

MINUTES OF MEETING (Draft)

STRATHALBYN COMMUNITY CONSULTATIVE COMMITTEE

Thursday 15 May @ 7.00 pm
Senior Citizens Hall, 6 Parker Avenue, Strathalbyn

PRESENT:

Charles Irwin Andrew Pederick Sue Jettner Julia Currie
Ann Woolford Mark Dale
Matt Osborne - Sec

DMITRE:

Hans Bailiht

TERRAMIN:

Matt Daniels Joe Ranford

EPA:

Nil.

APOLOGIES:

Karen Rogerson Mike Farrier Malcolm Twartz Peter Reilly
Fred Carrangis Greg Marshall Rhonda McCarthy

Gallery – approximately 10

1. WELCOME, INTRODUCTIONS AND APOLOGIES

Charles Irwin opened the meeting at 7:07

Meeting is being recorded as per Terms of Reference

2. REVIEW OF MINUTES OF LAST MEETING

- The previous minutes have been circulated
- **All Action items from the previous minutes remain outstanding.**
- Minutes were accepted as is by consensus

3. DMITRE: COMPLIANCE OVERVIEW - Compliance and Inspections report

Hans Bailiht

Site

- Hans has visited the site a number of times with Joe Ranford
- Little activity at site, water in the tailings is very low
- Some foxes have been sighted, a baiting program has started or will start shortly
- Onsite rubbish has been cleaned up

Reports

- Draft TSF cover report has been submitted, currently being reviewed by O'Kane Consultants for DMITRE (Note: URS are Terramin's consultants.). Draft Care and Management Plan has been received and is being finalised. Should have final version shortly.
- A Draft Land Management agreement has been distributed to the SCCC. DMITRE legal representatives are reviewing this and drafting a brief going to their Minister. This will be forwarded to Planning Minister who will have commercial lawyers review it and go through the necessary process to finalise an agreement. This should be complete by the next SCCC meeting.

DMITRE review of CCC Terms of Reference

- DMITRE and GHD have been to all Community Consultative groups,
- GHD have received feedback, document is now being updated to be released end of next week (week starting 19/5/2014).

- We are working on a Stakeholder and Community Management Plan (which will go hand in hand with the Terms or Reference document). DMITRE have provided feedback on the draft to GHD. GHD are now responding to feedback prior to distributing to groups.

Question/Comment -

Chair – *There were a number of reports/documents that were meant to be circulated prior to this meeting, for review at this meeting. As this has not happened there is not as much information as expected to discuss tonight.*

4. TERRAMIN: UPDATE AND REVIEW (presentation available on website)

Joe Ranford

Site Program

- Currently in Care & Maintenance phase
 - Maintaining all onsite infrastructure and equipment
 - Monitoring ground conditions and water underground
 - Ongoing environmental monitoring and management
- Interim 2012 PEPR was approved on 6th May 2014
- Care and Maintenance Plan resubmitted in line with DMITRE feedback and incorporated for inclusion into the PEPR.
- DMITRE have provided more feedback on the Care and Maintenance Plan on 13th May 2014.

Mining and Underground Management (Quarter 1, 2014)

- A total 19,800m³ of water placed underground during the quarter – storm water runoff and bore water injection
- Water reached the 120m RL in the decline – late April
- Quarterly ground control inspection
- UG Water 8.05pH on 29 April 2014

What's happening at Angas Zinc?

- 5 Environment, Community and Water Management staff remain onsite
- Clean-up work – steel recycling
- Rubbish removed
- Disposal of surplus mine equipment (Garwood machinery)
- Water and environmental management/monitoring continuing
 - Water, Dust and Environmental management
 - TSF management
 - Mine void Acid Mine Drainage (AMD) management

Closure Works to date

- Post closure site contour and drainage design
- Vegetation identification for TSF capping and seed collection
- Chemical analysis of TSF – Tails acid testwork, AMD testwork of underground paste
- Soil Testing – particle size distribution, Atterberg limits, moisture content, Emerson Class testing, standard compaction testing, permeability testing.
- Risk assessments
 - Internal PEPR risk assessment
 - URS risk assessment on closure design and capping options
 - FMEA (Failure Mode Effect Analysis) risk assessment with DMITRE & EPA

Question/Comment -

Joe – *This document looks at the criteria we have set for the site and works out the likelihood of things going wrong. It takes away all the controls and allows us to say 'if we had no controls in place what's the worst thing that could happen?' and then we put in place measures to make sure that we stop it from happening.*

- 3 reports currently being assessed by DMITRE, all yet to be circulated to the SCCC:
 - TSF Wall Geotechnical Investigation, URS, June 2013

Question/Comment -

Joe - *We have the annual report, has not been reviewed yet.*

- TSF Cap Options Report, URS, February, 2013
- TSF Proposed Phytocap Conceptual Design, URS, 2014
- Geotechnical stability report and void fill design
- Land Management Agreement as per Lease Condition 69.

