



Appendix B

Environmental Management Plan

Vista Gold Australia Pty Ltd
Mount Todd Project Area





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1 Introduction

It is the intention of Vista Gold to operate the Mt Todd Project Area (MTPA), limit impact to the environment during the life of mine (LOM) and then rehabilitate the site at the end of mining. The information for this Environmental Management Plan (EMP) has been sourced from the Mt Todd Draft Environmental Impact Statement (GHD 2013) unless stated otherwise.

1.1 Purpose

This document provides guidance on the application of an Environmental Management Plan (EMP) for the MTPA and is considered a working document. The EMP consists of a series of sub-plans which has been updated following formal assessment by Department of Primary Industry and Resources (DPIR) as part of the mining authorisation process.

This EMP has been prepared for the MTPA to establish specific safeguards and controls to be employed at the mine site. It provides the basis of an Environmental Management System for the MTPA to operate, including the assignment of responsibilities to site personnel roles and guidance in practical environmental management.

A precautionary approach to the management of environmental risks has been applied to the site including monitoring, auditing and reporting. The approach includes continual improvement of the EMP with the intention of reducing environmental risks on the mine site.

The EMP covers the construction (2 years) and operational (13 - 17 years) phases of the MTPA. The closure and rehabilitation phase will utilise another version of this EMP, which will have evolved through the LOM.

This EMP has been developed in general accordance with the following documents:

- NT EPA Terms of Reference for the Preparation of an Environmental Impact Statement Mt Todd Gold Project, Vista Gold Australia Pty Ltd, June 2013; and
- NT EPA Guideline for the Preparation of an Environmental Management Plan, May 2015.

1.2 Objectives

The objectives of the EMP are to:

- Outline an Environmental Management System (EMS) including structure, roles and responsibilities, environmental training and education and sub-plans;
- Summarise environmental monitoring across the MTPA including frequencies, analytes, quality assurance (where relevant) and reporting requirements;
- Establish management objectives and contingency measures for areas of key environmental risks; and
- Summarise previous period performance including internal reporting, external reporting, internal auditing, complaints register and a summary of sub- plan performance compliance (in future reviews of the EMP).

1.3 Structure

The EMP has been structured to be utilised and revised throughout the MTPA. It includes the following Sections:



- Section 2. Environmental Management System: Outlines the environmental management system, attribute responsibilities, internal and external reporting requirements and the management of non-conformance and complaints.

1.4 Document reviews

The EMP is an active document which will be updated or modified during the LOM. Updates are likely to be undertaken following:

- Throughout the MTPA authorisation processes with the Department of Primary Industry and Resources (DPIR).
- Scheduled EMP reviews will be undertaken annually as part of the internal annual reporting requirements, internal auditing plan and Mine Authorisation (Mining Management Plan) documentation.

2 Environmental Management System

1.5 Environmental management

It is in the best interests of Vista Gold, stakeholders and the environment that Vista Gold operates the project in accordance with its commitments set out in this document and WDL178. Vista Gold intends to operate the project to industry best practice standards or better, and to follow Australian and International standards and guidelines for its activities where applicable.

This EMP provides an overarching framework for the delivery of environmental management actions and commitments, and for the management of environmental risks. The environmental management plans (EMPs) attached to the MMP are supporting documents that provide detailed information relating to the management of environmental risks for this Project. The following EMP sub-plans that have been identified as supporting documents are a part of the Mining Management Plan (MMP) and are included in the MMP document as:

- Appendix B – Environmental Management Plan
- Appendix C – Hazardous Substances Management Plan
- Appendix D - Waste Management Plan
- Appendix E - Tailings Management Plan
- Appendix F – Waste Rock and AMD Management Plan
- Appendix G – Cultural Heritage Management Plan
- Appendix H – Community Engagement Management Plan
- Appendix I – Air Quality and Dust Management Plan
- Appendix J – Weed Management Plan
- Appendix K – Fire Management Plan
- Appendix L – Flora and Fauna Management Plan
- Appendix M – Emergency Response Management Plan
- Appendix N – Erosion and Sediment Control Plan
- Appendix O – Noise and Vibration Management Plan
- Appendix P – Water Management Plan
- Appendix Q – Traffic Management Plan
- Appendix R – Closure Plan

Additional sub-plans will be developed as, and if required.

1.5.1 Management and mitigation strategies

The management measures and mitigation strategies documented for each environmental aspect are detailed in the relevant EMP sub-plans. The EMP sub-plans will be implemented to achieve the objectives and targets set out in the MMP.

1.5.2 Monitoring and review

The EMP's effectiveness will be reviewed annually and/or any time there is a change to project activities that alter the risk profile. Reviews will be undertaken as part of the annual MMP review.

In addition to the monitoring activities listed in each EMP sub-plan, the following routine and non-routine monitoring activities will be undertaken on site:

- Routine monitoring of aquatic sediments and macroinvertebrates conducted annually as outlined in the Water Management Plan (WMP).
- Routine sampling of surface and groundwater undertaken as outlined in the WMP.

Non-routine monitoring activities include:

- Flora surveys to record the land quality value of the offsets area, as required by the conditions of the Approval for a Controlled Action under the EPBC Act.
- Surveys and monitoring of Gouldian Finches.

Monitoring requirements for the site may change as the MTPA progresses into operation.

1.5.3 Inspections

The Area Managers and/or appointed representative will undertake regular site inspections to assess Project risk including:

- Walkover of high risk locations including fuel farms, chemical storage shed, sewage treatment plant and stormwater ponds to identify any new risks / unmanaged risks;
- Assess environmental performance of department work areas;
- Walkover of construction activities to ensure the Ground Disturbance Permit procedure is being adhered; and
- Provision of environmental advice to personnel and/or contractors as required.

Responsibility: Area Managers and/or Appointed Representatives

Approval: General Manager

Documentation: Environmental Inspection Checklist (to be developed)

Issued to: Environmental Team

1.5.4 Monthly reporting

All Area Managers throughout the construction and LOM will develop a Monthly Report.

- **Responsibility:** Area Managers
- **Approval:** General Manager
- **Documentation:** Monthly Reporting
- **Issued to:** Vista Gold Management Team

1.5.5 Internal Audits

The Environmental Manager and/or suitably qualified representative will undertake internal auditing. The audit will assess the implementation of each EMP sub-plan and/or EMP requirements.

