

## IN THE MATTER OF THE HAZELWOOD MINE FIRE INQUIRY

### WITNESS STATEMENT OF JAMES ANTHONY FAITHFUL

1. My name is James Anthony Faithful. My work address is Brodribb Road Hazelwood.
2. I am employed by Hazelwood Power Corporation Pty Ltd at the Hazelwood Coal Mine ("Mine") as the Technical Services Manager - Mine. I hold a Bachelor of Engineering (Mining) with honours from Ballarat University and Masters of Business Administration from Deakin University.
3. My role in the broader senior Mine management team is depicted in the chart at **Annexure 1**.
4. I have worked on-site at the Mine since January 2013. My responsibilities at the Mine include management of the Mine's rehabilitation, survey, geological, hydrogeological, geotechnical and mine planning personnel and their related activities.
5. I am responsible for the long term rehabilitation program at the Mine. I supervise Melissa Schenkel (Environmental Engineer), who assists me with the Mine's rehabilitation program by breaking down the long term rehabilitation plans into annual components.
6. I have over 15 years' experience in mining, at a range of open cut and underground mining operations in Western Australia, New South Wales, Victoria and Tasmania.
7. Prior to working at the Mine, I was employed in the mining industry as follows:
  - **GHD Pty Ltd (GHD Engineering Consultants)** – as Principal Mining Engineer, Senior Mining Engineer and Mining Engineer;
  - **Leighton Contractors Pty Ltd (previously HWE Mining)** - as Technical Services Superintendent / alternate Quarry Manager;
  - **Unimin Australia Pty Ltd** – as Operations Superintendent;
  - **Coal and Allied Industries Ltd** (a Rio Tinto company) - as Mining Engineer/Dragline Engineer, Production Supervisor (Dragline, Drill and Blast, Projects), Mining Engineer, Drill and Blast Engineer/Supervisor and Shotfirer/Operator;
  - **Rio Tinto Limited** (Merlin/Argyle Diamond Mine) - as Acting Mine Production Superintendent/Project Engineer; and
  - **Aberfoyle Resources Ltd** (Hellyer Mine) - as Student Engineer/Trainee Miner.
8. This statement has been prepared in response to paragraphs 4 to 10 of the attachment to a letter from this Board of Inquiry to King & Wood Mallesons dated 9 May 2014. These paragraphs of the attachment concern rehabilitation of the Mine. A copy of the letter and the attachment are at **Annexure 2**.
9. The information within this statement is based on my own knowledge, and enquiries that I have made of relevant personnel within the Mine.

#### **Mining Licence and Work Plan**

10. On 10 September 1996, mining licence 5004 ("**Mining Licence**") was granted to Hazelwood Power Corporation Limited ("**HPC**") by Order in Council under section 47A of the *Electricity Industry Act 1993* (Vic) (now repealed).
11. The following documents comprised part of the Mining Licence and the Order:

- Schedule of Conditions;
  - Authority to Commence Work, being Schedule A to the Order;
  - Document entitled '*Mining Licence Application: Work Plan Submission*' dated 1 June 1995, including:
    - Document entitled '*5 Year Rolling Mine Rehabilitation Plans: Summer - Autumn 1996*', being Schedule B to the Order and Annexure 1 to the Work Plan;
    - Document entitled '*Report to Generation Victoria Morwell Mine: Morwell Mine Rehabilitation Concept Master Plan*' dated December 1994, being Annexure 2 to the Work Plan;
    - Document entitled '*Land Capability Analysis: Hazelwood Power Corporation Mine and Environs*' dated May 1995, being Annexure 3 to the Work Plan;
    - Series of figures and site plans, being Section 10 of the Work Plan; and
    - Document entitled '*Regional Monitoring Program: Latrobe Valley Open Cut Coal Mines*' which formed part of the Work Plan.
12. I understand that a copy of the Mining Licence (including the Work Plan and related appendices listed above) was supplied to the Board on 2 May 2014 at Tab 1.
13. Subsequently, four new mining licences MIN 5449, MIN 5450, MIN 5451 and MIN 5452 were granted in relation to the West Field extension of the Mine and were amalgamated and incorporated into the Mining Licence. I understand that the documentation regarding the amalgamation of these four additional licences into MIN 5004 was supplied to the Board on 2 May 2014 at Tab 2.
14. The Mining Licence contains conditions concerning Progressive Rehabilitation, Final Rehabilitation and the Rehabilitation Bond, as referred to below. The Mining Licence at condition 1.1 provides that work shall be carried out in accordance with the approved work plan (including a rehabilitation plan) as amended from time to time in accordance with the *Mineral Resources Development Act 1990* (MRD Act).

