

APPENDIX L – STATE CODE 27 RESPONSE

TABLE 1 – MATERIAL CHANGE OF USE

Performance Outcomes	ERM Response
Areas of high ecological value and associated wildlife habitats	
<p>PO1 Development is located, sited and designed to ensure that the following are protected from adverse impacts:</p> <ul style="list-style-type: none"> Protected wildlife and associated habitats; and Areas of high ecological value. 	<p>PO1 – Complies</p> <p>The Project design has been refined through an iterative process including environmental, wind resource, constructability, landholder, Traditional Owner, and transmission network considerations.</p> <p>The design refinement process focused on the avoidance and minimisation of environmental impacts where practicable through the various stages of Project Layout planning and design, and the coordination of these aspects with engineering, construction and wind resource restrictions.</p> <p>The Matters of State Environmental Significance Impact Assessment Report (Appendix N) has identified the nature and characteristics of the environmental values relevant to the Project and surrounding landscape context through preliminary desktop analysis, occurrence assessments and validated ground-truthing surveys conducted over the past 17 years.</p> <p>The Project comprises a Disturbance Footprint of 136.82 ha and will lead to an impact to the following MSES categories:</p> <ul style="list-style-type: none"> <u>136.82 ha of Regulated Vegetation (Category B) will be cleared.</u> <p>The Applicant has obtained a 'Relevant Purposed Determination' under section 22A of the <i>Vegetation Management Act 1999</i> with the Project considered to be for relevant infrastructure activities.</p> <ul style="list-style-type: none"> <u>0.74 ha of Regulated Vegetation (intersecting a watercourse).</u> <p>The majority of the areas will be avoided due to the size of the Study Area in comparison to the Development Footprint.</p> <ul style="list-style-type: none"> <u>135.7 ha of Regulated Vegetation (Essential Habitat).</u> <p>Ground-truth surveys and records of the Purple-necked rock-wallaby has shown there is 612.60 ha of essential habitat within the Study</p>

Performance Outcomes	ERM Response
	<p>Area, and the Applicant has committed to a maximum impact to essential habitat of 135.70 ha.</p> <ul style="list-style-type: none"> • <u>135.62 ha of Purple-necked rock-wallaby wildlife habitat (potential denning and foraging dispersal habitat)</u> <p>Ground-truthed ecological surveys have resulted in a clear and depicted assessment of the Purple-necked rock-wallaby habitat types relevant to the Knapdale Range, the Study area and the Disturbance Footprint. The Disturbance Footprint has been aligned to directly avoid known Purple-necked rock-wallaby Dens.</p> <p>With the exception of minor interactions at points, the Disturbance Footprint is aligned with ridgelines and therefore limits interaction with known, Purple-necked rock-wallaby dispersal and foraging habitat. Importantly, the Disturbance Footprint does not result in a fragmentation of Purple-necked rock-wallaby habitat or the severance of a link between a DEN and dispersal and foraging habitat.</p>

Risk mitigation	
<p>PO2 Development is designed, sited and constructed to ensure that risks from physical hazards, chemical hazards and battery failure hazards are avoided and/or mitigated with respect to:</p> <ul style="list-style-type: none"> • Human health and safety; and • The built and natural environment. 	<p>PO2 – Complies</p> <p>The BESS design and siting process has focused on the avoidance and minimisation of physical, chemical and battery failure hazards with respect to human health and safety and the environment.</p> <p>A Risk Management Assessment Report (Appendix R) has been prepared for the Project. The Risk Management Assessment Report is further supported by a Fire Safety Study (Appendix S) and an Emergency Response Guide (Appendix T).</p> <p>As part of the Assessment, hazards with the potential to cause risk during operation and construction of the BESS have been identified and assessed. The BESS has been sited to incorporate several safety features and avoid environmental risk associated with fire.</p> <p>The BESS infrastructure will be no less than 9 m from the site boundary, and there will be a 3 m clearance of infrastructure from access roads and other infrastructure. The BESS is located within the dedicated Central Operations and Switchyard Area. An Asset Protection Zone has been established around the BESS to mitigate potential impacts from bushfire.</p>

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	<p>Recent advancements to battery technology have moved away from lithium-metal to lithium-ion batteries (within composite materials). This change in technology reduces the incidence of lithium dendrites forming resulting in an overall safer battery.</p> <p>Furthermore, lithium-ion batteries are equipped with several safety features to prevent batteries from charging or discharging at voltages which result in battery degradation, leading to shorting of the battery and thermal runaway. The BESS design will include the use of lithium-ion batteries (held within composite materials) to reduce impacts on safety.</p> <p>The Risk Management Assessment Report, Fire Safety Study and Emergency Response Guide have been developed in unison to provide an assessment of hazard scenarios for the BESS and to provide for mitigation and management strategies.</p> <p>Hazard scenarios considered include:</p> <ul style="list-style-type: none"> • Li-ion battery fault, thermal runaway and fire; • Li-ion battery fire, toxic smoke plume; • Electrical equipment failure and fire; • Transformer internal arcing, oil spill, ignition and bund fire; • Transformer electrical surge protection failure and explosion; and • External fire impact. <p>Based on all the hazards identified, the Assessment concluded there are no unacceptable risks at the BESS boundary nor any risk of incident propagation. Therefore, the risks are considered sufficiently managed by the current BESS safety features and by existing safety precautions.</p> <p>Considering the above, the following measures will be implemented to mitigate the above risks associated with the BESS:</p> <ul style="list-style-type: none"> • Evidence of UL 9540A testing and LSFT shall be provided to the regulator and SARA upon acquisition and submission for approval; • All site personnel shall be inducted in site procedures and emergency response protocols relevant to their roles; • All site personnel who require training must undergo formal training in the required procedures and emergency response protocols relevant to their role;

