Energy Resources Of Australia

Ranger Mine Closure Plan 2023 Executive Summary

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Cover: Ranger mine with Pit 3 being dewatered in the foreground (November 2023).

1 INTRODUCTION

Energy Resources of Australia Ltd (ERA) produced uranium oxide for the global nuclear energy market for more than 40 years. The Ranger ore body, located on Mirarr country in the Alligator Rivers Region of the Northern Territory, was first discovered in 1969. ERA was established in February 1980, and when floated on the Australian Stock Exchange (ASX) in July 1980, was the largest public float in Australian history.

After considerable exploration and site preparation activity, mining started from Pit 1 (Plate 1), and ore processing soon followed with the plant commissioned in July 1981. The first drum of uranium oxide was produced on 13 August 1981.

Mining from Pit 1 finished in December 1994 and finished from Pit 3 in November 2012. The last processing of stockpiled ore and the final drum of uranium oxide was produced on 8 January 2021 (Plate 2) completing the mine's operational stage after producing a total of 132,000 tonnes of uranium oxide.

With the mine now in the closure phase, ERA's focus is to create a positive legacy and achieve world class, sustainable rehabilitation and closure of its former mine assets.

Plate 1: Pit 1 in 1981

Plate 2: Final drum of Uranium Oxide

The environmental protection conditions within which ERA has operated and must now close the mine are set out in the *Environmental Requirements of the Commonwealth of Australia for the Operation of Ranger Uranium Mine* (hereafter ERs). These ERs are attached to the Ranger Authority issued under Section 41 of the *Atomic Energy Act 1953*. The ERs are also given effect through the Ranger Authorisation issued under the Northern Territory *Mining Management Act 2001*.

The Atomic Energy Act included an end date for closure activities at Ranger of 8 January 2026. In November 2022, the *Atomic Energy Amendment (Mine Rehabilitation and Closure) Act 2022* (Cth) was passed. The amendments to the Act allow the Minister to vary or confer a new Authority for the express purposes of authorising rehabilitation, remediation and monitoring activities at Ranger to extend beyond the previously legislated deadline of 8 January 2026. The amendment also outlines a process for the progressive relinquishment (close-out) of parts of the Ranger Project Area (RPA). ERA continues to work with the Commonwealth Government, Northern Land Council (NLC) and Gundjeihmi Aboriginal Corporation (GAC) (on behalf of the Mirarr Traditional Owners), to negotiate the revised Section 41 Authority for the RPA. ERA intends to apply for a new Authority on or before May 2024.

The ultimate objective for closing the mine is to prevent impacts to people and the environment, and to rehabilitate the site to a standard that would allow its incorporation into Kakadu National Park. ERA has worked in close collaboration with many stakeholders over the last 40 years, generating a significant amount of information from research and monitoring. This ongoing information collection and analysis is guiding the rehabilitation activities towards a successful mine closure that achieves the above objective.

The first Ranger Mine Closure Plan (MCP) was submitted to the Commonwealth Minister for Resources and Northern Australia, and the Northern Territory Minister for Primary Industry and Resources, in May 2018. The MCP is ERA's primary mechanism to describe the closure activities and rehabilitation. The MCP seeks to consolidate the relevant information from the last 40 years and demonstrate how the current and planned closure and rehabilitation activities will achieve the ERs. The 2023 MCP also discusses the role of ERA in supporting the post-mining social and economic transition of Jabiru. To ensure its currency, and to incorporate lessons learnt from ongoing engineering, scientific and monitoring studies, the MCP is updated and submitted for approval annually.

Standalone applications seeking approval to perform certain closure activities (e.g. backfilling Pit 1 and Pit 3; demolishing the Processing Plant; deconstructing the Ranger Water Dam (RWD); and creating the Final Landform) are also submitted. The activities subject to standalone approval applications, and those seeking approval via the MCP, are described in Chapter 4 of the main document.

2 LOCATION OF THE MINE AND CLOSURE DOMAINS

Ranger is located within the RPA adjacent to Jabiru, approximately 260 km east of Darwin in the Northern Territory (Figure 1). Access to the RPA is via the Arnhem Highway. The RPA occupies approximately 79 square kilometres and is surrounded by, but separate from, Kakadu National Park.

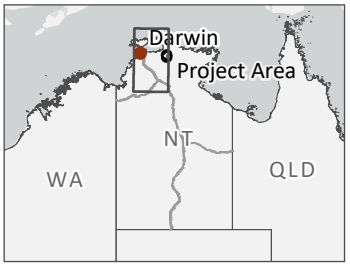
The Mirarr people are the Traditional Owners of the lands on which Ranger is located. Mirarr country encompasses the RPA, the Jabiluka Mineral Lease, the town of Jabiru, and parts of Kakadu National Park. In 1995, the Mirarr established the GAC, an incorporated body, to assist them to manage a balance between sustainable development and traditional practice on their land. The GAC represent the Mirarr Traditional Owners in discussions and negotiations with ERA.

FIGURE 1

Location of the Ranger Project Area (RPA)

LEGEND

- Ranger Project Area
- Jabiluka Lease
- Kakadu National Park World Heritage Area
- National Park
- Primary Roads
- Town



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GDA 1994 MGA Zone 53

Image Source: ESRI Basemap (2022); **Data source:** NT Government Data (2023)

It is common practice for spatial areas within a mine site to be identified as 'Closure Domains'. This provides a point of reference and spatial boundary for discussions that follow. The Closure Domains for Ranger are shown in Figure 2 and comprise the following:

- Domain 1: Pit 1 (~41 ha, backfilled and rehabilitated in 2021).
- Domain 2: Pit 3 (~107 ha, being dewatered at the time of writing this MCP to dry out the tailings, allowing them to start consolidating to improve their geotechnical strength ahead of initial capping).
- Domain 3: Tailings Storage Facility (TSF) / Ranger Water Dam (RWD) (~185 ha, previously stored tailings and is now being used to store process water, hence the name change).
- Domain 4: Land application areas (total ~157 ha, used for irrigation of treated water during the dry season if required).
- Domain 5: Processing plant, water treatment plant, power station, administration and maintenance facilities (~40 ha, the facilities used for processing ore have been decommissioned and are ready for demolition; some infrastructure like the water treatment and power supply facilities remain in operation).
- Domain 6: Rock stockpiles (~268 ha, will be used to backfill Pit 3 and create the final landform).
- Domain 7: Water retention ponds, water storage structures and constructed wetlands (~110 ha, used to store process water, pond water and release water).
- Domain 8: Linear infrastructure corridors supporting access roads and service tracks (~41 ha, most of these will remain throughout closure and some will remain throughout the monitoring and maintenance phase to access monitoring locations).
- Domain 9: Miscellaneous areas that include trial sites (~55 ha, will be progressively rehabilitated, with the plant nursery remaining active throughout the monitoring and maintenance phase).
- Domain 10: Jabiru Airport and offices of the Environmental Research Institute of the Supervising Scientist (ERISS) (~44 ha, future of the airport is uncertain, ERISS will likely remain throughout the monitoring and maintenance phase).
- Domain 11: Residual Ranger Project Area (RPA) (~6,852 ha). This area encompasses the balance of the RPA (i.e. all areas not included in another closure domain). It is largely undisturbed but was subject to exploration activities (e.g. historic exploration drill holes, access tracks). It also contains monitoring wells and sampling stations. Parts of this domain will be the first areas where ERA seeks progressive relinquishment.