#### **Rehabilitation Bond**

15. The Rehabilitation Bond for the Mine is \$15 million, in the form of a bank guarantee.
16. The amount of the Rehabilitation Bond was determined by the State Government, and specified in the Order. It is also referred to at condition 20.3 of the Mining Licence.

#### **Rehabilitation obligations under the Mining Licence and Work Plan**

17. The Mining Licence operates by reference to two broad concepts of rehabilitation: progressive rehabilitation (intended to be undertaken during the life of the Mine) and final rehabilitation (intended to be achieved at the end of the life of the Mine once coal production ceases).
18. The concept which underpins the Rehabilitation Bond is that it is liable to be forfeited at the end of the life of the Mine if final rehabilitation standards are not met.
19. Under the Mining Licence, Hazelwood's "progressive" (during Mine life) and "final" (post closure) rehabilitation obligations are as follows:

##### **15. PROGRESSIVE REHABILITATION**

- 15.1 *Progressive reclamation will be conducted as per the rehabilitation plan. In addition, any further rehabilitation work will be carried out at the direction of an Inspector.*

- 15.2 *As and when directed by an Inspector of Mines, despite any compensation agreements between the licensee and the owner of any private land in the licence, the licensee shall undertake progressive rehabilitation reclamation of land on the area subject to surface disturbance*

#### **16. FINAL REHABILITATION**

- 16.1 *Final reclamation will be in accordance with the rehabilitation plan and any additional requirements as directed by an Inspector.*
- 16.2 *Failure to complete works in accordance with the rehabilitation plan or in accordance with the directions of an Inspector, shall constitute grounds upon which the rehabilitation bond may be triggered either in whole or in part in accordance with Section 83 of the MRD Act.*

20. Under section 81 of the *Mineral Resources (Sustainable Development) Act 1990* (Vic), the rehabilitation obligation of licensees are as follows:

#### **81. Rehabilitation**

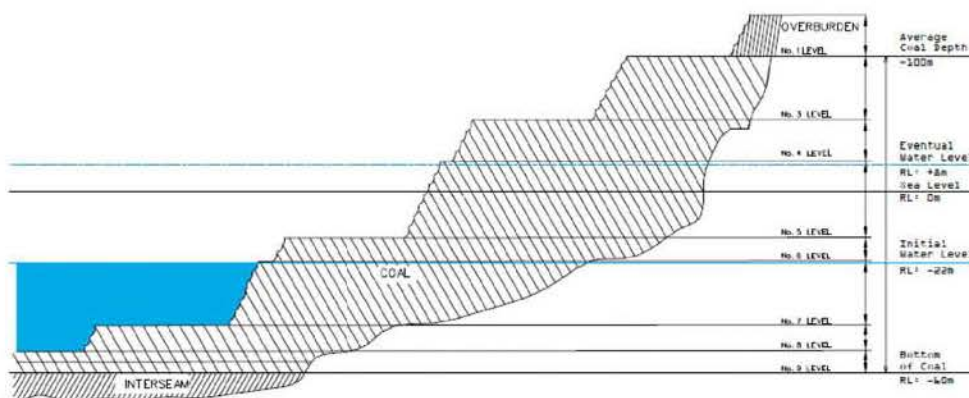
- (1) *The authority holder must rehabilitate land in the course of doing work under the authority and must, as far as practicable, complete the rehabilitation of the land before the authority or any renewed authority ceases to apply to that land.*
- (2) *If the rehabilitation has not been completed before the authority or renewed authority ceases to apply to the land the former authority holder must complete it as expeditiously as possible.*
- (3) *While the rehabilitation is being completed, a former authority holder must continue the appointment of—*
- (a) *in the case of a former licensee, a manager to control and manage the former licence worksite; and*
- (b) *in the case of a former extractive industry work authority holder, a quarry manager or person to manage the site where the extractive industry operation was carried out.*