Prior to the audit, a checklist will be developed that includes:

- Mitigation / commitment being assessed;
- Conformance with each mitigation measure / commitment; and
- Corrective actions required and responsibility.

The Environmental Manager shall ensure that investigations are initiated into non-conformances to determine whether mitigation measures are possible and appropriate. Incidents, non-conformance and spills will be entered into the required registers.

Frequency during construction will be as required and annually during operations.

1.5.6 External Audits

The implementation of the EMP and associated sub-plans will be audited by a suitable qualified, experienced and independent team within two years of the MTPA commencing. The external environmental audit will:

Assess the environmental performance of the MTPA including compliance with:

- EIS Assessment Report recommendations;
- Mine Authorisation approval conditions;
- EMP sub-plan commitments;
- EMP reporting requirements including Inspections, Monthly Reports, Annual Performance Review, Mining Management Plan and Statutory Incident Reporting (if occurred); and
- Approved EMP sub-plan commitments.
- Review environmental performance and recommend appropriate measures or actions to improve the HSEC performance of the action.

Non-conformances will be recorded and corrective actions captured within the Vista Gold incident and corrective action reporting system. Incident and Non-conformance Register attached as Attachment B2.

1.5.7 Non-Conformance and Corrective Action

Non-conformance and corrective actions will be reported internally and externally when required. Reported information will be considered during EMP and MMP reviews. Internal incidents will be recorded and actions reviewed as part of the ongoing continual improvement of the MMP. All reporting will be in accordance with the environmental incident reporting and investigation procedures (Section 1.6).

1.6 Incident reporting

All environmental incidents on site will be reported as per the requirements of Environmental Incident Reporting under Section 29 of the *Mining Management Act*. Under Section 29 an incident

must be reported as soon as practicable. Vista Gold will provide a verbal report of an incident within 24 hours and provide a written report within 7 days unless instructed otherwise by the DPIR.

All environmental incidents off site but associated with Vista Gold's activities at MTPA will be reported to the NT EPA under Section 14 of the *Waste Management and Pollution Control Act*. Notification must be received by the EPA within 24 hrs. A written response must be received by the EPA within 7 days. A summary of incident reporting requirements are provided in **Table 2-2 Statutory Incident Reporting Requirements**.

1.6.1 Statutory Incident Reporting

The Environmental Manager / Representative is responsible for ensuring that the Mine Manager is aware of all incidents that require statutory reporting and the associated communication requirements. Statutory incident reports submitted to DPIR will be summarised within future MMP revisions via an incident log.

1.6.2 Internal Incident Reporting

All reporting will be in accordance with the site's environmental incident reporting and investigation procedure. The procedure will detail the following steps in response to an accident or incident:

1. Initial Response
2. Notification & Recording
3. Assessment & Clarification
4. Initial Reporting
5. Investigation & Actions
6. Final Reporting
7. Sign Off & Review
8. Monitoring

Internal incidents and procedural non-conformances will be recorded and managed as described in each EMP sub-plan. The EMP sub-plans will be reviewed as part of the ongoing continual improvement of onsite processes and the MMP. Reviews will be undertaken as part of the annual MMP review.

All accidents and incidents will be investigated. The extent and depth of investigation shall be determined by the potential consequence that the accident or incident has been assigned as discussed in each EMP sub-plan. Investigations shall be conducted to ensure that the identified causes are prevented from re-occurring. Relevant corrective actions shall be raised to ensure that the identified causes are prevented from re-occurring. Accident and incident reports as well as corrective actions from these will be entered into Vista Gold's management system.

The site HSE Department will be responsible for the management of hard copy records associated with accident and incident investigations, and to ensure that the system is kept up to date.

1.6.3 Complaints

The MTPA has the potential to impact upon the local community both negatively and positively. The mitigation measures developed through the EMP sub-plans are designed to mitigate and

reduce environmental impacts. Should complaints be received from the public in relation to the MTPA activities, they will be logged within the complaints register including:

- Date
- Name and location of complainant
- Contact details
- Complaint
- Aspect
- Flow-up Actions / Mitigation Measures
- Close-out Approval

All complaints will be investigated to determine the source of the complaint, identify any underlying cause, establish additional investigation measure (if required), summarise corrective actions and undertake follow-up to ensure corrective actions are undertaken. The outcomes of investigations will be shared with the complainant and summarised in monthly reporting and the Annual Performance Review. The complaints form and register is provided in Attachment B3 and Attachment B4.

1.7 Responsibilities

Table 2-1 Responsibility for reporting environmental incidents outlines who is responsibility for reporting environmental incidents.

Table 2-1 Responsibility for reporting environmental incidents

Project Phase	Chain of Responsibility
Construction	<p>It is the responsibility of the Subcontractor's HSES Manager or delegate to contact the Primary Contractor's Environmental Manager / Representative verbally and without delay.</p> <p>The Primary Contractor will report all environmental incidents to Vista Gold's Environment Representative verbally and without delay.</p>
Operation and closure	<p>Vista Gold personnel and subcontractors, work area supervisors will report incidents to the Vista Gold's Environmental Manager / Representative verbally and without delay.</p> <p>The Vista Gold Environmental Manager / Representative is then responsible for ensuring that the Mine Manager is aware of all incidents and reporting and communication requirements.</p>

Table 2-2 Statutory Incident Reporting Requirements

Entity	Trigger	Timeframe and Contact Details	Incident Reporting Details
NT Environmental Protection Authority (NT EPA)	An Incident outside of mining activities which causes, or is threatening or may threaten to cause pollution resulting in material environmental harm or serious environmental harm, or breach of operating licence compliance requirements.	<p><24 hrs post incident nTEPA@nt.gov.au pollution@nt.gov.au</p> <p>Written response to the EPA within 7 days.</p>	<p>Section 14 of the Waste Management and Pollution Control Act. Section 14 Incident Reporting Form requires the following details: Incident causing or threatening to cause pollution Date & time How the pollution has occurred, is occurring or may occur Attempts made to prevent, reduce, control, rectify, investigate and/or clean up the pollution or resultant environmental harm caused or threatening to be caused by the incident Operator details The form is to be signed by the Health Safety and Environment Committee (HSEC) Manager and/or General Manager for submission.</p>
Department Primary Industry and Resources (DPIR)	An Incident on MLs / ELs that causes environmental harm that:	<p>As soon as practicable. mineral.info@nt.gov.au</p>	<p>Section 29 of the Mining Management Act. The Section 29 Notification of Environmental Incident Form requires the following details: Site and operator details: Location occurred and area impacted (GPS coordinates) Date and time Description of incident Emergency and remedial actions taken Nature of impact and severity Current situation Details of sampling undertaken Notification status internally and externally The form is to be signed by the Environment Manager and/or General Manager for submission.</p>
NT WorkSafe	Incident which results in either: Death of a person; Serious injury or illness; or Dangerous incident.	<p>Notification to NT WorkSafe as soon as practicable. Tel: 1800 019 115 ntworksafe@nt.gov.au Notification form submitted within 48hrs</p>	<p>Section 35 to 39 of the Work Health and Safety (National Uniform Legislation) Act. The NT WorkSafe Incident Notification Form requires the following details: Person submitting details Incident details including date, time and human injury details Work activity being undertaken at the time of incident</p>

