

Stakeholder Engagement Plan

Vulcan Complex Project

April 2020



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Document History and Status

Issue	Revision	Issued to	Qty	Date	Reviewed by
1	1 (Draft)	METServe		07/01/2020	Dave Moss
2	2 (Draft)	METServe		18/02/2020	Dave Moss
3	3 (Final Draft)	Vitrinite		26/03/2020	Dave Moss
4	4 (Final)	Vitrinite		31/03/2020	Dave Moss

Printed: 1 April 2020
 Last saved: 1 April 2020
 File ID: 00279945
 Project Manager: Dave Moss
 Name of Organisation: Vitrinite Pty Ltd
 Name of Project: Vulcan Complex Project
 Name of Document: Stakeholder Engagement Plan
 Document Version: 004
 Project Number: VI010



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1 INTRODUCTION

Mining and Energy Technical Services Pty Ltd (METServe) has been engaged by Vitrinite Pty. Ltd., owner of Qld Coal Aust No.1 Pty. Ltd. and Queensland Coking Coal Pty. Ltd. (Vitrinite) to manage the environmental approvals process for the Vulcan Complex Project (VCP or the Project). As part of the Project, Vitrinite will require a Stakeholder Engagement Plan (SEP) to be developed to ensure that relevant stakeholders are consulted about the Project, and stakeholder feedback is appropriately recorded, documented and considered throughout the Project planning process.

1.1 PROJECT OVERVIEW

The proposed Project comprises a new small scale coking coal mine located approximately 30 kilometres (km) north-west of Dysart and 35 km south-east of Moranbah in Queensland's Bowen Basin (**Figure 1**). The Project lies immediately west of BHP Billiton Mitsubishi Alliance's (BMA) Peak Downs Mine. BMA is the underlying land owner of the Project.

The Jupiter hard coking coal target has been defined and selected for open cut development via a single pit. The project will operate for approximately 4 years and will extract approximately 6 Million tonne (Mt) of Run of Mine (ROM) hard coking coal at a rate of up to 1.95 Million tonne per annum (Mtpa). The Project will target the Alex and multiple Dysart Lower coal seams. Truck and shovel mining operations will be employed to develop the pit. ROM coal will be trucked off site for toll washing at a nearby facility between Moranbah and Coppabella on the Peak Downs Highway.

A small out-of-pit waste rock dump will be established prior to commencing in-pit dumping activities that will continue for the life of the operation. Ancillary infrastructure, including a ROM pad, Mine Infrastructure Area (MIA), offices, roads and surface water management infrastructure will be established to the west and south of the open cut.

A realignment of the existing Saraji Road and services infrastructure to the eastern boundary of the proposed Mining Lease Application (MLA) area, adjacent to the existing rail easement, is also proposed. The re-alignment will occur on lease however the connection back to the existing alignment of Saraji Road to the north will extend off lease and will be subject to a separate approvals process.

In-pit dumping will fill the majority of the pit during operations with the remaining final void to be backfilled upon cessation of mining, resulting in the establishment of a low waste rock dump landform over the former pit area. The initial out-of-pit waste rock dump will be rehabilitated in-situ.

Vitrinite has been granted an Environmental Authority (EA0002054) and a Mineral Development Licence (MDL3039) to permit extraction of a bulk sample of coal from the Jupiter target. Prior to commencement of the VCP, Vitrinite will extract up to 600 kilotonnes (kt) of high-quality ROM coking coal from the bulk sample pit for testing by a number of international coal consumers. To access the coking coal within the bulk sample area, up to an additional 150 kt of weathered thermal coal lying above the coking coal, will also be extracted, incidentally. The bulk sample does not form part of the VCP however its features are assumed to form part of baseline conditions for the purposes of environmental assessment of the VCP.

The predominant pre-mining land use within the Project area is low intensity cattle grazing. A number of small scale commercial operations are located on the site. Rehabilitated coal exploration sites are also located across the Project area. Following mining activities, the land is proposed to be rehabilitated and returned to a post-mine land use which will be safe, stable, self-sustaining and capable of supporting the pre-mining land use of low intensity cattle grazing.

The Project is anticipated to require a workforce of 116 personnel (both permanent employees and contractors). As such, it is classified as a "large resource project" under the *Strong and Sustainable Resource Communities Act 2017* (SSRC Act). It is anticipated that less than approximately one quarter of this workforce would be present on site at any one time due to shift and roster arrangements and the inclusion of off-site haulage positions in this total. The Project's workforce will be primarily sourced from the regional area (i.e. Isaac and Mackay regions) and make use of the existing accommodation camp facilities and private housing at Moranbah and Dysart. Whilst sourcing

of local people will be prioritised, it is anticipated that a combination of regional workforce solutions (Drive-in / Drive-out (DIDO) from Mackay and Fly-in / Fly-out (FIFO) from Moranbah Airport) will be required.

For the purposes of this plan, it is assumed the workforce will reside in a mixture of accommodation facilities from camp (80%) to private residences (20%). It is assumed there will be a 50% / 50% split between Dysart and Moranbah. Travel to site from Dysart and Moranbah will be 80% bus (22 seat) and 20% private vehicle (approx.). There would be two 12 hour shifts per day, with crews operating on a 7 days on / 7 days off roster.

The following indicative workforce breakdown is proposed:

-) Staff – 23;
-) Mining contractor - 53; and
-) Road Haulage – 40.

The Project will require a mining lease (ML) as well as environmental approvals under Queensland and Commonwealth legislation. A site specific Environmental Authority (EA) application will need to be submitted for approval in accordance with the Queensland Environmental Protection Act 1994 (EP Act). It is anticipated that this will not trigger the requirement for a supporting Environmental Impact Statement (EIS).

The Project will also be referred to the Commonwealth Department of the Environment and Energy (DoEE) for approval under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act).

