



Vista Gold Australia Pty Ltd

Waste Discharge Licence 178-5

Communication Plan

January 2017



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1 Introduction

1.1 Overview

Vista Gold Australia Pty Ltd (Vista Gold) acquired the mining leases for the Mt Todd Gold Mine on March 1, 2006 (the acquisition closed on June 16, 2006), and Vista Gold took over care and maintenance of the site on January 1, 2007. Vista Gold promptly commenced investigations into remedial and preventative environmental management. Vista Gold is dedicated to operating the site in accordance with controlled management plans including water management.

The Northern Territory Government issued a Waste Discharge Licence (WDL 178) for discharge of water from the Mt Todd Gold Mine site in January 2011. The new licence specifies the need for a Communication Plan “for communicating with members of the public who are likely to have a real interest in or be affected by the discharge, about unexpected, unforeseen or emergency events associated with the discharge activities.”

1.2 Method

The Communication Plan for WDL 178 has been prepared in accordance with the National Environment Protection (Assessment of Site Contamination Measure) 1999 Schedule B (8) Guidelines on Community Consultation and Risk Communication.

Preparation of this Communication Plan entailed:

- ▶ Collecting and reviewing relevant information such as;
 - researching the demographic profile of the local government area and the local community area to assist in determining the most relevant consultation techniques including language requirement
 - researching past media reports to determine the tone of messages conveyed to the stakeholders via the media, the level of interest in the project and stakeholders involved
 - identifying issues and concerns raised by previous stakeholders and those likely to be raised
- ▶ Identifying information required for communication activities relating to the WDL;
- ▶ Identifying stakeholders that may be affected by discharge activities;
- ▶ Specifying the method and manner in which Vista Gold will communicate with stakeholders regarding any unexpected, unforeseen or emergency events associated with discharge activities; and
- ▶ Detailing protocols for communicating with stakeholders.

1.3 Scope

The ongoing monitoring program as detailed in the Mt Todd Gold Mine Water Management Plan outlines an incident reporting system based on the application of trigger values for surface and groundwater.

This plan outlines communication activity for both unexpected, unforeseen or emergency events associated with discharge activities as well as the seasonal commencement and cessation of water releases at the Mt Todd Gold Mine in accordance with the Waste Discharge Licence.

WDL 178 identifies stakeholders relevant to this communication plan as “members of the public who are likely to have a real interest in or be affected by the discharge.” Further detail on stakeholder categories is contained in section 4.

1.4 Community Engagement Objectives

The **overarching objective** of the community engagement process is to promote a high level of awareness and support for the Mt Todd Gold Project. Given the controversial history of the site there is an imperative for community consultation. Key principles of community engagement and risk communication are incorporated in the development of the Plan which includes objectives to:

- ▶ Raise awareness of the project to create interest and support for the project;
- ▶ Clearly communicate the key messages developed;
- ▶ Reduce potential for public outrage associated with risk perception of hazardous materials associated with waste water discharge through provision of consultation and education opportunities;
- ▶ Ensure the community and stakeholders are aware of and understand the protocols of the Waste Water Discharge Emergency Response Plans;
- ▶ Enhance the reputation of Vista Gold Australia;
- ▶ Ensure the community and stakeholders have opportunities to provide input into the management of waste discharge from the site;
- ▶ Build solid relationships with stakeholders through appropriate levels of engagement and contribute towards building long-term strategic partnerships;
- ▶ Ensure consistent messages are conveyed to all stakeholders; and
- ▶ Generate positive media coverage.



1.5 Key Messages

A number of key messages have been developed to position the project within the community, which in turn will help to reduce potential escalation of issues:

