTERNAL REVIEW

ERR periodically undertakes audits of this DMRP and ENGIE's compliance.

3. Implementation and review obligations in relation to the post-closure phase

The scope of relevant obligations for the implementation and review of the DMRP will change as the Hazelwood Mine transitions from the passive rehabilitation phase to the post-closure phase.

For example, once the Minister has determined that the closure criteria within the DMRP have been met, the Minister may direct the MLRA to register in the Declared Mine Land Register (MRSD Act, s 84AZZB):

- The declared mine land (i.e. all or any part of the MIN5004 area); and
- The post-closure plan for the declared mine land.

Once the post-closure plan is registered on the Declared Mine Land Register, the MLRA will also be required to initiate the registration of the post-closure plan against the title of any affected land (other than unalienated Crown land) (MRSD Act, s 84AZZD).

In applying for a determination that the closure criteria have been met, ENGIE Hazelwood will also provide the Minister with information to determine any amount that ENGIE must contribute to the Declared Mine Fund. This will include cost estimates in relation to monitoring and maintenance activities under the post-closure plan. As discussed further in *Chapter 17 - Financing and Relinquishment* and *Appendix C - Post Closure Monitoring & Maintenance Plan*, these costs:

- Are not currently known and cannot be accurately estimated at the time of this DMRP; and
- Will be better understood following the implementation of ENGIE Hazelwood's proposed final rehabilitation works.

It is anticipated that once the closure criteria have been met and the declared mine land has been registered, ENGIE Hazelwood would (at least initially) remain the owner of the land, until relevant land transfers have taken place. Therefore, the post-closure plan is expected to be implemented by the relevant owner of the land at the time (e.g. ENGIE Hazelwood or the MLRA, where the land is transferred to the MLRA in accordance with s 84AZZF of the MRSD Act).

Once ENGIE Hazelwood is no longer the owner of the land, the cost of post-closure monitoring and maintenance activities, along with the costs of rehabilitation following adverse events, will be funded out of the Declared Mine Fund. In relation to ongoing obligations for implementation and review of the post-closure plan at this time:

- The post-closure plan will identify the relevant information that must be provided to the MLRA following the registration of the post-closure plan, to support the MLRA's ongoing monitoring and evaluation of rehabilitation planning activities (r 64D(f) MRSD Regulations); and
- It is anticipated that procedures for ongoing review of the implementation of the post-closure plan will be developed by the relevant owner of the declared mine land during the post-closure phase.

4. Schedule of Reporting

Table 18.1 – Schedule of Reporting

				ACTIVE	PASSIVE
INTERNAL REPORTING					
AREA OF REPORTING	FREQUENCY	TO WHOM	CONTAINING		
Aquifer Depressurisation and Geotechnical Program Report	Monthly	Mine Tech. Services Manager Mine Services Superintendent	Monitoring Program Results Geotechnical Hazards Summary of Stability Conditions by Domain	✓	✓
Geotechnical and Hydrogeological Declared Mines Report – r 64 MRSD Regulations	6 monthly	Earth Resources Regulation Mine Tech. Services Manager	Monitoring Results TARP events Recommendations Action Status	✓	TBD
Regional Hydrogeology Assessment (combined Report with AGL Loy Yang and Yallourn)	Annual	SRW DELWP Mine Tech. Services Manager	Groundwater Extraction Data Groundwater Monitoring Results Bore rehabilitation	✓	TBD
Regional Groundwater Report (combined Report with AGL Loy Yang and Yallourn)	5 yearly	SRW DELWP Mine Tech. Services Manager	Groundwater Extraction Data Groundwater Monitoring Results Bore rehabilitation Subsidence Monitoring Results Groundwater Monitoring Results Groundwater Modelling Subsidence Modelling	✓	✓
Compliance Reporting	Quarterly	Environmental Review Committee (ERC)	Quarterly review of compliance, and prepare report for community/stakeholder/regulators for effective management of site and compliance to mining requirement for community consultative committee.	✓	TBD
Report to land manager	As required (for relinquishment)	Future land managers	ENGIE Hazelwood will prepare a report for the future land manager, to demonstrate the closure criteria for the sub domain or land unit has been attained. ENGIE Hazelwood will request formal acknowledgement from the future land manager.	✓	TBD
REGULATORY REPORTING					
SOURCE	SCHEDULE	REGULATOR	REQUIREMENTS		
MRSD Regulations – 57A Annual Reporting	Annually	ERR	Progress on technical studies to close knowledge gap	✓	✓
			Risk assessment review	✓	✓
			Any reason for non-compliance with rehab milestones	✓	✓
			Remedial action in respect to non-compliance	✓	✓
			Details of economic & technical studies (& cost) undertaken on licence relating to: development of the mineral resource & economic viability of the resource	✓	✓
			Summary of status of stat processes to achieve rehab	✓	✓
			Summary of env audits or contamination assessments	✓	✓
			Summary of CE programs relating to rehab including feedback and outcomes	✓	✓
			Summary of any reportable events under s41c of MRSDA	✓	✓
			Report on any potential issues	✓	✓
Section 51 of the Water Act 1989 – Extraction Licence No. 2007412	Monthly	SRW	Report on progressive rehab		
			Maintain extraction records.	✓	
			Monthly exception reporting.	✓	
Section 67 (IA) of the Water Act 1989 – Dam Operating Licence No 903591 for Cooling Pond	Annual		Undertake and report on a regional impact monitoring	✓	✓
			Surveillance and Emergency Management Plan.	✓	
Annual Environment Protection Biodiversity Conservation (EPBC) Act reporting compliance requirement from west field.	Annually	Commonwealth Department of Climate Change, Energy, Environment and Water (DCCEEW)	Annual surveillance program results.	✓	
				✓	✓
EP Act and licenced facilities reporting	Annual	Environment Protection Authority	Annual summary of licence compliance activities including audits, monitoring data and landfill rehabilitation efforts.	✓	
	Every 3 years		Aftercare landfill audits	✓	✓
Request closure determination under 64N of the MRSD Act	As required (for relinquishment)		Information will be provided to the Minister at the time of requesting closure determination, showing: <ul style="list-style-type: none"> An assessment and evidence of closure criteria being met An assessment of stakeholder engagement Information to enable the Minister to determine the final contribution to the Declared Mine Fund 	✓	✓