1.2 EXISTING LAND USE AND TENURE

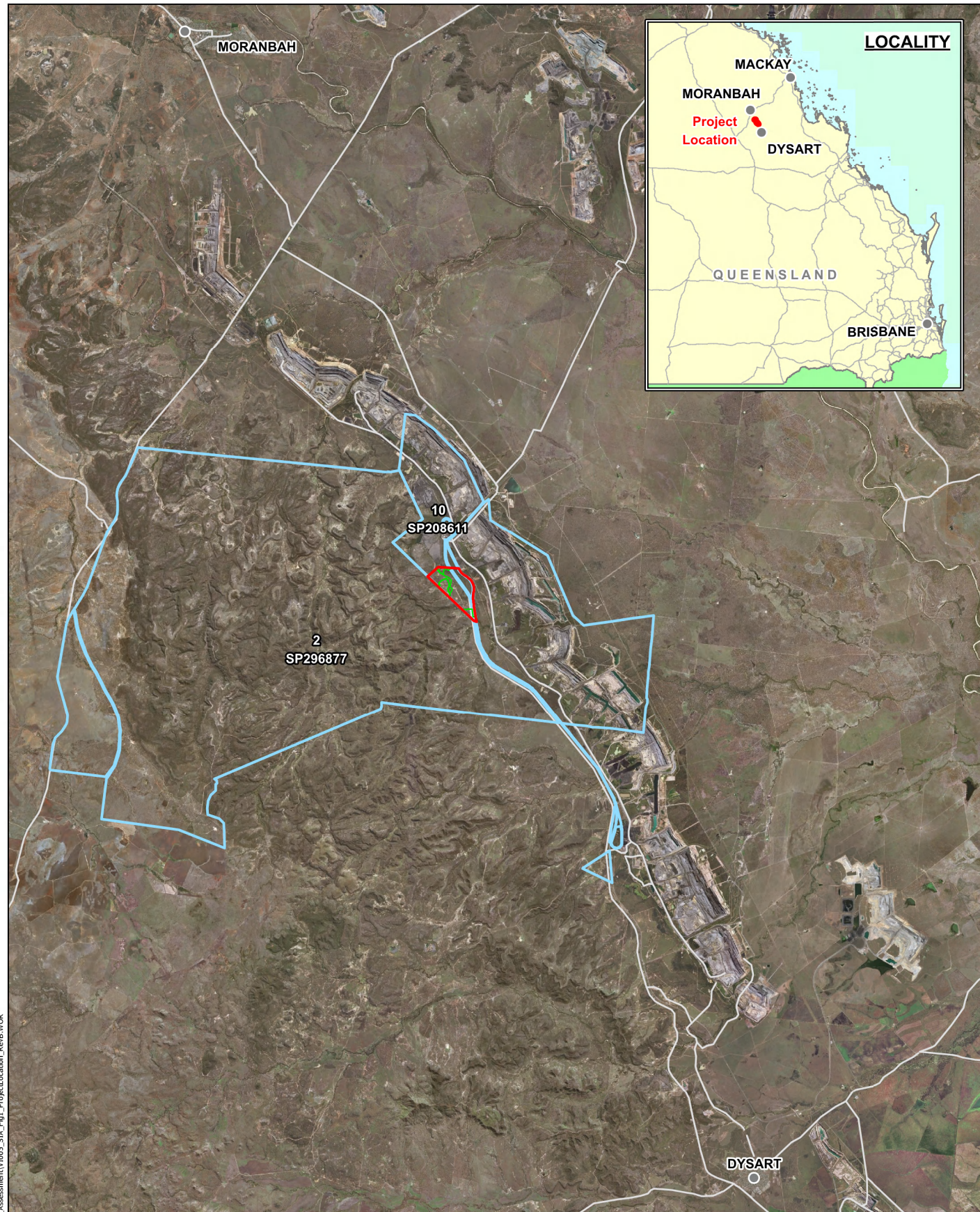
The Project MLA covers an area of approximately 408 hectares (ha) and is situated over multiple underlying tenures (MDL 3039, EPC 1732 and 1234). The MLA area overlies adjacent portions of existing Exploration Permit Coal (EPC) 1732 and 1234 tenements (held by Qld Coal Aust No.1 Pty Ltd and Queensland Coking Coal Pty Ltd, respectively). Both companies hold an equal 50% share of the Mineral Development Licence (MDL).

A list of the properties', tenure, usage and owners/managers within the proposed ML boundary are outlined in Table 1.

Table 1: Land Tenure and Real Property Descriptions for the Project

Lot/Plan	Tenure	Usage	Owner
10/SP208611	Lands Lease	Extractive	BHP Coal Pty Ltd
Saraji Road	Road Licence	Road for public use	Isaac Regional Council
26/CNS125	Lands Lease	Norwich Park Branch Railway	Aurizon

The Project falls within the Isaac Regional Council local government area. The region has a distinct mining influence with multiple significant coal mining operations in the immediate vicinity of the Project. A majority of the land within the MLA has been previously disturbed by agriculture and mining related activities. There are no rural or residential dwellings located within 10km of the Proposed VCP.



LEGEND

- Town
- Road
- Disturbance Area
- Mining Lease Application Area
- Property Boundary

Data Source: Town, Road - Geoscience Australia (2016); Survey Boundary - Vitrinite (2019);
Property Boundary - QLD Government (2019); Imagery - ESRI, DigitalGlobe, GeoEye,
Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community.

Vitrinite

**Vulcan Complex Project
Regional Location Plan**



Scale: 1:300,000 (A4)

26/03/2020



Datum: GDA94
Projection: MGA55

FIGURE 1

1.3 PURPOSE AND SCOPE OF THE STAKEHOLDER ENGAGEMENT PLAN

The purpose of the Project SEP is to assist in the planning, management and review of stakeholder engagement activities. Through the SEP, the Vitrinite aims to:

-) Build and maintain effective relationships with its stakeholders; and
-) Maintain its social license to operate.