Question/Comment -

Joe – *We have sent out the document and the question and answer sheet, if anyone has any more questions that I can't answer upfront I will take them on notice and get back to you.*

Planned works

- Awaiting feedback from DMITRE on TSF cover works
 - Update Closure Plan in accordance with feedback

Question/Comment -

Joe – *To clarify, O'Kane are a consulting group that are working with DMITRE on Brukunga. We are not working with O'Kane, instead we are using URS (which use a lot of the same systems as O'Kane) but we have picked up on a lot of the principles that O'Kane (as a world leader) is saying. We want people to be aware that we are not specifically using O'Kane to do our work, we're using URS, and O'Kane is being used by DMITRE to check that our science in the reports is appropriate.*

- Update soil surface erosion modelling in the boxcut area
- Groundwater modelling has been completed and submitted – awaiting feedback from the Department of Environment, Water and Natural Resources

Land Management Agreement

- Lease Agreement 69 – *“The Lessee must ensure that the area of the TSF and a 10m wide buffer on all sides is protected in perpetuity from development that may affect the integrity of the TSF design. This protection must include a caveat on the relevant freehold land tile”.*

Question/Comment -

Joe – *We have sought legal advice and found that a caveat does not apply. We are advised that we need to put a Land Management Agreement (LMA) on it. A Draft Land Management Agreement has been distributed, but some sections have been left out at this stage because we need to go through the process of getting the cover system approved before we can complete the relevant sections.*

- LMA drafted in conjunction with Norman Waterhouse Lawyers
- LMA operates under the *Development Act 1993* (SA) and in conjunction with the Department of Planning, Transport and Infrastructure
- LMA remains connected to the land title for such time as the Minister is satisfied that it should remain.
- LMA protects the land from defined forms of “development” which would be detrimental to the integrity of design.

In response to a Question generated since last meeting by Rhonda McCarthy:

“If, for example, the area of the TSF was fenced and maybe planted with groundcover and trees, wouldn't it be easy enough, for future resale of such property, to have this encumbrance lifted?”

- The LMA is connected to the land title and registered through the Land Title Office. Once a LMA is placed on the land it can only be removed with the consent of the Minister (Minister for Planning – Department for Planning, Transport and Infrastructure)
- A LMA is listed on the title and will be found on a title search.

Question/Comment -

Hans – *The Minister will need to accept the liability that it will work, there are no guarantees this will occur. The normal process is that the Planning Minister would accept the liability as it comes under the Development Act 1993.*

Discussion on the Land Management Agreement

Hans – *If the LMA is in place it is separate to the Mining Act; it is not a substitute for a mining lease.*

Joe – *LMA doesn't change lease conditions, just prevents changes to drainage or developments on the property.*

Chair – *A lot relies on definition of 'development' which is currently not there. You can do these agreements defining either what development is allowed or what is not allowed. This may become important looking forward a couple of hundred years. Therefore this committee should be informed on how 'development' is defined in the LMA.*

Chair – *Because it goes under Department. of Planning, Transport and Infrastructure, it effectively comes under council responsibility.*

Hans – *It can come under the council but in this case it's under the Minister.*

Chair – *The memorandum suggests the council has a role to play, and the signature of the Mayor and CEO as witnesses to the LMA are bonding the council in as being aware of it. You need to think about a council's capabilities because the way this will be handled in practice will come down to the council.*

Jo – *It is the same as anything going on the land title. It will be the responsibility of the Minister but will be managed by the council like other matters on land titles.*

Hans – *The Council doesn't have the right to breach the agreement, it will still be enforced by the government.*

Chair – *I raise this because of the comment on page 2 stating that "should a new owner make an application for development that is prohibited by the LMA, the Alexandrina Council will not allow or consent to the development". That comes down to the interpretation of the council in many cases.*

Ann – *Council will do a search and refer it to the Minister.*

Chair – *Regarding the 'sale of land' clause in the memorandum, it is clear that the previous owner is released of obligation, it is not clear that the obligation is handed to the new owner.*

Hans – *The Government solicitors will be going through the draft document.*

Quarterly Environment Report #28 (October to December 2013) – Key Issues

Matt Daniels

Land Management Agreement – Structure

Care and Maintenance – what's different?

