



**VISTA GOLD AUSTRALIA P/L**

**MT TODD MINE SITE**

**WASTE DISCHARGE LICENCE 178-3**

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**Annual Audit and Compliance Report  
October 2014**



LICENCE NUMBER	WDL 178-3
REPORTING PERIOD	26 November 2013 – 30 September 2014

### Licensee Details

Legal Entity Name: Vista Gold Australia Pty Ltd  
ABN: 117 327 509  
Registered Business Address: 1/4 Manning Road  
Double Bay  
NSW 2028  
  
Postal Address: PO Box 1467  
Double Bay  
NSW 1360 Australia  
  
Contact Person: Brent Murdoch  
Position Title: Director and General Manager Australia  
Contact Details:  
b/h: 08 8941 9105  
mobile 0488 100 314  
email: bmurdoch@mttodd.com.au

### Location of Operation to which this licence applies

Name: Mt Todd Mine Site  
Address: Jatbula Road, Katherine NT  
Telephone Numbers:  
b/h: 08 8975 4297

### 24 hour emergency response

Contact Person: Mt Todd Site Manager  
Telephone Numbers: 08 8975 4297 (Site Office)  
08 8976 7132 (Site House)  
0488 100 314 (Darwin GM)



## Compliance with Licence Conditions

Condition	Action	Compliance ?	Evidence	When (Date)	Status
<b>OPERATIONAL</b>					
1	The Licensee must notify the NT EPA within 24 hours if there are changes to the details of the 24-hour emergency contact as provided on page two of this Licence.	Yes	Copy of email sent attached	10 <sup>th</sup> October 2014	Updated
2	The Licensee must notify the NT EPA within 14 days if there are changes to the Licensee details shown on page one of this Licence.	Yes	No changes to licence details	N/A	Unchanged
3	The Licensee must notify the NT EPA prior to making any operational change that will cause, or is likely to cause, an increase in the potential for environmental harm or environmental nuisance, resulting from the Licensed Activity.	Yes	No operational changes were made that had the potential to increase the potential for environmental harm or nuisance	N/A	Unchanged
4	The Licensee must cause a copy of this Licence to be available at all times:				
4.1	on the Licensee's Australian website;	Yes	URL to licence is <a href="http://www.mttodd.com.au/sites/default/files/files/WDL178-Vista-Gold-Mount-Todd-Gold-Mine.pdf">http://www.mttodd.com.au/sites/default/files/files/WDL178-Vista-Gold-Mount-Todd-Gold-Mine.pdf</a>	26/11/2013	Complete
4.2	at the Location; and	Yes	Copy of the licence available at the Site Office	26/11/2013	Complete
4.3	at the Registered business address.	Yes	Copy of the licence available at 1/4 Manning Rd, Double Bay NSW 2028	26/11/2013	Complete

5	Where this Licence requires the provision of any notice, document or other correspondence to the NT EPA, the relevant contact is: NT EPA - Pollution Control Physical Address: Level 2 Darwin Plaza, 41 Smith Street Mall, Darwin NT 0800 Postal Address: GPO Box 3675, Darwin NT 0801 Email:pollution@nt.gov.au	Yes	All documents, correspondence and communications conducted via the specified addresses	Various - Throughout the term of the licence	Unchanged
6	All notices, documents or other correspondence required to be provided pursuant to this Licence must be provided in electronic form unless otherwise specified as a condition of this Licence.	Yes	All documents provided in electronic format	Various - Throughout the term of the licence	Unchanged
<b>OPERATIONAL</b>					
7	The Licensee must, without limiting any other condition of this Licence in conducting the Activity do all things reasonable and practicable to ensure the Activity does not adversely affect the Declared Beneficial Uses and Objectives as declared from time to time, including those applying to: ● Edith River Surface Water; and ● Katherine Region Groundwater.	Yes	All post discharge monitoring has not detected any adverse impacts to the declared beneficial uses. No evidence has been provided to the Licensee from any third party indicating otherwise.	01/06/2014	Unchanged
8	The Licensee must maintain and implement a communication plan which includes a strategy for communicating with members of the public who are likely to have a real interest in or be affected by the Activity.	Yes	Communication plan has been developed. No unexpected events or emergencies have occurred during the term of the licence which required public communication as per the communication plan	26/11/2013	Unchanged