The Project SEP is a live and iterative document that:

-) Identifies relevant stakeholders across the life of the Project; initially during the approvals phase but also during post approval operations and rehabilitation and closure phases;
-) Identifies appropriate engagement approaches, activities and timeframes for these activities, both during the approvals phase and post approval phases; and
-) Details the requirements for recording, tracking and analysing consultation activities for reporting in the approval application, and for managing stakeholder concerns.

1.4 OBJECTIVES

The SEP aims to provide Vitrinite with a practical and ongoing management tool for effective stakeholder engagement and to assist in building and maintaining relationships, trust and credibility with the relevant groups.

The objectives of the SEP include:

-) Identify and record key stakeholders;
-) Identify challenges and opportunities;
-) Establish and implement communication and consultation practices that promote an ongoing relationship with stakeholders;
-) Provide timely and accurate information to stakeholders;
-) Provide convenient and identifiable avenues for feedback from stakeholders;
-) Record and respond to any complaints in a timely manner; and
-) Facilitate consultation feedback and input into mine rehabilitation and closure plans.

2 STAKEHOLDER ENGAGEMENT PLANNING

This SEP outlines how stakeholder engagement will be planned, managed and reviewed. It has been developed based on the identification and assessment of stakeholders, issues, opportunities, risks, concerns and interests within the Project's area of influence and impact.

2.1 IDENTIFICATION AND ASSESSMENT

Identification of stakeholders that have an interest and influence in the Project's approval, construction, operation and eventual rehabilitation and closure is based on their proximity, dependency, representation, responsibility and strategic intent and includes relevant Government and non-Government development organisations. The process includes:

-) Identify and assess issues, opportunities and associated risks, including access to resources;
-) Identify stakeholder concerns and interest gathered through a variety of mechanisms including direct consultation; and
-) Assess the impact of the Project's activities within the area of influence, including the social aspect of site closure.

2.2 STAKEHOLDER IDENTIFICATION

The identification of stakeholders is significant to the Project's longevity and sustainability. It is also practical to be able to identify and analyse the role and involvement that particular stakeholders will have throughout the life of the Project. As such, stakeholders have been classified into two categories (as defined under section 38 and section 41 of the EP Act) depending on the predicted level of Project impact, perceived level of stakeholder involvement on site activities, and the perceived level of interest in site activities or the outcomes of decisions. These two categories (and corresponding EP Act definitions) include:

1. Affected Stakeholder: Under section 38 of the EP Act this includes:
 -) A person mentioned in subsection (2) for the operational land or any land joining it. This includes (amongst others) the registered proprietor/s of any freehold land, the registered holder/s of any land that is held from the State, any holder/s or applicant/s of mining tenures or other resource related tenures, trustees of any land under the Nature Conservation Act 1992 or Land Act 1994, and holders of any unallocated State land, State forests or Conservation parks or State Controlled Roads;
 -) Registered native title body corporates, claimants or representative Aboriginal/Torres Strait Islander body; or
 -) A relevant local government.
2. Interested Stakeholder: Under section 41(3)(b) of the EP Act this includes an unincorporated community or environmental body with a financial or non-financial interest in the local government area that the operational land is in.

Categorising stakeholders as above allows for targeted planning, assessment and reviewing of stakeholder consultation practices, feedback, schedules and timing.

Table 2 below lists relevant stakeholders according to the definitions under section 38 and section 41 of the EP Act, as well as a summary of perceived potential interests in the Project. Appendix A presents a register of completed engagement activities.

Table 2: Stakeholder list by category and potential concerns

Stakeholder Group	Potential Interests
Affected Stakeholders	
Underlying Landholders	<ul style="list-style-type: none">) Lawful management of the land) Lawful operation of the project) Management of offsite impacts (particularly surface waters and groundwater)) Management of and interaction with BMA infrastructure) Land rehabilitation and post-mine land uses) Weed control) Site access) Unauthorised access controls
Adjacent Landholders	<ul style="list-style-type: none">) Noise and dust emissions) Blasting overpressure and vibration) Management of offsite impacts (particularly surface waters and groundwater)) Quality of mine rehabilitation) Offsite impacts on land capability) Lighting emissions) Work opportunities) Land acquisition process) Transport and road impacts) Fences and gates
Traditional Owners	<ul style="list-style-type: none">) Disturbance of cultural heritage sites and artefacts) Management of cultural heritage sites and artefacts) Access to land for cultural purposes) Employment opportunities
Local Council	<ul style="list-style-type: none">) Compliance with development and planning conditions) Re-alignment of IRC road infrastructure and associated approval processes) Support for community and local business) Engagement with stakeholders) Impact of mine closure) Information on significant variations to Project) Worker and contractor accommodation impacts) Social infrastructure impacts
Stakeholders with infrastructure within the Proposed MLA	<ul style="list-style-type: none">) Interaction with and effects on infrastructure) Possible relocation requirements) Continuity of service
Stakeholders with commercial operations within the proposed MLA	<ul style="list-style-type: none">) Interaction with and effects on infrastructure and operations) Possible relocation requirements) Continuity of operations
Interested Stakeholders	
Queensland Department of Environment and Science (DES)	<ul style="list-style-type: none">) EA application and PRCP) Environmental assessments and mitigation measures) Environmental management plans) Mine rehabilitation
Queensland Department of Natural Resources, Mines and Energy (DNRME)	<ul style="list-style-type: none">) Mining Lease application) Water supply and water infrastructure

Stakeholder Group	Potential Interests
	<ul style="list-style-type: none"> Compliance with operational plans and safety Mine closure
Queensland Department of Transport and Main Roads (DTMR)	<ul style="list-style-type: none"> Transport and road impacts Transport Impact Assessment (TIA) Pavement Impact Assessment (PIA) Associated contributions Road Use Management Plan
Commonwealth Department of the Environment and Energy (DoEE)	<ul style="list-style-type: none"> EPBC Act referral Assessment of MNES, values, impacts and mitigation measures
Downstream water users (BMA)	<ul style="list-style-type: none"> Impacts on local and regional surface and groundwater Potential flooding impacts and impacts on critical infrastructure

The VCP is a small scale, short term coal project located within a well-established coal mining region of Queensland. It is proposed on disturbed land immediately adjacent to a number of well-established large scale coal mining Projects. Based on this and limited social impacts determined to be associated with the Project, the need for broad community engagement has been determined not to be required. Representative bodies for the community (IRC, government agencies) will and have been consulted and the general public will have the opportunity to comment on the EA application and PRCP as part of the EA application assessment process. Vitrinite consider this to be an appropriate level of engagement.

