Appendix S

Recommendations and Responses from the NT EPA Assessment of the 2013 EIS and Supplementary

EPA Assessment Report 76				
EPA Assessment Report Recommendations	**Proponent Response**	**Section in MMP / EMP**	**Completion %**	**Reference Document**
Recommendation 1 The Proponent shall ensure that the Project is implemented in accordance with the environmental commitments and safeguards:				
Identified in the Mt Todd Gold Project Environmental Impact Statement (draft EIS and Supplement);	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 the EIS, MMP and WDL178. Vista Gold intends to operate the project to industry best practice or better and follow Australian and International standards and guidelines for its activities where applicable.	**N/A**	**100%**	
Identified in further information provided by the Proponent on the NT EPA's direction; and Recommended in this Assessment Report.				
All safeguards and mitigation measures outlined in the Environmental Impact Statement are considered commitments by the Proponent.				
Recommendation 2 The Proponent shall advise the NT EPA and the responsible Minister of any changes to the proposed action, in accordance with clause 14A of the Environmental Assessment Administrative Procedures.	Vista Gold understands that any significant changes to what is provided in the EIS will require review by the NT EPA in accordance with clause 14A of the Environmental Assessment Adminstration Procedures. Vista Gold will ensure that information will be submitted to the required regulatory departments for review and consideration. It should be noted that Vista Gold notified DENR of the correction of an error in the calculated height of the WRD (not an alteration of a the proposed action). **Attachment V3** – letter from DENR re: Variation to the Mt Todd EIS – Request for consideration under Clause 14A of the NT Environmental Assessment Administrative Procedures (31 March 2020) received from Paul Purdon, Executive Director Environmental Protection DENR, notes that under clause 14A of the Environmental Assessment Administrative Procedures, a notification to the NT EPA is not considered necessary.		**100%**	**Attachment V3 -** letter from DENR re: Variation to the Mt Todd EIS – Request for consideration under Clause 14A of the NT Environmental Assessment Administrative Procedures.
Recommendation 3 The Proponent must undertake a rigorous evaluation of alternative WRD cover designs prior to authorisation of the Project.	Due to the steep waste rock slopes proposed at closure, traditional closure methods (capping with soil cover) will not be practical due to slope constraints (access and stability). The long-term closure of the WRD will require a cover that does not allow water to infiltrate into the facility. Accordingly, the WRD design uses geotextile material as an impermeable cover to the waste material. This cover will be included on each catch bench as well as over the entirety of the upper lift of the waste dump. Vista Gold's consultants have evaluated WRD cover designs and the cover design put forward is the best suited for their structure (**Appendix A** and **Attachment A2**). **Atachment R2 - Cover Trials Design and Monitoring Procedure** provides a cover trial design, and instrumentation and monitoring procedure for trial sections of the waste rock dump (WRD) where Vista's preferred WRD cover (i.e., petticoat cover) will be installed during concurrent reclamation. The proposed cover design has been peer reviewed by an independent party - Tierra Group International Limited (TGI) have prepared the Mt Todd Waste Rock Dump Closure Assessment Report which is an independent review of the proposed approach to closing the WRD (**Attachment R1**). This report contains discussion on the proposed cover options for the WRD at closure.	This information is outlined in Sections 4 and 8. **Attachment A** **Attachment R1**		**Appendix A -** Tetra Tech (2019) NI 43-101 Technical Report, Mt Todd Gold Project, 50,000 tpd Preliminary Feasibility Study Northern Territory, Australia. Report prepared by Tetra Tech for Vista Gold, October 2019. **Attachment A2** - Mine Development Associates (2020) Preliminary Feasibility Mine Study Update, Mt Todd, Northern Territory Australia, April 2020. **Attachment R1** - Tierra Group International Limited (2020) Mt Todd Waste Rock Dump Closure Assessment Report, July 2020. **Attachment R2** - Tetra Tech (2020) Cover Trials Design and Monitoring Procedure.
Modelling work underpinning the design of covers, and subsequent monitored trial covers, must demonstrate that the covers can meet the required cover objectives within the context of the wet- dry cycling environment of the Top End and other biophysical factors that have the potential to affect cover integrity in the long term.				
The modelling must be subject to rigorous peer review by an independent party with practical experience with the issues that affect the real world performance of the modelled cover system/s.				