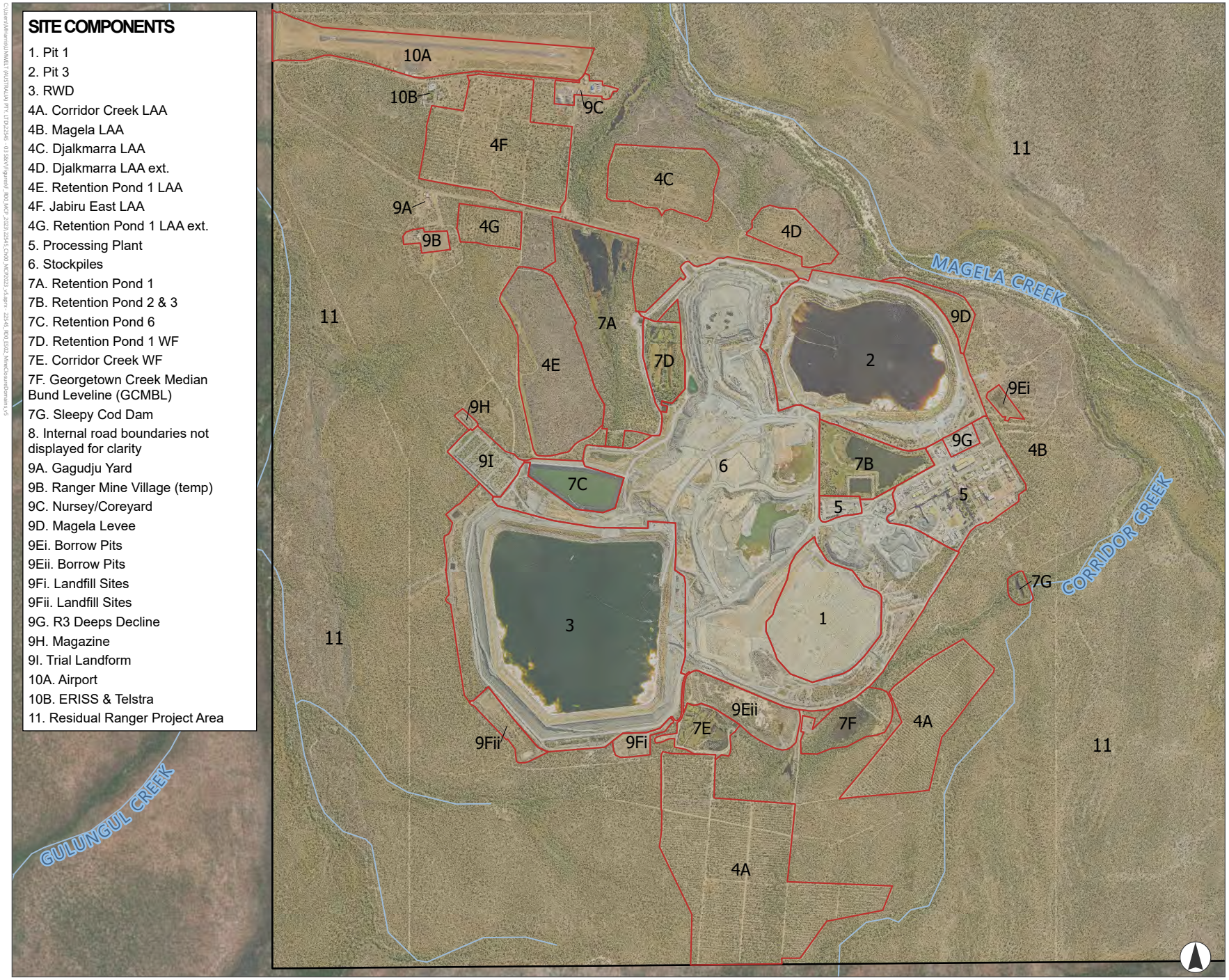

FIGURE 2

Ranger – Closure Domains

LEGEND

- Mine closure domain
- Ranger Project Area

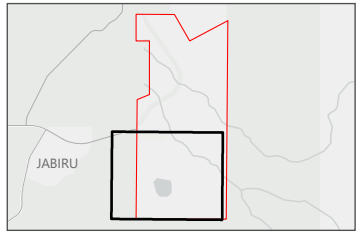

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Image Source: ESRI Basemap (2022); Aerometrex (2023) **Data source:** NT Government Data (2023)

3 STAKEHOLDER ENGAGEMENT

ERA's approach to stakeholder engagement is centred on maintaining and strengthening our relationships based on mutual respect, active partnership, transparency and long-term commitment. ERA will continue to connect with and respect Mirarr culture and the aspirations of local communities as we create a positive legacy and achieve world class, sustainable rehabilitation of Ranger.

Figure 3 illustrates the numerous external stakeholders associated with the closure and rehabilitation of Ranger. Most formal discussions with stakeholders are coordinated through the forums and committees listed in Table 1. These committees oversee and/or contribute to the mine's approval processes, mandatory reporting obligations, and the scientific integrity of studies, trials and projects. Figure 4 illustrates the extent of engagement, all of which facilitate a no surprises approach to on-site closure activities and opportunities to discuss the studies that inform the standalone approval applications.

To ensure the views of Traditional Owners are considered during the project and integrated into the design and execution strategy, ERA engages directly with Mirarr Traditional Owners through the Cultural Reconnection Steering Committee (CRSC). CRSC visits are held on the RPA and help facilitate cultural reconnection with the RPA, including consideration of how cultural knowledge can contribute to rehabilitation outcomes and how the cultural closure criteria will be monitored and assessed over time. Matters including water management, cultural heritage and environmental protection, revegetation and landform design, employment and training, housing and town planning, and involvement in decision making processes, have been topics discussed during CRSC visits.

A Social Impact and Opportunities Assessment (SIOA) commenced in 2023, with the objective of gaining an improved understanding of the existing socio-economic environment and potential social or economic impacts and opportunities associated with the closure and rehabilitation of Ranger. The SIOA will guide ERA's community and social performance activities moving forward. ERA's activities are centred on supporting the objectives set by the Mirarr Traditional Owners for the future of Jabiru post-mining. ERA has a role to play in delivering the following objectives, to:

- meet commitments regarding housing rectification and other infrastructure work as agreed and to the agreed standards;
- engage with stakeholders on a sustainable future for the Jabiru Airport;
- utilise Indigenous-owned enterprises, service providers or businesses throughout the closure and rehabilitation of Ranger;
- support the long-term retention of capability and capacity in Jabiru that fosters diverse regional development outcomes;
- support the Future of Jabiru governance structures that support the town's successful transition; and
- create opportunities in the form of employment, training, and/or livelihood opportunities for Indigenous people and local people from the region in the closure, rehabilitation and post-closure stages of the project.