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	<ul style="list-style-type: none"> • Necessary personnel to provide first aid are to be trained in accordance with the QLD Code of Practice for first aid in workplaces 2021- high-risk workplaces; • Site management to prepare and maintain operational procedures to minimise the number of hazardous incidents and accidents on site and to mitigate the consequences of incidents regarding the handling of dangerous goods and chemicals; • A site Emergency Management Plan per the requirements of HIPAP No. 1 and State Code 27 shall be prepared and shall include measures to advise neighbouring premises in the event of an emergency with potential offsite impacts; • Dangerous Goods documentation shall be prepared as required by the Work Health and Safety Regulation 2011 to demonstrate the risks associated with the storage and handling of DGs has been assessed and minimised; and • Any Dangerous Goods stored at the site shall be stored and handled in accordance with the Work Health and Safety Regulation 2011 and any applicable storage and handling standards. <p>The Emergency Response Guide (Appendix T) has been created to support the abovementioned reporting and provide a clear understanding of how to handle and react to any emergency events which may arise, particularly with respect to the proposed BESS site, during construction and regular operations. The intent of this guide is to prevent or minimise the impact of an emergency event and facilitate a return to normal operations as soon as possible.</p> <p>The following protection measures have been recommended within the guide as follows:</p> <ul style="list-style-type: none"> • Create and maintain an Asset Protection Zone of 10m around the Disturbance Footprint from woodland areas and 10 m from grassland areas. • During construction and design, ensure electrical equipment is installed in accordance with the relevant Australian Standards. All electrical equipment, including BESS units, are to be located on hardstand areas, meaning there is limited vegetation on the site to fuel bushfires. Furthermore, all equipment is to be housed in

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	<p>individual metal housing with suitable IP ratings, providing heat and fire resistance and protection from embers in the event of bushfire.</p> <ul style="list-style-type: none"> • All operations involving earth moving equipment, vehicles, slashers and hot works must cease during Total Fire Bans, while the Grassland Fire Danger Index is or is forecast to be 35 or greater, or when high winds are forecast. • The Asset Protection Zone is to incorporate a fire trail, established and maintained in accordance with Queensland Fire Department requirements, • Electrical equipment, particularly BESS units, shall be sufficiently separated to comply with VFPA 855 and supplier requirements to limit the potential for incident propagation. <p>Section 6.0 of the Guide provides emergency evacuation details, providing emergency assembly points, with Section 9.0 providing emergency response procedures for specific emergencies.</p>
<p>PO3 Development mitigates the risks of fire, explosion and thermal runaway from battery storage infrastructure.</p>	<p>PO3 – Complies</p> <p>The Project has considered mitigation measures for fire, explosion and thermal runaway risk from the BESS.</p> <p>The existing safety features and safety precautions for the BESS are:</p> <ul style="list-style-type: none"> • Control of ignition sources – no smoking / open flames around transformers; • Separation arrangement of equipment to prevent generation of potential propagation; • Housekeeping procedures to keep grass low; • Inherent fire protection in BESS and high heat resistance of other equipment; • Transformers are in containers which protect from lightning and cables are underground; • Overcharging and electrical circuit protection; • Battery monitoring systems;

Performance Outcomes	ERM Response
	<ul style="list-style-type: none"> • Electrical systems designed per AS/NZS 3000:2018(Ref. [19]); • Ventilation; • Explosion venting; • Smoke and gas detection systems; and • Water-based fire suppression system. <p>A Risk Management Assessment Report (RMAR) has been prepared for the Project (refer to Appendix R of the Planning Report). The Risk Management Assessment Report is further supported by a Fire Safety Study (Appendix S) and a Emergency Response Guide (Appendix T).</p> <p>As part of the Assessment, hazards with the potential to cause risk during operation and construction of the BESS have been identified and assessed.</p> <p>Based on all the hazards identified, the Assessment concluded there are no unacceptable risks at the BESS boundary nor any risk of incident propagation. Therefore, the risks are considered sufficiently managed by the current BESS safety features and by existing safety precautions.</p> <p>Additional to the existing safety features and precautions, the following measures will be implemented to mitigate the above risks associated with the BESS:</p> <ul style="list-style-type: none"> • Evidence of UL 9540A testing and LSFT shall be provided to the regulator and SARA upon acquisition and submission for approval; • All site personnel shall be inducted in site procedures and emergency response protocols relevant to their roles; • All site personnel who require training must undergo formal training in the required procedures and emergency response protocols relevant to their role; • Necessary personnel to provide first aid are to be trained in accordance with the QLD Code of Practice for first aid in workplaces 2021– high-risk workplaces; • Site management to prepare and maintain operational procedures to minimise the number of hazardous incidents and accidents on site and to mitigate the consequences of incidents regarding the handling of dangerous goods and chemicals;

Performance Outcomes	ERM Response
	<ul style="list-style-type: none"> • A site Emergency Management Plan per the requirements of HIPAP No. 1 and State Code 27 shall be prepared and shall include measures to advise neighbouring premises in the event of an emergency with potential offsite impacts; • Dangerous Goods documentation shall be prepared as required by the Work Health and Safety Regulation 2011 to demonstrate the risks associated with the storage and handling of DGs has been assessed and minimised; and • Any Dangerous Goods stored at the site shall be stored and handled in accordance with the Work Health and Safety Regulation 2011 and any applicable storage and handling standards.
<p>PO4 Development is designed to ensure fire and thermal events can be contained and isolated to prevent escalation and propagation to other developments and uses on and offsite.</p>	<p>PO4 – Complies</p> <p>The Project has been designed to ensure fire and thermal events can be contained and isolated. The existing safety features and safety precautions for the BESS are:</p> <ul style="list-style-type: none"> • Control of ignition sources – no smoking / open flames around transformers; • Separation arrangement of equipment to prevent generation of potential propagation; • Housekeeping procedures to keep grass low; • Inherent fire protection in BESS and high heat resistance of other equipment; • Transformers are in containers which protect from lightning and cables are underground; • Overcharging and electrical circuit protection; • Battery monitoring systems; • Electrical systems designed per AS/NZS 3000:2018; • Ventilation; • Explosion venting; • Smoke and gas detection systems; and