- This quarter reflects the changing nature of the Environmental Monitoring Plan, as the Angas Zinc Mine transforms from an Operational site into Care and Maintenance.
- Some monitoring has been based on compliance requirements from the 2012 approved PEPR, while other sections have adopted monitoring in compliance with the Mine Care and Maintenance Plan.

Question/Comment -

Matt D - *No more blast monitoring, new water sampling procedures in place (based on recommendation from EPA)*

Environmental Activities

- TSF surveying – Maptek onsite
 - Drone trialled for survey work, cost effective and accurate data
- TSF tails surface acidity monitoring
- Weed spraying in time for winter
- Dust management
- Waste management – steel recycling continued through the quarter
- Monitoring water levels in mine decline
- SEB direct seeding success
 - Direct seeding in July 2013 has worked well, good species diversity and Ruby Saltbush is in seed

Underground Mine Void

- 4th February, water samples from the void were taken at the 190m RL where water had risen to; from natural upwelling and pumping into void
 - Results of TDS, Turbidity, SO₄ similar to background
 - Approximately 19,800m³ of water has been sent to underground (between 1st Jan 2013 and 31st March 2014)
 - pH of 8.05 on 29 April
- Water has now reach 120m RL

Community Activities

- A member of the Strathalbyn Model Aircraft Club recovered his aeroplane on 25th February 2014.

Community Feedback & Environmental Incidents

- No environmental incidents were recorded during Quarter 1
- No registered community complaints during Quarter 1
- Hare-proofing fence along the TSF boundary in February

TSF Decant Pond – Surface Area

- The TSF Decant Pond remains in compliance (<15,000m²)
- Surface area of ≈2,000m² at RL 66.55 at the end of March
- 5th May 2014 pH meter reading 4.67

TSF Water Quality

- 4.67pH on 5th May 2014
- pH continues to be monitored
- TSF tails surface surveyed for pH on a quarterly basis
- Tails surface pH in February
 - Ranged from 6.2 – 8.1pH
 - Due to be retested in May

Questions

Nil

5. DMITRE / Terramin: PEPR Review/Care and Maintenance/Mine Closure Planning

Upcoming Activities

- Awaiting feedback from DMITRE for phytocap and groundwater modeling in Closure Plan
- Care & Maintenance Plan updating
- Closure Plan updating
- Ongoing TSF monitoring and water management
- Planting trees in SEB areas

- Ongoing weed and pest management
- General site dust, water and erosion works
- Ecosystem Function Analysis (EFA) for SEB areas

Closure Plan

Closure Planning work completed so far

- Vegetation for TSF capping
- Identification and regrowth establishment
- Chemical analysis of TSF – Tails AMD testwork, cemented paste testwork
- Soil Testing – particle size distribution, Atterberg limits, moisture content, Emerson Class testing, standard compaction testing, permeability testing.

Phytocap Vegetation List

- Grasses
- Kangaroo grass, *Themeda macra*
- Redgrass, *Bothriochloa macra*
- Windmill grass, *Chloris truncata*
- Wallaby grass, *Austrodanthonia spp.*
- Additional vegetation to be assessed include shrubs and small trees identified in the 2012 PEPR.

Closure Planning completed so far

- Risk assessment FMEA
- 3 reports currently being assessed by DMITRE
 - TSF Wall Geotechnical Investigation, URS, June 2013
 - TSF Cap Options Report, URS, February, 2013
 - TSF Proposed Phytocap Conceptual Design, URS, 2014.

Question/Comment -

Matt D - *TSF proposed Phytocap conceptual design to be sent to SCCC with a ten page Executive Summary document on how to interpret the key points.*

- Phytocap information documents
 - 1 page “What is a Phytocap?”
 - 4 page “Phytocaps at a Glance”
 - 10 page “Phytocaps at a glance, AA Cap Trials and Angas Zinc Mine” **still to be issued, with DMITRE approval**
- Geotechnical design for vent rise and decline plugs
 - Reviewing draft, received 13-5-14
- Land Management Agreement as per Lease Condition 69.