Entity	Trigger	Timeframe and Contact Details	Incident Reporting Details
			Witness(es) details Details of injured / deceased persons Summary of injury or illness Future remedial actions The form is to be signed by the General Manager or delegate for submission.
Aboriginal Areas Protection Authority	Entrance and/or damage of sacred site or restricted works area.	As soon as practicable. Tel:(08) 8999 5511	No standard notification form is available. However, the following should be provided within the initial notification: Location of the site (grid reference) AAPA certificate pertaining to the site Summary of damage Name and organisation of discoverer Type and method of interference (exposed and/or damaged) Photograph of damage
Heritage Branch	Discovery or damage to items of heritage value.	As soon as practicable Tel: (08) 8999 5039	Seek advice from the Heritage Council.

Attachments

Attachment B1- Vista Gold Environmental Policy



VISTA GOLD

Vista Gold Corp.

Environmental Policy

Adopted on August 1, 2012, as amended on August 1, 2016

Vista Gold Corp. believes that effective environmental stewardship is based on careful work planning, education, diligent implementation, thoughtful assessment of performance and a desire to continuously improve over time.

We recognize that successful implementation of our plans results in some degree of disturbance to the natural environment. However, we believe that we can contribute to the sustainable development of our host communities. We are committed to meeting the needs of current members of that community without jeopardizing the ability to meet the needs of future generations.

Recognizing this, it is Vista Gold Corp.'s policy to:

- Regularly communicate our policy to those who work at and with Vista, their families, and the communities in which we operate.
- Establish, document and maintain appropriate environmental management systems and clearly defined environmental requirements.
- Apply proven practices to prevent pollution and other environmental impacts when practical, or to mitigate our impacts.
- Develop, design and operate facilities that are based upon the efficient use of energy, resources and materials.
- Plan for the entire life cycle of our activities and ensure that environmental mitigation, closure and reclamation planning are integrated into mine feasibility planning and make adequate resources available to deal with environmental impacts and closure of all phases of the project.
- Set and review environmental objectives and targets aimed at continual improvement.
- Educate our employees, their families, contractors, regulators and our neighboring communities about our environmental systems and practices.

- Conduct periodic reviews of each operation to monitor environmental performance and to guide its environmental management programs.
- Insist and document that those who provide services or products are made aware of our environmental policy and practices and observe them.
- Comply with relevant environmental laws and regulations and with other relevant environmental practices where none may exist.
- Ensure that our leadership, employees and contractors understand, support and maintain our environmental management system.
- Work with governmental and community/civic leaders, environmental groups, and other impacted or concerned parties to identify risks and develop a mutual understanding of environmental issues.
- Provide managers and supervisors the authority and resources necessary to implement our environmental management system and associated environmental standards and practices.



Michael B. Richings
Chairman of the Board of Directors

August 1, 2012



Attachment B2– Incident and Non-conformance register

Incident / Non-conformance			Management Response			
No.	EMP / Sub-plan	Details	Corrective Actions	Responsibility	Completion Date	Close-out Summary

Attachment B3– Complaint Form

Details of Complaint					
Vista Gold Staff Details					
Name		Date		Time	
Complaint Details					
Name					
Address					
Phone Number					
Email Address					
Complaint Type	<input type="checkbox"/> Letter <input type="checkbox"/> Email <input type="checkbox"/> Phone <input type="checkbox"/> Site Visit <input type="checkbox"/> Internal Audit <input type="checkbox"/> External Audit				
Project Area	<input type="checkbox"/> Mine Site <input type="checkbox"/> Accommodation <input type="checkbox"/> Processing Site <input type="checkbox"/> Power Station <input type="checkbox"/> Borefield				
Complaint Summary					
Action Taken					



Details of Complaint		
Responsible Persons		
Follow up of Actions Required		
Complaint Advised	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	Date
Closeout Summary		
Complainant Advised	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	Date
Procedure Modification	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Complaint Logged	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Attachment B4– Complaint Register

Complaint					Management Response				
No.	Date	Type	Project Area	Summary	Responsible Person	Follow-up of Actions	Complainant Advised	Close-out Summary	Complainant Advised

Attachment B5 – MTPA Environmental Commitments

Impact area	Proponent Commitment
Community	
Community health and safety	Occupation health and safety policies will be developed for the construction and operational phases of the MTPA.
	First aid will be available at the MTPA. Complete
	A site safety plan will be developed that includes preventative measures for a range of on and off-site incidents that might impact on community health and safety.
	An emergency response plan will be developed that includes any emergency incidents that might involve members of the public. The proponent will work closely with the Katherine Emergency Services in developing the plan. Complete
Community housing and accommodation	A housing and accommodation strategy will be developed in consultation with the Northern Territory Government and key regional stakeholders that will include:
	Development of a purpose-built construction camp for the temporary construction workforce, outside of existing settlements
	Finalisation and implementation of a hybrid accommodation strategy for the operational workforce including a mix of FIFO / DIDO and residential options.
Workforce management	A workforce management strategy for the construction and operational phases will be developed and address workforce sources, workforce management, worker health and wellbeing and worker behaviour.
	The workforce management strategy will include a recruitment policy that allows for appropriate notice periods to be served for new employees.
Community employment and training	An industry participation plan will be developed in accordance with the requirements of the Northern Territory Government, and with a preference to build business, industry and community capability within the Northern Territory.
	Vista Gold will work with local training providers to develop local training programs that will provide opportunities for employment to unskilled people.
Community values and change	A community and stakeholder engagement plan will be developed. Complete
	The plan will establish a community and stakeholder relations role and a community reference group that will advise the Proponent on community matters. Complete
	The community reference group will include representatives of vulnerable groups. Complete