9	<p>The Licensee must maintain a log of each complaint, made in relation to the Activity ,to any persons involved in the Activity. The log must include details of the following:</p> <ul style="list-style-type: none"> <li>● the date and time of the complaint;</li> <li>● the contact details of the complainant if known, or where no details are provided, a note to that effect;</li> <li>● the nature of the complaint;</li> <li>● the nature of events giving rise to the complaint;</li> <li>● prevailing weather conditions at the time of the complaint;</li> <li>● the action taken in relation to the complaint, including any follow-up contact with the complainant; and</li> <li>● if no action was taken, why no action was taken.</li> </ul>	Yes	Complaint register maintained on site. No complaints were received during the licence period.	N/A	Complete
10	<p>The Licensee must implement and comply with the Vista Gold Australia Pty Ltd Discharge Plan ("the Discharge Plan"). Where there is any discrepancy between the Discharge Plan and this Licence, this Licence takes precedence.</p>	Yes	All actions of the discharge plan were complied with	Various - Throughout the term of the licence	Complete
11	<p>The Licensee must cause a copy of the current Discharge Plan to be:</p>				
11.1	<p>provided to the NT EPA; and</p>	Yes	Copy provided by email	31/1 2014	Complete
11.2	<p>available on the Licensee's Australian website within 10 Business days of the commencement date of this License or the approval of a revision of the Discharge Plan under condition 12 of this License.</p>	Yes	<p>URL to document is  <a href="http://www.mttodd.com.au/sites/default/files/files/WDL178_vista_gold_discharge_plan.pdf">http://www.mttodd.com.au/sites/default/files/files/WDL178_vista_gold_discharge_plan.pdf</a></p>	26/11/2013	Complete

12	The Licensee must cause any proposed revision of the Discharge Plan (other than typographical changes or revisions to formatting or referencing) to be:	Yes	No revisions during the term of the licence	30/09/2014	Complete
12.1	submitted to the NT EPA with a copy of the peer review; and	Yes	Peer review provided by Dr Graeme Batley from CSIRO	41670	Complete
12.2	approved by the Controller of Water Resources prior to implementation noting that Controller of Water Resources may require the Licensee to revise, amend and/or resubmit the proposed revision.	Yes	Approval received by virtue of new licence being granted	26/11/2013	Complete
<b>DISCHARGES AND EMISSIONS</b>					
13	This Licence authorises waste water from Retention Ponds RP1, RP3, RP7 to be discharges from the Authorised Discharge Points identified in Table 1 and Appendix 1.	Yes	Only discharge during licence period was from RP3 via Authorised Discharge Point CSE	01/02/2014	Complete
14	The Licensee must, for each wastewater source or each combination of wastewater sources, determine the Dilution Factor and Monitoring Value(s) required to achieve an 80% species level of protection at monitoring point SW4. The Dilution Factor and Monitoring Value(s) must be:	Yes	DTA assessments conducted on RP3 and RP1	RP3 DTA November 2013 RP1 DTA January 2014	Complete
14.1	determined in accordance with the Discharge Plan using Direct Toxicity Assessment;	Yes	All DTA's conducted in accordance with the plan	RP3 DTA November 2013 RP1 DTA January 2014	Complete
14.2	determined prior to the first discharge for each Wet season covered by this Licence;	Yes	First discharge for the licence period was February 2014 from RP3. DTA conducted in November 2013	01/12/2013	Complete

