

Review Group	Management Plan/PEPR Section	Section or Area of Focus	Rex Feedback ID (Internal)	Reviewer Feedback	Rex Response
		Public Nuisance Impacts	N038	Performance indicators/measurement criteria be developed by Rex in consultation with the community to define "public nuisance impacts" and "adverse impact on amenity".	Rex has lease condition limits, and has / will define trigger and response points. Complaints procedure will be used to follow up public nuisance issues, and ad hoc noise checks can be undertaken. Agreed with HMCV to maintain a Noise working group during operations.
		Noise Levels	N039	<i>Noise levels can be increased; Page 8: Condition 11: Rex can exceed stipulated noise levels if Director of Mines is satisfied that, based on info provided by acoustics expert, noise from mine will not cause adverse impact at sensitive receiver due to ambient noise, limited duration and /or frequency of occurrence of activity.</i> Reliance on information/advice from an external acoustics expert unfamiliar with the local environment and community is unacceptable.	While Rex will always rely on qualified Acoustics Engineer and expertise, however engagement with the community will take place prior to any proposed change
	N040		<p>Community Recommendations:</p> <ul style="list-style-type: none"> Community must be informed and consulted beforehand of Rex's intention to seek approval to exceed stipulated noise levels Community-derived measurement criteria (see Point 1 above) must inform any assessment of whether such increases would cause adverse impacts at sensitive receivers. Community must also have input into determining how long such exceedances can stay in place. Temporary or permanent? These commitments must be included in MP. 	While Rex will always rely on qualified Acoustics Engineer and expertise, however engagement with the community will take place prior to any proposed change	
	N041		DSD comment: DSD expects that Rex would engage with the local community in the preparation of any application to exceed their current noise limits, to ascertain the community's views on what they consider an acceptable level of noise. (DSD response to questions re ML conditions – dated 3.7.15)	Comment noted - refer above	
		Noise Limits	N042	What implications do the current noise limits have for public amenity?	ML conditions have been set following EPA noise policy and standards, which do take into account public amenity
		Noise Levels	N043	<i>EPA (Noise) Policy 2007: "Construction activity with adverse impact on amenity must not occur on Sundays, public holidays or between 7am and 7 pm."</i> (Noise and Vibration Management Plan – AECOM, p 11) What does EPA define as "adverse impact on amenity"? Do these time restrictions apply to Hillside during road construction?	ML conditions have been set following EPA noise policy and standards. Rex has no time constraints on its construction and operations, however will recognise location and wind direction in planning activities, and use trigger levels to determine increasing noise patterns
		Mine Generated Noise	N044	How accurately can mine-generated noise be differentiated from ambient noise?	Attended monitoring can differentiate between these, and real time monitoring can to a certain extent where audio link is included.
	N045		Given that real time monitoring cannot differentiate between these two components, how will Rex use this monitoring to determine if and when mine generated noise limits are being exceeded?	Real time monitoring has capacity for real time audio link to identify noise type, and also record noise for later analysis. However, attended monitoring is the most accurate.	
	N046		How subjective is this decision, and to what extent is it subject to independent review? ie : does it allow Rex to claim that an exceedance is due to ambient noise, not mine noise?	Refer response above	
	N047		This problem doesn't seem to be resolved by attended noise monitoring and noise loggers, because of limited attendance time (15 mins at night time only) and 7 – 14 day noise loggers and discretion re when and where to undertake this attended monitoring rests entirely with Rex.	Refer response above	
		Baseline Noise Monitoring	N048	Community Recommendation: a period of baseline measurement (at least 6 months) should be undertaken prior to any work commencing at Hillside (including construction).	Background / baseline / ambient noise has already been completed and Lease condition Noise levels set - attended monitoring can differentiate between background and mine noise at the time monitoring is being undertaken. To be usefule, the ambient noise needs to be determined at time of measuring.