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	<ul style="list-style-type: none"> • Water-based fire suppression system. <p>A Risk Management Assessment Report (RMAR) has been prepared for the Project (refer to Appendix R of the Planning Report). The Risk Management Assessment Report is further supported by a Fire Safety Study (Appendix S) and a Emergency Response Guide (Appendix T).</p> <p>As part of the assessment, hazards with the potential to cause fire and thermal risk during operation and construction of the BESS have been identified and assessed. These hazards were assessed against the existing safety features and safety precautions for impact.</p> <p>Based on all the hazards identified, the assessment concluded there are no unacceptable risks at the BESS boundary nor any risk of incident propagation. Therefore, the risks are considered sufficiently managed by the current BESS safety features and by existing safety precautions.</p> <p>Additional to the existing safety features and precautions, the following measures will be implemented to mitigate the above risks associated with the BESS:</p> <ul style="list-style-type: none"> • Evidence of UL 9540A testing and LSFT shall be provided to the regulator and SARA upon acquisition and submission for approval; • All site personnel shall be inducted in site procedures and emergency response protocols relevant to their roles; • All site personnel who require training must undergo formal training in the required procedures and emergency response protocols relevant to their role; • Necessary personnel to provide first aid are to be trained in accordance with the QLD Code of Practice for first aid in workplaces 2021- high-risk workplaces; • Site management to prepare and maintain operational procedures to minimise the number of hazardous incidents and accidents on site and to mitigate the consequences of incidents regarding the handling of dangerous goods and chemicals; • A site Emergency Management Plan per the requirements of HIPAP No. 1 and State Code 27 shall be prepared and shall include measures

Performance Outcomes	ERM Response
	<p>to advise neighbouring premises in the event of an emergency with potential offsite impacts;</p> <ul style="list-style-type: none"> • Dangerous Goods documentation shall be prepared as required by the Work Health and Safety Regulation 2011 to demonstrate the risks associated with the storage and handling of DGs has been assessed and minimised; and • Any Dangerous Goods stored at the site shall be stored and handled in accordance with the Work Health and Safety Regulation 2011 and any applicable storage and handling standards.

Incident response	
<p>PO5 Development is designed to facilitate effective and efficient emergency service access and response in the event of a fire, bushfire (including cleared fire fighting areas at the interface of hazardous vegetation), explosion, contamination leak or any other incident requiring an emergency service response.</p>	<p>PO5 – Complies</p> <p>The Project Layout has been designed to facilitate effective and efficient emergency service access and response in the event of an incident. A Fire Safety Study (Appendix S) was completed for the Project.</p> <p>The Study identifies the following protection measures which will be implemented within the BESS units:</p> <ul style="list-style-type: none"> • Heat and smoke detection; • Audible alarms; • Fire system emergency start; • Emergency stop; • Pressure relief valve; • Thermally insulated top and sides; • Passive and active ventilation; and • Extensive third party certification (UL 9540A) and LSFT according to CSA800. <p>Additionally, the BESS has been designed to contain the following safety features:</p> <ul style="list-style-type: none"> • Location of critical components (Battery Units and Medium Voltage Power Stations) no less than 9 m from site boundary;

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	<ul style="list-style-type: none"> • A 3 m clearance of critical components (Battery Units and Medium Voltage Power Stations) from access roads and infrastructure; and • Access roads constructed to a minimum of 6 m in width. <p>The Study concluded that the designs and existing fire protection strategies adequately managed the credible fire risks at site. However, the following measures will be implemented to mitigate the risks associated with emergency response:</p> <ul style="list-style-type: none"> • All site personnel shall be inducted in site procedures and emergency response protocols relevant to their roles; • All site personnel who require training must undergo formal training in the required procedures and emergency response protocols relevant to their role; • Necessary personnel to provide first aid are to be trained in accordance with the QLD Code of Practice for first aid in workplaces 2021– high-risk workplaces; • A team of site personnel are to be trained in the use of the water cart and first-attack firefighting methods; • Site management to prepare and maintain operational procedures to minimise the number of hazardous incidents and accidents on site and to mitigate the consequences of incidents regarding the handling of dangerous goods and chemicals; • A Risk Management Assessment Report has been prepared; • A site Emergency Management Plan per the requirements of HIPAP No. 1 and State Code 27 shall be prepared and shall include measures to advise neighbouring premises in the event of an emergency with potential offsite impacts; • Dangerous Goods (DG) documentation shall be prepared as required by the Work Health and Safety Regulation 2011 to demonstrate the risks associated with the storage and handling of DGs has been assessed and minimised; and • Any DGs stored at the site shall be stored and handled in accordance with the Work Health and Safety Regulation 2011 and any applicable storage and handling standards.

Performance Outcomes	ERM Response
	<p>The Emergency Response Guide (Appendix T) has been created to support the abovementioned reporting and provide a clear understanding of how to handle and react to any emergency events which may arise, particularly with respect to the proposed BESS site, during construction and regular operations. The intent of this guide is to prevent or minimise the impact of an emergency event and facilitate a return to normal operations as soon as possible.</p> <p>The following protection measures have been recommended within the guide as follows:</p> <ul style="list-style-type: none"> • Create and maintain an Asset Protection Zone of 10m around the Disturbance Footprint from woodland areas and 10 m from grassland areas. • During construction and design, ensure electrical equipment is installed in accordance with the relevant Australian Standards. All electrical equipment, including BESS units, are to be located on hardstand areas, meaning there is limited vegetation on the site to fuel bushfires. Furthermore, all equipment is to be housed in individual metal housing with suitable IP ratings, providing heat and fire resistance and protection from embers in the event of bushfire. • All operations involving earth moving equipment, vehicles, slashers and hot works must cease during Total Fire Bans, while the Grassland Fire Danger Index is or is forecast to be 35 or greater, or when high winds are forecast. • The Asset Protection Zone is to incorporate a fire trail, established and maintained in accordance with Queensland Fire Department requirements, • Electrical equipment, particularly BESS units, shall be sufficiently separated to comply with VFPA 855 and supplier requirements to limit the potential for incident propagation. <p>Section 6.0 of the Guide provides emergency evacuation details, providing emergency assembly points, with Section 9.0 providing emergency response procedures for specific emergencies.</p>