Recommendation 4 In designing and constructing waste rock facilities for the Project, the following principles **must be adhered to:**				
Lining of the surface drainage channels that are to be covered by the WRD with NAF waste rock to ensure that any clean natural flow-through does not come into contact with PAF or uncertain waste rock;	• Vista Gold will ensure that any surface drainage lines that will be covered by the expansion of the WRD will be rock filled with NAF material to ensure that there is seperation between PAF and NAF material. • Photos will be taken during the period that this work is undertaken. Progress photos will be submitted through reporting processes.	This information is outlined in Sections 4 and 8.	**100%**	
No PAF or uncertain waste rock to be placed beneath operational or final WRD slopes;	• Vista Gold has provided information on how the waste rock dump will constructed to encapulate PAF and uncertain waste rock. • As each lift of the WRD is completed a 10m rind will be installed to encapsulate PAG or undefined waste rock within the WRD. The non-PAG rind will be placed only on the slopes as they are finished. Before the next lift commences a cover layer of non-PAG rock composed of a 0.3m bedding layer of crushed rock, a geo-synthetic clay liner (GCL) will be laid on top of the outer 15m of the lift at an outward slope of at least 1.5% and a further 0.3m layer of finely crushed rock. The total width of the GCL would be approximately 52m, which corresponds to the width required to provide full overlap from bench to bench. The GCL will promote drainage to the outer portions of the dump where drainage channels will allow storm water to drain without contacting any of the PAG material.			• Tetra Tech 2012, Waste rock dump design and drainage evaluation (20pp), report prepared for Vista Gold. • Tetra Tech 2013, Mt Todd Gold Project 50,000 tpd preliminary feasibility study NI 43-101 technical report, report prepared for Vista Gold. • Tetra Tech, Mount Todd Project EIS Comment Response January 14, 2014 114-311285 T050.05.
NAF waste rock or soil is required over the relatively flat top and any benches of the WRD to form a low net percolation cover, which should preferably be based on the store and release principle to avoid shedding excessive rainfall runoff over the side slopes.	• The WRD design includes a store and release cover with 3H:1V slopes consisting of a 0.3 meter (m) clay capillary break, 0.6 m fine non-potentially acid generating (Non- PAG or NAG) rock mixed with clay cover, and a shallow layer of growth medium. The cover would be placed over a mantle of coarser crushed Non-PAG waste rock surrounding/covering a potentially acid generating (PAG) material core. • Modelling has been undertaken on the proposed store and release cover and a response was provided in 2014 .			• Tetra Tech 2012, Waste rock dump design and drainage evaluation (20pp), report prepared for Vista Gold. • Tetra Tech 2013, Mt Todd Gold Project 50,000 tpd preliminary feasibility study NI 43-101 technical report, report prepared for Vista Gold. • Tetra Tech, Mount Todd Project EIS Comment Response January 14, 2014 114-311285 T050.05.
For the high PAF waste rock proportion expected at Mt Todd this will necessitate a relatively low level WRD covering a large area, rather than the high pyramid shape proposed.	The shape of the WRD has been redesigned and is now 160 m high.			Information to be provided by MDA

Recommendation 5 The Proponent must undertake modelling of the proposed store and release cover system for the TSFs using dynamic climate data to assess the long-term integrity of the design under conditions of extended, high rainfall periods. Monitored trial covers should subsequently be constructed to demonstrate that the cover designs achieve acceptably low net percolation.		**Commitment** Outlined in Appendix T - Closure Plan		MMP Table 3.3 Vista Gold's Commitments
Recommendation 6 The Proponent must become a signatory to the International Cyanide Management Code.	• Vista Gold intends to become a signatory to the Cyanide Code. Vista Gold will ensure that it will operate the Mt Todd operation using the Standards of Practice set out in the *International Cyanide Management Institute Mining Operations Verification Protocol For the International Cyanide Management Code.* • Evidence of signatory will be sent to regulators through reporting processes.	**Commitment**		MMP Table 3.3 Vista Gold's Commitments
The water quality monitoring program must include monitoring of cyanide in tailings supernatant and include the parameters of WAD, free and total cyanide. The standard, safe no-discharge level of 50mg/L WAD cyanide is to be set as the threshold to trigger corrective action.	The WMP (Appendix P) has been updated in 2020. Table 8-2 Surface water physical and chemical parameters for WDL sites and Table 8-3 Surface water physical and chemical parameters for non-WDL sites of the WMP have been updated and now include WAD, free and total cyanide. The 50 mg/L trigger was not added as a trigger value to the water quality monitoring program as Vista will be using cyanide in the process, but a cyanide destruction circuit has been built in to the end of the process (sodium metabisulphite is the "destructor"). Therefore, Vista does not expect cyanide to be present in any discharge from site and the trigger value and TARP for exceedances has not been included in the WMP. Vista expects any cyanide exceedances in the receiving water to be detected in the routine WDL monitoring at SW4 where the trigger value for total cyanide is 7 ug/L and any exceedances will be investigated as reported in the WDL TARP (Table 8-4 TARP for SW4 non-compliance) in the WMP. The processing plant will include a cyanide destruction plant which will greatly reduce cyanide species from being sent to storage facilities. Once the plant has been built, commissioned and processing starts, the water monitoring program will be expanded to include supernatant in TSF's and process water storage facilities.	This information is outlined in Section 6.		