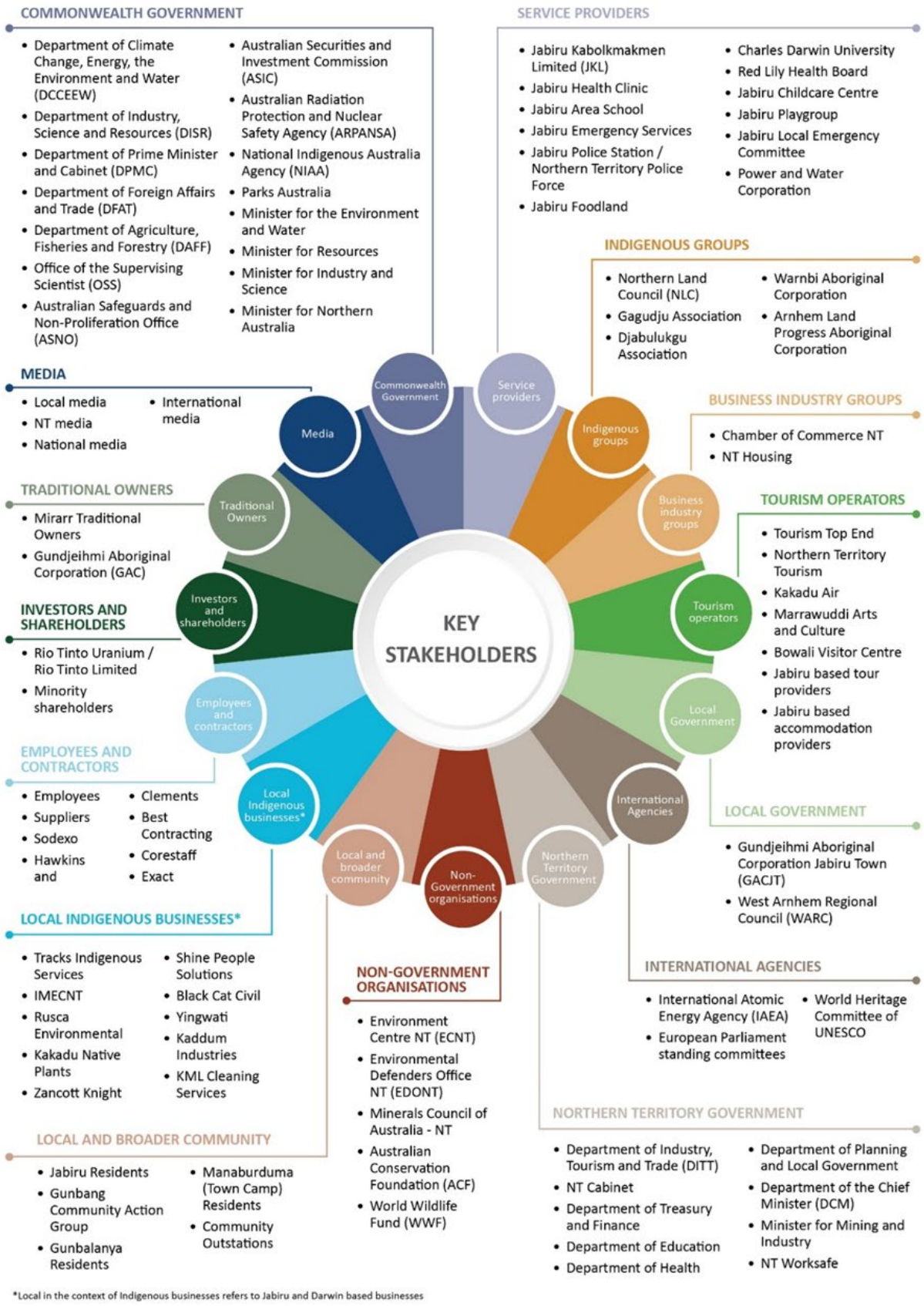


Figure 3: Stakeholder groups relevant to the Ranger Rehabilitation Project

Table 1: Stakeholder engagement forums

Forum / Committee	Description	Members / Attendees
Cultural Reconnection Steering Committee (CRSC)	The steering committee was established in 2021 to ensure the views of Traditional Owners are considered during the Project. The committee discusses cultural reconnection with the RPA, including consideration of how cultural knowledge can contribute to rehabilitation outcomes and how the Cultural Closure Criteria will be monitored and assessed over time.	Traditional Owners, GAC, NLC and ERA
Minesite Technical Committee (MTC)	The MTC provides a forum for stakeholders to discuss and resolve technical environmental management matters (assessments, inspections, audits and rehabilitation activities) and regulatory matters related to the Ranger mine and considers the views of the Mirarr and Aboriginal people.	DITT, OSS, ERA, GAC and NLC The Commonwealth DISR is an observer
Alligator Rivers Region Technical Committee (ARRTC)	The ARRTC oversee scientific studies undertaken to protect and restore the environment in the Alligator Rivers Region from effects of uranium mining. The ARRTC sign-off on scientific projects via Key Knowledge Needs (KKNs). These projects are undertaken by ERA and/or OSS and articulate the relevant knowledge and tools required to ensure protection of the environment from the potential impacts of mining and closing Ranger.	An independent chairperson, OSS, independent scientific members, NLC, representatives for DITT, Uranium Equities Limited (current holder of the Nabarlek lease), and Parks Australia
Alligator Rivers Region Advisory Committee (ARRAC)	The ARRAC is a public, non-technical statutory committee intended to facilitate communication between government, industry and community stakeholders on matters relating to the effects of uranium mining on the environment in the Alligator Rivers Region.	An independent chairperson, representatives from several NT and Commonwealth Government departments, Office of the Administrator of the NT, NGOs, GAC, NLC, OSS, ERA, and other mining companies that operate in the region
Ranger Closure Consultative Forum (RCCF)	RCCF was established to provide ongoing updates to stakeholders on Ranger closure activities; give stakeholders confidence that the proposed Ranger closure strategy will achieve the environmental requirements; provide information on upcoming approvals to allow stakeholders to appropriately resource; gain feedback from stakeholders on studies and applications to ensure outcomes are met, and provide feedback on close out of KKNs.	ERA, OSS, NLC, GAC, DITT, DISR
Relationship Committee	The committee was established to ensure effective information sharing and review processes between ERA and the Traditional Owners and their representatives.	Traditional Owners, GAC, NLC, ERA and invited observers

GAC – Gundjeihmi Aboriginal Corporation; NLC – Northern Land Council; DITT – NT Department of Industry, Tourism and Trade; OSS – Office of the Supervising Scientist; DISR – Commonwealth Department of Industry, Science and Resources; NGO – Non-Government Organisations.

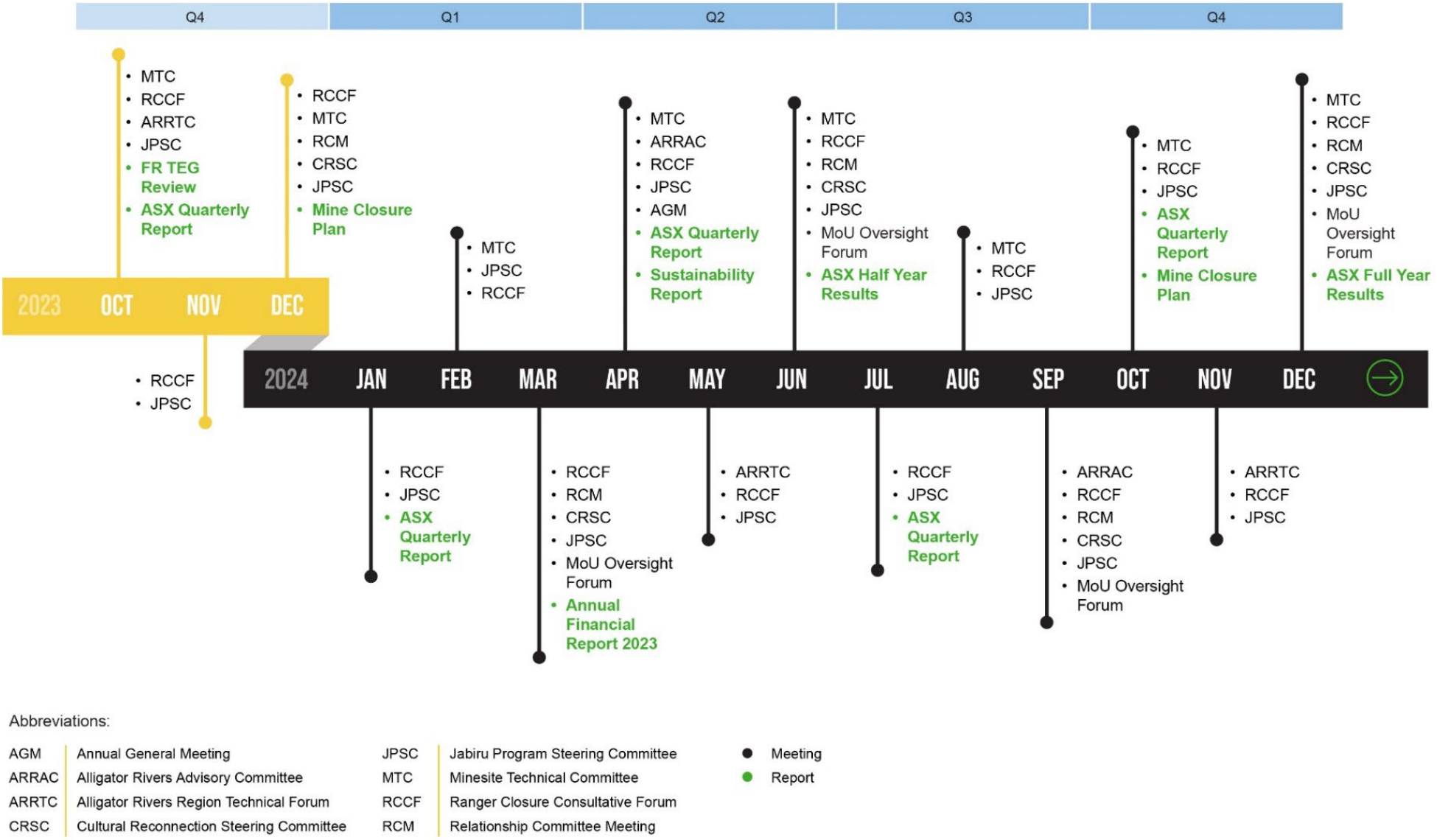


Figure 4: Multiple points of engagement (Q4, 2023 and 2024)

4 MINE CLOSURE PLAN UPDATE

The 2023 MCP includes substantial updates to study outcomes. The document has also been restructured to show more clearly the progress towards achieving the ERs and the current level of residual risk to the closure of Ranger. By doing so, it highlights the elements of the project that require further study and design refinement to achieve the ERs and reduce residual risk. Most of these studies are underway and the findings will be included in future MCPs.

Two notable additions to the 2023 MCP are:

1. Spider web diagrams for each of the six ER themes (Landform, Water and Sediment, Soils, Ecosystems, Radiation and Cultural) that provide a subjective per cent complete for the key metrics of Closure Criteria Approved; Relevant Studies Completed; Preventative Controls Effective; Monitoring Program Developed; and Corrective Actions Effective.
2. Bow-tie diagrams that provide on a single page a transparent way of showing progress towards achieving each ER. Within each bow-tie diagram:
    - Threats to achieving the ER and the preventative controls that have or will be implemented to manage these threats are represented on the left side of the diagram.
    - Corrective actions that will be implemented if the monitoring program identifies a deviation from the planned trajectory to achieving the ER, and the consequences and residual risk of this, are presented on the right side. The residual risk ratings reflect the current understanding and effectiveness of the controls and corrective actions. The findings of the studies that are currently underway will inform a refinement to, or addition of new, closure activities that will strengthen the effectiveness of the preventative controls and/or corrective actions, thereby reducing the level of residual risk. These changes will be made evident in each annual update of the MCP.

5 PROGRESS OF CLOSURE ACTIVITIES

Figure 5 shows the sequence in which closure activities are planned to occur, including indicative timeframes. It is noted that the timeframes shown are subject to change as they are pending the outcomes of further studies being undertaken on matters such as water management and bulk material movement. A detailed description of closure activities is provided in Chapter 4 of the MCP.

Table 2 summarises the completed, current and future activities being undertaken within each of the closure domains as they progress towards final landform.