- ▶ Vista Gold is investigating the resource availability and found it is economically viable to proceed with mining gold from the Mt Todd mine site;
- ▶ Vista Gold is not yet, and not likely to be for the duration of WDL 178, responsible for environmental issues and site conditions created by previous mine operators;
- ▶ Vista Gold is committed to operating in an environmentally and socially responsible manner;
- ▶ Vista Gold is committed to sourcing the workforce from the local population where possible and might develop a local industry participation plan;
- ▶ Vista Gold has developed water management, environmental management and mine operating management plans to ensure effective water management for the care and maintenance phase of the project and for the term of WDL 178;
- ▶ Vista Gold has engaged independent experts (GHD) to prepare and Environmental Impact Statement (including a Social Impact Assessment) to establish existing conditions and strategies for management of water for specified future proposed works;
- ▶ Vista Gold will develop mitigation strategies in consultation with regulatory bodies, independent bodies and stakeholders. These mitigation strategies will address environmental and social impacts;
- ▶ Vista Gold is committed to effective community engagement and will consult and seek feedback from key stakeholders, adjacent property owners and the wider community at appropriate times in the project lifecycle;
- ▶ Vista Gold places a high priority on safety and environmental protection. Vista Gold is dedicated to providing the appropriate training and equipment to meet the relevant standards and goals in these areas. Vista Gold believes that safety and environmental protection are personal as well as corporate responsibilities; and
- ▶ Vista Gold has in place Water Management Emergency Response Strategies.

1.6 Key Issues and Opportunities

1.6.1 Potential Issues Raised

There are many potential questions stakeholders may raise in relation to both the maintenance and care of the Mt Todd Gold Mine, for example:

- ▶ What has Vista Gold done in the last five years of care and maintenance at the Mt Todd mine site?

- ▶ What has Vista Gold done to prevent further uncontrolled surface water discharges?
- ▶ What has Vista Gold done to remediate current groundwater seepage and to prevent further groundwater seepage?
- ▶ Are there still contaminants in the water causing environmental damage?
- ▶ How can you guarantee that my health and the environment will not suffer from controlled and uncontrolled release of water with contaminants being discharged to the local waterway?
- ▶ How will adjacent landholders and downstream users be contacted if unregulated discharges occur?
- ▶ What is the potential for spills of on-site hazardous material storage, such as oils, petrol, cyanide? What is the potential for these materials to enter waterways?
- ▶ Why should we trust Vista Gold?
- ▶ How can Vista Gold guarantee that my health and the environment will not suffer from the transport of potentially contaminating materials to site – have you got appropriate spill recovery policies?
- ▶ Will Vista Gold really listen to our concerns?
- ▶ What is the potential of AMD to migrate off-site, potentially into waterways?
- ▶ What is the potential for unregulated discharge from the TSF due to high rainfall events or breaches in the lining/wall?
- ▶ What is the potential for water contamination – groundwater and surface water from unregulated discharges and regulated discharges?
- ▶ What is the potential in the wet season with higher rainfall events for unregulated runoff from the TSF to enter the waterway system?
- ▶ What are the potential environmental impacts to fauna species? For example, likely impact from mine expansion on the habitats of the Gouldian Finch, Northern Quoll, Bare-rumped Sheathail Bat.

1.6.2 Language Barriers

A plan to communicate with people who do not have English as their first language will be developed in partnership with representatives of appropriate literacy groups. It is acknowledged we may have to tailor communication to those who do not have English as their first language.



2 Responsibilities

The Site Manager is responsible for implementing this procedure and ensuring appropriate external and internal bodies are notified of environmental incidents as soon as possible.

It is intended that this document is reviewed and updated where necessary on a regular basis before the commencement of each wet season. In particular all contact details for individuals and organisations shall be reviewed.

External notification requirements are outlined in Table 1, Table 2 and Table 3.

Vista Gold is responsible for providing emergency response training, including the site Emergency Response Plan (stipulated in WDL 178), for both employees and contractors as part of compulsory induction training prior to being authorised to work on-site. As part of the induction process employees and contractors must be made aware of the following:

- ▶ All Vista Gold employees are responsible for notifying all environmental incidents to their manager immediately, and to participate in incident investigations to assist in determining the root cause and appropriate actions; and
- ▶ All contractors are responsible for notifying the relevant Vista Gold Manager of all environmental incidents, and to participate in investigations.

3 Community Feedback Number

The following must be posted on the Home Page of the Mt Todd website (www.mttodd.com.au);

Community Feedback Number
(08) 8941 9108

Call the Mt Todd Community Feedback Line at 08 8941 9108 with any issues, comments or questions you may have – and we will listen.

You can also reach us through this website at <http://www.mttodd.com.au/contact-us.html>, simply click on "Contact Us" tab and select any one of the contacts listed or fill out the online comment form at the bottom of the page.

4 Event categories

Impact zones for unexpected, unforeseen or emergency events will be determined by the specific nature of an event.