Recommendation 7 The Proponent must undertake revised water balance modelling prior to authorisation of the Project using the most up-to-date data and assumptions based on regulatory requirements. The water balance modelling is to be peer reviewed by an appropriately qualified independent expert and the review provided to the regulator. Revised modelling outputs will be used to inform the water management and treatment options for the site, including the water treatment plant capacity.	The Site Wide Water Balance (**Attachment A9**) was updated in October 2019. A Review of Hydrogeological Report – Factual Report (**Attachment V12**) was prepared by GHD in April 2020. The report formally documents the independent review, completed by GHD, and subsequent amendments of the Hydrogeological Report on the Water Balance Model, completed in April 2017 by Tetra Tech, for the Mt. Todd Gold Mine. The appendices to the document include Review Comments and Responses, Email Correspondence and CV. The report was used to inform the WMP (**Appendix P**) which has been updated in 2020 by Jill Woodworth from SLR. A written statement from Jill stating her independence as an external reviewer of the WMP and a copy of her CV is provided as **Attachment V9**. Details on the water balance can be found in the Water Management Plan (**Appendix P**) and *Section 6 Water Management* of the MMP.	This information is outlined in Section 6 of the MMP.		• Water Management Plan (**Appendix P**) • Site Wide Water Balance (**Attachment A9**) • Review of Hydrogeological Report – Factual Report (**Attachment V12**)
Recommendation 8 The 95% species protection level, determined in accordance with ANZECC 2000, is to apply to the immediate receiving waters for mine site discharge at, or prior to, the commencement of mining. This level must not be exceeded as a result of licensed discharges from the mine site.	• Vista Gold has undertaken in pit treatment of poor quality water in Batman Pit and continue to discharge treatment pit water into Horseshoe Creek during high flow events as per conditions of WDL178. • Once operations commence and the WTP is commissioned, any water actively discharged from site will be of sufficient quality to meet the 95% species protection guidelines at SW4	**Commitment** This information is outlined in Section 6 of the MMP.		MMP Table 3.3 Vista Gold's Commitments
Recommendation 9 An appropriately qualified, independent party is to review the macroinvertebrate monitoring plan to determine its adequacy in detecting impacts and determining the cause of any impacts to inform implementation of an appropriate monitoring program prior to commencement of construction.	The current Receiving Environment Monitoring Program is provided as **Attachment V6**. A written statement demonstrating Professor Jenny Davis's independence and a copy of her CV are attached as **Attachment V7**. The review of the 2017 REMP undertaken by Professor Jenny Davis is provided as **Attachment V8**.		**100%**	The REMP was reviewed and approved by Professor Jenny Davis at CDU in March 2017. The review of the 2017 REMP undertaken by Professor Jenny Davis is provided as **Attachment V8**.