What's left?

- URS to update soil surface erosion modelling/boxcut area
- URS TSF cover design work: to be independently reviewed by O’Kane (for DMITRE) and URS to update models in line with feedback if required
- Groundwater modelling – AGT will finalise and incorporate any independent review comments.
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AMD Conference

- Matt Daniel attended the 8th Australian Workshop and Conference on Acid and Metalliferous Drainage in April/May 2014.
- Many Australian and international experts on AMD management presented
- International Network for Acid Prevention (INAP) representatives in attendance
- Matt Daniel met with a variety of AMD and capping experts
- Terramin are utilising the expertise at URS Engineering, O’Kane (for DMITRE) will be reviewing all work undertaken by Terramin and URS.

- Sue Jettner and Mark Dale had the opportunity to attend presentations on AMD issues and meet with experts in the field of mine waste capping and will present now.

Questions

Nil

6. SCCC MEMBERS: CLOSURE OPTIONS

Presentation by Sue Jettner and Mark Dale on Phytocap's from AMD conference

Sue presented her brief report (circulated to SCCC) compiled from attendance at the 8th Australian Workshop on Acid and Metalliferous Drainage 29 April – 2 May 2014, Adelaide. Attendance on Wednesday 30 April 2014, reproduced as follows, with comments:

Introduction

- PEPR for Angas Zinc Mine includes documented information regarding Closure Plan for the TSF. Briefly, HDPE cover welded to existing liner under tailings' deposition and soil cover added, allowing grasses and other accepted species to be grown and no structures to be erected upon that area.
- Batters are to be constructed and no structures to be erected upon that area.

Further Discussions

- Terramin have indicated considerations of alternative cover proposals. One is not to use the sealing HDPE liner, instead use a phytocap system that stores and releases surface water and can support not only grasses and small shrubs but possibly trees.
- No mention of built environs has as yet been made?

Introductory Speaker

- Dr Terrence Chatwin (Technical Director for International Network for Acid Prevention (INAP)) mentioned '*The mining industry is still to fully grasp environmental issues; Collaboration is important; Research and Government support is important; Networking is a powerful tool in enabling progress in AMD.*'
- At the conclusion, he mentioned that management of AMD [relies on] company commitment and efforts of all stakeholders are critical – to ensure that mining is viable and will not destroy others' current livelihood.
- Most importantly – '*Do not forget lessons learnt from those who have gone before*'.

Workshop

- Speakers presented for 25 minutes or thereabouts.
- Projects included mine sites in Canada, Tanzania, Nova Scotia, New Zealand and Australia. Products included coal, precious metals, zinc, lead and the like.
- The majority considered the use of waste rock piles which may have, or have been found to be PAF (Potentially Acid Forming).

Unanswered Questions

Did any projects have an impervious layer (such as HDPE) under waste rock or tailings and that had been designated for encapsulation?

Are there characteristics of HDPE that ensure absolutely no further contamination of ground water?

Considerations

- Different situations will demand different solutions, but many factors still remain constant - site climate, hydrogeological setting, materials available to deal with AMD. Vegetation suited to site, cost, timing of rehabilitation and future use.

Question/Comment -

Susan – *These are all things being considered by Terramin, these have been included to reiterate.*

The timing of rehabilitation was interesting because it was suggested that companies and regulators could be more aware of 'start sooner rather than later', don't try and deal with it at end of the project, look at how you will manage it from the beginning. Try and take of cost effective management approaches to prevent disasters.

- Some sites had slopes, but [when] constructed with store and release systems required a collection pond for excess surface water that permeated to excess through the cover in high rainfall events.

Cover Systems Are We There Yet?

- Dr Mike O'Kane (Canada) was the opening speaker ... he mentioned context for cover systems, alternatives to current practice, functionality of chosen cover systems; acidity loads and technology available to create cover systems but also to demonstrate benefits.
- The Net Percolation (NP) of infiltrating water will effect low acid when NP is low.