#### **Work Plans**

21. The work plan (including a rehabilitation plan) for the Mine is the work plan forming part of the Mining Licence as varied by subsequent Work Plan Variations as approved by the responsible regulatory body at the time (which at various times has been the Department of Natural Resources and Environment (“DNRE”), Department of Primary Industries (“DPI”) and is currently the Department of State Development, Business and Innovation (“DSDBI”).
22. The most recent Work Plan Variation (which includes a rehabilitation plan) is the Work Plan which was approved by DPI on 11 May 2009 (“**Work Plan**”). Approval of the Work Plan was given by a Delegate of the Department head. I understand that a copy of the Work Plan was provided to the Board on 2 May 2014 at Tab 6.
23. Work Plans are prepared by the Mine, discussed extensively with the Mine regulator and revised in reference to those discussions, before being reviewed and approved by the mine regulator. Often, a series of amendments to the Work Plan are required, prior to approval being granted.
24. Hazelwood’s compliance with the Mining Licence and Work Plan is monitored by DSDBI officers and local inspectors, who presently include John Mitas, Doug Sceney, Karen Sonnekus, Mark Pratt and Anne Bignell. Mr Mitas is the Chief Inspector for Mines and Quarries in Victoria.

### Concepts in relation to rehabilitation

25. As noted in the Work Plan at 6-1, the goal of rehabilitation is to “provide a technically feasible, safe, stable and sustainable landscape that reflects the aspirations of stakeholders within the practical constraints of rehabilitation of the mine”.
26. The key rehabilitation concept on which the Work Plan, and its predecessor plans, are based is that at the end of the life of the Mine, the Mine will be converted into a lake with accessible public areas.
27. The final rehabilitation concept for the Mine, outlined in the rehabilitation reports associated with the initial grant of the Mining Licence, is that the open cut pit will be partially flooded to form a lake. This goal is also set out in the Work Plan at paragraph 6.4.
28. In the context of the Work Plan, references to “overburden mining” means the removal of the soil/clay material overlying the coal. References to “coal mining” means the mining operations in relation to the on average 100 metre thick coal seam underlying the overburden.
29. As the lower coal levels within the Mine will be submerged by the future lake, it is only exposed coal levels above the water level that will require rehabilitation by steps including reshaping the batters, the placement of overburden and revegetation. There are a number of different options for flooding the pit, including gradually allowing the aquifer levels to rise to their natural levels (subject to managing stability issues impacting the Mine).
30. The Mine is about 120 metres deep and current plans exist for the water level in the Mine to initially reach (within 6 years of closure) what we call RL – 22 (“RL” meaning “relative level” to sea level), which is 22 metres below sea level. The Mine will subsequently fill with water from natural sources and reach an eventual estimated water level of RL + 8. The Mine crest itself on grass level is approximately 60 metres above sea level, which means that the water level will be approximately 80 metres below grass level, leaving approximately 60 metres of exposed coal batters requiring rehabilitation. A simple graphical depiction of this paragraph is:



HAZELWOOD MINE TYPICAL CROSS SECTION

31. As the long term plan for the end of the life of the Mine is that pit of the Mine will become a lake (38m deep), rehabilitation plans generally are not focussed on rehabilitating the lower levels inside the floor of the Mine. As detailed above, it is intended that the lake in the pit of the Mine will come up to 22 metres below sea level and that rehabilitation works will be concentrated on the parts of the pit which remain “exposed” above the water line.