Impact area	Proponent Commitment
	A complaints and feedback register will be established to track complaints and feed the response back to of the Proponent. Complete
	Vista Gold will continue to maintain, develop and operate the project website in order to inform the community. On-going
	Vista Gold will establish a community sponsorship fund to contribute to community development initiatives. On-going
	Contractors will be selected on their ability and willingness to uphold the community commitments of the Project.
Near neighbour impacts	A 'near neighbour' program will be established to monitor any changes on adjacent and downstream properties and agree to mitigation.
	The 'near neighbour' program will include monitoring for impacts to the road network affecting such properties.
Indigenous resources, values and aspirations	Vista Gold will continue to work under the Partnership Agreement with the Jawoyn Traditional Owners, towards achievement of their economic and employment aspirations. On-going
	Clear mechanisms will be established for collaboration, communication, reporting and dispute resolution between the Proponent and Indigenous groups that may be affected by the Project. On-going
	A Cultural Heritage Management Plan will be implemented, monitored and maintained. Complete – On-going
Climate Change and Sustainability	
Impact Area	Proponent Commitment
Climatic conditions	Undertake adaptive management to manage extremes of air temperature, precipitation, flash floods, tropical cyclones, wet and dry periods and evaporation. On-going
	Consider appropriate temperature ranges during the design phase of the Project; including storage of chemicals and explosives; and the procurement of plant, equipment and construction materials. On-going
	Preventative maintenance of plant and equipment will be incorporated into standard working procedures. Monitoring will be undertaken during extremes of temperature. On-going
	Potential increased risk of flooding will be considered in the design of the Project, including site drainage, bunding of watercourses, pond sizing and open pit slopes. On-going
	Dry and wet periods will be considered in the design of recycled plant process water. On-going
	Risk management systems will be enacted to provide early identified and corrective action to avoid potential project failures. On-going

Impact area	Proponent Commitment
Sustainability (community, economy, environment)	An environmental management system will be developed based on established guidelines and include a requirement to report on key result areas, key performance indicators and sustainability goals. Complete
	An environmental management, monitoring and reporting schedule will be established to support the environmental management system. Complete
	Project personnel and contractors will be educated on the environmental management system and their roles within it. On-going
	Project personnel and contractors will be educated on the risk management system to create a culture of risk awareness and risk management. On-going
	Consider type, volume, sourcing and application of materials, services and resources to achieve sustainable outcomes. On-going
	Sustainability criteria will be incorporated into tender documents, where practicable. On-going
	Whole of life considerations will be incorporated into project design. On-going
	Resilience of equipment will be considered to minimise long-term costs. On-going
Greenhouse Gas	
Impact Area	Proponent Commitment
Emissions to atmosphere	A commitment to energy efficiency will be carried into the environmental management plan. On-going
	An energy efficiency assessment will be undertaken to identify initiatives and technologies leading to implementation of processes to allow energy efficiency opportunities to be integrated into operations.
	The detailed design and planning stage of the MTPA will include a focus on the optimisation of diesel use. On-going
	Opportunities for the use of biodiesel on the MTPA will be examined.
	Through assessment and review, the MTPA will seek continuous improvement in compliance and emissions reduction. On-going
	Scope 1 and Scope 2 emissions will be reported under the National Greenhouse and Energy Reporting Scheme (NGERS). On-going
	The legislated reporting requirements of NGERS will be used to monitor performance and identify opportunities across the life of the MTPA. On-going
Land	
Impact Area	Proponent Commitment
Landscape	Where possible rehabilitated structures will be integrated with existing topography and landscape features.

Impact area	Proponent Commitment
Soil	Develop and implement Erosion and Sediment Control Plan including installation of temporary erosion control measures such as sediment fences, diversion drains, hay bales, sediment traps and hardstand covers. Complete
	Regular inspection and maintenance of sediment control structures.
	Minimise the disturbance footprint and undertake progressive rehabilitation where practicable.
	Construction and management of soil stockpiles to ensure they do not contribute to sediment load on drainage lines and watercourses.
	Stormwater drainage controls and erosion and sediment controls for haul roads will be designed and constructed to minimise erosion and channel scour. Verges will be vegetated where practicable.
Hazardous materials management	Appropriate design and storage of hazardous materials to Australian standards. On-going
	All hydrocarbons will be stored and handled in accordance with the bunding requirements of AS 1940:2004: The Storage and handling of combustible and flammable liquids. On-going
	Regular inspections of storages, tanks and bulk containers and the integrity of bunded areas and containment systems.
	Chemical and hydrocarbon storage facilities will be managed in accordance with a MMP, and include an inventory of chemicals stored on site, the relevant material safety data sheets, spill kits and spill response procedures. On-going
	The MTPA will comply with the International Cyanide Management Code.
	Spill clean-up procedures will be developed, and project personnel and contractors will be trained accordingly. On-going
AMD or cyanide contamination	Monitoring of groundwater quality. On-going
	Characterisation of waste material. On-going
	Encapsulation of AMD material in the WRD.
	Treatment of water prior to discharge. On-going
	Comply with International Cyanide Management Code.
Surface Water	
Impact Area	Proponent Commitments

Impact area	Proponent Commitment
Flooding, AMD run-off	Water retention ponds will be sized to capture an ARI event appropriate to their hazard category, plus an appropriate freeboard allowance for sedimentation. On-going
	The ponds will be designed to discharge to the natural environment in periods of extreme rainfall to protect the integrity of the structure.
	A site Water Management Plan will be developed, implemented and regularly reviewed. Complete
	Water retention ponds will be managed to maximise their available storage in the Wet Season, including discharge in accordance with the WDL. On-going
	Additional pumping capacity will be installed to accommodate severe rainfall.
	If all water storages are at capacity, excess water will be transferred to the TSFs for temporary storage or released in compliance with WDL178. On-going
	The heap leach pad and heap leach pad moats will be reshaped and lined to accommodate extreme rainfall events.
	Surface water monitoring will be undertaken to validate the Water Balance Model. On-going
	Design and construction of infrastructure in accordance with Australian National Committee on Large Dams (ANCOLD) requirements. On-going
	The capacity of the WTP and PWP will be sufficient to prevent overflows in normal operating conditions.
	Active water treatment will be undertaken including for general on-site use and to meet discharge criteria for release to the Edith River during the Wet Season.
	During the pre-production phase, a lined equalisation pond will be constructed for mixing of AMD from various on-site sources prior to treatment and to temporarily store AMD in case of system upset. A lined sludge disposal cell will also be constructed for the permanent disposal of water treatment sludge.
	Treatment of water prior to release.
	Any emergency Wet Season release to the Edith River will only be considered in consultation with the Northern Territory Government.
	Discharge events will be monitored and reported to the Northern Territory Government and stakeholders in accordance with the WDL. On-going
A Surface Water Monitoring Program will be developed and implemented. Complete	
Development and implementation of a Tailings Management Plan. Complete	