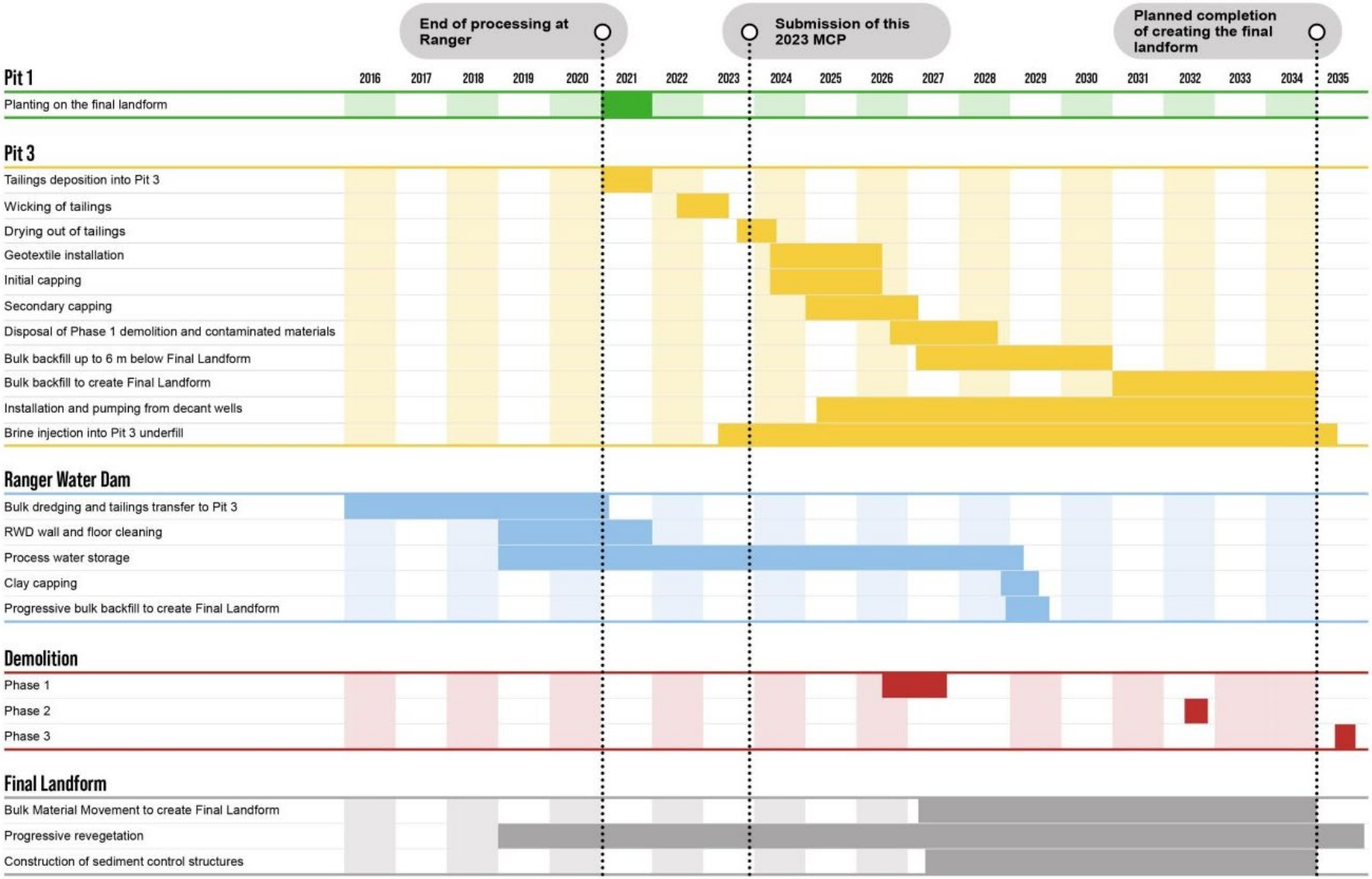


Figure 5: Indicative sequence of major closure activities

Table 2: Closure implementation work program

Domain	Completed Activity	Current Activity	Future Activity
1: Pit 1 (~41 ha)	• Mining of Pit 1 ended in December 1994 (Plate 3). • Underdrain installed in preparation to receive tailings. • Tailings deposition began in August 1996 and ended Q4 2008 (Plate 4). • Wicking to assist dewatering and consolidation of tailings. • Installation of geotextile layer and initial capping in 2013–14. • Full backfill started in May 2019 and final landform achieved in August 2020 (Plate 5). • Scarification of the landform started in November 2020 and rehabilitation plantings started in 2021 (Plate 6). • Creation of habitat via rock features (Plate 7).	• Removal of pit tailings flux (process water) via decant wells. • Monitoring, maintenance and adaptive management activities to inform surface water runoff and ecosystem re-establishment. This work will enable ERA to apply lessons learnt to other landforms as they are progressively established. • Replanting on Pit 1 waste rock after 2 years has an average success rate of 70% and some plants have reached 7 m in height.	• Contour perimeter drain backfilled to final landform (Plate 8). • Removal of corridor creek road, associated bund and high voltage (HV) power.
2: Pit 3 (~107 ha)	• Mining started in 1997 and ended in November 2012 (Plate 9). • Underfill, underdrain and dewatering systems completed 2012-2014 (Plate 10). • Tailings deposition from mill processing started in 2015 and ended 2021 (Plate 11). • Tailings transfer from TSF started in 2016 and ended 2021. • Tailings floor transferred via truck and dozer. • Wicking to assist dewatering and consolidation of tailings.	• Brine injection into the underfill zone via pit wall directional drilling (Plate 12). • Ongoing wicking and dewatering to accelerate tailings consolidation (Plate 13). • Dust suppression activities and crusting the tailings surface (amphibious excavator, water spray, amphiroller).	• Installation of geotextile and then initial and secondary capping (standalone approval application for Pit 3 backfill lodged September 2023). • Placement of demolished plant and other infrastructure / materials into Pit 3 (standalone approval application to demolish plant will be submitted). • Progressive waste disposal and bulk backfill (standalone approval application for Pit 3 backfill). • Final 6 m of landform and revegetation (standalone approval application for Final Landform will be submitted).

Domain	Completed Activity	Current Activity	Future Activity
3: TSF / RWD (~185 ha)	• Tailings transfer into Pit 3 ended in 2021. • Cleaning of remnant tailings from walls and floor in 2019-21 (Plate 14 and Plate 15). • RWD wall notches installed and process water received from Pit 3 in 2022.	• Process water storage and evaporation.	• RWD deconstruction (standalone approval application for RWD deconstruction will be submitted). • Final landform and revegetation (standalone approval application for Final Landform).
4: Land Application Areas (~157 ha)	• Used for disposal of release water during the dry season when required.	• Ongoing disposal of release water when required. • Sampling to confirm levels of contamination and removal from Ranger Contaminated Sites Register if applicable.	• Progressive removal of above ground infrastructure. • Progressive remediation of any contamination. • Progressive revegetation.
5: Process plant, water treatment plants & other infrastructure (~40 ha)	• Decommissioning of infrastructure associated with the leaching and solvent extraction circuits and areas of calcination, drying and product packing.	• Sampling for contaminated material. • Ongoing use of water treatment facilities (e.g. brine concentrator, brine squeezer, water treatment plants), fuel storage, power station and administration buildings (Plate 16).	• Demolition of plant / crusher (standalone approval application to demolish plant). • Treatment of water – progressively transfer sections from process water to pond water. • Remediation of contaminated sites. • Revegetation (standalone approval application for Final Landform).
6: Stockpiles (~268 ha)	• Stockpiled waste rock used to backfill Pit 1 in 2020. • Stockpiled waste rock used to create Stage 13 and Stage 52 final landform. • Progressive rehabilitation of small areas.	• Weed and water management. • Preparation for capping Pit 3.	• Re-routing pipelines. • Initial capping and bulk material movement for Pit 3 backfill (standalone approval application for Pit 3 backfill). • Bulk material movement for RPA final landform (standalone approval application for Final Landform).
7: Water management areas (~110 ha)	• Ongoing use.	• These areas continue to support ongoing water storage, dust suppression and management, including authorised release of treated water during the wet season. • Sampling for contaminated material.	• Ongoing use ahead of progressive remediation, backfill, rehabilitation of retention ponds, water storages and wetland filters.

Domain	Completed Activity	Current Activity	Future Activity
8: Linear infrastructure (~41 ha)	• Two redundant tracks (3.6 ha) and six drill pads (0.8 ha) have been rehabilitated. • Bulk of this domain is supporting ongoing activities.	• These areas continue to support ongoing activities.	• Access during monitoring phase. • Progressive removal and rehabilitation as aspects of this domain are no longer required.
9: Miscellaneous areas (~55 ha)	• Trail landform constructed in 2009 to investigate rehabilitation plantings into waste rock (Plate 17). • Closure of the Ranger 3 Deeps (R3D) approved April 2019. • Ranger mine village and adjacent workshop rehabilitated in 2020. • All explosives have been removed from the magazine area and the site has been de-registered.	• Ongoing use of the plant nursery, trial landform (Plate 18), Magela Creek levee and some landfill sites.	• Relocating office space/gate house to maximise demolition efficiency. • Plant nursery expansion/core yard decommissioned and rehabilitated. • Progressive decommissioning, remediation, backfill and rehabilitation of miscellaneous areas.
10: Airport and ERISS offices (~44 ha)	• Ongoing use.	• Ongoing use.	• Final decommissioning and closure to be determined via the socio-economic assessment.
11. Residual RPA (~6,852)	• Exploration activities.	• Investigating partial relinquishment of ~3,000 ha north of Magela Creek.	• Progressive rehabilitation and/or retention and handover of some access tracks to Mirarr (to be determined as part of partial relinquishment).

