

Appendix A - Stakeholder Engagement Plan

**Primary Gold Ltd
Rustlers Roost and Quest 29 Mine
Redevelopment Project
Stakeholder Engagement Plan**

**CDM
Smith**



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Stakeholder Engagement Plan

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Section 1 Introduction

1.1 Project Summary

Rustlers Roost and Quest 29 are existing brownfield sites on Mineral Leases (ML) located within pastoral leases in the Mount Bundey locality, approximately 85 km south-east of Darwin in the Northern Territory (NT). These sites will be redeveloped for open-cut mining, involving connection of the non-contiguous areas by a haul road and construction of an accommodation camp (the Project).

The mine sites are located approximately 11 km apart and are connected by an existing unsealed access track, which will be upgraded to accommodate haulage of ore from the Quest 29 satellite pits to Rustlers Roost processing facility. Ore mined at both sites will be processed at a new purpose-built processing facility located at the Rustlers Roost site to produce gold bullion. The rate of production will be 4 Mtpa over an approximately ten year life of mine (LOM).

1.2 Purpose

This Stakeholder Engagement Plan (SEP) has been developed by CDM Smith in collaboration with Primary Gold Ltd (Primary Gold) for the Project. The purpose of the SEP is to create a structured process of engagement that sets out Primary Gold's vision for engagement, guides Project team members regarding how and why to engage, and enables Primary Gold to clearly and transparently articulate their commitments to Government, community and other stakeholders.

The SEP process and development will enable Primary Gold to build an understanding of stakeholder values, potential stakeholder concerns and Project impacts (both adverse and beneficial) and create meaningful opportunities for stakeholder participation from the early stages of preparation for the Project Environmental Impact Statement (EIS). The SEP has been specifically developed for the pre-construction EIS phase of the Project and is focused on collating stakeholder interests to inform relevant environmental approvals, and to build a social licence to operate from the beginning of the Project. Much of the content in this SEP can be utilised and refined for the engagement approach and planning undertaken for future Project phases.

Importantly, the Northern Territory Environment Protection Authority (NT EPA) obligates proponents to inform and seek community involvement, in a culturally appropriate manner, about potential environmental impacts and risks of a proposal^{1,2}. Section 3(d) and 3(e) of the *Environment Protection Act 2019* (EP Act) states the objects of the EP Act are to:

- *"To provide for broad community involvement during the process of environmental impact assessment and environmental approval"; and*

¹ NT EPA 2021a, Preparing an environmental impact statement (EIS) – Environmental impact assessment guidance for proponents.

² NT EPA 2021b, Stakeholder Engagement and Consultation – Environmental impact assessment guidance for proponents.

- *“To recognise the role that Aboriginal people have as stewards of their country as conferred under their traditions and recognised in law, and the importance of participation by Aboriginal people and communities in environmental decision making processes.”*

Proponents must seek and document community knowledge and understanding of the area, including traditional Aboriginal knowledge, and use this expertise in identifying impacts and risks, and then planning for the avoidance or mitigation of those impacts and risks. As such, the stakeholder input received as a result of engagement stemming from this SEP has fed into the Project risk assessment, which was completed as a separate component of the EIS approvals work flow.

It is important to note the spatial and community context for which the Project is located. The Project is proposed in a pre-existing mine lease area subject to existing disturbance, it is relatively remote from major populations and therefore direct stakeholder interactions with Project activities are limited. Primary Gold maintains a positive relationship with the existing pastoral leaseholders and has undertaken significant engagement with known stakeholders as part of the previous Toms Gully Mine EIS process. Primary Gold appreciates the importance of targeted engagement and the proposed activities included in this SEP have been developed considering both the context and the value of a targeted and pragmatic engagement program.

1.3 Outcomes and Objectives

1.3.1 Outcomes

Engagement for the Project is focused on achieving the following outcomes:

- All identified key stakeholders are appropriately informed of the Project;
- The Project environmental assessment is completed in a manner that is consistent with the EP Act;
- Stakeholders are provided with meaningful opportunities to participate in consultation for the Project;
- Traditional Owners feel as if they have been provided opportunities for meaningful engagement, that they have been listened to, and their culture and values respected; and
- The Project specific environmental risk assessment has been actively informed by the input and feedback received from stakeholders.

