

Kylie Fitzpatrick
Manager Environmental Assessment
Environmental Assessment
Department of Environment, Parks and Water Security
Northern Territory Government
Floor1, Arnhemica House,
16 Parap Road,
Parap, NT 0804
kylie.fitzpatrick@nt.gov.au

4th August 2023

Dear Kylie

Re: Mt Todd Project Referral

In response to your email dated 8th June 2023 we have considered each of the points raised and compiled the attached "*Response Table for NTEPA Referral 4th August 2023 – pages 3 to 6.*" detailing the changes.

We have updated the Referral documents for your consideration, as attached to this letter.

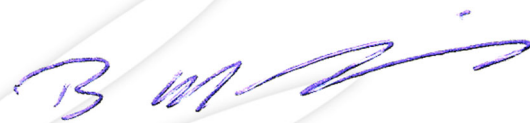
We have uploaded all of the attachments to your ftp site and also created a trial web portal on our www.mttodd.com.au website. We have temporarily password protected the webpage until the documents have been accepted by your department.

The password is Yq82eRnnd

All the files were able to be either reduced in quality or broken into parts, with the exception of one drawing file, to comply with the directive of having files less than 20mb. We have provided a screenshot of the drawing (*Part3b*) but the detail may not be adequate.

Please do not hesitate to contact us if there is any additional information or clarification(s) you may need.

Yours sincerely



Brett Murdoch
Director/General Manager

CC [ntepea@nt.gov.au](mailto:ntepa@nt.gov.au) – NTEPA File
Mineral.info@nt.gov.au – DITT File
Lisa Bradley - DEPaWS
Armando Padovan - DITT
Ray Iacono – Vista Gold
John Rozelle – Vista Gold

Attachments

1. 23 08 04 VG SLR Referral Submission V2-20230719.pdf
2. 19/07/2023 Application form – Confidential Information
3. Referral Attachments
4. Referral Maps and Figures
5. Referral Spatial Files – EIS
6. Referral Spatial Files – Proposed Changes
7. Response Table for NTEPA Referral 4th August 2023 – pages 9-12

1. 23 08 04 VG SLR Referral Submission V2-20230719.pdf

Name	Size
📁 Attachments	
📁 Maps and Figures	
📁 Spatial Data	
📄 23 08 04 VG SLR Referral Submission V2-20230719	2,452 KB
📄 Application form - Confidential information (Section 281 for NT EPA and or Minister considera...	184 KB

2. 19/07/2023 Application form – Confidential Information

Application form s.281

Application form – Confidential information

Section 281 of the *Environment Protection Act 2019*

The information provided on this form including the reasons that confidentiality is requested, will be considered by the Minister for the Environment and/or the Northern Territory Environment Protection Authority (NT EPA). You will be notified of the Minister / NT EPA's decision about whether to withhold information from being published as soon as practicable.

The proponent or approval holder is requested to provide the following with this application:

- a version of the information that is suitable for publishing on the NT EPA website for public consultation and/or the public register
- a separate standalone addendum/attachment with the confidential information (for example a document not embedded in a referral document and not to be made available to the public).

This application form will not be published.

Request that information not be made public

Name of the proposed action or approved action	Mt Todd Gold Project
Approval number	Assessment Report 76 (June 2014)
Proponent / Approval holder name (legal entity)	Vista Gold Australia Pty Ltd
Proponent trading name (if applicable)	
Australian Company Number	117 327 509
Australian Business Number	12 117 327 509
Refer to section 281(1) of the EP Act This application relates to: (select one only)	<input type="checkbox"/> a referred action <input type="checkbox"/> a referred strategic proposal <input type="checkbox"/> the environmental impact assessment of an action <input type="checkbox"/> the approval of an action <input type="checkbox"/> a significant variation of an action <input type="checkbox"/> the amendment of an environmental approval <input type="checkbox"/> the suspension or revocation of an environmental approval <input type="checkbox"/> the transfer of an environmental approval <input checked="" type="checkbox"/> a circumstance prescribed by regulation.



