Unexpected, unforeseen or emergency events associated with the discharge activities are categorised as either Category 1 or Category 2 events. This method of categorisation does

not indicate the severity of the environmental impact, but is employed to distinguish between the responses appropriate to the different types of events.

Seasonal commencement and cessation of water releases are categorised as Category 3, in this instance treated water is released from site when there is sufficient flow in the Edith River in order to reduce water inventory held at Mt Todd.

The events are defined as follows:

Category 1 event

A Category 1 event is classified as an emergency event

Category 2 event

A Category 2 event is classified as a non-emergency discharge beyond the terms of WDL178 that requires investigation and assessment.

Category 3 event

A Category 3 event is classified as the first and last WDL178 compliant water release of the wet season.

5 Procedure

This section provides a framework of processes and protocols to guide communication activities.

5.1 Category 1 event – emergency event

Initial advice

A Category 1 event is recognised as an emergency as defined in section 16 of the Mt Todd Gold Mine Induction Manual:

An emergency is any unusual situation which endangers life and property.
Emergencies that might be encountered on site include:

- Fire involving buildings, fixed plant, vehicles, heavy equipment, chemicals and/or vegetation;
- Explosion involving gasoline or diesel fuel, gases, flammables, poisons or chemical reagents;
- Collisions/rollovers involving vehicles or other mobile equipment;
- Collapse of surface structures or rock slides;
- Contact with an energized power circuit; and
- Medical emergency involving personnel working on or visiting the site.



The Emergency Response Procedure (ERP) detailed in that document should be adhered to in the first instance, as follows:

1. Warn all of the people in the danger area to evacuate as required
2. Assess the situation
3. Contact Emergency Response Personnel on the radio
4. Give Emergency Response Personnel the following details:
 - Your name and location
 - A brief description of the emergency and its location
 - Number and if possible severity of injuries
5. Maintain radio contact until instructed otherwise
6. If safe to do so, attempt to control or contain the emergency
7. Assist the emergency team if instructed to do so

If the site needs to be evacuated Emergency Response Personnel will issue the instructions on the radio. Personnel are to gather at the designated Muster Point for further instructions.

Emergency phone numbers for the Mt Todd Mine are as follows:

- | | |
|-----------------------------|------------------------------------|
| ▶ Major emergencies | 000 (112 if calling from a Mobile) |
| ▶ Katherine Hospital | 8973 9211 |
| ▶ Ambulance | 8973 8555 |
| ▶ NT Fire and Rescue | 8972 0133 |
| ▶ Katherine Police | 8972 0111 |
| ▶ Poison Information Centre | 13 11 26 |

Stakeholder contact

In addition to activating the ERP it is imperative to contact external stakeholders immediately in the order of priority detailed in Table 1.

Note that by contacting the relevant councils and AFANT (Amateur Fishing Association of Northern Territory) and issuing advice to the media, recreational water users will be informed of any event.

Media alert

A media alert will be drafted in readiness for various scenarios including the possibility of a Category 1 event. The media alert will be issued to the media contacts as defined in Table 1.

Subsequent media releases will be issued in a timely manner as and when more information is known.

Employees and contractors are not permitted to communicate with any members of the print, electronic or broadcast media about any aspect of the Mt Todd Mine, or any other Vista Gold matters. Team members should be cautious of any request for information on the project, as media representatives may not identify themselves as such.

If approached by a media representative employees and contractors should:

Not make any comment in relation to Mt Todd Gold Mine or Vista Gold; instead

Be courteous and advise:

'I am not an authorised spokesperson for Vista Gold; however Vista Gold will be pleased to discuss this matter with you. Please contact our media consultant Jeannette Button on 0407 727 080'.