14.3	provided to the NT EPA prior to the first discharge for each Wet season of this Licence; and	Yes	DTA Report emailed to pollution.nt.gov.au	07/01/2014	Complete
14.4	made available on the Licensee's Australian website within 10 Business days of being provided to the NT EPA under condition 14.3.	Yes	URL of document is <a href="http://mttodd.com.au/sites/default/files/files/RP3%20Ecotox%20Report%20-%20January%202014.pdf">http://mttodd.com.au/sites/default/files/files/RP3%20Ecotox%20Report%20-%20January%202014.pdf</a>	17/01/2014	Complete
15	The Licensee must apply, in accordance with the Discharge Plan, the Dilution Factor and Monitoring Value(s) provided to the NT EPA under condition 14 at monitoring point SW4.	Yes	Periodic reports (Condition 30) evidence use of dilution factors and monitoring values	Various - Throughout the term of the licence	Complete
16	The Licensee must notify the NT EPA when discharge from a wastewater source starts and stops for each discharge event authorised under this Licence by emailing pollution@nt.gov.au.	No	An email to the required address was overlooked when the discharge was stopped.	15/02/2014	For Improvement in any future licences
17	Waste discharged from the Authorised Discharge Point(s) in Table 1 must not: <ul style="list-style-type: none"> <li>● contain floating oil or grease or petroleum hydrocarbon sheen or scum, or litter;</li> <li>● cause or generate odours which would adversely affect the use of surrounding waters;</li> <li>● cause algal blooms;</li> <li>● cause visible change in the behaviour of fish or other aquatic organisms; or</li> <li>● cause mortality of fish or other aquatic organisms.</li> </ul>	Yes	Discharged waters during the single February 2014 discharge did not contain or generate any of the specified items	28/02/2014	Complete

18	At any time during the duration of this Licence, the Controller of Water Resources may direct the Licensee to cease discharge from a wastewater source and the Licensee must:	Yes	No directions were received from the Controller of water resources to cease discharge during the licence period.	30/09/2014	Complete
18.1	immediately comply with the Direction of the Controller of Water Resources to cease discharge; and	Yes	No directions were received from the Controller of water resources to cease discharge during the licence period.	30/09/2014	Complete
18.2	comply with any further Direction of the Controller of Water Resources.	Yes	No directions were received from the Controller of water resources during the licence period.	30/09/2014	Complete
<b>MONITORING</b>					
19	The licensee must for all monitoring points shown in Appendix 1: <ul style="list-style-type: none"> <li>● install, maintain and provide identification signage so that they are easily identifiable at all times; and</li> <li>● maintain safe access and egress, as is reasonably practicable.</li> </ul>	Yes	All monitoring locations are clearly signed and easily accessible	30/09/2014	Complete



20	<p>For each sample required to be collected as a condition of this Licence the following information must be recorded:</p> <ul style="list-style-type: none"> <li>● the date(s) on which the sample was taken;</li> <li>● the time(s) at which the sample was collected;</li> <li>● the point(s) at which the sample was taken;</li> <li>● the name of the person who collected the sample;</li> <li>● the chain of custody forms relating to the sample(s);</li> <li>● the field measurements and/or analytical results for the sample; and</li> <li>● laboratory QA/QC documentation.</li> </ul>	Yes	All details as specified were recorded and are present of original field sheets or electronic data	28/02/2014	Complete
21	The Licensee must cause surface water monitoring to be conducted in accordance with APPENDIX 1.	Yes	The respective monitoring reports as required by the License evidence the monitoring in compliance with Appendix 1	30/09/2014	Complete
22	The Licensee must cause biological monitoring to be conducted in accordance with the <i>Mt Todd Mine, Proposed Macroinvertebrate &amp; Sediment Monitoring Plan 2013</i> , dated December 2012 ("Macroinvertebrate Plan") or any revision approved in accordance with Condition 31.	No	Adjustments to the macroinvertebrate and sediment monitoring programmes were made for the monitoring conducted in 2014. Communication and prior approval of the changes were not sought from the EPA due to the inability of the onground sampling to be delayed in awaiting for approval. Such delays would have compromised the results of the sampling programme and post analysis. The changes made were sound in scientific basis and did not reduce the strength or effectiveness of the biological monitoring programme which is evidenced in the 2014 report.	30/09/2014	Revised Plan to be provided in anticipation of new licence

23	The Licensee must cause sediment monitoring to be conducted in accordance with the Macroinvertebrate Plan or any revision approved in accordance with Condition 31.	No	Refer response to condition 23	30/09/2014	Revised Plan to be provided in anticipation of new licence
24	The Licensee must cause a copy of the current Macroinvertebrate Plan to be:				
24.1	provided to the NT EPA; and	No	Refer response to condition 23	30/09/2014	Revised Plan to be provided in anticipation of new licence
24.2	available on the Licensee's Australian website within 10 Business days of the commencement date of this License or the approval of a revision of the Macroinvertebrate Plan under condition 27 of this License.	No	Refer response to condition 23	30/09/2014	Revised Plan to be made available on the website following receipt of a new licence
25	Any proposed revisions of the Macroinvertebrate Plan (other than typographical changes of revisions to formatting or referencing must be:				
25.1	submitted to the NT EPA for review; and	No	Refer response to condition 23	30/09/2014	Revised Plan to be provided in anticipation of new licence
25.2	approved by the Controller of Water Resources (or delegate) prior to implementation noting that the Controller of Water Resources (or delegate) may require the Licensee to revise, amend and/or resubmit the proposed revision.	No	Refer response to condition 23	30/09/2014	Revised Plan to be provided in anticipation of new licence