32. Reshaping the batters means laying back and re-sloping the batters from about the anticipated water line. Working coal batters at the Mine are typically at a slope of about 1H:1V. During rehabilitation, batters are progressively laid back to a slope of no steeper than 2.5H:1V and preferably 3H:1V.
33. Reshaping of batters for the purpose of rehabilitation is for several reasons, including:
- to ensure the stability of soil placed on the batters;
  - to enable revegetation;
  - to make the area visually compatible with surrounding land; and
  - to make the areas capable of being used by the public and for other purposes post closure.
34. Broadly speaking, the steps involved in relation to rehabilitation of the batters of the Mine include the following:
- a. First, stability assessments are required. This step is crucial and would likely take at least 6 to 12 months for an area of the Mine such as the Northern Batters, which is in close proximity to the Morwell township and infrastructure. Stability assessments take the current known stability of the batters and then model the stability level after the proposed rehabilitation is completed. A range of variables including batter profiles, groundwater levels, seismic events, and weather events are simulated to determine how the rehabilitated batters would perform under varying load conditions. Once that assessment is undertaken, controls are then simulated to ensure that the resulting batter safety factors are not compromised. Such controls include horizontal bores, open drains and vertical pumping bores.
  - b. Secondly, planning is then undertaken for the rehabilitation works. Based on the desired batter profile (or 'steepness'), the extent to which the existing batters need to be laid back has to be determined.
  - c. Thirdly, the mining infrastructure situated in the vicinity of the batters that will need to be removed is identified and, depending on what the infrastructure is, and what stage of the mining sequence has been reached, infrastructure which is required for the ongoing operation of the Mine needs to be rebuilt in a different location.
  - d. Once the necessary relocated infrastructure is rebuilt, the coal and overburden can be removed, and the batters are laid back to the desired profile. This work is completed using a method we call "truck and shovel". Excavators (shovels) are used to progressively remove the coal and the overburden from each of the levels and this material is carted away in trucks. This process is the most complex process. In the Latrobe Valley, the "earthworks" season is generally from Melbourne Cup Day to Anzac Day each year. The weather outside of this period is generally wetter and unsuitable for major earthworks of this nature. It is worth noting that weather conditions within this period can obviously vary significantly, so that the "earthworks season" is not immune from weather-related obstacles to progress.
  - e. Once the necessary coal is removed, overburden is then used to cover the newly profiled coal batters. The layer of overburden is typically about 1 metre deep. In order to do this, additional suitable overburden material may have to be located. The material within the Mine is not of a consistent composition and overburden from some areas is more suitable for use in batter rehabilitation works than other parts of the Mine. For example, the overburden currently being produced from mining operations in Block 1C is too high in its moisture content, and on this basis, is unsuitable for placement on batters as it may lead to batter stability issues. Consequently the overburden presently being produced from mining operations is being placed on the floor of the Mine. If extensive batter rehabilitation works were required to be undertaken in the short term, given the nature of the overburden that is currently available from the mining operations, any additional suitable overburden would need to be specifically sourced from other areas within the Mining Licence Area (i.e. would not be available as a by-product of the mining operations themselves) or, depending on availability, externally sourced.