Impact area	Proponent Commitment
	Overflow from the seepage collection sump under upset conditions such as a mechanical failure of the pumps, will discharge into the adjoining lined seepage overflow collection pond.
Offsite release of sediment and of poor quality water	<p>Development, implementation and regular review of the Erosion and Sediment Control Plan. Complete</p> <p>Stormwater drainage will be designed for a 100 year ARI design event and all drainage will be regularly checked and maintained. Stormwater drainage has been designed for a 10-year ARI (Appendix T in MMP)</p> <p>Stormwater runoff into the pit will be minimised by construction of runoff barriers (e.g. engineered mounds / levees) around the pit. On-going</p> <p>“Clean” runoff from undisturbed land within and upstream of the mine site will be kept separate from “dirty” runoff from disturbed areas within the mine site. Clean runoff will be diverted downstream of the mine site with no further treatment. Dirty runoff will be stored and treated on site. On-going</p> <p>Regular checks and maintenance of structures and scouring protection. On-going</p>
Hazardous materials management	<p>All chemicals, fuels and oils will be stored and contained according to Australian Standards and Regulations for the protection of surface water from impacts of spills. Lubricating oil will be stored in bulk containers inside a bunded area with spill protection and recovery. On-going</p> <p>Waste oil / lube oil will be stored in tanks within a bunded area and held for collection by a contractor for reprocessing and recycling. On-going</p> <p>Vista Gold will use low toxicity, non-ionic or anionic flocculants to prevent adverse environmental impacts if required.</p> <p>Vista Gold will provide an alternative and temporary supply for potable water in the event of failure of the water treatment plant.</p> <p>Spill response and clean up procedures will be implemented.</p> <p>Sewage treatment will be licenced by the Department of Health and a WDL will be applied if treated effluent is to be discharged from site.</p> <p>Stormwater runoff from material storage dumps will be managed by:</p> <ul style="list-style-type: none"> • Constructing dumps in a manner that dissipates runoff through seepage and evaporation; • Constructing the outer batter slopes of dumps with inert overburden material; • Construction of perimeter drains that collect runoff from the outer batter slopes and perimeter areas; and • Construction of drainage lines that convey runoff from dump perimeter drains to water retention ponds. • Testing for chemicals will be included in the Surface Water Monitoring Program. Complete

Impact area	Proponent Commitment
Groundwater	
Impact Area	Vista Gold Commitment
Contamination from TSF	Tailings will be managed in accordance with the Tailings Management Plan.
	Reinstate existing TSF1 underdrainage system and associated infrastructure to reduce seepage to groundwater.
	TSF2 will be designed, constructed and rehabilitated in a manner that will minimise oxidisation of sulfides and leakage of contaminated liquor or leachate
	TSF2 will be underlain by a system of under-drains, geo-membrane liner, toe drains and over-drains. There will be no connection between TSF2 and underlying groundwater.
	Monitoring of water levels and quality adjacent to tailings storage facilities to establish if there is a linkage with the TSFs and the surrounding environment - data to be assessed monthly and summarised yearly within the Water Management Plan.
	Rehabilitation of monitoring bores proposed to be retained, to meet most current Minimum Construction Requirements for Water Bores in Australia. Decommissioning redundant bores and / or grouting of exposed exploration drill holes.
Contamination from the WRD	Existing WRD will be encapsulated within the expanded WRD.
	Investigate alternative methods of neutralising PAG rock (e.g. anoxic limestone drains).
	AMD materials in the WRD selectively handled to exclude oxygen and water.
	The WRD will be managed in accordance with the Waste Rock Management Plan.
	Groundwater Monitoring Program associated with the WRD. On-going
	Construction of 8 m wide benches at 30 m vertical intervals in WRD to collect stormwater drainage and convey to surface water collection ditch.
	A surface water collection ditch will be constructed down gradient of the WRD to collect flows for treatment prior to discharge.
	Potentially acid forming rock in the WRD will be contained in a non-acid forming shell reducing exposure to air and water during operations and post mining.
	Monitoring of water levels and quality adjacent to WRD to establish if there is a linkage with the WRD and the surrounding environment - data to be assessed monthly and summarised yearly within the Water Management Plan.
	Continued collection of seepage from the WRD by RP1

Impact area	Proponent Commitment
	Installation of GCL progressively throughout closure of areas of the WRD. The installation of the GCL will reduce / eliminate infiltration and generation of AMD in the structure.
Contamination from HLP	Processing or rehabilitation of heap leach materials.
	Ongoing maintenance of the HLP post-Wet Season.
	Cleaning of HLP moat and repairs of liners as required.
	Pumping of stormwater from the HLP to the WTP.
	Monitoring of water levels and quality adjacent to the HLP to establish if there is a linkage with the surrounding environment -data to be assessed monthly and summarised yearly within the Water Management Plan
HazMat	Manage disposal of wastes in accordance with the Waste Management and Pollution Control Act and waste management hierarchy through the MMP.
	Chemical and hydrocarbon storage facilities bunded and managed in accordance with the MMP including inventory of chemicals onsite, material safety data sheets, spill kits and spill response procedures.
Groundwater drawdown	Ongoing monitoring to ensure that groundwater impacts are not greater than those predicted.
Flora and Vegetation	
Impact Area	Proponent Commitments
Vegetation clearing	Adhere to buffer widths recommended by the Northern Territory Land Clearing Guidelines, where possible, with regard to riparian vegetation in drainage lines. If not possible install structures that would capture sediment downstream of development.
	Stage clearing of vegetation to minimise areas of bare ground and clear land only as required and in accordance with the Erosion Sediment Control Plan.
	Avoid land clearing for construction during the Wet Season (Dec-May) if practicable.
	Develop and implement Vegetation Clearing Plans which include areas not to be cleared (no-go areas) and make all workers aware of them through EMP and site work briefings.
	Clearly mark limits of clearing.