Unanswered Questions

*What might be the effect in a system such as Angas Zinc Mine when NP is high?
How are extreme events going to be managed?*

- Main concern when speaking to Mike O'Kane at lunch was mainly ensuring that all relevant research and trials presented by Terramin would be able to address the issues of Net Percolation.
- In other words, as he mentioned in his comprehensive address ... 'What do you need to do on the surface, in order to protect what is beneath?'

Unresolved Question

*Following Greg Meirs' presentation on geosynthetic layers over coal waste rock piles...
Do regulators ask for HDPE in order to fight nature? Could there be better thought given to addressing mother nature's behaviour?*

How are you going to deal with water coming in from the sides of the cover into the tailings (bath tub effect)?

Questions/Comments -

Susan – *Thank you to Terramin for inviting us to come to the conference, it was very good.*

Joe – *Thanks Sue, we wanted to bring people to the conference to show people we are really trying to find the best solution possible for the site.*

Susan – *So does that sum up where you are going on the site?*

Joe – *Absolutely, Mark what are your thoughts?*

Mark Dale provided his presentation to the SCCC from his experience at the AMD conference.

Mark – *It put my mind at ease about covers but raised all sorts of other questions.*

- Mark discussed that soil drainage is the main point of concern in cover designs.
- *'From my experience in the mallee, before colonisation it was full of soil cover, and with a thick clay layer, water would still get through to water table at high rain events'*
- O'Kane obviously has extensive experience in designing covers in different weather conditions
- Mark discussed his own diagram; his main points were:
 - High annual rainfall in the region means it likely that drainage will occur annually,
 - Using a deep course layer allows drainage to flow downhill and escape,
 - No matter what you do there will be some seepage,
 - Can use interception drain to divert water in the course layer,

- We currently have the 2 drains in the tailings that are running at 4 litres a minute, so the water will drain but the TSF will not dry (remain at field capacity) and any water that makes its way in will spread through (form a saturating/wetting front) and pool at the bottom and we'll have a point source of pollution.

Marks' Key Points from the AMD Conference

- Each site is different and capping must be specifically designed for AMD, geotechnical, geophysical, geochemical and climatic conditions
- Many cover system failures have occurred as a result of poor modelling and planning and poor construction practices and unusual climate events. Long term weather data must be used
- Phytocaps remove the reliance on unnatural materials within the capping system
- Waste rock dumps seemed more difficult to manage in terms of AMD than TSFs
- Didn't hear much about water balances at the conference, main focus was on capping waste rock piles and not a lot on tailings

Questions/Comments -

Mark – *My concerns are what is going to happen to the tailings, will it oxidise and produce acid, is much water going to seep in and if any does will it come out the bottom?*

Hans – *We had that (water pooling at bottom of tailings) in mind in the initial design, we think it can be addressed using the decant tower and pump water out once cover is on. Also surface run off was not included in the diagram and appropriate measures need to be incorporated in the final cover design to manage this as well.*

Antonia – *There was a statement at the start of the conference that a lot of previous work was done on tailings, now they understand the biggest risk is waste rock dumps, also more difficult to put a cover on. That's why the emphasis was on waste rock piles at the conference.*

Jo – *These are all valid points, we understand the bath tub effect and water going in, we acknowledge that the diagram we put up was simplified, but we had to start somewhere and build everyone's awareness. As we go if people need more information we can provide that. All these things are valid and are being considered. What we wanted from this (sending members to the AMD conference) was for you to be able to independently get the point across that we (Terramin) are putting good science into this process. We don't have all the solutions at the moment and that's why it's taking so long; we have to get this right.*

Matt – *We are looking to have a bore in the tailings to monitor water levels within the tails, and if necessary open the decant tower and pump the water out.*

Julia – *Was the large, 1 in 100 year flood event considered?*

Mark – *Not really a worry because most will go off as run off.*

Hans – *The top area won't have steep slopes for the water to build up speed and create erosion, it will also be directed to the spillway.*

Antonia – *Terramin will be around in the early years to fix anything that happens, the design will have to be working before they walk away.*

Mark - *Erosion is not that much of a problem. It's more about the saturation during winter and early summer and the bath tub effect (Net Percolation).*

Chair – *Thank you to Terramin for sending two members to the conference and thank you to those members that went and provided a summary. A key issue is drainage or Net Percolation (same concept), another is the thickness of the cover; also, the bathtub effect is another important issue. The incorporation of a means to deal with the 'bathtub effect' in 50 to 100 years' time is critical and that needs to be thought through because the drains at that stage may not be serviced.*