Plate 3: Pit 1 (1992)

Plate 4: Pit 1 tailings deposition (2008)

Plate 5: Pit 1 being backfilled (2014)

Plate 6: Pit 1 backfilled (2022)

Plate 7: Pit 1 fauna habitat features added as boulder piles (2021)

Plate 8: Pit 1 perimeter drain with access track (left) and rock check dam (right) (2021)

Plate 9: Mining Pit 3 (2007)

Plate 10: Pit 3 underfill (2014)

Plate 11: Pit 3 tailings deposition (2016)

Plate 12: Directional drilling for brine injection into Pit 3 underfill (2022)

Plate 13: Dewatering Pit 3 (November, 2023)

Plate 14: Cleaning remnant tailings from walls of tailings storage facility (2020)

Plate 15: Ranger Water Dam in final stages of remnant tailings removal from floor (2021)

Plate 16: Processing plant (foreground) and Retention Pond 2 centre right (2023)

Plate 17: Trial landform constructed (2009)

Plate 18: Trial landform as of March 2022, plants ~12 years old

6 CURRENT PROGRESS FOR EACH THEME

The benefit of operating a mine, collaborating with stakeholders, and conducting research and monitoring for over 40 years, is an in-depth understanding and substantial base of knowledge on which closure activities and rehabilitation can be guided. ERA acknowledge that further work is required to improve our understanding and reduce uncertainty on several aspects of the project. Table 3 shows the subjective self-assessment of current per cent complete for the key metrics to achieving the ERs for each of the six themes. The key metrics are (these are illustrated as spider web diagrams in Chapters 6 to 11 of the MCP):

- Closure Criteria Approved: the latest approved MCP was from 2020 (exemptions were received for the 2021 and 2022 MCP). The percentage complete for this metric reflects how many of the total closure criteria for each theme were approved via the 2020 MCP. Where the percentage progress is less than 100, closure criteria are either included in this 2023 MCP for approval or still in draft and the subject of discussion.
- Relevant Studies Completed: this metric reflects the progress towards completing the studies necessary to demonstrate that the relevant ERs can be achieved.
- Preventative Controls Effective: this metric reflects progress towards the effectiveness of the controls that will be put in place between now and the creation of the final landform, or shortly thereafter, to ensure that ERs can be achieved or are on the desired trajectory to being achieved.

- Monitoring Programs Developed: this metric reflects progress towards having developed and implemented a monitoring program that will demonstrate model validation, and either the confirmation of trajectories towards closure criteria or an undesirable outcome and thus a deviated trajectory.
- Corrective Actions Effective: this metric reflects progress towards the effectiveness of corrective actions that if implemented would recover a deviated trajectory to a desired trajectory within an acceptable timeframe, and would avoid unacceptable human health, environmental and cultural impacts.

Table 3: Subjective percentage progress for each theme against key metrics

	Landform	Water and Sediment	Soils	Ecosystems	Radiation	Cultural
Closure Criteria Approved	80	70	100	80	100	100
Relevant Studies Completed	70	70	60	70	80	70
Preventative Controls Effective	80	70	60	40	70	60
Monitoring Program Developed	80	80	20	60	70	50
Corrective Actions Effective	70	60	80	50	50	60

Table 3 shows that significant progress has been made across the six themes in many of the key metrics. The sections that follow provide a brief overview of the outcomes of this work and the areas targeted for future work. Chapters 6 to 11 of the MCP describe the progress and future works program for each of the six themes in much more detail.

6.1 Landform

Landform covers the physical aspects of the final landform that will cover the disturbed footprint of the mine site (Figure 6). It includes the long-term isolation of tailings and geotechnical stability of the final landform.

The final landform is to isolate the buried tailings for a period of 10,000 years and to have similar indices of erosion and runoff distribution to the natural landscape. A Landform Evolution Model is used by OSS to assess the performance of ERA's final landform design over various rainfall scenarios and durations. The latest version of the final landform design assessed by OSS in 2020 was Final Landform Version 6.2 (FLv6.2). The key findings were:

- Potential formation of gullies after 10,000 years was up to 7 m deep under normal rainfall conditions, and up to 9 m deep under worst case rainfall conditions and with no active management. Noting that this assessment was undertaken for a landform with no vegetation covering the surface for the entire 10,000 years. The modelling will be refined to include such factors, but even in its current state it provides comfort because the tailings buried in Pit 1 in the areas with modelled gully formation have a waste rock cover of 15 m (and substantial vegetation growth after just 2 years), and the tailings in Pit 3 will be covered by 27 m of waste rock. Therefore, the current conservative assessment suggests that no tailings would be exposed within 10,000 years.

- With regards to erosion, this criterion will be achieved if the model demonstrates the long-term predictions of denudation rates from the designed landform are approaching the background denudation rate. Denudation is the measure of weathering, or erosion of a landform surface by forces such as water and wind. It is expressed in terms of millimetres per annum (mm/a). A recent study by Wasson and others (2021) identified a background denudation rate of 0.075 mm/a being relevant for Ranger. The 10,000 year assessment of the FLv6.2 LEM predicts a denudation rate of 0.15 mm/a over Pit 1 and 0.21 mm/a over Pit 3 under normal rainfall conditions. It is noted that a grass cover was also modelled for denudation rate from Pit 1 and this reduced the predicted 0.15 mm/a to 0.04 mm/a. Therefore, erosion of the modelled final landform is approaching the target criterion, but further refinement is required.

The findings of the OSS modelling assessment of FLv6.2 have been taken into consideration by ERA in the development of FLv7. In February 2022, an ERA landform design group was formed. This group is currently refining FLv7 and once completed will provide the revised design to OSS to assess the performance of the enhanced landform design.

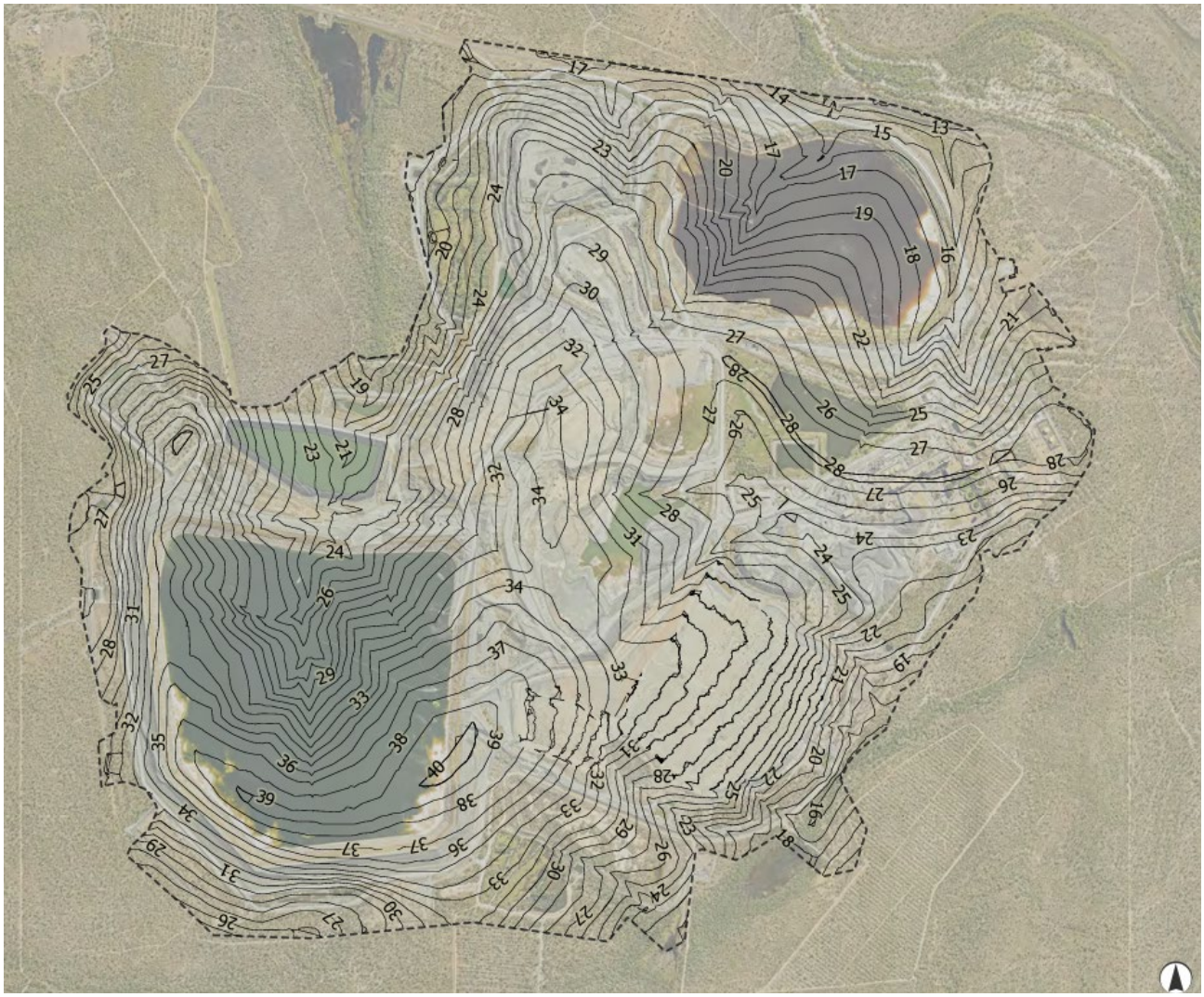


Figure 6: Final landform boundary and contours (meters relative level; mRL)

Further to the LEM development for tailings isolation and erosion rates, ERA are undertaking a number of studies to inform an Erosion, Sediment and Water Control Plan. The objectives for the plan are to:

- in conjunction with stakeholders, determine appropriate water criteria (including bedload and turbidity) for within the RPA during the final landform construction and for the years that follow;
- design the infrastructure required to manage run-off and near surface seepage from each catchment, and across all catchments as a whole, and compare that behaviour with the agreed landform and water quality criteria;
- determine the monitoring required to support decision making and to track performance;
- develop corrective actions that would be implemented if the monitoring program detects deviation from the desired trajectory; and
- describe how the actively managed final landform will transition to long-term passive sediment management features.