Impact area	Proponent Commitment
	Project personnel and contractors will be educated to understand the vegetation clearing plans as part of general environmental inductions for the workforce.
	Clearing will be monitored to comply with areas marked for clearing. No intrusion of any kind will be made on areas outside the clearing zone.
	Areas of potential habitat for the threatened species will be fenced off and clearly marked as 'no-go' areas.
	Where clearing is proposed for habitat of the threatened <i>Ultricularia singeriana</i> or <i>Fimbrostylus fimrostyloides</i> , a targeted survey of the area will be conducted prior to any clearing.
Dust	Chemically treat haul roads to minimise dust emissions, use water sprays on haul roads, and loads, wet ore before crushing, use hooded crushers and enclosed HPGR's.
	Dust suppression sprays on conveyor.
Fire	Controlled burning will be carried out with a focus on burning patches of vegetation in a mosaic during early Dry Season.
Weeds	Weed Management Plan implemented.
	Environmental inductions for workforce.
	Vehicle and equipment wash-down procedures on site.
Terrestrial Fauna	
Impact Area	Proponent Commitments
Clearing	Areas of land to be cleared will be clearly marked to ensure no intrusion into lands intended to remain intact.
	Activities will be monitored to comply with areas marked for clearing and no intrusion of any kind will be made on areas outside the clearing zone.
	The Gouldian finch habitat, <i>Eucalyptus tintinnans</i> woodlands adjacent to the pit will only be cleared during the non-breeding season i.e. the Wet Season.
	Standard noise mitigation will be applied to minimise noise levels during clearing
Fire	The existing system of early Dry Season controlled burns will be maintained.
	Fire management will include the Yinberrie Hills site of conservation significance. A fire management approach resulting in a patchy mosaic of burned and unburned areas will be investigated.

Impact area	Proponent Commitment
	Monitoring of the breeding population of the Gouldian finch will continue and focus on uncertainties surrounding the highest recorded risk to that species, impacts to the crested shrike-tit and partridge pigeon populations, and impacts to the fauna on the Yinberrie Hills generally.
Feral Species	Standard mitigation regarding waste management will limit the potential for colonisation by black rats.
Artificial light	The potential impacts of artificial light will be mitigated in accordance with an EMP.
Dust	Standard dust mitigation will include chemical treatment of roads to reduce dust generation, use of water sprays, wetting of ore prior to crushing, hooded crushers and enclosed HPGR.
	Additional mitigation measures are planned should dust levels prove excessive.
	Monitoring of the Gouldian finch breeding population will continue and will also assist with inferring impacts on the crested shrike-tit and partridge pigeon populations.
	Dust levels will be monitored to assist in determining:
	<ul style="list-style-type: none"> • Levels of dust concentration and dust deposition in breeding habitat adjacent to the Mt Todd mine before and during mine operation; and • Effects of dust levels on intensity and success of Gouldian finch nesting.
Monitoring	A Gouldian finch population monitoring program has been developed alongside the dust monitoring and allow analysis of the effects of habitat, dust levels and distance from the mine on nesting frequency and success.
	Monitoring of the breeding population will focus on dealing with uncertainties surrounding the highest recorded risk to the Yinberrie Hills fauna.
	The monitoring program documents how the status of other potential breeding areas of Gouldian finch in the Yinberrie Hills and the Mt Todd to Pine Creek region will be recorded.
	MTPA will assist long term population monitoring conducted by DLRM.
Biting Insects	
Impact Area	Proponent Commitment
Public health	Storm water drainage will be designed and managed to avoid ponding and maximise sheeting.
	Containers (drums, tyres etc) will be appropriately disposed of or stored under cover.
	Rainwater tanks will be appropriately screened at the inlet and outlet.

Impact area	Proponent Commitment
	Construction will be managed to avoid establishment of areas of temporary water.
	Monitoring for mosquito presence.
	Larvacides used if breeding detected.
	Personnel to wear long sleeved shirts, long trousers and mosquito repellent.
	The MRPA will comply with “Guidelines for preventing mosquito breeding sites associated with mining sites” (Medical Entomology Centre for Disease Control 2005).
	Drainage of grassy waterways will be maintained or improved.
Aquatic Fauna	
Impact Area	Proponent Commitment
AMD contamination	Proactive management of water levels to ensure adequate storage capacity.
	Increase the rate of treatment and discharge if uncontrolled release likely.
	Ongoing monitoring and evaluation of water quality and macroinvertebrate and fish community structure.
	Targeting sampling of refugia pools during the Dry Season to investigate to potential of groundwater seepage impacting aquatic fauna.
	Effective implementation of site Water Management Plan. On-going
	Compliance with the Waste Discharge Licence. On-going
	Tailings dam design to ANCOLD guidelines.
	Surface Water Monitoring Program. Complete
Diversion channel design and planning	Prior to construction existing and proposed site drainage patterns will be identified.
	A revegetation plan will be developed prior to creek diversion to stabilise and to suit the physical characteristics and requisite environmental values of the waterway.
	Incorporate appropriate materials into the design to achieve the requirements for habitat creation.