Questions:

Adrian – *Will it be possible to have large trees in the cover?*

Matt D – *At Brukunga they have large trees growing, but what we've found is that they do not grow down through the tailings; we're looking to have small trees and shrubs instead. We have looked at the depth plants are sending their roots down. This is informing our revegetation plan for the site, using native plants.*

Mark – *The roots you see are the normal structural ones, there are little roots you don't see that are sucking up water deeper down.*

Chair - *How much top soil or available soil do you have access to, if you needed more where would you get it from, and what are the proposed depths of the cover?*

Matt D – *We have enough top soil to cover for 100mm, enough soil in the tailings wall for 1600mm depth, and we can also take soil from the boxcut, eastern paddock and neighbours property. We have enough material onsite for the cover.*

Joe – *One of our constraints is access to clay layers, the soil depth will be designed to mitigate the lack of clay in the cover.*

Chair – *Presumably the greater the depth of the cover the higher the transpiration rate and lower Net Percolation. If you did need to put a clay layer in how deep would it be?*

Joe – *We would have to ask our experts*

Chair - *Thanks for the presentation, it's always been a difficult problem and I thank you for your efforts to try to find a solution that will work longer term than might a plastic solution. The question now is how that flows into land uses permitted thereafter. That's something the committee is very interested in and as information comes to hand please send it through, because there are a lot of unknowns about that. However, it does seem this solution has more flexibility than some of the previous solutions and it's worth exploring.*

Susan – *Are you collaborating with other mines in similar context in developing the cap?*

Matt D – *The designer of the cap is Canadian, and is part of a national initiative where researchers get together regularly to compare different sites and performances, so there is some real learning to be obtained there. Part of why we selected that provider.*

Hans - *The same is happening at Kanmantoo, we're talking to them about it now.*

Joe – *Also some work on coal tailings in east coast and north of WA; similar climate and similar cover design. Tailings also on top of plastic liner and a waste rock dump.*

7. TERRAMIN: COMMUNITY ENGAGEMENT PROGRAM UPDATE

Newsletter, Website and any other publicity

Mike - *Newsletter came out in March in the Argus; notice also went into the Argus and Mt Barker Courier*

8. Review of Terms of Reference Update and Progress

- See 3 above
- Sue and Charles provided comments to the Draft Terms of Reference document
- Further progress would be good

9. Other Business

- Council community database update received and returned by Chair.

- Council offer of board and community office bearers training was received, not considered relevant to this group

Questions/Comments -

Adrian – *Thank you to Terramin for offer to attend the AMD Conference. It was disappointing I couldn't go but glad to see the research is ongoing.*

Susan – *Has the Annual Compliance Report been submitted?*

Hans – *Yes, I have received it, should also be on the web*

Charles - *Has 2012 PEPR gone onto the web? It should be on the web for people to see despite the fact that this group has never seen the final version*

Jo – *Thanks all for coming. I query the status of Ben Brazzilotto's membership of this committee, I have been here for 2 years and he's only attended half of one meeting.*

Charles – *He was apologising quite regularly, but not so the last couple of meetings. I have been keeping track of this. As the number of meetings he has not attended without providing an apology is now three, as per our Terms of Reference that is a conversation I will have.*

Mark – *Thanks to Terramin for getting us to that workshop, was good to see that it is an active development that is dealing with this problem, and that there is a lot of international work going on.*

Anne – *In November this year its Strathalbyn's 175 year anniversary and we're asking people if they would like to highlight their activities around the district in the last 175 years.*

10. FUTURE MEETINGS AND CLOSE.

Charles – *Thank you everyone for attending, and Matt O for taking the minutes.*

Julia submitted an apology for next meeting.

Meeting closed at 8:30

Next Meeting 21 August (by email?), 2014, at 7:00pm, Parker Ave. Hall

Future Meetings: November 20, 2014, February 20, 2015

Action List – Carried over from previous meeting

Terramin	Terramin to provide Executive Summary of cover options, consultant reports and expert opinions and an example Land Management Agreement framework prior to further discussion at the next meeting (May, 2014)
Terramin	Terramin to distribute agreed PEPR including agreed Care and Maintenance plan to the SCCC.