Recommendation 10 A survey of potential Gouldian finch nesting sites to be cleared and within a reasonable adjacent area must be conducted in the 2015 breeding season as agreed with and to the satisfaction of the NT EPA prior to commencement of Project works to ascertain the potential direct impacts of clearing.	Vista Gold commissioned GHD Pty Ltd (GHD) to undertake a fauna assessment as part of a draft Environmental Impact Statement (EIS) required for the project. GHD conducted the study from the 11th to 16th April 2014 to detect nesting activity in the study area from the 11th to 16th April 2014. The purpose of this study was to detect nesting activity in the study area and examine a subset of the mapped potential breeding habitat that is proposed to be disturbed by the proposed mine activities, and survey individual trees on a systematic basis using typical nest survey methods. In July 2015 Vista Gold sent a letter to DoE requesting that assessment approach for acceptability of potential impacts to the Gouldian Finch be varied to remove the requirement for the 2015 breeding season surveys as it was identified that there was limited value in undertaking additional breeding habitat surveys primarily because the survey done in 2014 was considered to cover 3-5 years of breeding information as residual physical nesting constructs would have been identified if nesting had occurred in recent years. DOE responded on 13 August 2015 (see **Attachment V10**) varying their requirement for breeding habitat surveys to be undertaken in 2015. DoE amended their information request for Vista to '*assess and define the relative importance of the "Gouldian Finch core breeding habitat" to the maintenance of the regional Gouldian Finch population* .' Since then, Vista has obtained EPBC Approval 2011/5967 on 19 January 2018 which changed the condition related to Gouldian Finch breeding habitat to Condition2a: '*the action must not result in the quality or extent of breeding habitat outside of the project footprint* '. The Draft Gouldian Finch Management Plan (GFMP) is provided as **Attachment U1**. The draft GFMP includes management triggers that will enable actual or potential adverse impacts to the Gouldian Finch to be avoided, mitigated or minimised in a timely manner. The Draft GFMP has been reviewed by the Technical Advisory Committee (TAC). Changes recommended by the TAC members will be reviewed and incorporated into the GFMP. The GFMP will be re-submitted to the TAC for a final review prior to the document being submitted to the Department of Agriculture, Water and the Environment (DAWE).	**Commitment to ongoing monitoring**	**100%**	• GHD 2014. Vista Gold Australia Pty Ltd. Mt Todd Gold Project Draft EIS Gouldian Finch Nest Survey, May 2014. • SLR 2017. The Assessment of Gouldian Finches in Relation to the Mt Todd Gold Project. • SLR 2018. Mt Todd Project DRAFT Gouldian Finch Management Plan (**Attachment U1**) • SLR 2018. Mt Todd Project DRAFT Gouldian Finch Monitoring Methodology (**Attachment U2**)
Recommendation 11 In the absence of an appropriate threshold for the Gouldian finch with respect to safe levels of ground level PM10 dust, the upper safe limit for human health of 50µg/m³ is to be applied to the Yinberrie Hills SOCS core breeding habitat in the first instance as a trigger for mitigative action.	The Air Quality and Dust Management Plan (**Appendix I** of the MMP) has been updated. This plan contains Project Specific Dust Thresholds, Dispersion Modelling - Predicted PM10 Impacts and a Reactive Dust Management Strategy - 1-Hour Average Trigger Levels. The Air Quality and Dust Management Plan (**Appendix I** of the MMP) will be reviewed by the Mt Todd Technical Advisory Committee (TAC) prior to finalisation. Changes recommended by the TAC members on the previous version of the Air Quality and Dust Management Plan will be reviewed and incorporated into the document prior to it being re-submitted to the TAC for a final review before the document is submitted to the DAWE. • To manage dust on the project, Vista Gold will implement the Dust Mitigation Measures listed in Table 3 of the Plan.	See **Appendix I**	**100%**	• SLR 2016 SLR EPBC Response Dust & Monitoring Plan. Mt Todd Gold Mine Dust Monitoring and Mitigation Programme August 2016 680.10150-R5. • SLR 2019 Mt Todd Gold Mine Dust Monitoring and Mitigation Programme (See **Appendix I**).
Recommendation 12 The Proponent must conduct laboratory studies to develop a more appropriate threshold limit for inspirable dust impacts on representative finch species and evaluate the feasibility and value of a sentinel bird program that is responsive to mine-related impacts.	Since the NT EPA handed down the EIS Recommendations, Vista has undertaken significant work in understanding the potential impacts of dust on the Gouldian Finch. Laboratory studies were found to be an unethical as a means to understand the threshold limit for inspirable dust impacts of the Gouldian Finch. As such, EPBC Approval 2011/5967, received on 19 January 2018, does not include a requirement for laboratory studies to be undertaken. Approval Condition 2d of EPBC 2011/5967 states that '*The action must not result in significant decrease in the short, medium or long-term health of the Gouldian Finch population within the Yinberrie Hills Site of Conservation Significance* ' and to meet this condition the Draft Gouldian Finch Management Plan (GFMP) (provided as **Attachment U1**) and the Draft Gouldian Finch Monitoring Methodology (GFMM) (provided as **Attachment U2**). The Draft GFMP and GFMM have been reviewed by the TAC. Changes recommended by the TAC members will be reviewed and incorporated into the documents which will be re-submitted to the TAC for a final review prior to the document being submitted to the DAWE. The GFMP and GFMM will be implemented for the Mt Todd Gold Mine for the Construction Phase which will then be modified and rolled over into the operational phase which will also include the specific GFMM Program.	**N/A**		• SLR 2017. The Assessment of Gouldian Finches in Relation to the Mt Todd Gold Project. Response to the Department of the Environmental and Energy (submission # 4). • SLR 2017 Mt Todd Gold Mine Construction Phase Air Quality Impact Assessment. Response to the Department of the Environment and Energy (submission # 4). • SLR 2018. Mt Todd Project DRAFT Gouldian Finch Management Plan (**Attachment U1**) • SLR 2018. Mt Todd Project DRAFT Gouldian Finch Monitoring Methodology (**Attachment U2**)
Results from the sentinel bird program evaluation must be provided to the DME and the NT EPA prior to the commencement of construction and serious consideration given to implementing the program subject to the results.	The Gouldian Finch Monitoring Program will be a continuous entity and data collected will be submitted to the required regulatory bodies as part of the sites yearly monitoring requirements.			