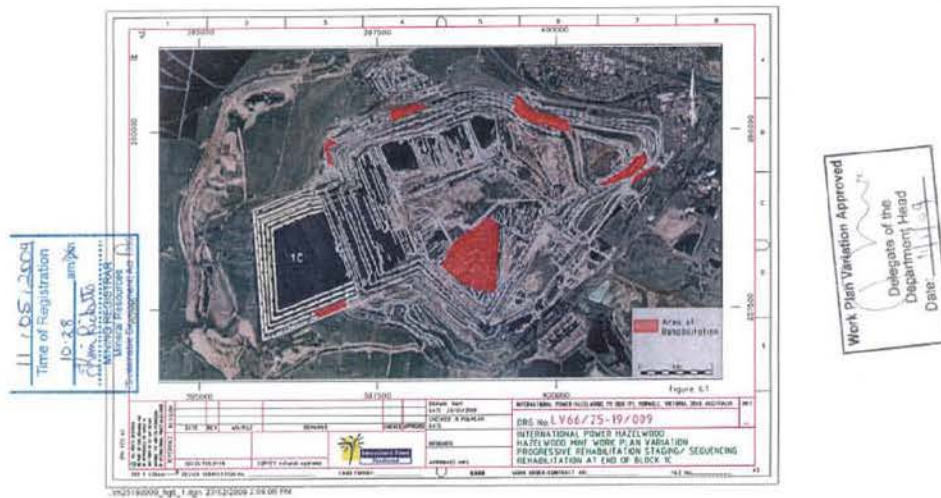


- f. After the batters are laid back and re-sloped, and covered in suitable overburden, topsoil is spread on the batters and the area can be revegetated, and any necessary geotechnical equipment (e.g. horizontal bores, standpipes, inclinometers, extensometers) is installed.
35. Batter rehabilitation requires extensive planning, and involves significant resources including plant, equipment, labour and engagement of external consultants.
36. Some infrastructure within the Mine is critical, and could not feasibly be relocated or replaced, for example the coal conveyors along the southern and south eastern batters of the Mine which supply the Power Station and Energy Brix. As a result, the batters on which this infrastructure is situated will not be amenable for rehabilitation until mining operations have ceased.

#### Rehabilitation requirements under the Work Plan

37. Under the Work Plan, the 'base case' features of the conceptual mine closure and rehabilitation plan for the Mine are as follows:
- **Mining infrastructure** will be decommissioned and removed;
  - **Pit void:** The pit will be allowed to fill with water creating a lake. This will initially take place by continuing aquifer depressurisation pumping, until the weight of the water within the mine void is enough to stabilise the batters (estimated to be RL -22m). The pit lake will then gradually fill over a period of time to its hydrological equilibrium (estimated at RL + 8m);
  - **High-magnesium ash:** The power station coal ash is environmentally relatively benign and will be placed at the eastern end of the void, in the Hazelwood Ash Retention Area (HARA). It is separated from the lake by the Hazelwood Ash Retention Embankment (HARE);
  - **Overburden batters:** Overburden batters will be reshaped to no steeper than 3H:1V with safety berms introduced where the vertical distance exceeds 20 m, topsoiled and seeded;
  - **Coal batters:** New permanent coal batter faces will be shaped to no steeper than 2.5H:1V and preferably 3H:1V. Permanent coal batters are batters which are already laid back at suitable grade and ready to be covered with suitable material. Non-permanent coal batters will be maintained as they are until they are dug as permanent coal batters. Existing batters and benches carrying critical conveying infrastructure are considered non-permanent batters as the digging program has been revised to allow a final retreat digging pass that will convert them to permanent batters, i.e., no steeper than 2.5H:1V and preferably 3H:1V. Once the bench has been completed, exposed coal will be progressively covered with overburden from the working face of the mine and revegetated on decommissioning;
  - **Public access:** these are matters to be discussed closer to the time of closure, although the intent is to ensure a site that provides safe access if that is deemed a requirement at the time; and
  - **Ecological function:** revegetation options are constrained by a shortage of topsoil. The Mine has developed a site-specific species planting guide.
37. Under the Work Plan, the progressive rehabilitation program is tied to the nature of the overburden that becomes available from the mining operations in the various fields of the Mine.
38. Given the unsuitability of the materials in fields 1A, 1B and 1C for placement on batters, under the Work Plan, progressive rehabilitation of several areas of the Mine will be undertaken at the conclusion of Block 1C mining, at which time the red shaded areas are proposed to next be rehabilitated:

Figure 6.1 Progressive rehabilitation staging / sequencing – Rehabilitation at end of Block 1C