RECORDING AND REPORTING					
26	All records required to be kept by this Licence must be in a legible format.	Yes	All records are legible	30/09/2014	Complete
27	The Licensee must keep records of all non-compliances with conditions of this Licence.	Yes	All non compliances are recorded within this AACR	30/09/2014	Complete
28	In addition to any statutory obligations that may apply, the Licensee must as soon as practicable, and in any case within 24 hours after first becoming aware, notify the NT EPA of non-compliances with conditions of this Licence by emailing <a href="mailto:pollution@nt.gov.au">pollution@nt.gov.au</a> .	No	Four administrative non compliances have occurred during the licence period. Communication of these non compliances via the email address specified has not occurred	30/09/2014	For Improvement in any future licences
29	The Licensee must where the rolling 7 day 80 <sup>th</sup> percentile for an analyte exceeds a Monitoring Value, determined under condition 14, at monitoring point SW4:				
29.1	notify the NT EPA of the exceedance, as soon as practicable, and in any case within 24 hours, after first becoming aware, by emailing <a href="mailto:pollution@nt.gov.au">pollution@nt.gov.au</a> ; and	Yes	No rolling 7 day exceedances occurred during the licence period	N/A	Complete
29.2	implement the <i>Investigation Process for Exceedance of Dilution Factors</i> as per APPENDIX 2; and	Yes	Not required following from Condition 29.1	N/A	Complete
29.3	make the risk assessment report prepared in accordance with condition 32.2 available on the Licensee's Australian website within 10 Business days of providing the report to the NT EPA.	Yes	Not required following from Condition 29.1	N/A	Complete

30	<p>The Licensee must submit a periodic report to the NT EPA for each calendar month during which a discharge has occurred and no later than 10 Business days after the last day of the relevant calendar month.</p> <p>The periodic report must:</p>	Yes	Periodic single discharge event of February 2014 provided to EPA as specified	10/03/2014	Complete
30.1	<p>include, for each day of the month where a discharge occurred, tabulated data including:</p> <ul style="list-style-type: none"> <li>● the factors used to assess the Dilution Factor at SW4;</li> <li>● surface water monitoring results required under condition 23;</li> <li>● a comparison of surface water monitoring results for monitoring point SW4 with Monitoring Values determined under condition 14;</li> <li>● a comparison of surface water monitoring results for monitoring points SW2 and SW10 with applicable health guideline values from Australian Drinking Water Guidelines 6, 2011, Table 10.5; and</li> </ul>	Yes	All items as specified are evidenced in the periodic report	10/03/2014	Complete
30.2	<p>be made available on the Licensee's Australian website within 10 Business days of providing the report to the NT EPA.</p>	Yes	<p>URL of document is  <a href="http://www.mttodd.com.au/sites/default/files/files/WDL178-3%20Discharge%20Report%20Feb-14%20Final.pdf">http://www.mttodd.com.au/sites/default/files/files/WDL178-3%20Discharge%20Report%20Feb-14%20Final.pdf</a></p>	10/03/2014	Complete