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<p>PO6 The development:</p> <ul style="list-style-type: none"> • Provides appropriate fire detection, monitoring and notification to the site operator; and • Ensures the electrical safety of the facility, in the event of an incident requiring emergency response. 	<p>PO6 – Complies</p> <p>The Project will utilise Battery Units that are UL 9540A compliant.</p> <p>These Battery Units are equipped with smoke and thermal detectors to detect the early signs of a fire. If elevated temperatures or smoke is detected, an audible fire alarm and visual fire strobes fitted on the BESS will be activation. Additionally, this alarm will be sent to the EMS systems to alert site personnel to start emergency procedures. In the event of a gas detection, the alarm will activate the ventilation system.</p> <p>The electrical equipment will be located within the switch room. A Fire Safety Study (Appendix S) was completed for the Project. The Study noted that type fire development within switch rooms the fire would be considered to be relatively slow in growth and would be unlikely to result in substantial impacts in terms of incident propagation and firefighting equipment.</p>
<p>PO7 Development demonstrates that there is capacity to provide a reliable, sustainable and fit-for-purpose water supply.</p>	<p>PO7 – Complies</p> <p>A Fire Safety Study (Appendix S) was completed for the Project.</p> <p>The Study concluded that the existing fire protection strategies adequately managed the credible fire risks at site. As such, portable fire extinguishers will be used to supply fire protection in place of a fire water supply on site.</p> <p>The Study identifies a potential firewater supply at the fire water tanks of the DRM and DRM Accommodation Village sites, each approximately 2 km from the BESS location. The combined capacity of the fire water at these sites is approximately 1,000 m³. Additionally, the DRM operates several water carrying vehicles, including two 2 kL water trucks and one 10 kL water cart.</p> <p>Additionally, emergency service vehicles are located in Cloncurry and further supported by the surrounding area including Julia Creek and Mount Isa.</p> <p>As the Study concluded that the designs and existing fire protection strategies adequately managed the credible fire risks at site, it is considered that the above water supply would be adequate to deal with the potential fire hazards at the BESS location.</p>

Performance Outcomes	ERM Response
Social impacts	
<p>PO8 Development demonstrates that either:</p> <ul style="list-style-type: none"> • A community benefit agreement has been entered into for development requiring social impact assessment; or • Where a community benefit agreement has not been entered into, social impacts of the development, including workforce accommodation, local business and industry impacts, community health and well-being, are identified, managed, mitigated, counterbalanced and monitored. 	<p>PO8 – Complies</p> <p>The Project, being located on the Knapdale Range and adjacent to the Dugald River Mine is isolated and therefore, has a limited number of stakeholders.</p> <p>Engagement with stakeholders including the Cloncurry Shire Council, State and Federal Government, the McMillan Family (leaseholder), the broader community and the Kalkadoon People (Traditional Owners) has been undertaken since commencement of the Project and is an ongoing commitment from MMG. Stakeholder engagement completed to date has identified there are no objections to the Project.</p> <p>In particular it is noted that:</p> <ul style="list-style-type: none"> • An Indigenous Land Use Agreement with the Kalkadoon People has been developed, agreed, and registered. • The landholder has agreed to, and subsequently participated in, processes under State legislation to subdivide a portion of their existing lands lease to support the Project through the securing of tenure. • Local Council has supported the Project by assessing and approving (through exemption) Meteorologic Masts to allow for detailed weather patterns to be studied to ensure optimisation of the Project design. <p>Additionally, a Social Impact Assessment (Appendix U) has been completed for the Project and identified potential social impacts and benefits across the construction and operation phases of the Project. The Assessment identified a total of 18 potential social impacts (direct and indirect, positive and negative).</p> <p>Three of these impacts were positive and are summarised below:</p> <ul style="list-style-type: none"> • Increased potential to secure the long term operational future of the DRM, which will provide benefit from sustained economic activity to the Social Study Area;

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	<ul style="list-style-type: none"> • Increased demand for labour creates direct and indirect employment opportunities for the local and regional communities within the Social Study Area; and • Increased demand for goods and services helps to stimulate the local economies through greater indirect spend. <p>No potential negative social impacts were assessed as having a residual (post-mitigation) impact significance of 'Major'.</p> <p>Only one negative social impact was assessed as having a residual impact significance of 'Moderate' as summarised below:</p> <ul style="list-style-type: none"> • Transportation of materials and equipment to the Study Area has the potential to cause traffic safety concerns for road users along the haylage routes. <p>The remaining 14 negative impacts were assessed as having 'Minor' or 'Negligible' residual impacts. Across all social impacts identified, management measures and monitoring have been devised, and have already been, or will be adopted by MMG (or their appointed contractor) for the Project. These measures, and the associated impact monitoring framework, will also be embedded into MMG's internal systems and processes.</p> <p>The Assessment was used to support the successful development and execution of a community Benefit Agreement which has been entered into for the Project between the Applicant and Cloncurry Shire Council.</p>
Agricultural land	
<p>PO9 Development is located and designed to ensure there is no unacceptable loss of high-quality agricultural land.</p>	<p>PO9 – Complies</p> <p>A desktop Agricultural Land Assessment was completed for the Project using publicly available land resource data and in consideration of the Guidelines for Agricultural Land Evaluation in Queensland. The assessment concluded that the Study Area comprises Class C Agricultural Land, which indicates land use is for pasture and/or low intensity grazing.</p> <p>No potential impacts have been identified due to the absence of any high-quality agricultural land values within the Study Area. The Project is</p>

Performance Outcomes	ERM Response
	<p>designed to be co-located with the existing mining operations and low-intensity cattle grazing land uses. The Project will not result in a net loss of agricultural land and will maintain the current land use which is consistent with Class C land.</p>
<p>PO10 Development does not fragment high-quality agricultural land in a way that restricts connectivity of agricultural land necessary to ensure its ongoing productivity and operation.</p>	<p>PO10 – Complies</p> <p>The Project is not located within an area mapped for high-quality agricultural land, being mapped entirely within Class C land. The Project therefore will not result in a net loss of agricultural land and will maintain the existing agricultural land use consistent with Class C land.</p>
<p>PO11 Development is constructed to maintain the fertility and soil attributes of high-quality agricultural land and to enable decommissioning at the end of operations to return the land to pre-construction agricultural land productive value.</p>	<p>PO11 – Complies</p> <p>The Project is not located within an area mapped for high-quality agricultural land, being mapped entirely within Class C land. The Project therefore will not result in a net loss of agricultural land and will maintain the existing agricultural land use consistent with Class C land.</p>
<p>PO12 Development on or adjacent to the stock route network maintains its operational efficiency and ongoing integrity and function.</p>	<p>PO12 – Complies</p> <p>The Project is not located on or adjacent to a stock route network.</p>
<p>Natural hazards</p>	
<p>PO13 Development is located and sited to avoid natural hazard areas including high erosion risk areas and bushfire prone areas.</p>	<p>PO13 – Complies</p> <p>A Natural Hazard Risk Assessment Report (Appendix Q) has been completed for the Project and assessed potential impacts from the Project on Flood and Bushfire related hazards.</p> <p>The report concludes that the Project is not located within a mapped flood hazard areas per State Planning Policy or the Cloncurry Shire Council mapping overlays, however, Dugald River to the east and Cabbage Tree</p>