Recommendation 13 A baseline (pre-mining) and ongoing (during construction and mining) Gouldian finch population monitoring program must be established and implemented prior to the construction phase of the Project. The program must: • Allow for a substantial baseline survey effort to be undertaken; • Have sufficient rigour to detect short-term changes in the Gouldian finch breeding population; • Distinguish between natural variation in the population and mine-related impacts; • Establish appropriate trigger levels and management responses to enable reactive and effective impact minimisation. The program design must be peer reviewed by an appropriately qualified, independent person, to the satisfaction of DME and the NT EPA prior to survey commencement. The baseline survey report is to be provided to the DME and the NT EPA prior to authorisation of the Project.	The Draft GFMP is provided as **Attachment U1**. The Draft GFMP has been reviewed by the TAC. Changes recommended by the TAC members have been reviewed and will be incorporated into the GFMP. The GFMP will be re-submitted to the TAC for a final review prior to the document being submitted to the DAWE. The Draft GFMM has been included as **Attachment U2**. The Draft GFMM has been reviewed by the TAC. Changes recommended by the TAC members have been reviewed and will be incorporated into the GFMM. The GFMM will be re-submitted to the TAC for a final review prior to the document being submitted to the DAWE. The GFMP and GFMM will be submitted to DPIR and the NT EPA following finalisation and acceptance of the plans by DAWE. Under the Terms of Reference for the TAC (**Attachment U4**) the members must be suitably qualified. For the purpose of the TAC, this has been defined as 'A person with relevant tertiary qualifications and a minimum of ten years demonstrated experience relevant to the requirements of the conditions of approval'. A copy of CVs for the current TAC members is provided as **Attachment U5**. Monitoring of the Gouldian Finch continues in order to develop the baseline Gouldian Finch population. Comprehensive monitoring will be implemented for the Mt Todd Gold Mine for the Construction Phase which will then be modified and rolled over into the operational phase which will also include the specific GFMM Program.	**Commitment to ongoing monitoring**		• SLR 2017. Mt Todd Project Gouldian Finch Monitoring and Mitigation Program. Response to the Department of the Environment and Energy (submission # 4). • SLR 2018. Mt Todd Project DRAFT Gouldian Finch Management Plan (**Attachment U1**) • SLR 2018. Mt Todd Project DRAFT Gouldian Finch Monitoring Methodology (**Attachment U2**) • Mt Todd Project Technical Advisory Committee Terms of Reference (**Attachment U4**).