31	The Licensee must complete the attached Annual Audit and Compliance Report (AACR), APPENDIX 3, and provide it to the NT EPA no later than 20 Business days prior to the Expiry Date of this Licence noting that the NT EPA may require the Licensee to revise, amend and/or resubmit the AACR.	No	Provision of this AACR was not completed within the time specified due to an administrative oversight.	30/09/2014	For Improvement in any future licences
32	The Licensee must provide to the NT EPA by 30 September for each year of the Licence period a monitoring report. The monitoring report must:	No	Provision of the annual monitoring report was not completed within the time specified due to an administrative oversight.	30/09/2014	For Improvement in any future licences
32.1	be prepared with regard to the requirements for a Monitoring Report identified on pages 6-15 of the document: Guidelines for Consultants reporting on Environmental Issues available from the NT EPA website: <a href="http://www.ntepa.nt.gov.au/waste-and-pollution">http://www.ntepa.nt.gov.au/waste-and-pollution</a> ;	No	The "Guidelines for Consultants" is not relevant to this type of reporting	30/09/2014	Complete
32.2	include trend analyses, where appropriate, and interpretation of all monitoring data required as a condition of this Licence including surface water, biological and sediment monitoring; and	Yes	Evidenced in the monitoring report	30/09/2014	Complete
32.3	be made available on the Licensee's Australian website within 10 Business days of providing the report to the NT EPA.	Yes	Document will be available within URL <a href="http://www.mttodd.com.au/content/waste-discharge-licence">http://www.mttodd.com.au/content/waste-discharge-licence</a>	TBA	In Progress

33	The Licensee must provide to the NT EPA no later than 20 Business days prior to the Expiry Date of this Licence the Licence Report. The Licence Report must include but is not limited to:	No	Provision of the licence report was not completed within the time specified due to an administrative oversight.	30/09/2014	For Improvement in any future licences
33.1	outcomes associated with ongoing studies including:				
33.1.1	results of the mixing zone modelling, mixing zone validation and mixing zone confirmation;	Yes	Evidenced in the licence report	30/09/2014	
33.1.2	results of the metal speciation modelling,	Yes	Evidenced in the licence report	30/09/2014	
33.1.3	results of the ecotoxicology testing conducted prior to the commissioning of the water treatment plant (if applicable); and	Yes	Evidenced in the licence report	30/09/2014	
33.2	be made available on the Licensee's Australian website within 10 Business days of being provided to the NT EPA.	Yes	Document will be available within URL <a href="http://www.mttodd.com.au/content/waste-discharge-licence">http://www.mttodd.com.au/content/waste-discharge-licence</a>	TBA	In Progress
<b>END OF LICENCE CONDITIONS</b>					



## Recording and Reporting

### Complaints Recording

Number of complaints recorded by the Licensee during the reporting period	0
Summary of complaints	NA
Summary of outcomes	NA

### Notifications of non-compliance

Number of events recorded by the licensee during the reporting period (as required by condition 28 of the licence)	6
Summary of events	<p>Administrative only non compliances in regard to submitting reports and documentation on time.</p> <ol style="list-style-type: none"> <li>1. Oversight in sending email informing EPA that discharge had stopped (refer Condition 16)</li> <li>2. Failure to notify EPA regarding changes to the Macroinvertebrate &amp; Sediment Monitoring programme. (Refer comments in Condition 22)</li> <li>3. Notification was not provided that notifications were not sent. (Condition 28)</li> <li>4. Submission of this AACR was late (Condition 31)</li> <li>5. Submission of the monitoring report was late (Condition 32)</li> <li>6. Submission of Licence Report was late (Condition 33)</li> </ol>
Summary of outcomes	Improvements will be made to ensure administrative related matters are completed on time in any future licences.

**Notifications of exceedance of Monitoring Value**

Number of events recorded by the licensee during the reporting period (as required by condition 29 of the licence)	1
Summary of events	One discharge event in February 2014
Summary of outcomes	No incidents or issues resulted from the discharge event



### Signature and Certification

This declaration must only be signed by a person(s) with the legal authority to sign it. The ways in which the declaration may be signed, and the people who may sign the application, are set out in the categories below.

If the Licensee is:	Tick	The declaration must be signed and certified by one of the following:
An individual		The individual
A company		The common seal being affixed in accordance with the Corporations Act , or
		Two directors, or
		A director and a company secretary, or
		If a proprietary company that has a sole director who is also the sole company secretary- by that director
A public authority		The Chief Executive Officer (CEO) of the public authority, or
		By a person delegated to sign on the public authority's behalf in accordance with its legislation (Please note: a copy of the relevant instrument of delegation must be attached to this report).

I/We hereby declare that the information provided in this Annual Audit and Compliance Report and accompanying documents is to the best of my/our knowledge, true and correct.

Signature		Signature	
Name (printed)	Brent Murdoch	Name (printed)	
Position	Director	Position	
Date	10/10/14	Date	
Seal (if signing under seal):	N/A		