Table 1 – Stakeholder engagement for Category 1 event

Stakeholder	Priority	Category 1: Action	Contact details
Essential services			
Emergency services (including poison information centre)	High – first priority	<ol style="list-style-type: none"> Contact Emergency Response Personnel on the radio Give Emergency Response Personnel the following details: <ul style="list-style-type: none"> Your name and location A brief description of the emergency and its location Number and if possible severity of injuries 	XXX Radio Telephone: 000 Poison information centre: Telephone: 13 11 26 Email: waste@nt.gov.au
Government Bodies and Regulatory Authorities			
NT Environmental Protection Authority (NTEPA)	High	Contact Pollutions Hotline by telephone to advise of situation as soon as practicable. Brief and keep informed of situation on regular basis (case by case basis as agreed with NTEPA).	Pollution Hotline Telephone: 1800 064 567 Email: waste@nt.gov.au
Department of Primary Industry and Resources	Medium	Contact appropriate officer by telephone as soon as practicable. Advise when emergency status ceases.	Peter Waggitt Telephone: 08 8999 5162 Email: peter.waggitt@nt.gov.au Mining Incidents after hours number: 0419 184 621



Stakeholder	Priority	Category 1: Action	Contact details
Katherine Town Council	High	Contact Mayor or deputy by telephone to advise of situation as soon as practicable. Brief and keep informed of situation on regular basis.	Fay Miller Telephone: 08 8972 5500 Email: records@ktc.nt.gov.au
Roper Gulf Council	High	Contact CEO or deputy by telephone to advise of situation as soon as practicable. Brief and keep informed of situation on regular basis.	Michael Berto, CEO Telephone: 08 8972 9002 Email Michael.berito@ropergulf.nt.gov.au
Rehabilitation Reference Group			
Jawoyn Association Aboriginal Corporation (JAAC)	High	Contact CEO or deputy by telephone to advise of situation as soon as practicable. Brief and keep informed of situation on regular basis (case by case basis as agreed with Jawoyn).	John Berto, CEO Telephone (08) 8972 2036 ceo@jawoyn.org.au
AFANT (Amateur Fishing Association of Northern Territory)	High	Contact Executive Director – discuss if any fisherman in area and evacuation details. Advise when emergency status ceases.	Executive Director, <i>Currently Vacant</i> Telephone 08 8945 6455 Mobile 0415 471 600 Email research@afant.com.au
NT Environment Centre	High	Contact officer as soon as practicable. Advise when emergency status ceases.	Glenn Evans Telephone 08 8981 1984 Email glenn.evans@ecnt.org
NT Minerals Council	Medium	Contact officer as soon as practicable. Advise when emergency status ceases.	Drew Wagner Telephone 0412 848 331 Email: info.nt@minerals.org.au
Charles Darwin University	Medium	Contact officer as soon as practicable. Advise when emergency status ceases.	Vicki Williams – Katherine Campus Administrator Telephone: 08 8973 9901 Email:

Stakeholder	Priority	Category 1: Action	Contact details
			vicki.williams@cdu.edu.au
Government Officials	Medium	Contact Executive Directors as soon as practicable. Advise when emergency status ceases.	Alister Trier, Executive Director of Department of Primary Industry and Resources Telephone: 8999 5332 alister.trier@nt.gov.au Alastair Shields, CEO Environment Telephone: 8999 3662 Email: alastair.shields@nt.gov.au
Adjacent Landholders (refer to Appendix A for parcel numbers)			
Parcel 5838 and 5833 Barnjarn Aboriginal Corporation	High	Contact CEO as soon as practicable Brief and keep informed of situation on regular basis (case by case basis as agreed with landholder).	John Berto, CEO Telephone (08) 8972 5401
Parcel 3468 Jason Tennant, Two Rivers	High	Contact landholder Brief and keep informed of situation on regular basis (case by case basis as agreed with landholder).	Telephone /SMS Email jason Tennant@westnet.com.au
Parcel 1796 Ryppglow Pty Ltd	High	Contact landholder Brief and keep informed of situation on regular basis (case by case basis as agreed with landholder).	TBA
Parcel 4725 Daly River Pastoral Pty Ltd	High	Contact landholder Brief and keep informed of situation on regular basis (case by case basis as agreed with landholder).	TBA
Parcel 2364 Brett and Lesley Doherty	High	Contact landholder Brief and keep informed of situation on regular basis (case by case basis as agreed with landholder).	TBA
Parcel 2351 John Etty and Caroline Milwright	High	Contact landholder Brief and keep informed of situation on regular basis (case by case basis as agreed with landholder).	Telephone: 08 8975 4932 Email wildfarm@bigpond.com
Parcel 5007 St John Robinson	High	Contact landholder	TBA