6.2 Water and Sediment

Water and Sediment covers the activities undertaken to minimise the release of contaminants (i.e. radiological, chemical and physical) and prevent changes to water and sediment quality in the receiving environment that could otherwise have a detrimental impact to human health and/or ecosystems (animals and plants).

Water management is a critical aspect of the day-to-day activities at Ranger and a key driver of the timing of closure activities. It is also a key driver in achieving many of the ERs, because water is the pathway for contaminants that are present on site (largely buried in Pit 1 and Pit 3) to move off site.

Numerous studies and predictive models over the life of the mine have been developed to understand and document the often-complex hydrogeological processes. This body of work has identified Constituents of Potential Concern (CoPCs), quantified the sources of these CoPCs, and modelled the transport pathways and receptors for groundwater and surface water on and off the RPA out to 10,000 years post-closure.

There are four catchments that collect and transfer water from the mine site into Magela Creek (Figure 7). While there are hundreds of active groundwater and surface water monitoring locations on the RPA at present, the points that are particularly important to help understand the post-closure effects on Magela Creek from operating and closing the Ranger mine are shown on Figure 7. Magela Creek is an important receptor for two reasons. First, all water from the mine ultimately drains into Magela Creek. Second, the nearest resident population to the mine is located at Mudginberri Billabong, a receiving waterbody on Magela Creek approximately 5 km downstream of the point where Magela Creek crosses the boundary of the RPA (Figure 7).

The Ranger Surface Water Model (RSWM) calculates concentrations of 20 mine derived CoPCs in surface waters of the Magela Creek catchment, from Magela Creek upstream (MCUS) to Mudginberri Billabong downstream. The model is useful for estimating surface water CoPC concentrations at discrete locations as it effectively models the mixing of solutes in low concentration background loads with site loads by applying a mass balance approach. Conservation of mass is assumed for all CoPC movement within the Magela Creek system, and no allowance is made for any reactivity of CoPCs with creek flows (i.e. a conservative approach is applied).

Outputs from the model include flow exceedance values that represent the predicted solute concentration that will be exceeded for a certain percentage of the time where there is flow at that location. Concentrations taken from the model at peak loads and at 10,000 years post-closure are reported in the MCP. The values used in this assessment are a flow-weighted 3-day average of the concentration.

The results provided in the 2023 MCP are a combination of the latest 2023 modelling undertaken for the recently submitted Pit 3 application (i.e. for the Djalkmarra catchment and all source terms from contaminants to be disposed in Pit 3) and modelling undertaken in 2020 for the rest of the non-Pit 3 related sources. A Best Practicable Technology (BPT) assessment is currently underway to identify additional mitigations that would reduce solute loads from the RWD. Once completed, the modelling will be re-run to update the rest of the non-Pit 3 sources and the outcomes of this work will be provided in the Ranger Water Dam / Final Landform standalone approval applications and future updates to the MCP.

To help understand the potential effects of the CoPC concentrations entering Magela Creek, the predicted concentrations at peak loads and 10,000 years post-closure were compared to various guideline values. The outcomes of this comparison are:

- Drinking water: the concentrations of all CoPCs are less than the guideline values – that is, there would be no risk to health from drinking the water at any of the monitoring points from predicted peak load concentrations or 10,000 years post-closure.
- Recreational water: the concentrations of all CoPCs are less than the guideline values.
- Australian livestock drinking water: the concentrations of all CoPCs are less than the guideline values.
- International wildlife / livestock drinking water: the concentrations of all CoPCs are less than the guideline values.
- Species protection level (SPL) for 99% of aquatic species: Manganese (Mn) is the only CoPC that current modelling shows an exceedance of the 99% SPL guideline value. The 99% SPL for manganese is 73 µg/L. The background manganese concentration in Magela Creek (at MCUS) is 14 µg/L. The predicted 50% exceedance at the end of RPA is 178 and 61 µg/L for the peak and 10,000 year concentrations respectively (261 and 85 µg/L for the 10% exceedance for peak and 10,000 years respectively).

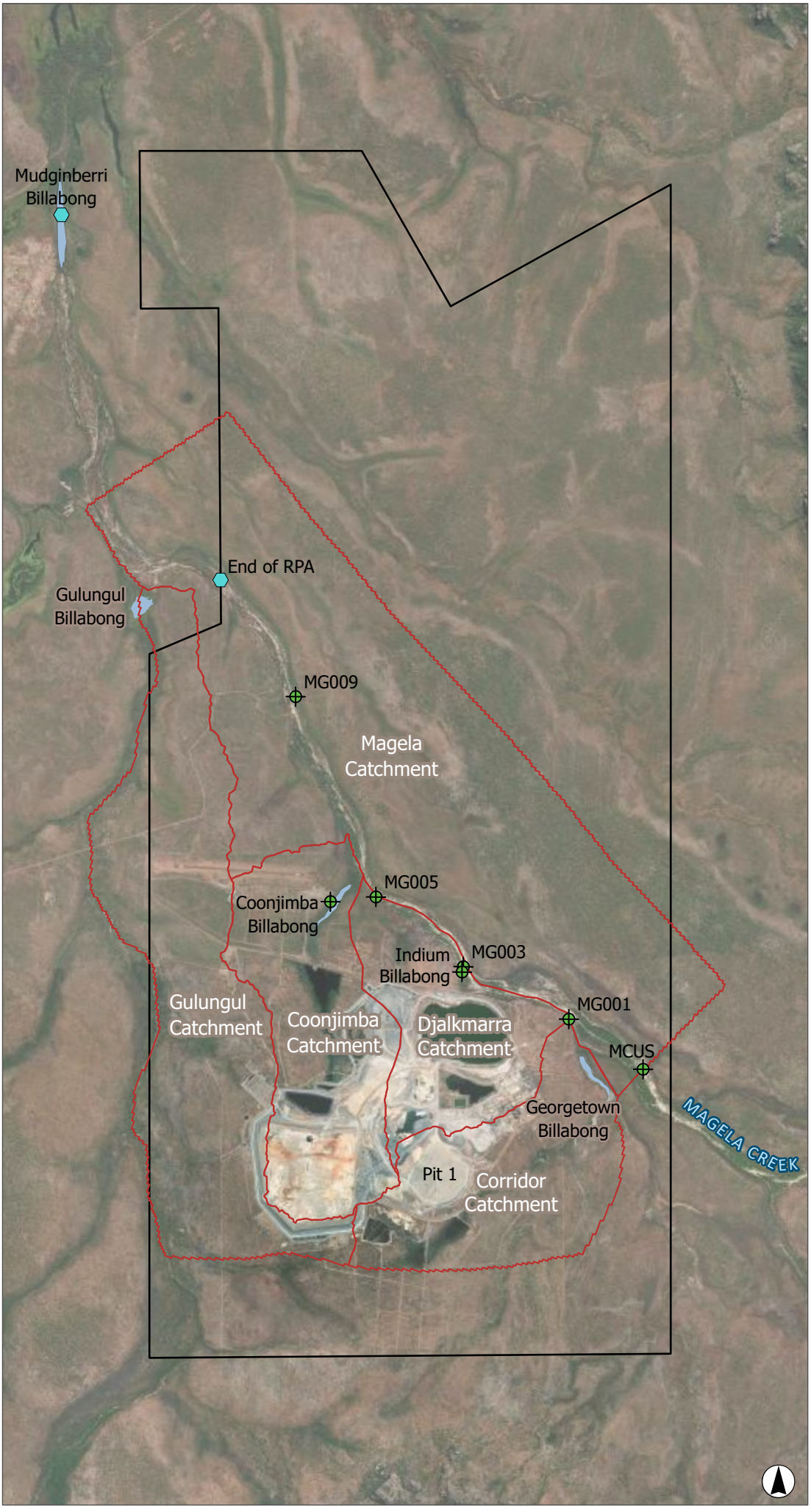
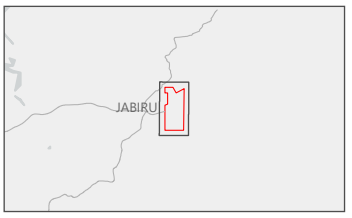


FIGURE 7

Water Catchments and Key Monitoring Locations

LEGEND

- Ranger Project Area
- Groundwater Watershed Boundary
- Waterbody
- Modelling Assessment Point
- Surface Water Monitoring Site



0 1 2
Kilometres

Scale 1:65,000 at A4
GDA 1994 MGA Zone 53

Image Source: ESRI Basemap (2022); **Data source:** NT Government Data (2023)

Whilst not showing as an exceedance against any guideline value, the predicted loads of nutrients and sulfate are recognised as factors that require further investigation (for eutrophication and potential formation of acid sulfate soils respectively). Increased nutrient loads may contribute to eutrophication, the biological processes characterised by high levels of plant and/or algae phytoplankton that may result in the water becoming green and cloudy. Increased sulfate loads in sediments, under certain conditions and when oxidised (exposed to the air), can produce acid. Instances of acidification associated with acid sulfate soils have been observed in Coonjimba Billabong, indicating conditions suitable for the formation of acid sulfate soils are present in at least some locations on the RPA.

