



Independent Environmental Monitoring Agency

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Memo: Preliminary IEMA Concerns regarding the BHP-Billiton April 2004
Abandonment and Reclamation Plan (A&R Plan)

To: Latisha Heilman, MVLWB

From: Sean Kollee, IEMA

The Agency is presently conducting a thorough review of the above document, and will be submitting detailed comments to the MVLWB by Friday, May 14, 2004. In our view, the revised *Plan* still has major deficiencies that will require substantial work prior to approval. We are hopeful that we can meet with BHPB during our June site visit and have an extended discussion about what this would entail.

However, in preparation for your May 11th, 2004, technical meeting to discuss major concerns about the revised *Plan*, we highlight a few key points for your consideration:

- The *A&R Plan* still fails to provide much of the substantive information required by Part K 1[a] to [m] of the N7L2-1616 *Water Licence*. Information provided in BHPB's *Response Document* does not satisfactorily resolve the deficiencies.
- The *Restoration Research Plan* (item 4 of Part K) seems not to have been provided. This is needed in order to be reassured that this research plan will provide answers to residual gaps in the information necessary to finalise the *A&R Plan*.
- The proposed diversion of upper Koala water flows to flood pit lakes at closure lacks an environmental assessment of downstream consequences within the Koala watershed. We believe such an activity should entail an environmental screening.
- The current *Plan* still lacks sufficient detail to provide readily implementable reclamation measures for constructed mine components in the unlikely event of a premature shutdown. The lack of detail should be explicitly reconciled with the level of detailed reclamation planning obviously used in the reclamation liability estimates contained in the Komex report. No useful, appropriately scaled graphics (maps, photos, cross-sections, plan views, drawings, etc) of any of the proposed reclamation measures for the various mine components have been provided.

- The methods for road reclamation as described by BHPB are not currently compatible with the Agency view of road closure.
- There is no “harmonization” with, or linkage to, the *A&R Plan* and the *Komex Liability Estimate* information, or the *Restoration Research Plan* required under Item 4, Part K of the Water Licence.