		Lease Conditions Breach	N049	How accurately can Rex identify what caused the breach?	As before - real time has some capacity to do this, and attended monitoring is the most accurate
	N050		How quickly can they respond to shut down the cause of the noise?	Realtime monitoring is instantaneous, and if a mine generated source is identified as above limits action can be taken immediately	

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		Exceedance of Recommended Criteria	N051	<i>Environmental Noise Impact Assessment – Resonate Acoustics pages 6-7: “exceedance of the recommended criteria does not necessarily mean that the development will be non-compliant.”</i> What does this mean for Hillside and nearby residents? Who determines whether exceedance equates to non-compliance? Rex or DSD? Using what evidence? What role does community have in this decision?	Rex noting when a possible exceedance occurs, why and how and who makes the decision as to whether it was operational related or ambient.
		Noise Modelling	N052	Question accuracy of baseline measurements given failure to collect noise levels 24/7 for sufficient time period.	Background has already been completed and Lease condition Noise levels set - as before, background / ambient noise can be determined during attended monitoring
			N053	Assumptions built into model can't be validated until operations commence.	Modelling is based on wide experience - ML conditions re Noise levels now set - Real time and Attended monitoring is designed to confirm operations are within limits set
		Key Noise Risks	N054	Given noise levels of most of plant at Hillside, how will Rex meet conditions?	Rex acoustic engineer outlined the distance squared rule, and how noise levels drop with distance - modelling has determined that ML conditions can be met and the combination of monitoring types will confirm this
		Mitigation Strategies	N055	Waste rock storage facilities: <i>“designed to provide shielding from general on-site operations.”</i> Won't shield noise from haul trucks dumping on top of WRDs , esp eastern WRD which will impact esp. on RP.	Truck noise also follows the distance squared rule - Rex will schedule activities according to noise risk, with trigger points to check on likely noise impacts
			N056	<i>Should site specific monitoring or real time monitoring indicate adverse noise impacts from the mine, REASONABLE and PRACTICAL measures to mitigate noise at affected receptors will be INVESTIGATED.</i> See also page 14: <i>restrict operations during adverse weather conditions on outer stockpile faces,... where practicable.</i> What involvement will the community have in determining what is reasonable and practical?	Rex Noise Management Plan outlines the responses and measures the operations can take, including scheduling activities to reduce external noise - monitoring and feedback from the community will input into this
			N057	Community Recommendation: As an additional mitigation strategy to provide at least some noise/dust/lights screening for Rogues Point, the coastal side of St Vincent's Highway road diversion especially at northern end from where road starts to diverge until it reaches the coast, should be revegetated asap with mallee or similar trees.	Words added "Noise will be monitored and a vegetation buffer to reduce any incremental noise."
		Noise Monitoring	N058	Page 19: Allows noise levels and local met. data to be analysed and compared against noise compliance predictions. What does Predictions mean in this context?	We will compare it to the noise model in order to validate the model
			N059	Real time audio feed to identify contributing noise sources relating to displayed real time noise levels. How does this work?	Microphone at real time monitoring sites allows immediate recognition of contributing noise sources - also can be recorded for later analysis. If a mine source exceedance is identified actions can be taken.
			N060	Will there be a graded "alert" system similar to the real time dust monitors, alerting Rex to possibility of exceedance and allow mitigation strategies to be implemented BEFORE exceedance occurs?	Yes - a trigger and response plan will be established for early warning of noise increase which may result in an exceedance. Appropriate responses can then be taken. - ensure TARP is in MP as per prior comments and Section 5
			N061	<i>See Page 19: “real time noise monitoring will be programmed to alert key Hillside Mine personnel when trigger noise level is reached”.</i> Does the term trigger mean an actual exceedance or an early warning of an exceedance?	Refers to a trigger point - see above
			N062	<i>A real time audio link will be provided at key locations to enable quicker discernment of influencing noise sources.</i> Which locations?	Refer to management plan proposed real time noise monitoring locations. Additional real time monitor to be added at Rogues Pt
			N063	What does sound level analyser do compared with noise logger?	One records noise one analyses the frequencies that make up the noise spectrum.