1.3.2 Objectives

The SEP aims to achieve outcomes by:

- Creating a structured process focused on:
 - Building trust and mutual understanding between Primary Gold and Project stakeholders
 - Addressing statutory stakeholder consultation requirements
 - Meaningfully engaging with stakeholders, specifically with regards to the environmental assessment and approvals process.
- Providing opportunities for Primary Gold to understand stakeholder values and expectations;
- Embedding the importance of using local contractors and employees as much as possible throughout the Project;
- Ensuring that Traditional Owners and Indigenous groups are engaged wherever possible;
- Securing stakeholder feedback that will be used as input for the environmental assessment process and to inform Primary Gold's longer term activities and community involvement; and
- Aligning with Primary Gold's Corporate approach to stakeholder engagement

1.4 Regulatory Requirements

Primary Gold Limited is proposing to recommence open-cut gold mining across two mine sites, Rustlers Roost and Quest 29, located in the Mount Bundey region, approximately 100 km south east of Darwin, via the Arnhem Highway. A referral for the Project was submitted to the NT EPA in early 2021, with the NT EPA publishing acceptance of the referral on 23 February 2021. On 11 May 2021 the NT EPA decided the Project required assessment via EIS. The project-specific requirements for the NTEPA's expectations for stakeholder engagement and consultation are described in the Terms of Reference (Section 4.2). Specifically, the proponent must document the following in the EIS:

- Identified stakeholders;
- The stakeholder consultation undertaken and the outcomes, including decision-making and any adjustments to the proposal as a result of consultation; and
- Future engagement activities intended during the assessment process and post-approval, including during construction and operation of the proposal.

As per the NT EPA environmental impact assessment guidance³, proponents are responsible for undertaking stakeholder engagement and consultation from the earliest stage of the environmental impact assessment process and continuing throughout the process. Primary Gold is required to provide details of any stakeholder engagement and consultation undertaken to meet the requirements of section 43 of the EP Act and outline how this consultation has informed the EIS; including the environmental impact assessment, identification and management of impacts, and selection of offsets. Section 43 of the EP Act provide the general duty of proponents and states the following with regard to stakeholder consultation:

“A proponent of an action has the following general duties under an environmental impact assessment process:

- a) To provide communities that may be affected by a proposed action with information and opportunities for consultation to assist each community's understanding of the proposed action and its potential impacts and benefits;*
- b) To consult with affected communities, including Aboriginal communities, in a culturally appropriate manner; and*
- c) To seek and document community knowledge and understanding (including scientific and traditional knowledge and understanding) of the natural and cultural values of areas that may be impacted by the proposed action.”*

The NT EPA guidance related to stakeholder consultation focuses on an ongoing process of stakeholder engagement that involves building relationships, actively sharing information, and bringing stakeholder voices into decisions that may affect or interest them. The Project SEP has been prepared with this outcome as a key focus.

³ NT EPA 2021a, Preparing an environmental impact statement (EIS) – Environmental impact assessment guidance for proponents.

Section 2 Engagement Approach

2.1 Overview of Approach

Primary Gold is committed to undertaking projects in a manner that will both deliver on regulatory requirements and engage and contribute to the communities in which it operates. More broadly, Primary Gold is focused on understanding and integrating those matters that will ensure the long-term outcomes aspired to by relevant stakeholders. The key focus will be on:

- Governance and systems frameworks to support the business operations and how Primary Gold works with stakeholders;
- The formation of long-term, meaningful relationships and partnerships with stakeholders;
- Alignment with relevant Northern Territory standards regarding stakeholder impact assessment, management and social investment; and
- An active risk management approach and a focus on creating longer term value for the communities where Primary Gold operates.

2.2 Principles for Project Engagement

In developing its approach for Project engagement, Primary Gold has referred to industry leading standards and practice including the Northern Territory Stakeholder Engagement and Consultation guidance (NT EPA, 2021a), Northern Territory guidance for preparing an environmental impact statement ((NT EPA, 2021b), the International Association for Public Participation’s (IAP2) Quality Assurance Standard For Community and Stakeholder Engagement (IAP2, 2015) and relevant International Finance Corporation guides (IFC, 2007).