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	<p>Creek west of the Project are mapped as Flood Hazard – Area – Level 1 – Queensland floodplain assessment overlay and Interim Flood Plain Assessment for the SPP and Planning Scheme mapping respectively. Three areas of interest were identified as potentially vulnerable locations that may experience a level of inundation during a rainfall event and advised that a detailed flood assessment be undertaken to accurately assess the flood extent and impact on site. These locations do not contain Project infrastructure and are limited to access tracks and/or above-ground powerlines.</p> <p>The Project is within mapped medium and high potential bushfire areas, and there is very high potential bushfire intensity typically observed in gullies to the north and west of the Project Area. For this reason, a recommended set back distance of 10 m between Project infrastructure and vegetation prone to bushfire hazards will be established.</p>
<p>PO14 Where development cannot be located and sited to avoid natural hazard areas (e.g. Bushfire prone areas, and high erosion risk areas), demonstrate that:</p> <ul style="list-style-type: none"> • There is no suitable alternative location; • Infrastructure can function effectively during and after a natural hazard event; and • Mitigation measures are implemented to reduce the risk to people, property and the environment to a tolerable level. 	<p>PO14 – Complies</p> <p>The siting of the proposed development in this location is required to be at the existing DRM site, and therefore alternative locations outside bushfire prone areas are not possible. The Project is within mapped medium and high potential bushfire areas, and there is very high potential bushfire intensity typically observed in gullies to the north and west of the Project Area. The BESS is entirely contained within a mapped medium potential bushfire area. For this reason, a recommended set back distance of 10 m between Project infrastructure and vegetation prone to bushfire hazards will be established. Additionally, the BESS is not located within a flood hazard area.</p> <p>The Project has been designed to ensure infrastructure can function effectively during and after a natural hazard event. The existing safety features and safety precautions for the BESS are:</p> <ul style="list-style-type: none"> • Control of ignition sources – no smoking / open flames around transformers; • Separation arrangement of equipment to prevent generation of potential propagation; • Housekeeping procedures to keep grass low;

Performance Outcomes	ERM Response
	<ul style="list-style-type: none"> • Inherent fire protection in BESS and high heat resistance of other equipment; • Transformers are in containers which protect from lightning and cables are underground; • Overcharging and electrical circuit protection; • Battery monitoring systems; • Electrical systems designed per AS/NZS 3000:2018; • Ventilation; • Explosion venting; • Smoke and gas detection systems; and • Water-based fire suppression system. <p>Additional to the existing safety features and precautions, the following measures will be implemented to mitigate the above risks associated with the BESS:</p> <ul style="list-style-type: none"> • Evidence of UL 9540A testing and LSFT shall be provided to the regulator and SARA upon acquisition and submission for approval; • All site personnel shall be inducted in site procedures and emergency response protocols relevant to their roles; • All site personnel who require training must undergo formal training in the required procedures and emergency response protocols relevant to their role; • Necessary personnel to provide first aid are to be trained in accordance with the QLD Code of Practice for first aid in workplaces 2021- high-risk workplaces; • Site management to prepare and maintain operational procedures to minimise the number of hazardous incidents and accidents on site and to mitigate the consequences of incidents regarding the handling of dangerous goods and chemicals; • A site Emergency Management Plan per the requirements of HIPAP No. 1 and State Code 27 shall be prepared and shall include measures to advise neighbouring premises in the event of an emergency with potential offsite impacts;

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	<ul style="list-style-type: none"> • Dangerous Goods documentation shall be prepared as required by the Work Health and Safety Regulation 2011 to demonstrate the risks associated with the storage and handling of DGs has been assessed and minimised; and • Any Dangerous Goods stored at the site shall be stored and handled in accordance with the Work Health and Safety Regulation 2011 and any applicable storage and handling standards.
<p>PO15 Bushfire hazard is identified and risk is mitigated through strategies for vegetation management, landscape management, water supply, provision of appropriate access, identification of safe assembly or evacuation routes and establishing cleared and maintained asset protection zones around infrastructure that is wholly contained on site.</p>	<p>PO15 – Complies</p> <p>A Bushfire Management Plan has been prepared for the Project (refer to Appendix U of the Planning Report). The report identified the following mitigation measures:</p> <ul style="list-style-type: none"> • Provision of appropriate separation from unmanaged vegetation (through nominated APZs located entirely within the site) to limit bushfire impact on proposed development, in addition to a number of bushfire resilience design measures; • Establishes appropriate vehicular access across the site to all proposed infrastructure; • Utilises significant existing onsite firewater supplies and fire appliances for bushfire fighting purposes, which is supplemented by an additional firewater tank in the more remote southern portion of the site; and • In addition to the Emergency Management Plan for the facility, proposes a number of emergency management procedures for the wind turbines.
<p>Protecting water quality and stormwater management</p>	
<p>PO16 Development:</p> <ul style="list-style-type: none"> • Minimises the disturbance of high risk soils; and 	<p>PO16 – Complies</p> <p>A Stormwater and Erosion Risk Assessment Report (Appendix P) has been prepared for the Project.</p>