Stakeholder	Priority	Category 1: Action	Contact details
and Elizabeth Myers		Brief and keep informed of situation on regular basis (case by case basis as agreed with landholder).	
Broader Community			
Residents of Katherine, Pine Creek and surrounding areas	Medium	Inform through media.	n/a
Werrenbun Community	Medium	Inform through media.	Robbie Friel 0458 787 558
Media			
NT News	High	Media alert.	Editor : news@ntnews.com.au
Katherine Times	High	Media alert.	Editor : kathtimes@fairfaxmedia.com.au
ABC Darwin	High	Media alert.	Rob Cross, Chief Editor 08 8943 3170
Local electronic media	High	Media alert.	www.mttodd.com.au

5.2 Category 2 event – uncontrolled discharge

Initial advice

A Category 2 event is defined as a non-emergency uncontrolled discharge of water. Although a Category 2 event may have significant environmental impacts, they will be more localised and would require investigation and assessment, although will not be an immediate cause of danger to life or property.

Consequently the required communication response to a Category 2 event will be localised, and will be dependent upon the circumstances (severity, the volume and composition of the discharge). In some circumstances this may take time to assess. Severity will be identified with reference to the ongoing monitoring program and the trigger values plan for WDL 178 and detailed in the Mt Todd Gold Mine Water Management Plan.

If uncontrolled discharge occurs and appropriate trigger levels (volume and pH) at SW10 are not reached then communication with external stakeholders will not be required.

If trigger levels are reached, then the procedure outlined below will be applied and monitoring will continue until levels are under control:

Stakeholder contact

It is imperative to contact external stakeholders immediately in the order of priority detailed in Table 2.

Vista Gold will issue a notice for circulation to stakeholders based on the specific Category 2 event circumstances.

Media alert

A media alert will be drafted in readiness for various scenarios including the possibility of a Category 2 event. The media alert will be issued to the media contacts as defined in Table 2.

Subsequent media releases will be issued in a timely manner as and when more information is known, including a media release confirming that the discharge event has ended.

Employees and contractors are not permitted to communicate with any members of the print, electronic or broadcast media about any aspect of the Mt Todd Mine, or any other Vista Gold matters. Team members should be cautious of any request for information on the project, as media representatives may not identify themselves as such.

If approached by a media representative employees and contractors should:

- ▶ Not make any comment in relation to the Mt Todd Gold Mine or Vista Gold; instead
- ▶ Be courteous and advise:

'I am not an authorised spokesperson for Vista Gold; however Vista Gold will be pleased to discuss this matter with you. Please contact our media consultant Jeannette Button on 0407 727 080.'

Table 2 – Stakeholder engagement for Category 2 event

Stakeholder	Priority	Action	Contact details
Essential services			
Emergency services (including poison information centre)	Medium	Notify that an investigation is underway and keep informed.	Telephone: 1800 064 567 Email: waste@nt.gov.au



Stakeholder	Priority	Action	Contact details
Government Bodies and Regulatory Authorities			
Department of Environment,	High	Notify that an investigation is underway and keep informed.	Lauren Moss Minister for the Environment Telephone: 08 8999 5363 Email: bioresources.dpif@nt.gov.au
Department of Mines and Energy	Low	No action required	Peter Waggit Telephone: 08 8999 5162 Email peter.waggit@nt.gov.au Mining Incidents after hours number: 0419 184 621
Dept of Lands and Planning	Low	No action required	
Environment Protection Authority (EPA)	Medium	Notify that an investigation is underway and keep informed.	Telephone 08 8999 3747
Katherine Town Council	Low	No action required	
Roper Gulf Council	Low	No action required	
Rehabilitation Reference Group			
Jawoyn Association Aboriginal Corporation (JAAC)	High	Notify that an investigation is underway and keep informed.	John Berto, CEO Telephone (08) 8972 5401
AFANT (Amateur Fishing Association of Northern Territory)	Medium	Notify of water conditions	Craig Ingram Email: research@afant.com.au
NT Environment Centre	Medium	No action required	Email: policy@ecnt.org
NT Minerals Council	Low	No action required	Email: info.nt@minerals.org.au