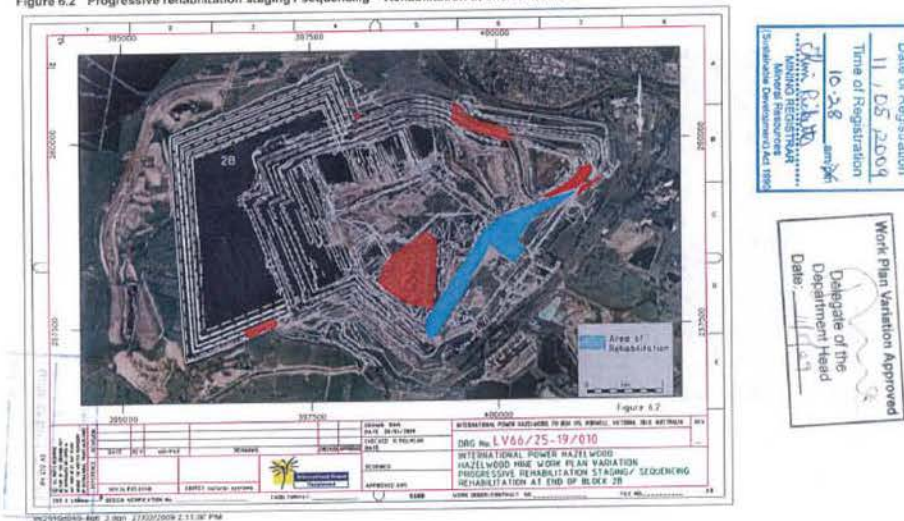
39. Block 1C is still being mined. Under the Work Plan, the expected dates for completion of mining of Block 1C are as follows:

- **Overburden mining – (2010 – 2015); and**
- **Coal mining – (2011 – 2019).**

40. In other words, the Work Plan contemplates that rehabilitation of the parts of the Mine shaded in red shall commence at the conclusion of coal mining of Block 1C in 2019. The areas shaded in red include a part of the northern batters heavily impacted by the recent Mine fire.

41. Overburden materials from Block 2B mining operations are inherently more stable materials and have been scheduled for use in rehabilitation works on permanent eastern and southern batters, at the conclusion of Block 2B, as follows (blue shaded areas):

Figure 6.2 Progressive rehabilitation staging / sequencing – Rehabilitation at end of Block 2B



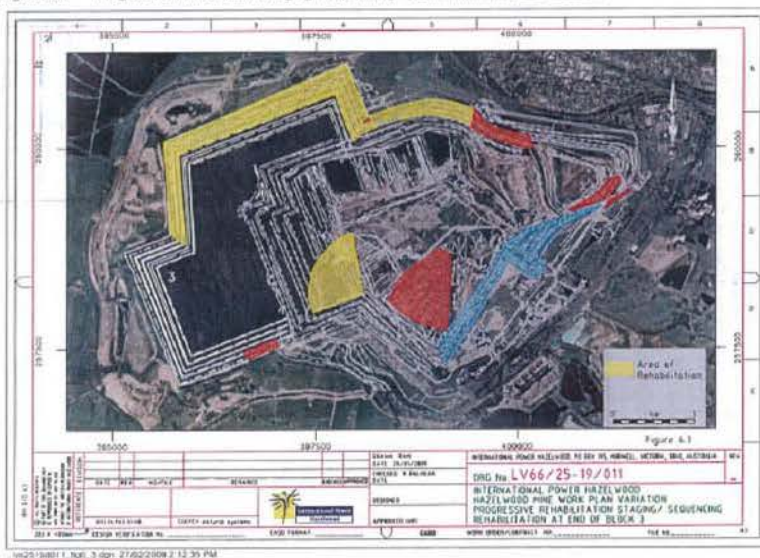
42. Under the Work Plan, the expected dates for mining of Block 2B are as follows:

- **Overburden 2018 – 2025; and**
- **Coal 2019 – 2028.**

43. In other words, the Work Plan contemplates that rehabilitation of parts of the eastern and south eastern batters shaded in blue shall commence at the conclusion of coal mining of Block 2B in 2028. The areas shaded in blue include parts of the south eastern and eastern batters significantly impacted by the recent Mine fire.