As outlined above, Primary Gold actively builds community investment into its overall business and planning process. Engagement for this Project will be based on the following key principles:

- Focusing on achieving genuine outcomes for communities;
- Providing a flexible and proactive approach;
- Being visible and transparent;
- Where investment in communities is undertaken, supporting projects that encourage community self-sufficiency and sustainability; and
- Enhancing social return on investment through strategic reviews of outcomes.

To achieve engagement objectives and outcomes it is important to define and explain the parameters of the Project including decisions that have already been made, decision-making processes and governance structures, statutory obligations and regulatory requirements. When Primary Gold engages with stakeholders it is important that there is clarity regarding what can and cannot be influenced with regards to the Project. This is particularly important in terms of managing stakeholder expectations. The following points provide a frame of reference for what can and cannot be influenced.

2.2.1 What Can Stakeholders Influence

The following are identified as aspects stakeholders can influence:

- How and when stakeholders are engaged across the Project lifecycle;
- Identification of potential Project impacts through provision of local knowledge;
- Considerations in the environmental assessment process and the supporting EIS studies (e.g. information considered or assessed);
- How Primary Gold manages potential impacts (e.g. selection of control in accordance with the environmental decision-making process) and maximises potential opportunities/benefits;
- The type and frequency of Project consultation they receive going forward; and
- How Primary Gold works with the local community and focuses on local priorities.

2.2.2 What Stakeholders Cannot Influence

The following are aspects stakeholders cannot influence:

- The location of the Project;
- The focus on achieving genuine outcomes for the local community, company workers and Primary Gold shareholders; and
- Approaches or requirements that must be implemented due to statutory obligations and regulatory requirements.

2.3 Engagement Undertaken to Date

Primary Gold has undertaken initial engagement during Project planning and feasibility. The focus of initial engagement has been with the leaseholders for the properties on which the Project is located. The public have been given an opportunity to review and comment on the Project referral documentation to the NT EPA via the dedicated online consultation portal and submissions from eight Northern Territory Government agencies/departments were issued from this process. A list of the submitters and key items raised is provided in

Table 1-1 Stakeholder Submissions on Project Referral

Stakeholder	Key Items Raised
Aboriginal Areas Protection Authority	<ul style="list-style-type: none"> ▪ Potential for significant impact to cultural heritage if there are sacred sites in the disturbance envelope or downstream ▪ Confirmation of an existing Authority Certificate for exploration activities. However, ML29785 (part of Quest 29) is not covered by the Authority. ▪ Intersection of ML29785 of a restricted work area. ▪ Known sacred sites downstream of the proposed Project. Potential impacts to downstream waterway are to be effectively mitigated to protect sacred sites. ▪ For sacred sites in the vicinity of the proposed action, a new Authority Certificate is the appropriate protecting mechanism.