Impact area	Proponent Commitment
	<p>Post-construction monitoring to assess creek bank remediation measures.</p> <p>A macroinvertebrate monitoring program will be developed that takes into account the location of potential sources of impact, the large inputs of rain during the Wet Season and the necessary level of statistical power to detect change in macroinvertebrate communities. Complete</p> <p>Modelling at normal flow conditions will be undertaken to assess the hydraulic impacts of diversion channels on fish passage.</p> <p>Fish passage will be considered in the design of diversion channels</p>
<p>Diversion channel construction - erosion and sediment control</p>	<p>A clearly definable site boundary will be delineated (where practicable), with construction and vegetation clearance not occurring outside of this area. Site entry and exit points will be clearly defined.</p> <p>Works will be scheduled so that construction coincides with periods of low flow and low rainfall.</p> <p>Implement spill and sediment control measures (such as silt curtains within the river channel) to minimise the potential for sediments to deposit on downstream foraging areas.</p> <p>Stabilise banks, including appropriate native plantings, to consolidate banks post-construction and restore habitat to current, or improved, condition.</p> <p>Avoid stockpiling of soil along existing drainage lines, keep vehicles to tracks and divert storm water away from disturbed areas to minimise soil loss.</p> <p>Minimise the area of exposed ground to reduce the amount of ground subject to erosion.</p> <p>Conduct excavation in stages to minimise ground exposed to erosion.</p> <p>Existing crossings should be used to move equipment across the waterway. If there is no crossing, machinery should be carefully 'walked' across the waterway.</p> <p>If frequent crossings are required, a pad of clean rock will be laid at a shallow point of the waterway to make a temporary crossing. Temporary crossings will be entirely removed when works have finished.</p> <p>Any diversion will be constructed using clean non-erodible material.</p> <p>Develop contingency measures to prevent flooding of the worksite by a rapid rise in the creek.</p> <p>A revegetation plan will be developed during the detailed design phase of the diversion to suit the physical characteristics and requisite environmental values of the waterway.</p> <p>Long-term measures will be used to control erosion at the works site including slope stabilisation, revegetation, soil coverings, rip-rap and armouring, check dams, sediment traps, brush barriers and vegetation filters.</p>

Impact area	Proponent Commitment
Diversion channel construction - pollution control	Implement spill control measures.
	Petroleum products and other hazardous substances will be kept out of the waterway and in a bunded storage facility.
	Refuelling, top-ups and oil checks will be done well away from the waterway.
	Non-toxic hydraulic fluids, such as vegetable-based fluids will be used if possible.
	All equipment will be inspected and repaired regularly to prevent oil and other fluids leaking.
	If equipment is to be immersed in the waterway, it will be cleaned beforehand to remove any external grease, oil and other fluids.
	Dirt and mud will be removed from all equipment before entering the works site and waterway to avoid transferring weeds and disease.
	Wash-down water will not be allowed to enter waterways.
	Any cast-in-place concrete will be isolated from the waterway for at least 48 hours to allow pH to neutralise.
	Paints will not be allowed to enter the waterway when constructing, repairing and maintaining in-stream structures.
If using wood treated with preservatives, the chemicals will be given enough time to fix before immersing the wood in the water.	
Heritage	
Impact Area	Proponent Commitment
Sacred sites	Actively maintain AAPA Certificate(s) for the project area and the proposed works.
	Undertake inductions and ensure all personnel understand of the need to comply with the conditions of the AAPA Certificate(s).
	Restricted work areas will be clearly demarcated at a given buffer / standoff distance and 'no go' areas will be applied where necessary.
Open pit slope failure	Identify sacred sites within close proximity of the open pit.
	Ensure adjacent slope design configuration and Factor of Safety and / or Probability of Failure are commensurate with nature of sensitive site (i.e., acceptable design tolerance given level of confidence in geotechnical model and analysis – within detailed design phase).
	Develop and implement a suitably robust and appropriate Ground Control Management Plan (including comprehensive slope design verification, protection measures and monitoring routines).
	Any sacred sites in proximity to the open pit will be the subject of a Ground Control Management Plan. The plan will be accompanied by verification of slope design, protection measures and monitoring routines that are commensurate with the sensitivity of the site.

Impact area	Proponent Commitment
Archaeological sites	Areas of European or Indigenous heritage, and or archaeological significance will be clearly demarcated at a given buffer / standoff distance and 'no go' areas will be applied where necessary.
	Permit to Disturb applications and consultation for isolated artefacts and small sites if necessary to disturb and or relocate.
	Consultation with traditional owners as part of the management, permitting and possible salvage of sites using acceptable archaeological methodology.
	Implement a Cultural Heritage Management Plan for the sites remaining and sites to be removed with approval. Complete
	Consultation with Heritage Branch and other relevant stakeholders in relation to heritage management decisions and location of heritage objects removed with approval under the Heritage Act.
	Locations of unrecorded archaeological sites that may be discovered during the course of works to be reported to the Heritage Branch of DLPE and the Jawoyn Association.

Air Quality

Impact Area	Proponent Commitment
Sensitive receptors	Interactive Dust management plan produced with standard dust mitigation procedures detailed including chemical treatment of roads to reduce dust generation; use of water sprays; wetting of ore prior to crushing; hooded crushers; and enclosed HPGR. Complete
	Sprays on primary crusher dump pocket.
	Dust suppression sprays on conveyors.
	Continuous dust and metrological monitoring during preproduction construction and operations at site boundary and sensitive receptors including Werenbun.
	Implement additional management controls if exceedance is likely.
	Retention of vegetation as a buffer, and to limit potential dust sources.
	Covering areas of disturbed soil, stockpiles and temporary spoil containment with mulch or other material as best practicable.
	Whenever possible, avoid conducting dust generating activities during high wind speeds.
	Burning of waste and materials will not be allowed on site at any time.
Spraying of paint will not be undertaken during periods of high wind.	

Impact area	Proponent Commitment
	Implement additional management controls if exceedances occur.
	A risk assessment will be undertaken against validated model results
Noise and Vibration	
Impact Area	Proponent Commitment
Mine construction and operation	A Noise Management Plan including mitigation measures will be included in site wide EMP. Complete
	Although not expected to cause adverse noise impacts, a complaint management system will be implemented. Including the implementation of management measures adopted should noise complaints be received.
	Operation of more recent and silenced equipment where possible and maintenance for good working condition.
	Blasting will only occur between 6 am to 6 pm (Monday to Friday)
Traffic and Transport	
Impact Area	Proponent Commitment
Increased vehicle and freight traffic	Prepare Traffic Management Plan, including community consultation strategy. Complete
	Use of pooled vehicles such as buses and work vehicles (to minimise exposure).
	Fitness for work assessments for site personnel.
	Workforce management strategy and Traffic Management Plan to address driver fatigue.
	Prepare Contractor Management Plan.
	Regular pavement condition review of Edith Falls Road.
	Liaise with Northern Territory Government to ensure funding and maintenance routines are appropriate.
	Consolidation of freight and reagent transportation to rationalise transport movements.
Dangerous goods transport	Transport of dangerous goods in accordance with relevant legislation with measures incorporated into the Traffic Management Plan.
	Prepare Incident Management Plan.
	Comply with International Cyanide Management Code.