44. The rehabilitation planned at the end of Blocks 3 and 4 is as follows:

Figure 6.3 Progressive rehabilitation staging / sequencing – Rehabilitation at end of Block 3



Work Plan Variation Approved  
 Delegate of the Department Head  
 Date: 11/05/09

Date of Registration: 11/05/2009  
 Time of Registration: 10:28 AM  
 MINE REGISTRATION  
 Mining Regulation Act 1994  
 Sustainable Development Act 1994

Figure 6.4 Progressive rehabilitation staging / sequencing – Rehabilitation at end of Block 4



Date of Registration: 11/05/2009  
 Time of Registration: 10:28 AM  
 MINE REGISTRATION  
 Mining Regulation Act 1994  
 Sustainable Development Act 1994

Work Plan Variation Approved  
 Delegate of the Department Head  
 Date: 11/05/09

45. Under the Work Plan, the expected dates for mining of Block 3 are as follows:

- Overburden: 2026 to 2028; and
- Coal: 2027 to 2031.

46. Under the Work Plan, the expected dates for mining of Block 4 are as follows:

- Overburden: 2028; and
- Coal: 2027 to 2031.



47. In 2013, Hazelwood applied for a further Work Plan Variation, which is presently being considered by DSDBI. A copy is at **Annexure 3**.

#### **Rehabilitation works undertaken to date**

48. The areas within the Mine that have been rehabilitated to date are shown in the plan at **Annexure 4**.
49. Since 1996/1997, Hazelwood has rehabilitated about 431.3 hectares of land within the Mining Licence boundary. However, the hectare figures do not paint the full picture.
50. Some areas within the Mining Licence boundary were rehabilitated prior to privatisation. However, on the basis of my enquiries, I understand that the majority of the rehabilitation works carried out prior to privatisation were “easy wins” – e.g. rehabilitation of external waste dumps, where all that was required was grading the overburden material (which was already relatively flat), and topsoiling and re-vegetating the area. I understand that no rehabilitation works were undertaken within the pit of the Mine prior to privatisation, including in relation to any of the Mine’s batters.
51. As regards the northern batters, the eastern end of the northern batters, being the part of the Mine closest to the township of Morwell, were rehabilitated between 2008 and 2012. These rehabilitated areas are shown in the plan at **Annexure 4**. These batter rehabilitation works were complex and labour and time intensive. In order to rehabilitate the area, fire service pipes and mains had to be removed prior to the batter reshaping works. At the time of privatisation, this section of the northern batters was an exposed permanent coal batter. I understand that mining operations in that part of the Mine had concluded approximately 15 - 20 years prior to privatisation.
52. Since 2009, 20 hectares of the Mine have been rehabilitated.
53. In January 2014, a further 9 hectare area on the northern and eastern batters of the Mine had been identified as potentially suitable for rehabilitation works in 2014: see **Annexure 5**. This area is still targeted for rehabilitation works in the fourth quarter of 2014.

#### **Reporting on rehabilitation works**

54. Progressive rehabilitation works undertaken within the Mine are regularly reported in Environmental Review Committee (“ERC”) Reports produced by Hazelwood under its Mining Licence. These reports are provided to a range of regulators and agencies, who have representatives on the ERC, including:
- DSDBI;
  - the Department of Environment and Primary Industries;
  - the West Gippsland Catchment Management Authority; and
  - Latrobe City Council.
55. The ERC meets on a quarterly basis, and meeting minutes are taken. I understand that copies of the quarterly ERC Reports from February 2009 to February 2014 (excluding February 2013) were provided to the Board on 9 May 2014 in response to a Summons (document numbers 7.01 – 7.27). The reports contain the minutes of the previous meetings.
56. Officers from DSDBI and its predecessor agencies regularly view rehabilitation works within the Mine, as part of their routine Mine visits.
57. On the basis of my enquiries, I understand that at no time since privatisation:
- a. has Hazelwood been directed by the Minister or by DSDBI (including its predecessor agencies) to undertake further rehabilitation within the Mine; or

- b. has the Minister or DSDBI (including its predecessors) directed the Mine to undertake different, greater in size or faster rehabilitation of any areas within the Mine.

