

## Submission on the referral

### Vista Gold Australia Pty Ltd – Mount Todd Gold Project Alterations

This submission is made under regulation 53 of the Environment Protection Regulations 2020

**Government authority:** Department of Chief Minister and Cabinet, Strategic Policy Division

**Summary:** There are several socio-economic matters with potential for significant impact that are not adequately described in the Referral. Additional information is required to assess these matters and, if impacts are significant, address them.

Section of Referral	Theme or issue	Comment
Referral Report, page 39  Community Engagement Plan, pages 6, 10, 12	People - Community and Economy Factor - socio-economic impacts	<p>The Referral Report states that ‘no environmental values or sensitivities relating to the people theme factors and objectives have been identified’ (Table 8 p39), however Table 3-3 in the Community Engagement Plan (p10) identifies, in point format, 11 potential negative socio-economic impacts and reports against likelihood, consequence and residual risk.</p> <p>The Community Engagement Plan also refers to an ‘SIA’ (p6) and to ‘a comprehensive register of issues for more detailed reference’ (p10), however these appear unavailable.</p> <p>Further detail, explaining how the 11 potential impacts were identified, the potential impacts themselves, and how the risk ratings were assigned is required to enable sufficient assessment of significance.</p> <p>The Community Engagement Plan (Table 3-4 p12) has been used as the mechanism to address potential economic and social impacts such as skills shortages, infrastructure demands and antisocial behaviour.</p> <p>Given the scale of the project, and the current inadequacies of several of the strategies proposed a current socio-economic impact assessment aligned to the <u>NT EPA’s guidelines for the preparation of an economic and social impact assessment</u> is recommended to better understand and assess potential impacts and their significance. An economic and social impact management plan or similar is also recommended to avoid, mitigate, manage or offset any potential significant impacts throughout the life of the project.</p>
Referral Report, page 39	People - Community and Economy Factor - Alcohol	<p>The closest receptor communities to this project site are General Restricted Areas. Werrenbun Community (6.5 km south-east), Wugularr (Beswick) and Kybrook Farm all have complete prohibition of liquor and are subject to a permit system. Barunga has partial prohibition of liquor, subject to a permit system, with beer permitted.</p> <p>It is strongly recommended that consideration be given to the potential social implications that may arise from having a wet mess located in such relatively close proximity to communities where alcohol is restricted and/or prohibited.</p>
Referral Report, pages 25, 52	People - Community and	<p>Attachment A of the Community Engagement Plan notes an accommodation and housing strategy has been developed for the project. The Referral Report states that ‘permanent accommodation for plant operating staff will be in the town of Katherine at the discretion of operators’ (p25) and that Vista Gold has ‘worked with the NT Department of Infrastructure,</p>

Environmental impact assessment under *the Environment Protection Act 2019*

Community Engagement Plan, Attachment A	Economy Factor - Accommodation	<p>Planning and Logistics to ensure that Crown Land will be made available for additional housing development in Katherine' (p52).</p> <p>The Referral would benefit from including further detail relating to the accommodation and housing strategy, and clarifying arrangements regarding accommodating staff in Katherine and the potential development of Crown Land for additional housing.</p>
Referral Report, page 40  Cultural Heritage Management Plan, page 5	People - Culture and Heritage Factor - AAPA Certificate	<p>The Referral Report indicates that the Aboriginal Areas Protection Authority (AAPA) Certificates obtained historically have informed the development of the Cultural Heritage Management Plan (CHMP). The CHMP states 'there is no current Certificate that applies specifically to mining activity or covers the entire mine site' (p5).</p> <p>A current AAPA certificate for the entire site and proposed activities is strongly recommended to inform project planning and engagement activities.</p>