2.2.1 Landholders

Underlying and adjacent landholders are described in Table 3.

Table 3: Landholders / Reserves by Lot / Plan and Property Name

Lot / Plan	Landholder / Reserve	Property Name
Underlying Landholders/ Reserves		
10 SP208611	BHP Coal Pty Ltd	Peak Downs Mine
26 CNS125	Aurizon Holdings Limited	Norwich Park Branch Railway
	Isaac Regional Council	Saraji Road Reserve
Adjacent Landholders		
2 SP296877	Robert A & Raye M O'Sullivan	Saraji Station

2.2.2 Traditional Owners

The Barada Barna People (QUD380/08), represented by the Barada Barna Aboriginal Corporation RNTBC ICN 8343 (BBAC), are the native title holders for the broader project area, and the 'Aboriginal party' for the Project under the Aboriginal Cultural Heritage Act 2003 (Qld).

2.2.3 Local Councils

The relevant local council is the Isaac Regional Council.

2.2.4 Organisations with Infrastructure on the MLA

The following organisations own and / or operate infrastructure on the proposed MLA:

-) Aurizon;
-) IRC;
-) Telstra;
-) Dyno Nobel Asia Pacific Ltd;
-) Kalari Pty Ltd;
-) Saraji Station; and
-) BHP Billiton Mitsubishi Alliance (BMA) Pty Ltd.

2.2.5 Nearby Businesses

Businesses in close proximity to the proposed Vulcan Complex Project include:

-) Dyno Nobel Asia Pacific Ltd;
-) Kalari Pty Ltd;
-) BHP Billiton Mitsubishi Alliance (BMA) Pty Ltd; and
-) Saraji Station.

2.2.6 State and Federal Regulators

Relevant State and Federal regulatory agencies include:

-) Queensland Department of Environment and Science (DES);
-) Queensland Department of Natural Resources, Mines and Energy (DNRME);
-) Queensland Department of Transport and Main Roads (DTMR); and
-) Commonwealth Department of the Environment and Energy (DoEE).

2.2.7 Neighbouring Mining Operations

BMA own the neighbouring Peak Downs and Saraji coal mines.

3 STAKEHOLDER ENGAGEMENT ACTIVITIES

Stakeholder engagement activities (including frequency of engagement) have been identified for the various stakeholders discussed above, and once executed, are included in the Project's Stakeholder Register (refer Appendix A).

The level of stakeholder engagement will:

-) Be based on the goals / objectives of the engagement program and effectiveness of the technique in reaching the target audience; and
-) May vary considerably depending on the level of interest and impact the stakeholder has.

The methods of stakeholder engagement that have been considered include:

-) Face to face meetings;
-) Scheduled and routine conferences (monthly, quarterly, annual, etc.);
-) Telephone meetings;
-) Workshops; and / or
-) Newsletters and email correspondence.

Regardless of the stakeholder group or method of engagement, all engagement should apply the following principles:

-) Transparent - Open and honest in engagement activities, setting expectations;
-) Realistic - Set clear objectives and understanding of what is to be achieved out of the engagement;
-) Inclusive - Identify stakeholders and provide meaningful opportunities for them to engage;
-) Respectful - Listen and acknowledge the needs of stakeholders, different opinions and perspectives; and
-) Responsive - Consider and respond to issues and concerns, providing feedback to stakeholders.

3.1.1 Landholders

Underlying and adjacent landholders have been identified as Affected Project stakeholders.

Project Engagement activities will involve the following:

-) Initial telephone contact between the Project Manager and the landholder;
-) Round 1 - individual face-to-face meetings to discuss:
 - o Draft Project description;
 - o Environmental approvals and tenure processes and scheduling;
 - o Environmental baseline surveys and monitoring undertaken to date and baseline results;
 - o Approach to impact assessment and management of noise, dust, weed management, property disturbance etc.;
 - o Approach to progressive rehabilitation and closure planning; and
 - o Future communications protocol.
-) Round 2 - individual face-to-face meetings to discuss:
 - o Final Project description proposed for approval;
 - o Results of impact assessment - particularly management of noise, dust and weeds, and closure impacts;
 - o Proposed project rehabilitation and final landform / land use; and

- Further information on the environmental approvals process and opportunities to comment during the public notification process.

3.1.2 Traditional Owners

The Proponent and the BBAC have entered into an indigenous land use agreement (body corporate agreement) (ILUA) in respect of the Vulcan Project, which is in the process of being registered with the National Native Title Tribunal. The ILUA also contemplates the management of Aboriginal cultural heritage under the Aboriginal Cultural Heritage Act 2003 (Qld). Engagement will continue in accordance with the ILUA.

3.1.3 Local Council

The Project is located within the Isaac Regional Council and engagement will focus on the Project's potential impacts to the surrounding region (including infrastructure and transport impacts). IRC data has been interrogated as part of the social impact assessment, and impacts to local businesses, community groups, worker accommodation in Dysart and Moranbah, social infrastructure (health, education and emergency services) are considered to be limited.