Therefore, whilst the planned water management activities on site are predicted to have considerable success in minimising the concentrations of most CoPCs that will enter the Magela Creek system, further work is underway to reduce the predicted concentrations of several CoPCs. This work is detailed in Chapter 7 of the MCP and includes:

- To improve modelling of likely solute concentrations in surface water, including work to reduce uncertainty in both groundwater and surface water modelling, and to better capture the spatial and temporal aspects of CoPC movement into surface waters.
- To undertake BPT assessments of additional remediation concepts aimed at reducing the downstream concentrations of CoPCs (particularly manganese).
- ERA will continue to monitor nitrate, ammonia, total nitrogen and total phosphorous concentrations at MCUS and MG009 to advance our understanding of eutrophication. This monitoring will provide an improved evaluation of natural background load variability, both in terms of total load as well as temporal and flow related variability. This improved understanding will help inform revisions of the RSWM with regards to background loads of nutrients.
- Potential mitigation options being considered for reducing manganese loads in the above-mentioned BPTs will also be beneficial for reducing sulfate loads. Field sampling to confirm the presence and extent of existing acid sulfate soils is also being undertaken.

6.3 Soils

The theme of ‘Soils’ for Ranger is referring to surface or near-surface land that may have been contaminated during the operation of the mine. It includes land on the RPA that has become contaminated through treatment of pond water in wetlands and bunds, irrigation of pond water in the Land Application Areas (LAAs), and seeps and spills in areas such as the processing plant.

Studies to identify and categorise the contaminants on the RPA have been occurring for decades. ERA maintains a contaminated sites register and updates the register routinely, the last update occurring in 2023 as part of the 2022 Feasibility Study.

The general principle with regards to the disposal of demolished plant and contaminated soils is to maximise the amount of material disposed into Pit 3, where:

- Approximately 455,000 m^3 of demolished and/or contaminated material is to be disposed to Pit 3. The total void space available in Pit 3 is approximately 29,000,000 m^3.
- Approximately 117,400 m^3 of demolished and/or contaminated material is to be disposed to Retention Pond Number 2 (RP2). The total void space available in RP2 is approximately 2,500,000 m^3.

The bulk of this material is contaminated soils, representing approximately 405,000 m^3 (or 81%) and 35,000 m^3 (or 42%) to Pit 3 and RP2 respectively. The bulk of contaminated soils will come from beneath the processing plant, wetland filters and from the retention ponds (RP1, RP3 and RP6).

Whilst a conservative prediction of contaminant volumes across the RPA has been generated by the Phase 1 studies completed to date, further work is planned, including:

- Phase 2 of the soil contamination studies that will:
    - conduct further soil / sediment sampling (e.g. within Coonjimba Billabong, RP1, beneath the processing plant);
    - conduct further characterisation of the final landform waste rock; and
    - conduct a BPT to establish preferred remediation options and develop Remediation Action Plans (RAPs) for the preferred remediation options across relevant areas of the RPA.
- Phase 3 of the soil contamination studies, which is the on-ground execution of the RAPs, the validation sampling, and the reporting of performance against the agreed criteria.
- The subjective 20% complete assigned to the 'Soils' monitoring program (refer Table 3) also requires attention. This reflects the considerable future work that is planned to better inform the validation sampling and post-closure monitoring program.

6.4 Ecosystems

The 'Ecosystems' theme covers the restoration of flora and fauna communities on the final landform, aiming to ensure they are sustainable and similar to those in the adjacent areas of Kakadu National Park.

Decades of relevant studies and ongoing revegetation trials have provided a substantial knowledge base for Ranger. There are two key aspects of achieving the ERs for ecosystems:

- Ecosystem similarity – which requires the flora and fauna species composition, abundance and community structure of rehabilitated areas within the RPA to be similar to Kakadu National Park. Relevant information on this aspect is provided in the MCP under the headings:
    - Vegetation composition, abundance and community structure; and
    - Habitat formation, composition and abundance of fauna.
- Ecosystem sustainability – which requires rehabilitated areas to contain functioning ecosystems that are viable in the long-term and similar to those in adjacent areas of Kakadu National Park. Relevant information on this aspect is provided in the MCP under the headings:

- Habitat formation, composition and abundance of fauna;
- Nutrient cycling;
- Resilience to an appropriate fire regime;
- Resilience to extreme weather events, pests and disease;
- Declared weeds and other introduced flora; and
- Abundance of exotic fauna.

The key drivers for the success of the ecosystems work are to understand the reference ecosystems that are to be re-created on the disturbed areas of the RPA, the characteristics of the waste rock in which the plants are to grow, and the factors that will promote or hinder vegetation establishment and long-term sustainability. Success in these areas will provide the habitat suitable for recolonisation by native fauna.

ERA, and our partner Kakadu Native Plant Supplies, have demonstrated considerable success in collecting and propagating local provenance plant species, establishing these species on waste rock, particularly on the TLF for over 13 years (Plate 19), Pit 1 for over 2 years (Plate 20) and more recently Stage 52 that was planted about 9 months ago (Plate 21).

Whilst progress to date is very promising, there is still much work to be done, including:

- Further development of the savanna woodland Conceptual Reference Ecosystem (CRE), particularly regarding fauna and understorey composition.
- Development of proposed additional CREs, including 'intermittently flooding savanna', 'riparian' and a potential RWD alternative, with integration of these into the Species Establishment Research Program (SERP).
- Further investigation of reconstructed landform areas that are cut-to areas (i.e. stockpiles that will be cut down to final landform elevation and may therefore be compacted; e.g. Stage 13) and areas with an elevated proportion of fines (e.g. Stage 52).
- Continued analysis of monitoring data for research trials and other non-waste rock disturbance areas, with learnings included in the SERP and to further develop the revegetation strategy.
- Further research and implementation of effective controls for preventing weed spread to rehabilitation areas and surrounds.
- Development of methodologies for assessment of nutrient cycling and litter decomposition on waste rock, with implementation on current research areas.
- Continued support of remote sensing methods, which are likely to increase efficiencies and confidence in future monitoring.

Plate 19: Plantings on TLF (~13 years old)

Plate 20: Plantings on Pit 1 (~2 years old)

Plate 21: Plantings on Stage 52 (~9 months old)

6.5 Radiation

There is a substantial body of knowledge that has been generated by ERA and OSS to understand and predict radiation doses to people and radiological risks to plants and animals arising from mining activities at Ranger.

A radiological impact assessment aims to quantify the impacts of radiation that originate from sources associated with a particular activity or practice, and to compare the results to existing and accepted standards. For people, the radiological impact is calculated as a potential radiation dose, where the incremental impacts above natural background levels are assessed and compared against relevant standards and limits to determine whether the impacts are acceptable.

The potential exposure pathways to radiation are:

- dust lift off leading to subsequent deposition of radionuclides in the wider environment and uptake into plants and animals that are consumed;
- dust lift off leading to radionuclides in air that can be inhaled;
- radon emission from the rehabilitated landform and the LAAs resulting in elevated radon decay product concentrations and subsequent inhalation;
- mobilisation of radionuclides into groundwater and surface water resulting in changes in concentrations and subsequent ingestion of water or uptake into plants and animals; and
- Gamma irradiation to people in the immediate vicinity of the rehabilitated landform and the LAA from potentially elevated radionuclide concentrations.

It is understood that the rehabilitated site will be used for both recreational and cultural use by the Mirarr Traditional Owners. ERA has a long history of engagement with the Mirarr through consultation with the GAC and NLC. In 2014, ERA formalised the engagement regarding post-mining land use and closure criteria through extensive consultation with Traditional Owners via the consulting linguist and anthropologist Murray Garde. His resulting report (Garde, 2015) identified occupancy intentions (1,040 hours or 43 days per year estimated to be spent on the rehabilitated Ranger mine area), use of traditional plants and animals, and the expected post-closure bush food diet.

The dose assessment method used internationally accepted processes and recognised dose factors developed by the International Commission of Radiological Protection and considered the exposure pathways listed above for a range of age groups. The assessment considered numerous scenarios, spanning from the expected occupancy intentions and bush food diet to conservative assumptions where the entire bush food diet was sourced exclusively from the rehabilitated mine area and all water consumed was based on the peak radionuclide concentrations predicted from the surface water model. In total, doses were calculated for 100 scenarios (20 different scenarios for 5 age groups; being 1, 5, 10, 15 year old and adults). For all 100 scenarios, the total radiation dose to the public is below the public dose limit of 1 millisievert per year (mSv/y) and the ALARA dose of 0.3 mSv/y.

For non-human biota (animals and plants), the changes in radionuclide concentrations due to emissions from the rehabilitated mine are calculated at relevant locations of interest. For potential radiological impacts to plants and animals, a combination of changes in soil concentrations due to dust deposition and the changes to water concentrations due to solute transfer at peak loads and at 10,000 years post closure were used.