Application form s.281

<p>Refer to section 281 (2) of the EP Act This application is to request that identified information provided not be made public on the basis that the information is: (select one only)</p>	<p><input type="checkbox"/> commercial-in-confidence</p> <p style="padding-left: 20px;"><input type="checkbox"/> commercial contractual information or</p> <p style="padding-left: 20px;"><input type="checkbox"/> confidential agreements with third parties which are required not to be disclosed</p> <p><input checked="" type="checkbox"/> cultural-in-confidence</p> <p><input type="checkbox"/> subject to legal professional privilege</p> <p><input type="checkbox"/> otherwise required by law to be withheld from publication</p> <p><input type="checkbox"/> information that is in the public interest to withhold.</p>
<p>Provide a detailed justification for the request that the information not be made public</p>	<p>Attachment R14 of the referral (Cultural Heritage Management Plan) has been amended to redact confidential information under the <i>Sacred Sites Act</i> including the locations of known Aboriginal heritage and archaeological places (coordinates and maps within the Cultural Heritage Management Plan body as well as AAPA Certificate C2021/028 attached as Attachment D).</p> <p>To ensure the protection of these sites, Vista Gold, Jawoyn and the AAPA do not want the location published to the public.</p>
<p>Name (print) Brent Murdoch</p>	<p>Signature </p>
<p>Date</p>	<p>19/07/2023</p>
<p>Position</p>	<p>Director and General Manager Australia</p>
<p>Organisation (if a business or)</p>	<p>Vista Gold Australia Pty Ltd</p>
<p>Email</p>	<p>bmurdoch@mttodd.com.au</p>
<p>Address</p>	<p>Level 1, 43 <u>Cavenagh</u> Centre <u>Cavenagh</u> Street</p>
<p>Darwin</p>	<p>NT 0801</p>







Submission details

Please submit this form electronically to Environmental Assessments, Department of Environment, Parks and Water Security at eia.ntepa@nt.gov.au. If you have any questions please phone 08 8924 4218.









3. Referral Attachments

Name	Size
 Attachment R1-2011-5967 Approval-Final-Notice-Signed-180119	1,631 KB
 Attachment R2-Gouldian Finch Literature Review and Habitat Assessment 2	8,682 KB
 Attachment R3-Waste Rock and AMD Management Plan 2022	18,437 KB
 Attachment R4-Erosion and Sediment Control Plan 2022	2,821 KB
 Attachment R5-Stormwater Management Plan -	7,482 KB
 Attachment R5-Stormwater Management Plan - Surface Water Management Plans_Part2	15,148 KB
 Attachment R5-Stormwater Management Plan - Surface Water Management Plans_Part3	34,775 KB
 Attachment R5-Stormwater Management Plan - Surface Water Management Plans_Part3b	1,937 KB
 Attachment R5-Stormwater Management Plan - Surface Water Management Plans_Part4	12,981 KB
 Attachment R5-Stormwater Management Plan -Surface Water Management Plans_Part1	19,109 KB
 Attachment R6-Draft GFMP 2	6,305 KB
 Attachment R7-Draft GFOS	4,457 KB
 Attachment R8-Water Management Plan	6,623 KB
 Attachment R9-Water Treatment Plant	1,589 KB
 Attachment R10-Draft GFMM	17,353 KB
 Attachment R11-Weed Management Plan 2022	1,101 KB
 Attachment R12-Flora and Fauna Management Plan 2022	3,283 KB
 Attachment R13-DRAFT Dust Monitoring and Mitigation Programme	15,256 KB
 Attachment R14 - Cultural Heritage Management Plan_Redacted version for publication	2,411 KB
 Attachment R15-Closure Plan 2022	4,001 KB
 Attachment R16-WRD Closure Assessment Report(TGI 2020)	5,951 KB
 Attachment R17-Mt Todd Cover Trials Design Procedure	5,024 KB
 Attachment R18-Batman Pit Predictive Geochemical Modelling	2,972 KB
 Attachment R19-Post Closure Pit Lake Water Quality	172 KB
 Attachment R20-Reclamation Plan	12,777 KB
 Attachment R21-Community Engagement Plan 2022	777 KB












4. Referral Maps and Figures

Name	Size
 Fig 1_WRD_Elevation_01	1,431 KB
 Fig 2_Redesignated_Dum...	8,369 KB
 Fig 3_FS_EIS_Final_Batm...	10,078 KB
 Fig 5 Construction Camp	1,543 KB
 Referral Report - Figure 4	3,127 KB
 Referral Report - Figure 6	3,608 KB

5. Referral Spatial Files – EIS

Name	Size
 13 EIS Final Batman Pit.dxf	3,148 KB
 Approved_WRD_Boundary_20230627.CPG	1 KB
 Approved_WRD_Boundary_20230627.dbf	1 KB
 Approved_WRD_Boundary_20230627.prj	1 KB
 Approved_WRD_Boundary_20230627.sbn	1 KB
 Approved_WRD_Boundary_20230627.sbx	1 KB
 Approved_WRD_Boundary_20230627	3 KB
 Approved_WRD_Boundary_20230627	1 KB