			N064	<i>Page 20: used to quantify and describe acoustic environment at each monitoring location. There results to be compared with noise criteria. Allows for accurate determination of contribution made by mine to ambient noise levels.</i> How can this very intermittent monitoring process be used to measure compliance if not done in conjunction with real time noise monitoring at the same site? If this is the only way to come to understanding of differentiation between ambient and mine generated noise, then during construction and first year at least of operation, needs to be undertaken almost continuously.	Real time noise monitoring will determine when a trigger point or a lease condition point is reached. Noise loggers can record noise levels or frequencies over period of time. Attended monitoring can accurately determine actual mine noise compared with ambient noise. A combination of all three is planned to be used to ensure the mine is in compliance.

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Community - Note: HMCV WG feedback meeting on noise held 24/8 - Rex acoustic engineer answered all questions raised, and WG appeared satisfied with outcomes.	Noise Management Plan		N065	What are Noise Loggers? What do they measure? What can't they measure compared with attendant monitoring? Why are they only left in place for between 7 and 14 days once every one to three months. And why this lack of specificity – ie is it one month, 2 months or 3 months?	Words to answer this.
		Noise Monitoring Frequency	N066	<i>One 15 minute measurement by acoustics attendant and then another 15 minute observation when noise logger collected –both attendances at night - seems extremely limited. Given the very rapid shifts in noise levels over any 24 hour period, due to changes in wind direction/strength, rain events, whether tide is in/out etc.... a 15 minute observation seems meaningless. Once every one to 3 months? This means that at any given location, such as Pine Point or Rogues Point, if observations are conducted on a monthly cycle (ie two observations per month per logger placement) the total time spent by an acoustics attendant would equate to 12 x 2 x 15 minutes = 6 hours over a 12 month period (all during the night time). How can this be used to determine whether noise limits are being met, especially at sites such as RP and PP where no real time monitoring is currently planned?</i>	As per N064
			N067	If this is the only way to come to understanding of differentiation between ambient and mine generated noise, then during construction and first year at least of operation, why isn't it being undertaken almost continuously.	As per N064
	Noise Monitoring	N068	Page 21: <i>“will be sufficient to prove compliance by monitoring during night period with assumption that compliance”</i> would be achieved during day. The assumption that day time levels will be higher than night time has not been verified by comprehensive baseline measurement. Also assumption people have greater tolerance to noise during day than at night not tested with local community. Note: rock breaker (120+ dbs) will not be used at night, but will be used during day, thereby adding to day-time noise levels.	Daytime ambient noise, eg traffic, farm equipment, local household noise, means impact of mine generated sources are far less. Baseline monitoring has confirmed this. Hence attended monitoring is planned at worst case condistions, eg night, low wind. Experience with EPA and other sites is this is the case. Rex to modify and clarify.	
		N069	Page 21: monitoring only at night because <i>“wind during the day is likely to be above speeds during which monitoring can be effectively done”</i> . o Assumes less wind at night than day – where is evidence for this? o What is the wind speed cut-off point above which monitoring becomes ineffective? o How useful is this method if it is restricted to times of low wind speeds, especially given the windy nature of the area at and around Hillside?	Resonate Accoustics response - Using statistical wind data to predict the wind induced noise level is the only method which is able to ensure that wind induced microphone noise is not adversely affecting noise measurement results. This statistical assessment will occur at each monitoring location. Note that wind induced microphone noise is unlikely to significantly contribute to the mine noise level when near to the noise compliance limit - even under higher winds speed conditions. However, higher winds speeds may increase noise from trees and vegetation local to a monitoring station which could make the detection of mine related noise more difficult. The wind speed that would cause this issue would vary with each site and potentially seasonally with the presence of crops, grass height etc.	