Isaac Regional Council will be consulted directly in relation to the proposed realignment of IRC's Saraji Road and provided with regular Project updates. This will include approval applications requirements for the off-lease component of the road realignment to the north of the proposed MLA.

3.1.4 Organisations with Infrastructure on the MLA

Direct consultation will occur with each organisation that operates infrastructure on the proposed MLA. Each party will be engaged separately via e-mail, phone and face-to-face meetings to discuss current infrastructure operations, interactions with the project, realignment requirements and ongoing management requirements.

3.1.5 Nearby Businesses

Direct consultation will occur with each organisation that operates businesses on or adjacent to the proposed MLA. Each party will be engaged separately via e-mail, phone and face-to-face meetings to discuss current business operations, interactions with the project, potential relocation requirements and ongoing management requirements.

3.1.6 State and Federal Regulators

Engagement with State and Federal regulators will occur throughout the Project planning assessment and execution phases. Engagement will be via e-mail, phone and face-to-face meetings (including presentations of Project information). Engagement will typically be focussed around a number of approval process stages including:

-) Introduction of proponent and project concept (including clarification of approval processes and assessment / application requirements);
-) Discussion of baseline assessment findings;
-) Discussion of impact assessment findings and management and mitigation proposals;
-) Application pre-lodgement;
-) Application assessment consultation, information requests, notification processes; and
-) Compliance and reporting.

3.1.7 Neighbouring Operations

BMA operates the Peak Downs mine immediately to the east of the Project MLA. BMA will be engaged via e-mail, phone and face-to-face meetings.

3.1.8 Statutory Public Notification

Prescribed statutory public notification periods form part of the ML, EA and EPBC referral application and approvals process. During these periods, approval application material will be advertised in

various newspapers, made available on the Vitrinite website and on the DES and DoEE websites for the public to respond to by way of written submissions to the regulators.

3.2 COMMUNICATION CHANNELS

A Vitrinite channel of communication will be established linking Project staff / management to external stakeholders who wish to comment on (or ask questions about) the Projects various components and / or impacts. Information will also be included on the Vitrinite website and updated as necessary along with instructions on how external stakeholders can make a submission to DoEE, DNMRE, DES and / or Vitrinite during the public notification process.

Vitrinite will distribute information to stakeholders as required and in consideration of confidentiality requirements as well as releasing information as required in accordance with its public notification obligations.

Two-way communication is fundamental to engagement with stakeholders. Engagement and feedback opportunities should be actively sought to ensure that stakeholders are comfortable with the level of Project knowledge and so that any management of enquiries, complaints or issues can be handled efficiently. Feedback from Project consultation activities will be met within appropriate timeframes as follows:

-)] Telephone or face-to-face enquiries about current Project activities will aim to be responded to by the next business day;
-)] Telephone or face-to-face enquiries about non-current (ie. proposed) Project activities will aim to be responded to within three business days; and
-)] Email and letter enquires within five business days from date of receipt of correspondence.

4 ONGOING ENGAGEMENT

Stakeholders will continue to be engaged during the project construction, operations and closure phases. Specific consultation in relation to the Progressive Rehabilitation and Closure Plan (PRCP) is discussed in Section 7.

Affected stakeholders will be advised of any relevant Project changes that are proposed to occur throughout the Project execution. Relevant Project changes are considered to be those that significantly change the information, decisions and agreements that had been discussed in prior engagement or approval notification activities.

5 RECORD KEEPING, REPORTING AND REVIEW

A record of all stakeholder engagement (past, ongoing or prospective) should be maintained in order to verify stakeholder engagement conducted, address stakeholder concerns in a timely manner and manage the Project approval process to acknowledge and (where feasible) incorporate stakeholder feedback.

Appendix A provides relevant engagement records documented to date (at time of publication).

5.1 RECORD KEEPING

The Vitrinite Project Manager and / or personnel responsible for stakeholder engagement, as well as any staff responsible for holding a Project email and / or telephone number, will be accountable for implementing Vitrinite's record keeping process, including:

-) Direct data entry into records; and
-) Advising any other supporting staff responsible for inputting stakeholder engagement data into formal records.

5.2 REPORTING

For each stakeholder engagement record generated, the following should be reported:

-) Consultation date(s);
-) The stakeholders consulted;
-) Consultation type (face-to-face meeting, community forum, workshop, quarterly meetings, etc.);
-) Information provided;
-) Topics of discussion; and
-) Outcomes and ongoing commitments.

5.3 ANNUAL REVIEW

This SEP (including the Stakeholder Register) will be reviewed annually (post Project approval) and updated accordingly to ensure that:

-) Any updated legislation, standards and other reference information is incorporated into the SEP and any supporting Vitrinite management systems; and
-) Vitrinite's engagement process throughout the Project's operations and rehabilitation and closure phases remains efficient, informative and fit for purpose in accordance with accepted industry standards and legislative requirements.

6 ROLES AND RESPONSIBILITIES

The Vitrinite Project Manager is primarily responsible for the planning and implementation of stakeholder engagement activities for the Project. Where applicable, engagement will build on existing engagement between stakeholders and Vitrinite personnel. Accordingly, those involved with existing engagement tasks will play an ongoing role in the implementation of the SEP. Other Vitrinite personnel involved in stakeholder engagement are identified in the Stakeholder Register (Appendix A).

7 REHABILITATION AND CLOSURE

7.1 ENGAGEMENT AND CLOSURE PLANNING

A PRCP is required to be developed for the Project in accordance with the Queensland Government's Mined Land Rehabilitation Policy. The PRCP must be submitted as part of the site-specific EA application for a new mining activity and is required to comply with requirements as set out in DES' Progressive Rehabilitation and Closure Plans Guideline (PRCP Guideline) (effective as at 1 November 2019).