Recommendation 14 In recognition of the difficulty in establishing a reactive monitoring program that can establish causal effects of dust on Gouldian finches, the Proponent shall ensure that dust levels within the Gouldian finch nesting aggregation area or 'core breeding habitat' are maintained below the threshold stated in Recommendation 11 unless a more appropriate threshold is determined in accordance with Recommendation 12. A baseline (pre-mining) and ongoing (during construction and mining) program to monitor the extent of dust deposition over Gouldian finch habitat must be established and implemented to the satisfaction of the NT EPA and the DME prior to the construction phase of the Project. The program must: • Be capable of detecting Project-related ground level PM10 dust (above baseline); • Be capable of monitoring the range and extent of Project-related dust; • Ensure that 98% of Gouldian finch core breeding habitat remains below the default Project-related PM10 dust level; and • Include annual reporting of monitoring results and allow for program review. A baseline monitoring report is to be provided to the DME and the NT EPA prior to authorisation of the Project.	The Draft GFMP is provided as **Attachment U1**. The Draft GFMP has been reviewed by the TAC. Changes recommended by the TAC members will be reviewed and incorporated into the GFMP. The GFMP will be re-submitted to the TAC for a final review prior to the document being submitted to the DAWE. The Draft Gouldian Finch Dust Monitoring and Mitigation Program (DMMP) is attached as **Appendix I** to the MMP. This document has been reviewed by the TAC and recommended changes have been incorporated. The DMMP will be re-submitted to the TAC for a final review prior to the document being submitted to the DAWE. A comprehensive environmental monitoring program will be implemented for the Mt Todd Gold Mine for the Construction Phase which will then be modified and rolled over into the operational phase which will also include a specific GFMM Program.			• SLR 2017. The Assessment of Gouldian Finches in Relation to the Mt Todd Gold Project. Response to the Department of the Environmental and Energy (submission # 4). • SLR 2017 Mt Todd Gold Mine Construction Phase Air Quality Impact Assessment. Response to the Department of the Environment and Energy (submission # 4). • SLR 2017. Mt Todd Project Gouldian Finch Monitoring and Mitigation Program. Response to the Department of the Environment and Energy (submission # 4). • SLR 2019. Mt Todd Project DRAFT Dust Monitoring and Mitigation Program.
Recommendation 15 Any authorisation of further mining or related activities associated with the Mt Todd mineral leases should not be considered until the NT EPA has been notified and consideration has been given to the activities under clause 14A of the Environmental Assessment Administrative Procedures in accordance with Recommendation 2 of this Report.	• Vista Gold understands that any significant changes to what is provided in the EIS will require review by the NT EPA in accordance with clause 14A of the Environmental Assessment Adminstration Procedures. • Vista Gold will ensure that information will be submitted to the required regulatory departments for review and consideration.	**N/A**	**100%**	
Recommendation 16 Prior to commencement of activities likely to disturb potential Northern quoll habitat, the Proponent is to conduct pre-clearance procedures to salvage any individual quolls that may be affected and relocate to a pre-arranged recovery area.	Before clearing is undertaken the areas directly impacted will be checked as part of the site clearing process and appropriate actions will implemented.	This information is outlined in Section 5.		SLR Consulting conducted a habitat survey in 2018 for th areas likely to be cleared and did not findand Northern Quolls. A survey will be conducted again just prior to clearing occouring.
Recommendation 17 Prior to commencement of activities that would directly disturb suitable habitat for the Crested shrike-tit, surveys should be conducted and the area avoided if active nesting is found, until such time as the nest is abandoned or any young fledge.	Before clearing is undertaken the areas directly impacted will be checked as part of the site clearing process and appropriate actions will implemented.	This information is outlined in Section 5.		SLR Consulting conducted a habitat survey in 2018 for th areas likely to be cleared and did not findand Crested shrike-tits. A survey will be conducted again just prior to clearing occouring.
Recommendation 18 Prior to commencement of vegetation clearing activities, surveys should be conducted by trained experts in the accurate identification of microbats to identify and relocate any Bare-rumped sheathtail bats in the area to be cleared.	Before clearing is undertaken the areas directly impacted will be checked as part of the site clearing process and appropriate actions will implemented.	This information is outlined in Section 5.		