		N070	Selection of observation times: How will the times/locations of attendant monitoring be selected? Seems to provide Company with considerable discretion re when and where to conduct these attended monitoring sessions – ie to select monitoring times to guarantee low noise level readings at any particular receptor. Eg measure at RP when northerly wind blowing and measure at Pine Point when SW winds blowing.	Noise management plan has locations of attended monitoring - identified as close to receptors. External independent consultants will undertake attended noise monitoring, at all receptors during night, hence if light wind is from one direction this impact will be noted in upwind and downwind locations.	
		N071	All 4 real-time monitors are located inland. In at least the two inland sites to the north of the mine, some of the mine generated noise is likely to be screened by undulating, elevated topography between the house and the mine site. No real time monitors at either PP or RP and in neither case there is very little, if any, topographic screening between these locations and the mine site.	As acoustic engineer outlined, noise can still carry over slightly undulating topography, with sites selected based on receptor locations. The NW receptor is directly in line with processing plant, with no RSF screening, so is an ideal worst case location for noise. PP and RP will ultimately be screened by RSF	
		N072	RP does not have a real time noise monitor – only an attended sound level analyser + noise logger even though there are a number of permanent residences located at southern, most exposed section of Rogues Point. Noise exposure likely to be very high. Reasons similar to that for high dust exposure. Community Recommendation: RP requires a real time noise monitor + attended monitoring/noise logger.	While Rex believes its planned real time noise monitor locations will accurately determine noise levels overall, we will agree to add one additional real time monitor at Rogues Point, mainly as there is a perception in community that sound will travel there by direct line of sight across water. Rex has pointed out that there are likely to be higher ambient noise levels at RP due to wave noise, other local noise sources, eg cars, doors closing, proximity to highway, etc. A suitable site has been selected by acoustic engineer in conjunction with community. Has been added to management plan .	

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			N073	Community Recommendation: Waiting for feedback from Pine Point Progress Association but likely the requirements will be the same as for Rogues Point.	The planned real time noise monitor at southern receptor will clearly indicate whether there are any noise issues at Pine Point. Rex declined to add another real time monitor at PP. This is an attended noise monitoring location, and levels of ambient noise will also be higher here, eg close to highway, wave noise, etc.
			N074	Black Point – no noise monitors at all. Waiting for feedback from BP Progress Association	Rex agreed to add an attended noise monitoring location at Black Point.
		Reporting	N075	<i>Page 20: Independent acoustic engineer will carry out routine compliance audits on biannual basis – ie every 2 years. This is unacceptable. Community Recommendation: Must be done at least every 6 months during first years of construction/operation and then at least annually, or following a sustained series of complaints.</i>	Planned every month for the first year and annual thereafter.
			N076	<i>P.22: Rex will engage acoustic engineer within 3 months of commencement of earthworks. What does commencement of earthworks mean? How long after road construction starts will this occur?</i>	The Road construction is approved under Sectionj 49 of the Development Act and does not come under ML conditions. However Rex will communicate clearly community concerns re noise with road construction contractor
			N077	<i>P 22 – will report on performance of this Plan in ACR – every 12 months – not enough. How frequently will Rex report attended monitoring results to community and in what form?</i>	Noise monitoring results will be communicated with HMCV at least on a quarterly basis, as well as the annual compliance review. If HMCV meets monthly then results can be tabled then. Real time monitor results will be available through independent website to public at all times. Rex to assess if this needs to be added to MP.
		Community Complaints Process	N078	Need clearly specified time frames within which investigation and response to individual must occur.	Immediate action will be undertaken on site when trigger points are reached and to rectify any exceedance - Complaints will be followed up as per procedure, and an independent review by qualified acoustics engineer may be carried out if determined necessary. Rex to assess if this needs to be added to MP.