Performance Outcomes	ERM Response
<ul style="list-style-type: none"> Manages the release of soil based contaminants. 	<p>The Report identifies Revised Universal Soil Loss Equation (RUSLE) classification of erosion risk throughout the Disturbance Footprint. Approximately 72% of the Disturbance Footprint is classified as Very Low to Low erosion risk. A small area of the Disturbance Footprint is mapped as high to very high erosion risk however this will not impact the BESS infrastructure.</p> <p>The high to very high erosion risk areas will impact three WTGs and their associated access tracks. An ESCP will be development in line with the IECA (2025) best practice management measures and outline BPESC controls for high to very high erosion risk areas. This will be developed in conjunction with the construction contractor following the detailed design phase of the project and will be implemented prior to commencement of construction.</p> <p>Additionally, the Report conducted a soil and land suitability assessment and concluded the soil types within the region are non-sodic, non-dispersive and resistant to erosion.</p> <p>Given the above, the Project manages the release of soil based contaminants and minimises the disturbance of high risk soils in the region.</p>
<p>PO17 Development maintains the water quality of receiving waters, waterways and wetlands by:</p> <ul style="list-style-type: none"> Avoiding locating in waterways and wetlands; Minimising crossings of and interference with natural drainage lines, farm drainage and irrigation infrastructure; Minimising erosion and sediment run off; Managing drainage control; and Preserving the bank stability of affected waterways and drainage lines avoiding non-essential hardening or unnatural modification of the waterway. 	<p>PO17 – Complies</p> <p>A Stormwater and Erosion Risk Assessment Report (Appendix P) has been prepared for the Project. The Report assesses the potential for impacts associated with the Project on natural drainage patterns, water quality and erosion control.</p> <p>The Report confirms the Project will have a negligible increase in impervious surfaces in the post-development landscape, and the proposed design indicates limited works near waterways (other than the construction of access tracks).</p> <p>Compliance with best management practices for stormwater (including appropriate design and implementation of erosion and sediment control measures), will be sufficient to manage stormwater quality. It is considered unlikely that the quantity and quality of the stormwater leaving the development footprint is to be of different quantity or quality to that observed prior to the development.</p>

Performance Outcomes	ERM Response
	<p>A Preliminary Construction Environmental Management Plan (Appendix F) has been prepared for the Project and outlines a broad range of mitigation and management measures to avoid or minimise impacts on identified waterways. During the detailed design stage, detailed erosion and sediment control measures specific to the final design will be developed and implemented.</p>
<p>PO18 Development prevents the release of contaminants to surface water or groundwater in the event of an incident, including a fire or explosion.</p>	<p>PO18 – Complies</p> <p>A Stormwater and Erosion Risk Assessment Report (Appendix P) has been prepared for the Project. The Report assesses the potential for impacts associated with the Project on natural drainage patterns, water quality and erosion control.</p> <p>The report concludes, based on the preliminary hydrology and flood assessment, the Project is unlikely to cause any significant risks of contaminant release as there are neither any significant watercourses nor any flood risk within the Disturbance Footprint.</p> <p>Where necessary, areas designated for the storage of chemicals and other identified contaminants will be appropriately bunded to ensure the capture of contaminants in the event of an incident.</p>
<p>PO19 Development minimises interference with overland flow paths.</p>	<p>PO19 – Complies</p> <p>A Stormwater and Erosion Risk Assessment Report (Appendix P) has been prepared for the Project. The Report assesses the potential for impacts associated with the Project on natural drainage patterns, water quality and erosion control.</p> <p>Surface water will be directed as overland sheet flow. The points of discharge will remain unchanged. Additionally, Project design and appropriate drainage controls will assist in ensuring that the Project does not result in significant changes to pre-development hydrology.</p>

Performance Outcomes	ERM Response
Acoustic amenity and vibration	
<p>PO20 Construction, operation, maintenance and decommissioning meets the acoustic quality objectives for sensitive receptors on or adjacent to the site identified in the Environmental Protection (Noise) Policy 2019.</p>	<p>PO20 – Complies</p> <p>A Noise Impact Assessment (Appendix AA) has been prepared for the Project and assesses impacts on the acoustic amenity of the single sensitive receptor (the McMillan Residence) within 5 km of the Project Layout.</p> <p>In addition to the McMillan Residence, the assessment considers the DRM Accommodation Camp and the DRM Fly Camp under a conservative approach noting that these facilities are specifically designed to accommodate 24/7 operations at the DRM and are approved as components of the broader DRM and not as stand-alone land uses.</p> <p>Noise modelling for the assessment assumed continuous noise emissions from the BESS under a worst-case scenario during any 1-hour period. The report concluded noise generation from the BESS will be compliant with the Environmental Protection (Noise) Policy 2019.</p>
<p>PO21 Construction, operation, maintenance and decommissioning does not cause vibration impacts that adversely affect the operational performance or sensitive receptors within or adjacent to the site.</p>	<p>PO21 – Complies</p> <p>A Noise Impact Assessment (Appendix AA) has been prepared for the Project and assesses impacts on the acoustic amenity of the single sensitive receptor (the McMillan Residence) within 5 km of the Project Layout.</p> <p>The report confirms that vibration impacts are not expected at the identified sensitive receptors due to the significant separation distances involved. The existing DRM has a closer proximity to the DRM Accommodation Camp and DRM Fly Camp than the Project and therefore, any potential impacts from the Project will not exceed that of the DRM noting the DRM is a substantial mining operation that occurs on a 24/7 basis.</p>

Performance Outcomes	ERM Response
Visual impact	
<p>PO22 Development is sited and designed to:</p> <ul style="list-style-type: none"> • Minimise visual impacts on sensitive receptors; • Protect the landscape values and scenic amenity of the surrounding landscape; and • Provide screening and buffering to sensitive receptors the greatest extent feasible. 	<p>PO22 – Complies</p> <p>A Landscape Visual Impact Assessment (Appendix Y) has been prepared for the Project and assesses the Projects potential for impacts on scenic amenity.</p> <p>From a visual impact perspective, the assessment concludes that:</p> <ul style="list-style-type: none"> • The existing landscape has the ability to incorporate the Project with a relatively low degree of visual impact; and • The Project does not impede on areas deemed as having high scenic amenity.
Lighting	
<p>PO23 Lighting associated with the development provides safe and effective illumination for site operations and maintenance, whilst minimising environmental impacts and visual impacts on sensitive receptors.</p>	<p>PO23 – Complies</p> <p>Outdoor lighting will be designed, installed and maintained in accordance with the parameters and requirements of the Australian Standard AS 4282 — Control of the obtrusive effects of outdoor lighting.</p>
Transport networks	
<p>PO24 Construction, operation, maintenance and decommissioning activities associated with the development do not adversely impact the efficiency and condition of transport networks and infrastructure.</p>	<p>PO24 – Complies</p> <p>A Traffic and Pavement Impact Assessment (Appendix V) has been prepared for the Project. The proposed haulage routes, road network and associated intersections are to be from the Port of Townsville to the Project site.</p> <p>The proposed transport haulage route has been assessed, considering requirements for both construction and operational phases of the development. Through engagement with necessary stakeholders, it is</p>