6. Referral Spatial Files – Proposed Changes

Name	Size
 22 FS Final Batman Pit.dxf	4,455 KB
 23 03 28 Power Station Drawing 2023.kmz	4 KB
 2023_s_dmp_v6.dxf	1,735 KB
 Proposed_Camp_Construction_Road_Area.cpg	1 KB
 Proposed_Camp_Construction_Road_Area.dbf	12 KB
 Proposed_Camp_Construction_Road_Area.prj	1 KB
 Proposed_Camp_Construction_Road_Area.sbn	1 KB
 Proposed_Camp_Construction_Road_Area.sbx	1 KB
 Proposed_Camp_Construction_Road_Area	167 KB
 Proposed_Camp_Construction_Road_Area.shp	1 KB
 Proposed_Camp_Construction_Road_Area	1 KB

7. Response Table for NTEPA Referral 4th August 2023 – pages 9 to 12.

7. NT EPA requested additional information	Vista Response
8. Referral	
9. The referral appears incomplete as there are some supporting documents with no information or incomplete information.	
10. Appendix P1 of Appendix H – Water Management Plan. There’s a cross-reference to the feasibility study Appendix K however no hydrogeology information has been presented. Please include the information.	The Water Management Plan has been relabelled at Attachment R8. It has been amended to include the correct information in Appendix K and is now complete for publication with the referral.
11. Appendix A of Appendix J - Gouldian Finch Monitoring and Methodology. Please provide the missing Appendix A Dust Monitoring and Mitigation Program	The Gouldian Finch Monitoring Methodology has been relabelled at Attachment R10. The Dust Monitoring and Mitigation Program has been appended to the Gouldian Finch Monitoring Methodology and the document is now complete for publication with the referral. <i>Please note that the Dust Monitoring and Mitigation Program is the same document that is Attachment R13 for referral.</i>
12. Appendix N – Culture and Heritage Management Plan 13. Appendix N appears incomplete. The last page of the AAPA certificate mentions an attachment of known burial and Aboriginal Heritage places however it has not been included. 14. Some information may be confidential under the Sacred Sites Act and therefore not suitable for publishing. If there is information that may not be suitable for publishing such as the location of sacred sites, please complete the attached application form and submit it with a version of the document that can	The Culture and Heritage Management Plan has been relabelled as Attachment R14. The Culture and Heritage Management Plan has been amended to redact confidential information under the <i>Sacred Sites Act</i> including the locations of known Aboriginal heritage and archaeological places (coordinates and maps within the Cultural Heritage Management Plan body as well as AAPA Certificate C2021/028 attached as Attachment D in Attachment R14). To ensure the protection of these sites, Vista Gold, Jawoyn and the AAPA do not want the location published to the public. The application form for confidential information has been completed and will be submitted with the redacted version of the Culture and Heritage Management Plan for publication with the referral.

7. Response Table for NTEPA Referral 4th August 2023 – pages 9 to 12.

7. NT EPA requested additional information	Vista Response
<p>be published (without the information to be redacted). Otherwise, please confirm that Appendix N does not include confidential information and that it can be published (subject to the NT EPA's decision).</p>	
15. Spatial Files	
<p>16. The referral form acknowledges the submission of electronic spatial data, however no spatial data files have been received by DEPWS. Prior to the start of this referral's public exhibition, please provide a spatial data package in an appropriate format (e.g. ESRI shp, kml, kmz etc) including but not limited to:</p>	
<p>17. development footprint and each activity area assessed under the previous Environmental Assessment Act 1982</p>	<p>Final landform boundaries for the approved WRD and Pit are available.</p> <ul style="list-style-type: none"> • Approved WRD boundary (full package including .shp) • EIS Final Batman Pit (.dxf)
<p>18. proposed changes to previously assessed mine layout (EIS 2014), e.g. modified designated areas for WRD, Batman Pit, accommodation camp, power station, retention pond (RP1) and ancillary infrastructure</p>	<p>Areas that are changing from the previously assessed mine layout EIS, which have spatial data available:</p> <ul style="list-style-type: none"> • 22 FS Final Batman Pit (.dxf) • 2023 new final WRD (.dxf) • Power station location (.kmz) • Camp and associated roads (full package including .shp) • New RP1 boundary (noting this has increased in size and will not inundate any additional land) (.shp)
19. Maps and Figures	
<p>20. The referral and supporting documents present some maps and figures that are of very low quality and contain text that is not legible, symbols that are not labelled or floating notes that are not embedded within figures. Examples include:</p>	
<p>21. Main Referral – Figures 4, 6</p>	<p>Figures replaced as required.</p>