The assessment was conducted using the ERICA software tool (Environmental Risk from Ionising Contaminant: Assessment and Management V2.0). The Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) notes that the ERICA software tool is applicable for use in Australia for assessing radiological impacts to non-human biota. The total dose rate per organisms are all below acceptable limits in all scenarios assessed.

The radiation impact assessment has demonstrated compliance with ALARA dose limits for human and non-human biota. Nevertheless, further engineering design of closure activities and additional remediation actions are planned, which are expected to lower radiation doses further. The following work is planned for radiation:

- a sampling program of bush tucker on the RPA will occur in 2024 to supplement existing data;
- the radiation assessment will be re-run and included in the RWD/FLF application after the following has occurred:
    - the 2024 bush tucker samples have been analysed; and
    - the BPTs for the additional groundwater remediation has been completed and surface water modelling has generated revised concentrations.

6.6 Cultural

Throughout the operational phase at Ranger, a fit-for-purpose cultural heritage management system (CHMS) was developed to promote the protection of cultural and historic heritage on the RPA. In 2006, ERA and GAC (on behalf of the Mirarr Traditional Owners) developed a protocol for cultural heritage management on the RPA.

The RPA has undergone extensive cultural heritage investigation since 2006 with approximately 75 per cent of the lease area subject to systematic pedestrian survey. A total of 112 cultural heritage sites have been recorded, with approximately 75 background artefact scatters also recorded.

In 2006, a ‘first pass’ closure model was provided to the Mirarr Traditional Owners. In response, a series of consultation meetings were held with the goal of understanding their expectations and concerns for closure. It was understood by the Mirarr Traditional Owners that there would be ongoing consultation over the years as the closure model was refined and more detailed information was known by ERA.

In 2012, ERA engaged Murray Garde to facilitate consultation with the Mirarr Traditional Owners to further develop the cultural closure criteria for Ranger. This consultation built on the initial discussions of the first pass closure model. To develop the criteria, the post-closure land use and the nature of the Mirarr’s interactions with the rehabilitated landscape needed to be understood. This is key to delivering a rehabilitated landform that will be accepted by the Mirarr Traditional Owners and provide them with a safe and healthy area to re-establish traditional practices.

Garde’s report (Garde, 2015) provides details of the end land use including a list of culturally important flora and fauna, the types and amount of bush foods consumed, and the nature of past and predicted future occupancy of the rehabilitated landform. Table 4 identifies the expected use of the mine area post-closure and the outcomes of preliminary assessments to understand the potential impacts to those uses based on the findings of the studies completed to date and reported in this MCP.

Consultation with the Mirarr Traditional Owners via the Cultural Reconnection Steering Committee is ongoing and will continue to inform ERA of the expectations of the Mirarr Traditional Owners and the cultural monitoring program.

ERA, NLC, GAC and the Mirarr Traditional Owners are aligned on the desire to upskill Traditional Owners to undertake some of the monitoring described in the MCP. The Cultural Reconnection Steering Committee will be key in the planning to transition the management responsibility to the Mirarr Traditional Owners at site relinquishment. The exact nature of this transition is currently being discussed.

Table 4: Preliminary assessment of the potential impacts to cultural land use activities

Purpose of visit	Estimated time[1]	Location	Preliminary Assessment of Potential Impact / Relevant Outcome[2]	Section in MCP
Hunting and food gathering (day trips)	30 days per person per year	Magela Creek and associated riparian zones (undisturbed)	No observable effect predicted from planned activities, human and animal drinking water quality all within limits, radiation doses all within limits.	7.3.6, 10.3
		Billabongs[2]	Preliminary and conservative calculations completed to date suggest that accumulation of manganese in older Mussels (bivalves) may pose a risk at Mudginberri Billabong.	7.3.10
Seasonal camping (extended camping)	20 days per person per year	Magela Creek and associated riparian zones (e.g. camp MG009)	No observable effect predicted from planned activities, all CoPCs within drinking water quality guidelines, potential for minor eutrophication effects (e.g. filamentous algal growth) in early recession period (April/May) reducing visual amenity of the waterway.	7.3.6, 7.3.8
		Billabongs[2]	No observable effect predicted from planned activities.	
Recreation	10 days per person per year	Magela Creek and associated riparian zones (undisturbed)	No observable effect predicted from planned activities, all CoPCs within drinking water quality guidelines, potential for minor eutrophication effects (e.g. filamentous algal growth) in early recession period (April/May) reducing visual amenity of the waterway.	7.3.6, 7.3.8
		Billabongs[2]		
Land management and monitoring	10 days per person per year	Magela Creek and associated riparian zones (undisturbed)	No material change to the proposed land management and monitoring.	6.6, 7.6, 8.6, 9.6, 10.6
		Billabongs[2]		
Ritual[3]	5 days per year	Magela Creek and associated riparian zones (undisturbed)	No observable effect predicted from planned activities. However, Traditional Owner perception may impact ritual land use. Ongoing consultation with Traditional Owners required.	7.3.6, 10.3
		Billabongs[2]		

[1] – occupancy rates from Garde (2015).

[2] – water quality modelling uncertainty remains and further work is being conducted to better understand potential impacts, including BPTs for additional mitigations.

[3] – Garde (2015) provides details on the type of rituals likely to be performed on the rehabilitated RPA and areas that may be utilised (including sacred sites, billabongs and camping areas).

7 CURRENT RISKS

Risk assessments for the closure of the RPA have been held since 2008 and will continue to be undertaken throughout closure as results of monitoring and technical studies become available and are used to refine ERA's understanding of risk.

A risk matrix is used to determine the overarching risk classification for each identified risk event or threat. The risk classification is a function of the consequence and likelihood ratings determined by subject matter experts. The overarching risk classification is determined to be either Class IV (Critical), Class III (High), Class II (Moderate) or Class I (Low). The risk classification identifies the level of management action that must be taken to mitigate the risk, with:

- Class IV: Risks that significantly exceed the risk acceptance threshold and require investment in a complete suite of suitable best practice controls and detailed studies to classify uncertainty;
- Class III: Risks that exceed the risk acceptance threshold and require further investment in controls and study development, with classification of uncertainty;
- Class II: Risks that lie on the risk acceptance threshold and require some development of controls or studies to address uncertainty; and
- Class I: Risks that are within the risk acceptance threshold and do not require further controls or studies.

There are two primary 'types' of risks that are relevant to the closure of the Ranger mine:

1. Those that relate to the physical activities that are to occur on-site to successfully close and rehabilitate the mine site. These are often referred to as 'project risks' and their consequence ratings are largely influenced by project cost and schedule.
2. Those that relate to the successful achievement of the ERs. These are presented in the bow-tie diagrams in Chapters 6 to 11 of the MCP and their consequence ratings are largely influenced by environmental and cultural outcomes.

Table 5 provides a summary of the risks, noting that further studies aimed at improving the controls and uncertainty for Class IV and Class III risks are underway, and the progress towards reducing these risks will be discussed in future iterations of the MCP. The Class III and IV risks included in Table 5 are a consolidated list from those identified in the MCP, that is, similar risks have not been duplicated.

Table 5: Summary of current risks

Class	Project risks		Risks to achieving ERs	
	No. Events	Description of risk event	No. Events	Description of risk event
Class IV	5	• Insufficient capacity of the underfill to accept all of the brine that is produced. • Failure to meet production targets for process water extraction from Pit 3 and/or process water treatment targets. • Failure to achieve release water criteria after two consecutive wet seasons post creation of the final landform. • Failure to manage weeds, including Spigelia. • Failure to achieve relinquishment of the RPA after the 25-year maintenance and monitoring period.	3	• Traditional Owners indicate that cultural activities will not be able to be resumed. • Above criteria concentrations of manganese result in health impacts. • Above criteria concentrations of manganese, sulfate and/or nutrients result in environmental impacts.
Class III	4	• Failure to inject brine into the underfill. • Failure to provide reliable and continuous provision of pond and process water storage and transmission. • Failure to manage Browsing Ant. • Failure to ensure activities on site are not delayed by delays to the Mine Closure Plan and/or approval applications.	7	• Traditional Owners indicate that the amount of water pooling on or adjacent to the landform is not acceptable. • Traditional Owners are concerned about the amount of erosion of the final landform. • Traditional Owners indicate that the view to significant cultural site/s is obscured by the final landform. • Traditional Owners indicate flora and/or fauna species diversity is not adequate. • Physical damage to cultural heritage site/s. • Indirect damage to cultural heritage site/s via mine-derived altered conditions. • Above baseline radiation doses result in health impacts.
Class II	6	See chapter 12 of the MCP for details.	17	See chapter 12 of the MCP for details.
Class I	10	See chapter 12 of the MCP for details.	8	See chapter 12 of the MCP for details.

8 REFERENCES

Garde, M 2015. *Closure Criteria Development - Cultural*. Energy Resources of Australia Ltd (ERA) Ranger Integrated Tailings, Water & Closure Confidential report, Northern Territory, p. 160.

Wasson, R.J., Saynor, M.J. & Lowry, J. (2021). The natural denudation rate of the lowlands near the Ranger mine, Australia: a target for mine site rehabilitation. Geomorphology, 389, pp. 107823.