			N079	Each complaint must be followed up with complainant to see if satisfied with response. If not, need independent appeals process.	Immediate action will be undertaken on site when trigger points are reached and to rectify any exceedance - Complaints will be followed up as per procedure (planned to be within 48 hours), and an independent review by qualified acoustics engineer may be carried out if determined necessary. Rex to assess if this needs to be added to MP.
			N080	All complaints to be recorded for public scrutiny on weekly basis.	Noise monitoring results will be communicated with HMCV at least on a quarterly basis, as well as the annual compliance review. If HMCV meets monthly then results can be tabled then. Real time monitor results will be available through independent website to public at all times. Rex to assess if this needs to be added to MP.
			N081	<i>Page 16: If landowner thinks noise criteria being exceeded..... attended noise monitoring units will be deployed– if mutual agreement can't be reached then independent review? Who will conduct independent review? How quickly can these units be deployed? Need to be there immediately complainant thinks criteria being exceeded, not the next day!</i>	Immediate action will be undertaken on site when trigger points are reached and to rectify any exceedance - Complaints will be followed up as per procedure (planned to be within 48 hours), and an independent review by qualified acoustics engineer may be carried out if determined necessary. Rex to assess if this needs to be added to MP.
			N082	<i>Page 17; response to complainant will be provided as soon as practical. Requirement: as soon as practical too open-ended. Need clear set of response targets: esp re:</i> o time lag between complaint and investigation, o duration of investigation and o time taken to report back to complainant.	As per complaints procedure, response is planned within 48 hours. If immediate action is required this will be undertaken. Rex to assess if this needs to be added to MP and S5.
		Breaches	N083	Does each breach need to be reported to DSD and if so, within what time frame?	Yes, each breach is reported to the DPC - Timing detailed in Section 5.
			N084	Will the community be informed of each breach, the cause of that breach and Rex's operational response?	Yes, as part of the HMCV reporting and annual compliance report.
		Review of MP	N085	Doesn't specify a regularly scheduled review of the Management Plan; only if certain circumstances arise. Seems inadequate.	All plans will be reviewed annually.
			N086	Can community request a review if, in their view, mine generated noise is creating a public nuisance?	Yes if there is a specific complaint - ML conditions determine minimum limits and Rex will work with the community on nuisance noise and complaints, or trending issues
			N087	Page 23: lists minimisation of noise complaints as evidenced by trends in frequency and extent of complaint as a PI. By itself, this is insufficient. May be other factors leading to reduction in noise complaints – eg frustration from lack of satisfactory responses from Rex causing people to give up because continued complaining is perceived as a waste of time.	Trend in number and type of complaints is an important measure for noise management, both to the company and the DPC. Rex is required to respond to genuine community concerns including responses to noise.

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		Performance Indicators	N088	As noted earlier, in consultation with community, Rex needs to develop a specific set of indicators or measurement criteria re what the community considers to be: <ul style="list-style-type: none"> o Adverse impacts on amenity o Public nuisance impacts o Need to be in place before construction starts, and constantly reviewed as residents gain more first-hand experience of mine generated noise. 	The ML Conditions govern the compliance of the site, and Rex will work with the community on complaints, noise trends and nuisance noise as these occur
			N089	Regular community satisfaction surveys auspiced by HMCV (as per recommendation in Air Quality WG Response document)	Community satisfaction surveys form an important part of Rex community engagement plan. These will help inform site management on reducing impacts from noise. The actual compliance monitoring and indepndent audits by acoustic engineer will inform the level of compliance.
		Other	N090	No WRDs on SW side of mine – will this create sound shell for nearby sensitive receiver?	The shallow angle of the RSF will mean there is no reflected noise. Only direct line of sight noise sources will reach this receptor. Real time monitoring and attended monitoring is planned at this location.
			N091	Effect of living below cliffs at Pine Point on noise levels.	In general the area below the cliffs at PP should have less noise from the mine, as it is not direct line of sight. Nearby receptor monitoring and attended monitoring at PP should determine this.