Performance Outcomes	ERM Response
	<p>expected that the proposed OSOM route is maintained to continue road loads proposed for the Project.</p>
<p>PO25 Construction, operation, maintenance and decommissioning activities associated with the development do not compromise the safety of users of the transport network.</p>	<p>PO25 – Complies</p> <p>A Traffic and Pavement Impact Assessment (Appendix V) has been prepared for the Project. The proposed haulage routes, road network and associated intersections are to be from the Port of Townsville to the Project site.</p> <p>The proposed transport haulage route has been assessed, considering requirements for both construction and operational phases of the development. Through engagement with necessary stakeholders, it is expected that the proposed OSOM route is maintained to continue road loads proposed for the Project.</p>
<p>PO26 Development delivers necessary upgrades to the transport network to ensure construction activities and ongoing maintenance do not adversely impact transport networks and infrastructure.</p>	<p>PO26 – Complies</p> <p>A Traffic and Pavement Impact Assessment (Appendix V) and OSOM Construction Concept Strategy (Appendix W) has been prepared for the Project. The proposed haulage routes, road network and associated intersections are to be from the Port of Townsville to the Project site.</p> <p>The OSOM Construction Concept Strategy details the necessary works required to transport OSOM components from the Port of Townsville to the Project site and the manner in which these works should be completed.</p>
<p>PO27 Development demonstrates that a safe, viable and practical haulage route can be secured to accommodate the movement of oversize/overmass vehicles during construction and ongoing maintenance activities.</p>	<p>PO27 – Complies</p> <p>A Traffic and Pavement Impact Assessment (Appendix V) and OSOM Construction Concept Strategy (Appendix W) has been prepared for the Project. The proposed haulage routes, road network and associated intersections are to be from the Port of Townsville to the Project site.</p>

Performance Outcomes	ERM Response
	<p>The main transport route is Townsville Port to Dugald River Mine via Flinders Highway. The proposed transport route includes the following bypasses:</p> <ul style="list-style-type: none"> • Townsville to Charters Towers – The generators and some tower sections to travel from Townsville to Charters Towers via Hervey Range Road and Gregory Development Road to bypass the Macrossan Burdekin River bridge and Reid River bridge. • Charters Towers Railway overpass – Loads higher than 5.5m to bypass the railway overpass on Flinders Highway in Charters Towers via New Queen Road and Victory Street. • Tommy Creek bridge – The generators, hubs and some towers sections to bypass the Tommy Creek bridge via a new crossing to be constructed.
<p>PO28 Development provides safe, efficient, and sustainable vehicular access to the site for all vehicle types anticipated through construction, operation, maintenance and decommissioning.</p>	<p>PO28 – Complies</p> <p>A Traffic and Pavement Impact Assessment (Appendix V) has been prepared for the Project. The proposed haulage routes, road network and associated intersections are to be from the Port of Townsville to the Project site.</p> <p>The Project will be accessed via a network of access tracks located on the Knapdale Range and linked to the existing road network supporting the Dugald River Mine. The access tracks are designed and located in consideration of topographical limits to allow for the movement of Over-sized and Over-mass components to each WTG pad. To limit disturbance, the Project has been designed with a linear access track configuration with minimal spurs to limit fragmentation.</p> <p>Existing light vehicle tracks will be used where possible, with the existing tracks being widened and graded to accommodate transport of turbine components. Where track widening and/or new track establishment is required, vegetation and topsoil will be cleared and stockpiled for use in rehabilitation in accordance with the Project’s Management Plans.</p>

Performance Outcomes	ERM Response
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Infrastructure	
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<p>PO29 Development is located and designed to avoid unacceptable impacts resulting from proximity to current or approved resource activity or pipeline near or on the site.</p>	<p>PO29 – Complies</p> <p>The Project has been strategically designed to be co-located with the existing mining operations at the DRM which is the primary benefactor of Stage 1 of the Project.</p> <p>The Project has been sited to respond to the current and future needs of the DRM including operations of the Tailings Storage Facility and future underground mining operations.</p>
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<p>PO30 Development is serviced by all relevant infrastructure commensurate with its scale and operational requirements.</p>	<p>PO30 – Complies</p> <p>The Project’s location in proximity to the existing DRM will allow for the provision of necessary infrastructure to facilitate the construction and operation of the proposed development. The Project will connect to existing electricity infrastructure at the Dugald River Mine through overhead connection.</p> <p>Furthermore, existing site access and amenities will be utilised during construction, with the Project Area to have its own operations and maintenance facility for use during operation. The DRM Accommodation Camp and DRM Fly Camp are both self-contained setups for all relevant infrastructure including water, sewerage and telecommunications.</p>
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Decommissioning	
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<p>PO31 Relevant components of development, both after completion of construction and at cessation of operations, are decommissioned in a timely and efficient manner.</p>	<p>PO31 – Complies</p> <p>A Preliminary Rehabilitation Management Plan (Appendix G) has been prepared for the Project.</p> <p>Following completion of the construction phase, areas not required for ongoing operational activities will be rehabilitated and/or regenerated in</p>
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Performance Outcomes	ERM Response
	<p>accordance with good practice at the time and where required for ongoing low-intensity cattle grazing.</p> <p>This will include:</p> <ul style="list-style-type: none"> • Temporary use areas, including construction laydown areas, concrete batching plants, temporary site office, and construction site compound. • All materials removed from the Project footprint will be sorted and packaged for reuse and/or recycled where possible in accordance with the waste hierarchy. <p>An End of Construction Decommissioning Plan will be prepared prior to finalisation of construction.</p> <p>At the end of the Project's economic life, the WTG towers and other above ground infrastructure will be removed, and the area will be rehabilitated in accordance with the regulatory framework applicable at the time and in consultation with the landowner per the existing sub-lease agreement.</p> <p>This will include:</p> <ul style="list-style-type: none"> • All above ground infrastructure not required for the ongoing agricultural use of the land, including the WTGs, substations, and operation and maintenance facilities, will be removed and the land rehabilitated; • Any access tracks and hardstands not wanted or required by the landholder will be removed and land rehabilitated and returned to a primary production use; • Below ground infrastructure, including cabling and the WTG foundations, will be left in situ to avoid further disturbance and minimise clearing of revegetated areas. Rehabilitated areas will be adequately graded to reflect the slope of the surrounding area and to mitigate the risk of soil erosion; and • All materials removed from the Project will be sorted and packaged for reuse and/or recycled where possible in accordance with the State Government's waste hierarchy. • As part of decommissioning the Project, particularly the BESS facility, the reuse, recycling and recovery of battery components will be undertaken. This will encompass a Battery Recycling Strategy.