As part of the PRCP planning process, and in accordance with section 126C(1)(c)(iii) and (iv) of the EP Act as well as DES' PRCP Guideline, Vitrinite must demonstrate that sufficient effort has been made in engaging stakeholders in the preparation of the PRCP. The following three components should be considered:

-) The identification of relevant stakeholders;
-) Identification of a Stakeholder Engagement Register identifying the engagement carried out in developing the PRCP (it may refer to the Stakeholder Engagement Register appended to this document); and
-) A description of ongoing (rehabilitation related) engagement proposed during Project operations and closure activities (note discussion of this in Section 7.2 below).

The above PRCP planning requirements have been considered in the development of this SEP, with rehabilitation and closure planning forming a component of the Project's stakeholder engagement process. Appendix A provides relevant engagement records documented to date (at time of publication). Appendix B provides a specific record of consultation with BMA, which is the primary stakeholder for the purposes of the PRCP, as the underlying landholder and downstream neighbour of the Project.

7.2 ONGOING PRCP ENGAGEMENT

The Progressive Rehabilitation and Closure Plans Guideline (PRCP Guideline), requires ongoing engagement with relevant stakeholders to determine any changes in stakeholder perspectives and to communicate any relevant closure related changes proposed by Vitrinite. Given the short duration of the proposed Project (four years of activity), it is considered unlikely that significant changes to the proposed rehabilitation activities will occur. Similarly, it is considered that stakeholder perspectives on rehabilitation are unlikely to change, particularly if the proposed rehabilitation activities are implemented successfully.

Nonetheless, Vitrinite commits to providing relevant stakeholders with copies of annual rehabilitation progress reporting and will utilise this mechanism for communication of any proposed changes to the PRCP and to obtain feedback from stakeholders for consideration in ongoing planning and activities. Should significant amendment of the PRCP be proposed, stakeholders will be engaged as part of the amendment process.

APPENDIX A

STAKEHOLDER REGISTER

Consultation date	Consultation type	Stakeholder	Location	Attendees	Information Provided	topics of discussion	outcomes/ ongoing commitments
20-Mar-2019	Meeting	O'Sullivans (Saraji and Cherwell)	Cherwell Station	Mike Cavanaugh, O'sullivan family	Planned location of water bores	Groundwater bores	Ongoing discussions around borehole conversion if suitable
30-April-2019	Meeting	DES	DES Office Emerald	Allison Sinclair, Mick Callan, Dave Moss, Heath Carney,	Vulcan Bulk Sample Project and Vitrinite introduction, VCP introduction	Bulk Sample Project Description, VCP introduction	BSP EA application planning to continue. Prelodgement meeting to be held in a few months prior to EA application submission
16-May-2019	Meeting	Barada Barna People	Vitrinite Office, Brisbane	Nick William Ryan Welker, Directors and members of Barada Barna Aboriginal Corporation, legal representatives	Project update presentation	Project update and preliminary ILUA discussions	Ongoing dialogue towards ILUA execution
21-May-2019	Meeting	DNRME (Coal Hub)	Rockhampton	Mick Callan, Nick Williams, DNMRE representatives	Project overview presentation	Project update	Ongoing consultation regarding project development
18-June-2019	Meeting	Barada Barna People	McCullough Robertson Lawyers	Nick William Ryan Welker, Directors and members of Barada Barna Aboriginal Corporation, legal representatives	Project update presentation	ILUA meetings, Info sessions, execution meeting	Ongoing dialogue towards ILUA execution
10-July-2019	Meeting	DES	DES Office Emerald	Allison Sinclair, Jessica Edgar, Mick Callan, Dave Moss. (joined later by Brenton Josie and Priti Mahajan)	Bulk Sample Project prelodgement, VCP assessment update, exploration activities update	Bulk Sample Project Description, environmental values, proposed mitigation and submission timing	BSP EA application submission to proceed as planned, Further updates on VCP to be provided.

Consultation date	Consultation type	Stakeholder	Location	Attendees	Information Provided	topics of discussion	outcomes/ ongoing commitments
10-July-2019	Meeting	IRC	IRC Office Moranbah	Pat Moore, Alexis Aylward, Mick Callan, Dave Moss	Overview of Bulk Sample Project and proposed haul routes and estimate volumes	Project overview provided, IRC approvals and notifications discussed, TIA and PIA requirement discussed, suitability of a Road Use Management Plan discussed	Vitrinite agreed to provide TIA/PIA and to ongoing consultation
10-July-2019	Meeting	Dyno Nobel	Dyno compound Office on site	Carlin, Dyno team x4, Mick Callan, Mike Cavanagh, Dave Moss	Overview of Bulk Sample Project, introduction to VCP	Interaction with Dyno operations discussed, potential Dyno relocation discussed,	Agreed to ongoing consultation and discussions with Dyno management
11-July-2019	Meeting	DTMR	DTMR Offices Mackay	Vickie Wood, Ross Young, Mick Callan, Dave Moss	Overview of Bulk Sample Project and proposed haul routes and estimate volumes	Project overview provided, DTMR approvals and notifications discussed, TIA and PIA requirement discussed, Notifiable road Use correspondence discussed.	Vitrinite agreed to provide TIA/PIA and to ongoing consultation
11-July-2019	Meeting	DNRME	DNRME Offices Rockhampton	Alex Grundy, Deb Toon, Mick Callan, Dave Moss	Overview of Bulk Sample Project, introduction to VCP	MDL Application requirements discussed and agreed. VCP and future opportunities broadly discussed	BSP EA and MDL application submissions to proceed as planned, Further updates on VCP to be provided.
31-July-2019	Meeting	Dyno Nobel	Vitrinite Office, Brisbane	John Stevens and simon masters (Dyno) Mick Callan, Nick Williams, Ryan Welker	Detailed project update	project interactions, update on preproject development	ongoing consultation