7. Response Table for NTEPA Referral 4th August 2023 – pages 9 to 12.

7. NT EPA requested additional information	Vista Response
22. Appendix B – Figure 5	<p><i>Appendix B – Gouldian Finch Literature Review and Habitat Assessment</i> has been relabelled as Attachment R2</p> <p>Figure replaced as required.</p>
23. Appendix D – Offset calculations presented in Appendix E	<p>We believe this is referring to <i>Appendix G – Gouldian Finch Offset Strategy</i> which has been relabelled as Attachment R7.</p> <p>The offset calculation spreadsheets within Appendix E have been reprinted across multiple pages and using A3 page sizes where required to improve clarity.</p>
24. Appendix H – Figures 2-1, 2-3, 3-2, 3-4, 10-12	<p><i>Appendix H – Water Management Plan</i> has been relabelled as Attachment R8.</p> <p>All low quality figures have been updated including those requested as well as Figure 6-3 (and associated text requiring updates) and Figure 10-10, 10-11 and 10-12.</p>
25. Appendix M - Figures 1, 2	<p><i>Appendix M – Draft Air Quality and Dust Management Plan</i> has been relabelled as <i>Attachment R13 - Dust Monitoring and Mitigation Program</i>.</p> <p>Figure 1 and 2 have been updated.</p>
26. Appendix O - Figure 3-1	<p><i>Appendix O – Mine Closure Plan</i> has been relabelled as Attachment R15.</p> <p>Figure 3-1 has been replaced with an updated version (from 2019) and the blurry version in the document has been removed.</p>
27. Appendix Q/T - Figure 2.	<p><i>Appendix Q – Cover Design Trials</i> has been relabelled as Attachment R17 – Cover Trials Design & Monitoring Procedure.</p> <p><i>Appendix T – Reclamation Plan</i> has been relabelled as Attachment R20.</p>

7. Response Table for NTEPA Referral 4th August 2023 – pages 9 to 12.

7. NT EPA requested additional information	Vista Response
	<p>Figure 2 (WRD general closure cover design) in both documents appear clear when viewed online and printed. There is no alternative copy available to replace these figures.</p> <p>The version in the Reclamation Plan is the most up to date version available (prepared in 2021 vs 2019).</p>
28. Appendix R - Figure 7	<p>Appendix R – Batman Pit Predictive Geochemical Modelling Report has been relabelled as Attachment R18.</p> <p>Unfortunately <i>Figure 7 - Humidity Cell Test – pH, Sulphate, and Copper Temporal Trends</i> cannot currently be replaced due to being a specialist report prepared three years ago. However, the graphs are still useful in their intended use to show trends.</p>
29. Please ensure that all maps and figures contained in the referral and supporting documents are clear, readable, of appropriate scale and good resolution (≥300 dpi) to enable interpretation of the content.	Noted.
30. Duplicated labelling	
31. The referral presents duplicated labelling (i.e. letters designation) for some supporting documents, e.g. Water Management Plan, Waste rock and AMD management plan, Erosion and sediment control management plan, Weed Management Plan etc. To assist the reader, it is recommended that you revise the appendices labels to only be relevant to the numbering for the referral. Alternatively, see the suggestion below to have one file per appendix so that if they are published, the hyperlink title which	<p>Noted.</p> <p>All appendices have been relabelled, relevant only to the referral, as Attachments R1 through R21. All appendices are now separate files for ease of publishing online.</p>

7. Response Table for NTEPA Referral 4th August 2023 – pages 9 to 12.

7. NT EPA requested additional information	Vista Response
assist the reader in knowing the referral appendix number	
32. Document size (<20 MB)	
<p>33. The referral including supporting documents (Appendices A - U) is about 1200 pages and 210MB. All documents are required to be 20MB or less for publishing on the NT EPA webpage. Please ensure that the main referral document is separated from appendices and all documents are less than 20 MB. It is suggested for the ease of the reader, that the document is split into the main referral document and a file for each referral appendix. For more information, please consult the guidance Referring a proposal to the NT EPA.</p>	<p>Noted. The referral document, referral form and all appendices are now separate files for ease of publishing online. Vista Gold will publish all documents on their website to check that the publication format is effective.</p>