Stakeholder	Priority	Action	Contact details
Adjacent Landowners (refer to Appendix A for parcel numbers)			
Parcel 5838 and 5833 Barnjarn Aboriginal Corporation	High	Notify that an investigation is underway and keep informed.	John Berto, CEO Telephone (08) 8972 2036
Parcel 3468 Jason Tennant, Two Rivers	High	Notify that an investigation is underway and keep informed.	Telephone /SMS Email jasontennant@westnet.com.au
Parcel 1796 Rypglow Pty Ltd	High	Notify that an investigation is underway and keep informed.	TBA
Parcel 4725 Daly River Pastoral Pty Ltd	High	Notify that an investigation is underway and keep informed.	TBA
Broader Community			
Residents of Katherine, Pine Creek and surrounding areas	Low	No action required (covered by media)	
Werrenbun Community	Low	No action required (covered by media)	
Media			
NT News	Medium	Media alert.	Editor :news@ntnews.com.au
Katherine Times	Medium	Media alert.	Editor : kathtimes@fairfaxmedia.com.au
ABC Darwin	Medium	Media alert.	Rob Cross, Chief Editor 08 8943 3173
Local electronic media	Medium	Media alert	www.mttodd.com.au

5.3 Category 3 event – compliant release

A Category 3 event is defined as a compliant release of water.

A Category 3 event is likely to occur when there is sufficient flow in the Edith River. The release of water is in strict accordance with the Waste Discharge Licence and is carried out in order to reduce the water inventory held at Mt Todd.



External Stakeholders, as listed in the table below, will be contacted as per our licence agreement.

Media may not be alerted to these events, an authorised Vista Gold spokesperson may however respond to media enquiries as requested.

All media enquiries should be directed to our media consultant, Jeannette Button on 0407 727 080 in the first instance.

Information regarding the water release will be posted on the Mt Todd website (www.mttodd.com.au).

A copy of the current Waste Discharge Licence and related reports are also available from the website at: www.mttodd.com.au/environment

Table 3 – Stakeholder engagement for Category 3 event

Stakeholder	Priority	Category 3: Action	Contact details
Government Bodies and Regulatory Authorities			
NT Environmental Protection Authority (NTEPA)	High	Contact Pollutions Hotline by telephone to advise as soon as practicable. Brief and keep informed of situation on regular basis.	Pollution Hotline Telephone: 1800 064 567 waste@nt.gov.au
Department of Mines and Energy	Medium	Contact appropriate officer by email as soon as practicable.	Peter Waggit peter.waggit@nt.gov.au
Katherine Town Council	Medium	Contact appropriate officer by email as soon as practicable.	Fay Miller records@kctc.nt.gov.au
Rehabilitation Reference Group			
Jawoyn Association Aboriginal Corporation (JAAC)	Medium	Contact appropriate officer by email as soon as practicable.	John Berto, CEO ceo@jawoyn.org.au
AFANT (Amateur Fishing Association of Northern Territory)	Medium	Contact appropriate officer by email as soon as practicable.	TBA research@afant.com.au
NT Minerals Council	Medium	Contact officer as soon as practicable.	Drew Wagner info.nt@minerals.org.au
Adjacent Landholders (refer to Appendix A for parcel numbers)			
Parcel 5838 and 5833	Medium	Contact CEO as soon as practicable	John Berto, CEO

Stakeholder	Priority	Category 3: Action	Contact details
Barnjarn Aboriginal Corporation		Brief and keep informed of situation on regular basis (case by case basis as agreed with landholder).	Telephone (08) 8972 5401
Parcel 3468 Jason Tennant, Two Rivers	Medium	Contact officer as soon as practicable.	Telephone /SMS Email jason Tennant@westnet.com.au
Parcel 1796 Rypglow Pty Ltd	Medium	Contact officer as soon as practicable.	TBA
Parcel 4725 Daly River Pastoral Pty Ltd	Medium	Contact officer as soon as practicable.	TBA
Parcel 2364 Brett and Lesley Doherty	Medium	Contact officer as soon as practicable.	TBA
Parcel 2351 John Etty and Caroline Milwright	Medium	Contact officer as soon as practicable.	wildfarm@bigpond.com
Parcel 5007 St John Robinson and Elizabeth Myers	Medium	Contact officer as soon as practicable.	TBA
Broader Community			
Residents of Katherine, Pine Creek and surrounding areas	Medium	Inform through media.	n/a
Media			
Local electronic media	High	Post	www.mttodd.com.au



Appendix A

Downstream Landholder Parcel Number