Consultation date	Consultation type	Stakeholder	Location	Attendees	Information Provided	topics of discussion	outcomes/ ongoing commitments
27-August-2019	Meeting	Dyno Nobel	Dyno Facility, Murrarie	John Stevens and simon masters (Dyno) Mick Callan, Ryan Welker	Project Update, interactions and relocation discussion	project interactions, update on preproject development	ongoing consultation
10-September-2019	Meeting	Barada Barna People	McCullough Robertson Lawyers	Nick William Ryan Welker, Directors and members of Barada Barna Aboriginal Corporation, legal representatives	Project update presentation	ILUA meetings, Info sessions, execution meeting	Ongoing dialogue towards Ilua execution
11-September-2019	Meeting	DES	DES Office - Gladstone	Chris Loveday, Nicholas Williams, Mick Callan, Dave Moss	VCP overview, values and impacts, approach to PRCP	VCP approval strategy, discussed likelihood of EIS and proposal to submit well informed EA application, identified environmental values and impacts. Approach to PRCP	Ongoing consultation around submission
11-September-2019	Meeting	RG Tanner	RG Tanner Gladstone	RG Tanner, Nicholas Williams, Mick Callan, Dave Moss	VCP overview	Port operations and allocations	Ongoing consultation
13-September-2019	Meeting	BMA/BHP	BHP Office, Brisbane			Water Supply	Ongoing consultation
24-October-2019	Meeting	O'Sullivan's (Saraji and Cherwell)	Saraji Station			Land purchase options / Project Update	Ongoing consultation
30-October-2019	Teleconference	DES	Teleconference Brisbane-Emerald	Allison Sinclair, Gillian Naylor, Jessica Edgar, Dave Moss	PRCP approach	PRCP approach, confirmation of submission requirements, query guideline availability - timing, scope of supporting assessments	Ongoing consultation once guideline available and understood.

Consultation date	Consultation type	Stakeholder	Location	Attendees	Information Provided	topics of discussion	outcomes/ ongoing commitments
04-November-2019	Meeting	BMA/BHP	BHP Office, Brisbane	Mick Callan, Dave Moss, Alan Hocking	Provided surface water modelling and flood assessment	Water supply, data sharing, project update, flood modelling	BHP to review and provide comment
07-November-2019	Meeting	O'Sullivans (Saraji and Cherwell)	Cherwell Station	Mick Callan, Nick Williams, O'Sullivan Family	Project update, discuss land owner plans for property	Land purchase options / Project update	Ongoing negotiation
07-November-2019	Meeting	Isaac Regional Council	Moranbah	Mick Callan, Nick Williams, Sean Robinson		Project update, road haulage. Road relocation, compensation agreement for ML	Ongoing Consultation
20-November-2019	Meeting	Isaac Regional Council	Moranbah	Mick Callan, Rob Machill, Sean Robinson	Project update and draft road relocation plans	Road relocation discussions and approval process	IRC to provide draft compensation agreement for road relocation
17-December-2019	Meeting	BMA	BMA offices Brisbane	Alan Hocking, James Zhan, Julian Orth, Mick Callan, Dave Moss	VCP Overview, water supply options	Discussed water supply options, VCP flood mapping and potential for use of mine affected water	Ongoing consultation and water supply discussion, provision of VCP project flood mapping for BMA incorporation and consideration against critical infrastructure.
13-January-2020	Meeting	Barada Barna	McCullough Robertson Lawyers	Nick William Ryan Welker, Directors and members of Barada Barna Aboriginal Corporation, legal representatives	Project update presentation	ILUA meetings, Info sessions, execution meeting	Ongoing dialogue towards ILUA execution

Consultation date	Consultation type	Stakeholder	Location	Attendees	Information Provided	topics of discussion	outcomes/ ongoing commitments
28-January-2020	Meeting	Barada Barna	Chermside Bowls Club, 468 Rode Road, Chermside	Nick William Ryan Welker, Directors and members of Barada Barna Aboriginal Corporation, legal representatives	Project update presentation	ILUA meetings, Info sessions, execution meeting	Ongoing dialogue towards ILUA execution
29-January-2020	Meeting	Barada Barna	Ipswich Best Western Hotel, 51/55 Warwick Street, Ipswich	Nick William Ryan Welker, Directors and members of Barada Barna Aboriginal Corporation, legal representatives	Project update presentation	ILUA meetings, Info sessions, execution meeting	Ongoing dialogue towards ILUA execution
17-February-2020	Meeting	BMA	BMA offices Brisbane	Alan Hocking, James Zhan, Mick Callan, Dave Moss	VCP Overview, water supply options	Discussed water supply options, confirmation of no BMA concern on impacts of VCP flood modelling on critical infrastructure at BMA operations	Ongoing consultation and water supply discussion
04-February-2020	Meeting	Mines Inspectorate	Dysart	Nick Williams, Ryan Welker, Mick Callan, Mike Cavanaugh, James Richardson, large contingent of QLD mines inspectors	Powerpoint presentation outlining the Vulcan project, our development plans and our SHMS development plans	Project update, initial consultation on SMS development	Presentation well received by inspectors, Vitrinite committed to maintaining open dialogue as the project develops
13-February-2020	Meeting	Aurizon	Vitrinite office, Brisbane	Mick Callan, James Richardson, Nick Remmelt, Tiffany Bruce	Project presentation, draft rail protection plan	Project update and discuss rail interactions	Aurizon to provide feedback on management plan and arrange follow up meetings