Recommendation 19 Appropriate offsets for potentially significant impacts to the Gouldian finch population of the Yinberrie Hills must be implemented by the Proponent in accordance with the Australian Government's EPBC Act Environmental Offsets Policy, October 2012.	A Draft Gouldian Finch Offset Strategy (GFOS) has been prepared for the Project in accordance with the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) *Environmental Offsets Policy 2012* (DSEWPaC, 2012a), and the conditions attached to the EPBC Act Approval issued 19 January 2018..\ It should be noted that the Draft GFOS has been reviewed by the Technical Advisory Committee (TAC) and changes recommended by the TAC members will be reviewed and incorporated into the GFOS. The GFOS will be re-submitted to the TAC for a final review prior to the document being submitted to the Department of Agriculture, Water and the Environment.	See EPBC Documentation (**Appendix U**)		**Attachment U3** - Gouldian Finch Offset Strategy (SLR, 2018)

Recommendation 20 The Proponent is to undertake regular monitoring of the mineral leases for exotic fauna species and implement control measures should the densities become a risk to biodiversity.	Section 3.4 (Table 3-5) and Section 4 (Table 4-1) of the Flora and Fauna Management Plan (**Appendix L**) includes details regarding trigger values to undertake population control measures where densities of identified exotic fauna species become a risk to biodiversity. A comprehensive environmental monitoring program will be developed for the Mt Todd Gold Mine for the Construction	See Flora and Fauna Management Plan (**Appendix L**)		***Appendix L - Flora and Fauna Management Plan***
Recommendation 21 The Proponent must factor into the design of its above-ground waste structures an appropriate design lifetime to the satisfaction of the DME to ensure that structures will be sustainable into the long term, taking into account the uncertainties of climate variability.	• Golder Associates Pty Ltd (Golder) produced a report dated 25 January, 2012 which addresses the stability of the WRD. Golder analysed the stability of the WRD for failures occurring both in a single 30 meter (m) bench and over the full dump height under both static and earthquake conditions. The analyses showed the WRD is expected to be stable under the modelled conditions. • Tetra Tech has reviewed this report and independently confirmed the results. The modeling input parameters reported by Golder are consistent with previous recommendations from Tetra Tech. Tetra Tech performed independent slope stability analyses to confirm the results produced by Golder.		100%	Golder Associates Pty Ltd, 2012, Batman Pit Waste Dump Design Review, Mt. Todd, N.T., Australia, Report Number 117661009-007-R-Rev2.
Recommendation 22 The Proponent must consider in detail the costs and the benefits of backfilling the pit with PAF waste rock and/or tailings and an appropriate cover at mine closure in accordance with leading practice mine closure principles. The benefit/cost analysis should include partial backfilling scenarios through disposal of the more reactive material as well as the full backfilling option. Details should be provided to the DME.	Vista Gold has undertaken a cost/benefit analysis that compares the social, environmental and economic costs associated with the proposed management of the Batman Pit void and management of waste rock upon the closure of the Mt Todd Project. The Closure Plan (**Appendix R**) includes a feasibility assessment of Pit closure options. Options considered include: 1. Backfill 2. Partial backfill 3. Pit Lake (chosen scenario) Due to the orientation of the deposit and sequencing of mining at Mt Todd, at end of mining in the Pit there will very little waste rock and majority ore being removed. As such, to backfill the Pit would mean moving the waste rock dump into the Pit after it is finished. The cost of double handling the waste rock from the completed WRD and back into the Pit at the end of mining is therefore cost prohibitive to the Project. The costs associated with both the complete backfill option, and the partial backfill option, would render the Project uneconomical and would prohibit the development of the operation. Should one of these options be chosen, the Project would not go ahead and would result in the consequent loss of employment opportunities and associated community investment projects, services, taxes and royalties.	See the Closure Plan (**Appendix R**)	100%	• Closure Plan (**Appendix R**)
Recommendation 23 Consideration must be given in the conceptual closure plan to methods for improving the water quality of the pit lake after closure if backfilling cannot be achieved.	As per the response to Recommendation 22, costs associated with both the complete backfill option, and the partial backfill option, would render the Project uneconomical and would prohibit the development of the operation. As such, a pit lake is proposed as the post closure option for the Batman Pit void. Practical Geochemistry LLC were engaged to complete geochemical modelling to assess future water quality for the Batman Pit lake (**Attachment R2**) and to provide expert opinion related to the water quality of the related to the post-closure pit lake (**Attachment R3**). Practical Geochemistry LLC identified several site-specific factors which highlight why the need for improvements to pit lake water quality following closure is not expected (see **Attachment R3**). Based on these considerations, there appears to be low risk to human and environmental health associated with the Batman Pit lake; therefore, post closure water quality improvements should not be required.	**Appendix R - Closure Plan** **Attachment R2** **Attachment R3**	100%	• ***Attachment R2 - Batman Pit Predictive Geochemical Modelling Report*** (Practical Geochemistry LLC, 2020) • ***Attachment R3 - Post-Closure Pit Lake Response to Comment*** (Practical Geochemistry LLC, 2019)
Recommendation 24 The Proponent must undertake further analyses and trials of options for passive water treatment during mining to ensure that such treatment options can meet the 95% species protection level for the receiving environment into the long term without periodic assistance.	Passive water treatment will be investigated to meet Recommendations 24 and Recommendation 25.	**Commitment**		MMP Table 3.3 Vista Gold's Commitments
Recommendation 25 Active water treatment is to continue at the mine site until such time as it can be demonstrated that successful treatment of all site AMD using passive treatment options is occurring in accordance with Recommendation 24.	Based on water quality estimates, the calculated acidity of these scenarios is 223 mg/L, 132 mg/L, and 43 mg/L, suggesting that the water quality is sufficient to be treated using a passive system. Additionally, the simulated flow rates of the seepage from the facility is expected to stabilize around 1.5 cubic meters per hour (m3/hr) (6.6 gallons per minute [gpm]) approximately three years after closure. This flow rate is within the range of flow rates successfully treated with passive systems.			

Recommendation 26 As part of the Project aquatic monitoring program, the Proponent must contribute to periodic tissue sampling of fish and other species from the Edith and Daly Rivers to monitor edible species and inform human health risk assessments.	Vista Gold has approached Fisheries on multiple occasions offering to provide funding and/or participate in a joint study to meet this recommendation. Vista is willing to contribute to a study, whether that involves the contribution of water quality data, the capture and provision of fish, or funding. Vista is willing to be involved in a study that is robust, not a study which samples tissue without scientific integrity. It should be noted that water quality results at the compliance (SW4) in the Edith River are not showing elevated levels of metals or potential for bioaccumulation downstream associated with the Mine. Further downstream there is the confounding factor associated with the train derailment. As such, isolating other impacts around the site and interpreting the results would be very difficult. Without undertaking isotope analysis, there is no way of confirming that a certain metal in a certain concentration is coming from the Mt Todd discharge. The vigorous macroinvertebrate and sediment monitoring program implemented by Vista Gold gives additional confidence that discharge from the mine is not negatively impacting the environment. DPIR has acknowledged the attempts by Vista Gold to meet this recommendation. DPIR has committed to meeting with DENR to discuss the recommendation. DPIR will advise Vista Gold of the outcomes of discussions with DENR. A comprehensive environmental monitoring program will be developed for the Mt Todd Gold Mine for the Construction Phase which will then be modified and rolled over into the operational phase which will also include a specific macroinvertebrate monitoring program.	N/A		
Recommendation 27 The Proponent taking the proposed action is wholly responsible for implementation of all conditions of approval and mitigation measures contained in the Environmental Management Plan and must ensure all staff and contractors comply with all requirements of conditions of approval and mitigation measures contained in the Environmental Management Plan. The Environmental Management Plan, and sub-plans, should form part of the Mining Management Plan. In preparing each plan, the Proponent will include any commitments and additional measures for environmental protection and monitoring contained in the Environmental Impact Statement and this Assessment Report.	• 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 the EIS, MMP and WDL178. • Vista Gold intends to operate the project to industry best practice or better and follow Australian and International standards and guidelines for its activities where applicable. • In the development ot the Vista Gold Mine Management Plan the following Environmental Management Plans have also been developed. These plans will be reviewed, revised and refined where required once the Porject becomes operational. • Environmental Management Plan; • Hazardous Waste Management Plan; • Waste Management Plan; • TSF Management Plan; • Waste Rock Management Plan; • Cultural Heritage Management Plan; • Community Engagement Plan; • Air Quality and Dust Management Plan • Weed Management Plan; • Fire Management Plan; • Flora and Fauna Management Plan; • Emergency Response Management Plan; • Erosion and Sediment Control Plan; • Noise and Vibration Management Plan; • Water Management Plan; and • Closure Plan	This information is outlined in Section 5.	**100%**	
Recommendation 28 Within two years of commencing the Project, the Proponent must commission and pay the full cost of an independent environmental audit of the project. The audit must: • Be conducted by a suitably qualified, experienced and independent team of experts; • Assess the environmental performance of the project and review whether the Proponent has complied with all recommendations, conditions and commitments; • Review the adequacy of the plans and procedures and recommend appropriate measures or actions to improve the environmental performance of the action, including any plans or procedures. The results of the audit are to be submitted to the DME and the NT EPA. The results of the audit must be made available on the Proponent's website.	The implementation of the MMP / EMP will be audited by a suitable qualified, experienced and independent team within two years of the Project commencing. The external environmental audit will assess the environmental performance of the Project 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); • Approved EMP sub program commitments; and • Review environmental performance and recommend appropriate measures or actions to improve the HSEC performance of the action. Non-conformance will be recorded and corrective actions captured within the Vista Gold incident and corrective action reporting system.	**Commitment** Environmental Management Plan	**100%**	MMP Table 3.3 Vista Gold's Commitments