58. Hazelwood considers that it is compliant with the current approved rehabilitation plan as contained in the Work Plan, and understands that the State government and DSDBI are of the same view.

#### Further rehabilitation of the northern batters

59. As noted above, further rehabilitation works on the northern batters would involve the following components:

- stability assessments;
- planning;
- removing/rebuilding infrastructure;
- removal of overburden, and sloping the coal batters to the new profile (no steeper than 2.5H:1V and preferably 3H:1V) which is a flatter grade than that which currently exists, providing for future land use;
- covering coal batter in 1m of suitable material;
- topsoiling the batter;
- re-vegetating the batter; and
- installing any required geotechnical equipment.

60. In planning rehabilitation works on the northern batters, the following factors and constraints need to be taken into account:

- **availability of sufficient quantities of suitable overburden:** the composition of the overburden (dirt and clay overlying the coal, utilised in rehabilitation works) varies throughout the Mine. Overburden is not always suitable for placement on batters. As noted in the Work Plan, the overburden currently being mined from Block 1C in the West Field is not suitable for placement on the batters of the Mine given its composition (saturation levels), and on this basis is being placed on the floor of the Mine. Further, only a certain volume of overburden is available from the mining operations conducted annually within the Mine;
- **construction constraints:** typically, given the ground conditions at the Mine, earthworks projects such as rehabilitating batters can only be carried out between Melbourne Cup Day and Anzac Day due to difficulties with the wet weather outside of this period;
- **infrastructure positioned on the northern batters:** important infrastructure is situated on the northern batters which would need to be removed in order for the rehabilitation works to be completed. Such infrastructure includes:
  - **Mine power lines** – including power lines which run up the northern batters and supply power to important mine infrastructure situated on the floor of the Mine beneath the northern batters such as pump stations servicing the Mine’s operations, including the fire services network;
  - **fire services mains pipes** - including additional pipework installed in response to the recent fire within the Mine;
  - **roads, ramps and benches** – most of which are required as part of the Mine’s operations (for example, for access to various parts of the Mine for operation and maintenance requirements). Alternative access arrangements would need to be arranged, prior to such infrastructure being removed;



to complete. The timeline would ultimately depend upon the various factors outlined above and in particular, the satisfactory resolution of issues arising from the impacts of rehabilitation works upon Mine and third party infrastructure.

62. Any possible rehabilitation of the western region of the northern batters needs to take into account that under the Work Plan, and the current Work Plan Variation before DSDBI, that area is to be mined in the future.
63. As regards the area **between**:
- the eastern section of the northern batters which has already been rehabilitated; and
  - the area on the western end of the northern batters which future mining operations will dissect,

this area has been plotted in a series of maps attached to this witness statement: see **Annexures 6 – 8**. These plans also mark:

- the area rehabilitated in the east;
  - the area to the west where future mining will proceed pursuant to the Work Plan;
  - the initial water level of the future proposed lake (RL – 22), relative to the height of the batter; and
  - infrastructure positioned on and above the batters.
64. I estimate that the works required to rehabilitate this area of the northern batters would be considerably more costly than rehabilitation works conducted in the sequence that is currently planned under the Work Plan and 2013 Work Plan Variation application. The timelines for the works would be partially dependent on the outcomes of consultation with a range of other relevant parties including DSDBI, VicRoads, Latrobe City Council and SP Ausnet.
65. Within the central region of the northern batters, it may be possible to identify smaller areas in relation to which rehabilitation works could be undertaken as a matter of priority within the shorter term (i.e. the next 2-3 years), for example areas without infrastructure that would be impacted by the works, and of those areas, particular priorities could be:
- the areas closest to the town of Morwell (other than areas that have already been rehabilitated or are planned to be rehabilitated); or
  - areas assessed as having higher fire risks – either due to environmental factors, or by virtue of the coverage of applicable fire services infrastructure.

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**JAMES ANTHONY FAITHFUL**

Date: