



WDL 178-5 ANNUAL REPORT 2018

VISTA GOLD AUSTRALIA PTY LTD

Mount Todd Gold Project

July 2018



LICENCE NUMBER	WDL 178-5
REPORTING PERIOD	30 September 2017 – 15 July 2018

Licensee Details

Legal Entity Name: Vista Gold Australia Pty Ltd
 ABN: 117 327 509
 Registered Business Address: 1/4 Manning Road
 Double Bay
 NSW 2028

 Postal Address: PO Box 1467
 Double Bay
 NSW 1360 Australia

 Contact Person: Brent Murdoch
 Position Title: General Manager
 Contact Details:
 b/h: 08 8941 9105
 mobile: 0488 100 314
 email: bmurdoch@mttodd.com.au

Location of Operation to which this licence applies

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

24 hour emergency response

Contact Person: Mt Todd Site Manager
 Telephone Numbers: 08 8975 4297 (Office)
 08 8975 4533 (House)

Compliance with Licence Conditions

Condition	Action	Compliance?	Evidence	When (Date)	Status
OPERATIONAL					
1	The Licensee must notify the NT EPA within 24 hours if there are changes to the details of the 24-hour emergency contact as provided on page one of this Licence.	Yes	No changes to emergency contact details	N/A	Unchanged
2	The Licensee must notify the NT EPA within 14 days if there are changes to the Licensee details shown on page one of this Licence.	Yes	No changes to licence details	N/A	Unchanged
3	The Licensee must notify the NT EPA within 14 days after ceasing to conduct the activity to which this Licence relates.	Yes	Notification of discharge cessation provided by email to pollution@nt.gov.au on the date specified.	24/04/2018	Complete
4	The Licensee must notify the NT EPA prior to making any operational change that will cause, or is likely to cause, an increase in the potential for environmental harm, environmental nuisance, material environmental harm or serious environmental harm.	Yes	No operational changes were made that had the potential to increase the potential for environmental harm, environmental nuisance, material environmental harm or serious environmental harm	N/A	Unchanged
5	The Licensee must ensure a copy of this Licence is available at all times:				
	5.1 on the Licensee's Australian website; and	Yes	URL to licence is http://www.mttodd.com.au/uploads/4/7/0/5/47056705/17_01_16_wdl178-05_vista_gold_-_web_optimised.pdf	10/01/2017	Complete
	5.2 at the Location.	Yes	Copy of the licence available at the Site Office	10/07/2018	Complete

Condition	Action	Compliance ?	Evidence	When (Date)	Status
6	Where this Licence requires the provision of any notice, document or other correspondence to the NT EPA, the relevant contact is: Pollution Control, NT EPA. Physical Address: Level 2 Darwin Plaza, 41 Smith Street Mall, Darwin NT 0800 Postal Address: GPO Box 3675, Darwin NT 0801 Email: pollution@nt.gov.au	Yes	All documents, correspondence and communications conducted via the specified addresses	Various - Throughout the term of the licence	Unchanged
7	All notices, documents or other correspondence required to be provided pursuant to this Licence must be provided in electronic form unless otherwise specified as a condition of this Licence.	Yes	All documents provided in electronic format	Various - Throughout the term of the licence	Unchanged
8	The Licensee must, on request, provide to the NT EPA any data relevant to this Licence, in such a form and after any interpretative analysis as requested by the NT EPA	Yes	All documents provided if requested	Various - Throughout the term of the licence	Unchanged
9	The Licensee must, without limiting any other condition of this Licence in conducting the Activity do all things reasonable and practicable to ensure the Activity does not adversely affect the Declared Beneficial Uses and Objectives as declared from time to time, including those applying to: ● Edith River Surface Water	Yes	All post discharge monitoring has not detected any adverse impacts to the declared beneficial uses. No evidence has been provided to the Licensee from any third party indicating otherwise.	01/08/2016 08/09/2017 2018 pending	Unchanged

Condition	Action	Compliance ?	Evidence	When (Date)	Status
10	The Licensee must maintain and implement a Communication Plan which includes a strategy for communicating with members of the public who are likely to have a real interest in or be affected by the Activity.	Yes	Communication plan has been updated	19/01/2017	Updated
11	The Licensee must ensure a copy of the Communication Plan is available on the Licensee's Australian internet website.	Yes	http://www.mttodd.com.au/uploads/4/7/0/5/47056705/17_01_19_wdl178-5_comms_plan_v5.pdf	19/01/2017	Updated
12	The Licensee must maintain a log of each complaint, made in relation to the Activity, to any persons involved in the Activity. The log must include details of the following:	Yes	Complaint register maintained on site. No complaints were received during the licence period.	N/A	Unchanged
	12.1 the date and time of the complaint;		N/A		
	12.2 the contact details of the complainant if known, or where no details are provided, a note to that effect;		N/A		
	12.3 the nature of the complaint;		N/A		
	12.4 the nature of events giving rise to the complaint;		N/A		
	12.5 prevailing weather conditions at the time of the complaint;		N/A		
	12.6 the action taken in relation to the complaint, including any follow-up contact with the complainant; and		N/A		
	12.7 if no action was taken, why no action was taken.		N/A		
13	The Licensee must implement and comply with the Vista Gold Australia Pty Ltd Discharge Plan Revision 3, dated December 2014 (the Discharge Plan) as provided to the NT EPA	Yes	All actions of the discharge plan were complied with	Various - Throughout the term of the licence	Unchanged

Condition	Action	Compliance ?	Evidence	When (Date)	Status
14	The Licensee must submit any proposed revision of the Discharge Plan (other than typographical changes or revisions to formatting or referencing) to the NT EPA	Yes	No revisions during the reporting period	15/07/2018	Complete
15	If there is any discrepancy between the Discharge Plan and this Licence, this Licence takes precedence.	Yes	Noted	15/07/2018	Complete
16	The NT EPA may, by notice in writing, require the Licensee to revise, amend and/or resubmit any report or plan required to be submitted under this Licence. Any report or plan including revision amendment or resubmission of the report or plan is not effective until accepted by the NT EPA.	Yes	Noted	15/07/2018	Complete
DISCHARGES AND EMISSIONS					
17	This Licence authorises waste water to be discharged from the authorised discharge points identified in table 1.	Yes	Only discharge during licence period was from RP3 via Authorised Discharge Point CSE.	15/07/2018	Complete
18	The Licensee must not discharge waste water to the Edith River from Retention Pond RP1 and/or Retention Pond RP7 unless there is imminent danger of waste water overtopping the retention pond walls:	Yes	No discharge from either location.	15/07/2018	Complete
	18.1 as a result of abnormal rainfall intensity or duration that has reduced storage capacity to a level predicted to be insufficient to contain site water;		N/A		
	18.2 all actions in accordance with the Discharge Plan to minimise the need to discharge have been undertaken to the satisfaction of the NT EPA; and		N/A		

Condition	Action	Compliance ?	Evidence	When (Date)	Status
	18.3 the Licensee has received written approval (can be email) for discharge from RP1 and/or RP7 from the NT EPA.		N/A		
19	Prior to any discharge from RP3, the Licensee must determine the dilution required to achieve the water quality objectives defined in condition 21. The dilution must be determined:	Yes	Dilution ratio determined prior to discharge.	06/12/2017	Complete
	19.1 in accordance with the Vista Gold Dilution Algorithm, based on chemistry of the water to be discharged from RP3 as specified in the Discharge plan; or	Yes	Dilution ratio of between 1:30 and 1:40 determined by Algorithm using RP3 water chemistry prior to discharge.	06/12/2017	Complete
	19.2 as directed by the NT EPA	Yes	No direction received	1/07/2015	Complete
20	The Licensee must as soon as practicable notify the NT EPA by email to pollution@nt.gov.au prior to commencing a discharge to the Edith River.	Yes	Notifications of discharge provided by email to pollution@nt.gov.au on the date specified.	24/12/2017	Complete
21	The water quality objectives to be met at monitoring site SW4 for this licence period are:				
	21.1 for aquatic ecosystem toxicants, maintenance of 80% level of species protection; and	Yes	Met in accordance with Discharge plan SSTVs	15/07/2018	Complete
	21.2 protection of water suitable for stock	Yes	Met in accordance with Discharge plan SSTVs	15/07/2018	Complete
22	Waste water monitoring locations are defined in Table 2 and Appendix 1.	Yes	Reflected in monitoring program	15/07/2018	Complete
23	The Licensee must apply site specific trigger values (SSTVs) specified in Appendix 3 at sampling location SW4 and must ensure:	Yes	Sampling at SW4 during discharge compared to SSSTVs	15/07/2018	Complete
	23.1 water quality parameters measured at SW4 do not exceed greater or equal to two times the SSTV for any single measurement; and	Yes	Please refer to non-conformance report Jul-18 as Zn exceeded twice and Al once during Jan-18 – see WDL report	15/07/2018	Complete

Condition	Action	Compliance ?	Evidence	When (Date)	Status
	23.2 the rolling seven day 80 th percentile of measurements for each water quality parameter does not exceed the SSTV.	Yes	No parameter with consecutive exceedances triggering rolling 80 th percentile calculation – see WDL report	15/07/2018	Complete
24	When water quality at monitoring point SW4 does not comply with condition 23.1 the Licensee must:	Yes	Complied with condition 23.1	15/07/2018	Complete
	24.1 cease discharge of waste water; and	Yes	Daily records emailed 09/03/2018	09/03/2018	Complete
	24.2 implement the Vista Gold investigation process defined in Appendix 4.	Yes	Letter with report sent via email	25/05/2018	Complete
25	When water quality at monitoring point SW4 does not comply with condition 23.2 the Licensee must:				
	25.1 increase dilution of the waste water; and		N/A as we had already ceased releasing water for the season		
	25.2 implement the Vista Gold investigation process defined in Appendix 4.		N/A as we had already ceased releasing water for the season		
26	Waste water at the monitoring point SW4 and the Edith River downstream of the mine site discharge must not:	Yes	Discharged waters over the reporting period did not contain or generate any of the specified items	15/07/2018	Complete
	26.1 contain any visible matter, floating oil and grease or petroleum hydrocarbon sheen or scum, or litter or other objectionable matter;	Yes	Never observed	15/07/2018	Complete
	26.2 cause or generate odours which would adversely affect the use of surrounding waters;	Yes	Never observed	15/07/2018	Complete
	26.3 cause algal blooms;	Yes	Never observed	15/07/2018	Complete
	26.4 cause visible change in the behaviour of fish or other aquatic organisms;	Yes	Never observed	15/07/2018	Complete
	26.5 cause mortality of fish or other aquatic organisms;	Yes	Never observed	15/07/2018	Complete
	26.6 cause adverse impacts on plants: and	Yes	Never observed	15/07/2018	Complete

Condition	Action	Compliance ?	Evidence	When (Date)	Status
	26.7 cause adverse impacts to drinking water	Yes	The Edith river is not a known source of direct drinking water for any downstream consumers, and there is no evidence of any indirect effects on alternative drinking water supplies.	15/07/2018	Complete
27	At any time the NT EPA may direct the Licensee to cease discharge from a waste water source and the Licensee must:	Yes	No directions were received from the NT EPA to cease discharge during the licence period.	15/07/2018	Complete
	27.1 immediately comply with the NT EPA direction to cease discharge; and		N/A		
	27.2 comply with any further direction of the NT EPA.		N/A		
MONITORING					
28	The licensee must for all monitoring points listed in Table 2:			15/07/2018	Complete
	28.1 install, maintain and provide appropriate identification signage so that they are easily identifiable at all times; and	Yes	All monitoring locations are clearly signed and easily accessible	15/07/2018	Complete
	28.2 maintain safe access and egress, as is reasonably practicable.	Yes	Existing tracks maintained throughout the year	15/07/2018	Complete
29	Water quality sampling and collection of field environmental data must be carried out in accordance with the sampling schedule prescribed in Appendix 2.	Yes	The respective monthly monitoring reports and annual WDL report evidence the monitoring undertaken in compliance with Appendix 2.	15/07/2018	Complete
30	The licensee must ensure that all water samples and field environmental data are representative of the conditions at the time of sampling and are collected in accordance with recognised Australian Standards and guidelines (e.g. AS/NZS 5667, ANZECC/ARMCANZ)	Yes	Water samples and field data is collected in accordance with recognised Australian standards as identified in the Discharge plan and water management plan on the Vista website. URL: http://www.mttodd.com.au/waste-discharge-licence.html	28/09/2017	Complete

Condition	Action	Compliance ?	Evidence	When (Date)	Status
31	The Licensee must ensure that all water samples used for reporting are analysed by a laboratory with current N.A.T.A certification for the analysis specified (or equivalent quality control).	Yes	Laboratory used is NATA accredited. Certificate available at following URL: http://www.nata.com.au/nata/scopeinfo/?key=2894&searchword=&ordering=Alphabetical&match=exact&accredit_no=2901&field=All&state=Select+State&postcode=	28/09/2017	Complete
32	For each sample required to be collected by this Licence, the following information must be recorded and retained:	Yes	All details as specified were recorded and are present as original field sheets or electronic data	15/07/2018	Complete
	32.1 the date(s) on which the sample was taken;	Yes	Contained on all field sheets		Complete
	32.2 the time(s) at which the sample was collected;	Yes	Contained on all field sheets		Complete
	32.3 the point(s) at which the sample was taken;	Yes	Contained on all field sheets		Complete
	32.4 the name of the person who collected the sample;	Yes	Contained on all field sheets		Complete
	32.5 the chain of custody forms relating to the sample(s);	Yes	Electronically retained		Complete
	32.6 the field measurements and/or analytical results for the sample; and	Yes	Contained on all field sheets		Complete
	32.7 laboratory QA/QC documentation.	Yes	Electronically retained		Complete
33	The Licensee must prepare and submit a monitoring plan to the NT EPA by 31 March 2015. The monitoring plan must:	Yes	Monitoring plan submitted	17/4/2015	Complete
	33.1 describe the methods used to measure the likely impact(s) of changes in water quality, sediment quality, biota quality and aquatic ecology in the Edith River over timeframes and spatial scales relevant to the waste water discharges from the Mount Todd mine site; and	Yes	Provided as part of the monitoring plan	17/4/2015	Complete
	33.2 consider comments provide by the NT EPA	Yes	No comments were received	28/09/2017	Complete

Condition	Action	Compliance ?	Evidence	When (Date)	Status
RECORDING AND REPORTING					
34	All records required to be kept by this Licence must be in a Legible format.	Yes	All records are legible	15/07/2018	Complete
35	The Licensee must keep records of all non-compliances with conditions of this Licence.	Yes	No non compliances	15/07/2018	Complete
36	The Licensee must as soon as practicable, and in any case within 24 hours, notify the NT EPA of non-compliances with conditions of this Licence by emailing pollution@nt.gov.au .	Yes	No notifications of non compliance have been issued over the reporting period as no conditions of the licence have been breached.	15/07/2018	Complete
37	Non-compliance notifications required under condition 36 must identify:	Yes	No non compliances	15/07/2018	Complete
	37.1 circumstances leading up to the non-compliance;		N/A		
	37.2 the risk to the environment from the non-compliance;		N/A		
	37.3 what actions the Licensee will undertake to mitigate any environmental harm resulting from the non-compliance; and		N/A		
	37.4 what corrective actions the Licensee will undertake to ensure the non-compliance does not occur again.		N/A		
38	The Licensee must immediately and in any case within 24 hours notify the NT EPA of any potential or actual environmental harm or pollution by contacting the Pollution Hotline on telephone number 1800 064 567 and emailing pollution@nt.gov.au	Yes	None	15/7/2018	Complete
39	The Licensee must submit a Monitoring Report to the NT EPA by 31 August for each year of the Licence. The Monitoring Report must:	Yes	WDL Monitoring Report submitted with annual return	~27/07/2018	Outstanding

Condition	Action	Compliance ?	Evidence	When (Date)	Status
	39.1 be prepared in accordance with requirements for a Monitoring Report as per NT EPA <i>Guidelines for Consultant Reporting on Environmental Issues</i> ;	Yes	Note that QA/QC and laboratory results have not been included in the monitoring report due to the quantity of data. This information can be made available electronically upon request.	15/07/2018	Complete
	39.2 include a tabulation of all monitoring data required as a condition of this Licence, including surface water, discharge, sediment and biological monitoring;	Yes	WDL Monitoring Report submitted all water quality data. Sediments and macroinvertebrates covered in Appendix 4	~27/07/2018	Outstanding
	39.3 include a trend analysis and interpretation of all monitoring data required as a condition of this Licence;	Yes	Included in monitoring report	~27/07/2018	Outstanding
	39.4 include long term trend analysis to demonstrate any environmental impact associated with the Activity over a minimum period of four years; and	Yes	Trend analysis of Macroinvertebrate data was included in respective report. Only 2 years of data were provided, attributed to change in personnel.	~27/07/2018	Outstanding
	39.5 contain a summary of the discharge events that exceeded the SSTVs during the reporting period.	Yes	No exceedances related to discharges. All data included in WDL Monitoring report	~27/07/2018	Outstanding
40	The Licensee must complete the Annual Return supplied at Appendix 5 and provide it to the NT EPA by 31 August for each year of the Licence	Yes	Current document submitted with WDL Monitoring Report prior to 31 August	~27/07/2018	Outstanding
VERIFICATION OF THE DILUTION ALGORITHM					
41	The Licensee must verify the dilution predicted by the Dilution Algorithm. Verification of the Dilution Algorithm must:	Yes	Validation of the dilution algorithm was conducted in 2014/15.	02/04/2015	Complete
	41.1 be carried out in accordance with the Discharge Plan; and	Yes	As above	02/04/2015	Complete
	41.2 consider comments provide by the NT EPA	Yes	As above	02/04/2015	Complete
42	The Licensee must provide a report to the NT EPA on results of verifying the Dilution Algorithm within 10 business days of receiving laboratory results.	Yes	As Above	02/04/2015	Complete
END OF LICENCE CONDITIONS					

Summaries

Complaints Recording

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

Notifications of potential or actual environmental harm or pollution


Number of events recorded by the licensee during the reporting period (as required by condition 37 of the licence)	0
Summary of events	NA
Summary of outcomes	NA

Signature and Certification

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

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

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

Signature		Signature	
Name (printed)	Brent Murdoch	Name (printed)	
Position	Director and General Manager	Position	
Date	27 July 2018	Date	
Seal (if signing under seal):	<i>N/A in accordance with the Corporations Act</i>		