Performance Outcomes	ERM Response
	<p>An End of Operation Decommissioning Plan will be prepared for the Project prior to decommissioning.</p> <p>Given the above, the Project relevant components will be decommissioned in a timely and efficient manner both after construction and the completion of operation.</p>
<p>PO32 Development decommissioning ensures that:</p> <ul style="list-style-type: none"> • Materials removed from site are minimised; • Materials that are removed from the site are disposed of at approved disposal facilities capable of receiving the materials; and • Opportunities to reuse, recycle and/or repurpose the materials are deployed to the greatest extent feasible. 	<p>PO32 – Complies</p> <p>A Preliminary Rehabilitation Management Plan (Appendix G) has been prepared for the Project.</p> <p>Waste generated from the decommissioning of the Project will primarily consist of the following waste streams:</p> <ul style="list-style-type: none"> • Construction and demolition waste – Inert waste, such as bricks, pavers, ceramics, concrete, glass, steel, or general waste that does not biodegrade or decompose. This waste may be suitable for recycling, resource recovery, or reprocessing; • Regulated waste – Waste that contains hazardous characteristics and is classified as regulated waste under the Environmental Protection Act 1994. Regulated waste includes electrical waste (e-waste) and biosecurity waste; and • General waste – Waste that does not fit into the above categories, including organic and putrescible wastes. <p>Opportunities to reuse, recycle and/or repurpose the Project components will be deployed to the greatest extent feasible.</p> <p>Waste will follow the end-of-life hierarchy as outlined below:</p> <ul style="list-style-type: none"> • Avoidance – waste minimisation and reduction; • Resource recovery – re-use (where the product maintains its original function), recycle (requires energy and resources to convert the product into a different function) and energy recovery (treatment processes used to generate a usable form of energy from waste materials); and

Performance Outcomes	ERM Response
	<ul style="list-style-type: none"> Disposal – management of all disposal options in the most environmentally responsible way. Disposal will occur at approved disposal facilities capable of receiving the materials.
<p>PO33 Decommissioning at end of operations ensures disturbance footprints are rehabilitated, and waterways and drainage patterns are reinstated.</p>	<p>PO33 – Complies</p> <p>A Preliminary Rehabilitation Management Plan (Appendix G) has been prepared for the Project.</p> <p>Following completion of the construction phase, areas not required for ongoing operational activities will be rehabilitated and/or regenerated in accordance with good practice at the time and where required for ongoing low-intensity cattle grazing.</p> <p>This will include:</p> <ul style="list-style-type: none"> Temporary use areas, including construction laydown areas, concrete batching plants, temporary site office, and construction site compound. All materials removed from the Project footprint will be sorted and packaged for reuse and/or recycled where possible in accordance with the waste hierarchy. <p>An End of Construction Decommissioning Plan will be prepared prior to finalisation of construction.</p> <p>At the end of the Project’s economic life, the WTG towers and other above ground infrastructure will be removed, and the area will be rehabilitated in accordance with the regulatory framework applicable at the time and in consultation with the landowner per the existing sub-lease agreement.</p> <p>This will include:</p> <ul style="list-style-type: none"> All above ground infrastructure not required for the ongoing agricultural use of the land, including the WTGs, substations, and operation and maintenance facilities, will be removed and the land rehabilitated; Any access tracks and hardstands not wanted or required by the landholder will be removed and land rehabilitated and returned to a primary production use;

Performance Outcomes

ERM Response

- Below ground infrastructure, including cabling and the WTG foundations, will be left in situ to avoid further disturbance and minimise clearing of revegetated areas. Rehabilitated areas will be adequately graded to reflect the slope of the surrounding area and to mitigate the risk of soil erosion; and
- All materials removed from the Project will be sorted and packaged for reuse and/or recycled where possible in accordance with the State Government’s waste hierarchy.
- As part of decommissioning the Project, particularly the BESS facility, the reuse, recycling and recovery of battery components will be undertaken. This will encompass a Battery Recycling Strategy.

An End of Operation Decommissioning Plan will be prepared for the Project prior to decommissioning.

Given the above, the Project relevant components will be decommissioned in a timely and efficient manner both after construction and the completion of operation.

PO34 Decommissioning incorporates design features that enable reuse, recycling, and recovery of battery components and associated infrastructure at end-of-life.

PO34 – Complies

A Decommissioning Security Report (**Appendix H**) has been prepared for the Project and is supported by a Preliminary Battery Recycling Strategy.

The BESS units will consist of Lithium-ion batteries (LIB) which contain valuable materials, such as lithium, cobalt, nickel, and aluminium.

As part of decommissioning the Project, the reuse, recycling and recovery of battery components will be undertaken. As the LIB recycling and re-use sector is evolving, the recovery of battery components and associated infrastructure at end-of-life will adhere to the regulatory and industry standards at the time.

PO35 Decommissioning plans are secured by bonds or financial guarantees or other mechanism/s to safeguard compliance.

PO35 – Complies

A Decommissioning Security Report (**Appendix H**) has been prepared for the Project and is supported by a Preliminary Battery Recycling Strategy.

Performance Outcomes**ERM Response**

The Report concludes that MMG is contractually obligated to the Landholder to decommission and rehabilitate the Project at the end of the Project's operational phase. MMG has demonstrated the ability to provide financial security for the Project.