Consultation date	Consultation type	Stakeholder	Location	Attendees	Information Provided	topics of discussion	outcomes/ ongoing commitments
20-February-2020	Meeting	Dyno Nobel	Dysart site	Mick Callan, Dave Moss, James Richardson, Site Manager of Dyno facility		Project update, inspect facilities	Ongoing consultation
20-February-2020	Meeting	DNRME	DNRME Offices Rockhampton	DNRME Reps, Mick Callan, James Richardson, Dave Moss	VCP Update and prelodgement MLA discussions	VCP Project information provided	Ongoing consultation around submission
20-February-2020	Meeting	Kalari Transport	Kalari yard at site followed by Kalari Depot in Moranbah	Kalari Personnel, Mick Callan, James Richardson, Dave Moss	Overview of Bulk Sample Project, VCP update	Discussion of haulage operations, use of site based yard	Ongoing consultation
20-February-2020	Meeting	IRC	IRC Office Moranbah	Steve Voke, IRC personnel, Mick Callan, James Richardson, Dave Moss	VCP update, Saraji Road alignment	compensation agreements, Road Use Management Plan, approval mechanisms under the Land Act. Opportunities to present to Council	Ongoing consultation
21-February-2020	Meeting / teleconference	DES	DES Office Emerald	Chris Loveday, Chris Wakes, Gillian Naylor, Louisa Nicholson, Barbara Van der pol, Jessica Edgar, Mick Callan, James Richardson, Dave Moss	VCP prelodgement meeting and PRCP approach and information requirements	Final VCP overview, impacts and mitigation presented and discussed, discussion of off lease road alignment being approved under Land act, Presented PRCP approach and raised a number of unsuitable guideline information requirements, (landform modelling and rehab trials), BMA levee and road reserve as PMLU's	Vitrinite to supply additional info on PRCP approach to landform stability and trials (supplied), DES to provide written response confirming information requirements.

Consultation date	Consultation type	Stakeholder	Location	Attendees	Information Provided	topics of discussion	outcomes/ ongoing commitments
25-February-2020	Meeting	IRC	Dysart	Mike Cavanaugh, IRC representatives		Discussions regarding Vitrinite use of recycled water for dust suppression	Ongoing consultation
30-March-2020	teleconference	DES	various	Emma Burgess, Tenille Neilsen, Mick Callan, Dave Moss	VCP prelodgement meeting and PRCP approach and information requirements	Final VCP overview, impacts and mitigation presented and discussed, discussion of off lease road alignment being approved under Land act, Presented PRCP approach, PMLU's, rehab areas proposed timing	Vitrinite to submit application in near future

APPENDIX B

LANDHOLDER RECORD OF CONSULTATION

Record of Consultation

Attendees:	Brett Garner (BMA)	Date/ Time:	20 March 2020 (3:00pm)
	Trudy Mazucco (BMA)	Consultation method:	Teleconference and e-mailed supporting material
	Nicholas Williams (Vitrinite)	File Ref:	VI010 (00280789-001)
	Mick Callan (Vitrinite)		
	Dave Moss (METServe)		
SUBJECT:	Vulcan Complex Project PRCP Consultation - BMA		

Introduction

This record of consultation has been prepared to document the discussion and outcomes of consultation between representatives of Vitrinite and BMA in relation to the Vulcan Complex Project (VCP) Progressive Rehabilitation and Closure Plan (PRCP). This record of consultation is intended to support Vitrinite's PRCP Stakeholder Consultation Register, required under Section 126C(1)(c)(iii) of the *Environmental Protection Act 1994*.

Information provided to stakeholders

VCP Project stage plans and PRCP Post Mine Land Use (PMLU) and rehabilitation area Plans were provided via e-mail in advance of the meeting. Dave Moss, on behalf of Vitrinite provided a summary of the following information:

- Brief overview of the VCP
- Brief overview of the PRCP requirements
- Vitrinite's approach to preparing the VCP PRCP
- Overview of the proposed:
 - PMLU's and rehabilitation areas;
 - the distribution of the PMLU's;
 - areas not affected by the Project;
 - progressive rehabilitation activities, schedule, milestones and criteria (physical and administrative).

Points raised by stakeholders

Brett Garner provided the following comments:

- BMA expects Vitrinite to adhere to the relevant requirements of the PRCP guideline
- As Project neighbours, BMA expects its interests to be protected from offsite impacts
- As landholders, BMA expects Vitrinite to successfully rehabilitate the land disturbed by proposed mining activities.
- BMA supports in principle the proposed Post Mine Land Uses, but reserves its rights for raising issues as the process advances

Brett Garner asked the following questions in relation to the PRCP:

- Will the Mining Lease (ML), Environmental Authority (EA) and PRCP notification processes occur simultaneously?

Vitrinite response: yes they will.

- What is the proposed Project submission and approval timing?

Vitrinite response: the intention is to submit the EA application before the end of March 2020, which will hopefully facilitate finalisation and issue of the EA by September 2020.

Trudy Mazucco asked the following questions in relation to the PRCP:

- Are there likely to be any engineered structures and will they attract a residual risk payment?

Vitrinite response: we will take the question on notice and provide you with a response

- What are the likely impacts on groundwater?

Vitrinite response: a full suite of environmental assessments, to an EIS standard, have been completed to support the EA application. This includes a full groundwater model and assessment. The VCP is modelled to cause minor localised drawdown to the east and is expected to generate limited (negligible) pit in-flows. Groundwater driven pit dewatering is not anticipated.

Brett Garner and Trudy Mazucco both advised they were looking forward to seeing the full PRCP document. Vitrinite confirmed BMA would be provided with a copy of the document along with the EA application and supporting information at the time of submission.

Consultation Outcomes

The following consultation outcomes were agreed:

- BMA expects Vitrinite to adhere to the relevant requirements of the PRCP guideline;
- As Project neighbours, BMA expects its interests to be protected from offsite impacts;
- As landholders, BMA expects Vitrinite to successfully rehabilitate the land disturbed by proposed mining activities;
- BMA supports the proposed Post Mine Land Uses;
- Vitrinite will confirm whether any engineered structures will remain and whether they will likely attract a residual risk payment; and
- Vitrinite will provide a 'Record of Consultation' (this document) to BMA for review and confirmation.

Both BMA and Vitrinite confirm this is an accurate record of consultation.



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on behalf of BMA

Brett Garner (0417 712009)



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on behalf of Vitrinite

.....26/3/20.....

Date

.....26/03/2020.....

Date