Impact area	Proponent Commitment
	Prepare Contractor Management Plan.
	Consolidation of freight and reagent transportation to rationalise transport movements
Economics	
Impact Area	Proponent Commitment
Gold price downturn / AUD fluctuations	Independent specialist PFS and FS inputs.
	Comprehensive financial modelling and scenario planning.
	Building in contingencies and adopting conservative assumptions (e.g., Au price, capital and operating costs, mine design parameters, etc.) for basis of Final Investment Decision and approvals.
Skill shortages	Identify labour requirements early and provide opportunities to develop skills where gaps in the local labour force are found to be present.
	Draw on contracting firms and personnel (local and / or interstate).
Acid and Metalliferous Drainage	
Impact Area	Proponent Commitment
Batman Pit	Continue current treatment Batman Pit waters to level deemed appropriate for discharge in accordance with Waste Discharge Licence.
	Ongoing monitoring of water quality prior to discharge. On-going
	Collection and treatment of AMD pit waters resulting from incident rainfall.
	Develop and implement a Water Management Plan and Closure Plan with detailed monitoring and contingency plans. Complete
	Post-mining, the pit is likely to behave as a sink under average conditions, effectively confining AMD to the pit and preventing release to the environment outside of the pit.
WRD	A Waste Rock Management Plan will be developed that specifies how waste rock is to be handled to minimise the potential for AMD and maximise the beneficial use of NAF waste rock for closure. Complete
	RP1 waters will be the required standard under the waste discharge license prior to a controlled discharge.
	Alternative methods of neutralising PAF rock, such as anoxic limestone drains, will be investigated.
	All AMD material stored in the WRD will be encapsulated.

Impact area	Proponent Commitment
	Vista Gold will undertake ongoing stabilisation and rehabilitation of embankments of the WRD.
	The WRD will be designed according to Western Australia and Northern Territory guidelines, including benches, stormwater drainage, and erosion and sediment controls.
	Any failure of the WRD slope will be immediately reconstructed
TSF	During mining comply with approved tailings management plan that will specify how tailings will be handled to minimise AMD, closure, rapid dewatering and consolidation of tailings.
Other infrastructure	Maintain existing diversion drains.
	Restrict excavation depths to oxidised material where possible.
	Inspect material types and classify as necessary.
	Surface flowing AMD from low grade ore stockpile, ROM pad and process plant area, as well as controlled seepage from TSF1, will be treated at the WTP during operation.
	The HLP and moat will be rehabilitated or processed.
	An assessment of AMD in historical mine workings, creek diversions and drainage diversion channels constructed through bedrock will be undertaken and management measures will be developed.
Additional work	A predictive geochemical pit lake model will be developed to assess the long-term acidity after cessation of mining operations.
	Additional tailings samples will be subjected to static testing to confirm the preliminary findings to-date. Humidity cell testing will also be initiated to investigate long-term metal leaching and the potential to generate acid.
Closure	After mining and processing of all residual ore, material in the LGO2 area will be regraded and covered. LGO1 will be consumed by the expansion of the Batman Pit.
	The process plant and pad area will be regraded, covered and revegetated.
	The following specific closure investigations will be undertaken to address information gaps:
	» analysis of waste and cover material hydraulic properties;
	» tailings trafficability study;
	» precipitation-watershed yield study;

Impact area	Proponent Commitment
	» site wide soils, closure cover, and rehabilitation material inventory and characterisation; and
	» waste and closure cover erosion and sediment control study.
	A design for the constructed wetlands will be finalised to confirm that water quality exiting the wetlands will meet the site specific trigger levels prescribed in the WDL.
Waste	
Impact Area	Proponent Commitment
Waste rock characterisation and storage	Further and ongoing waste characterisation.
	Leach Testing.
	Cover field assessments during years 1-5 of operations.
	Implement Waste Rock Management Plan.
	Provide ongoing refinement of materials balance.
	Construction of surface and sub-surface drainage and implementation of a Water Management Plan for contaminated water.
General waste	Waste management addressed in EMP. Complete
	Separation of waste for recycling and recovery.
	Removal of residual waste to landfill.
	Disposal of hydrocarbon and other chemical spills to approved facilities.
	Record waste types and volumes generated on-site and being transported off-site.
	Monitor for potential environmental impacts by conducting surface water quality monitoring. On-going
	Treatment of sewage.
Closure and Rehabilitation	
Impact Area	Proponent Commitment

Impact area	Proponent Commitment
Soils erosion and sedimentation	Closure and Rehabilitation Plan updated and refined throughout mining operations including life of mine closure planning, contingency planning, tailings management plan, waste rock management plan and a care and maintenance plan.
	Revegetation and weed management trials to determine best practice for revegetation of the site.
	Progressively rehabilitating the mine reducing the environmental and financial risk of closure.
Closure planning failures	Annual review of security bond calculations.
	Closure and Rehabilitation Plan updated and refined throughout mining operations including life of mine closure planning, contingency planning, tailings management planning, waste rock management planning and care and maintenance planning. On-going
	Revegetation and weed management trials to determine best practice for revegetation of the site.
	Progressively rehabilitating the mine reducing the environmental and financial risk of closure.
AMD issues	Closure and Rehabilitation Plan updated and refined throughout mining operations including life of mine closure planning, contingency planning, tailings management plan, waste rock management plan and a care and maintenance plan.
	Engagement with Northern Territory Government regulatory authorities on plans to leverage off other projects.
	Thickness of rock armouring to be substantially enough to ensure integrity of the cover.
	Revegetation and weed management trials to determine best practice for revegetation of the site.
	Progressively rehabilitating the mine reducing the environmental and financial risk of closure.
	Under the Water Management Plan and Closure and Rehabilitation Plan implement and maintain a passive water treatment system.
	Further study will be undertaken prior to mine operation on:
	<ul style="list-style-type: none"> <li data-bbox="427 1129 1400 1166">• Waste and cover material hydraulic properties, characterisation and analysis; <li data-bbox="427 1182 2119 1257">• Tailings trafficability testing; and improvement of the watershed hydrologic data collection system to enable an update of precipitation-yield characteristics of the site.

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Document Status

Revision	Author	Reviewer		Approved for Issue		
		Name	Signature	Name	Signature	Date
REV A	Kirsten Marmion	Nicole Conroy		Jill Woodworth		15/11/2017
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