Stakeholder	Key Items Raised
Department of Environment, Parks and Water Security (Flora and Fauna Division)	<ul style="list-style-type: none"> ▪ Threatened species are known or have potential to occur within the proposal area. ▪ The referral correctly identifies a number of risks from the proposal that may impact flora and fauna values. ▪ Sufficient uncertainty to warrant further assessment of potential risks and impacts to threatened species. ▪ Assessment should address all threatened species in addition to <i>Helicteres macrothrix</i> and <i>Stylidium ensatum</i>. ▪ Impacts to riparian vegetation should be avoided where possible. ▪ Detailed operational procedures and management strategies are to be provided in the EIS. ▪ The pit lakes are known to support one threatened species, the Mertens' Water Monitor. ▪ Indirect impacts to offsite water quality are considered possible due to erosion and movement of sediment, pit water discharges and AMD. ▪ The EIS should assess requirement to obtain licence and permits under the Water Act 1992
Department of Health	<ul style="list-style-type: none"> ▪ The previous proponents/owners of the Rustlers Roost and Quest 29 mine sites carried out baseline mosquito trapping. The proponent should utilise the management recommendations that were provided in both reports. ▪ The workers village should be protected from mosquitoes (i.e. suitable insect screens, non-attractive night lighting, use of residual adult mosquito control products if/when required), while workers should be advised to utilise suitable protective clothing and personal repellents. ▪ There are also other arthropods that could affect workers at the mine sites and accommodation camp. ▪ Upon cessation of mining operations, it is recommended that anthropogenic created areas of shallow water ponding are removed, to prevent the mine sites from leaving behind legacy mosquito breeding sites. ▪ No recommendation for further mosquito studies.
Department of Industry, Tourism and Trade (Resources)	<ul style="list-style-type: none"> ▪ The referral submitted recognises the requirement for further detailed studies. ▪ It is expected the MMP would describe an appropriate environmental management system that includes monitoring activities and action to mitigate exceedances against established criteria. ▪ The ToR submitted by Primary Gold appears adequate. ▪ Further analysis and detail required on prevention of seepage from the TSF, characterisation of the waste rock (e.g. potential for AMD), risks of constructing tailing dam over a heap leach pad and hydrogeology.
Department of Industry, Tourism and Trade (Resources)	<ul style="list-style-type: none"> ▪ Mary River Wilderness Retreat and other operators in the area are key tourism offerings. Located 5-10 km north east of Q29. Businesses should be consulted on proposed actions and included as a stakeholders. ▪ Further detail is required for Tourism NT to assess potential for general amenity disturbances to visitors. ▪ Further details are requested to address proposed signage for the project in order to assess the risk to visitors relating to road accidents. ▪ Further detail of mitigation and monitoring measures is requested to assess the management and prevention of uncontrolled discharges and potential impacts to aquatic ecosystems.
Department of Territory Families, Housing and Communities (Heritage Branch)	<ul style="list-style-type: none"> ▪ All heritage and archaeological issues have been adequately addressed for the Project.
Department of the Chief Minister and Cabinet	<ul style="list-style-type: none"> ▪ Suggestion to undertake a broader assessment to ensure that impacts and benefits of the Project are fully captured, analysed and communicated. ▪ Include strategies for local employment and procurement to examine opportunities for engagement with locally-based employees. ▪ Suggestion to examine impacts and benefits of increased activity and pollution (such as but not limited to noise, light, dust, etc.) on local industry (hospitality and tourism/eco-tourism etc). ▪ Consideration of traffic impacts.

Stakeholder	Key Items Raised
Northern Territory Police, Fire and Emergency Services	<ul style="list-style-type: none"> ▪ The remote location of the operation is outside NTFRS Emergency Response Area, which limits the ability to respond to an emergency in a timely manner. ▪ The NTFRS will respond as required within existing capacity should incidents occur. If the timeliness of that response does not adequately mitigate the risk, then self-funded measures should be implemented.

Separate to the current Project, Primary Gold has undertaken significant consultation with stakeholders of the nearby Toms Gully Gold Mine Project. Details of that consultation are provided in the Draft EIS and supplement to the EIS submitted to the NT EPA for that project.

Section 3 Stakeholders Analysis

3.1 Approach to Analysis

The analysis of stakeholders has been undertaken with a focus on understanding stakeholder values, understanding concerns and opportunities arising from the Project, and understanding potential impacts, risks, and levels of interest and influence. The intent of this initial analysis is to provide Primary Gold with the foundation through which to inform the EIS and continue engagement as the Project develops.

3.2 IAP2 Core Values

Stakeholder values are an important frame through which to understand what may be of importance. In accordance with the NT EPA stakeholder engagement and consultation guidelines, consultation will be guided by the principles of engagement, based on stakeholder level of interest and concern as outlined by the. The IAP2 core values for practicing public participation and community engagement are:

1. Public participation is based on the belief that those who are affected by a decision have a right to be involved in the decision-making process;
2. Public participation includes the promise that the public's contribution will influence the decision;
3. Public participation promotes sustainable decisions by recognising and communicating the needs and interests of all participants, including decision makers;
4. Public participation seeks out and facilitates the involvement of those potentially affected by or interested in a decision;
5. Public participation seeks input from participants in designing how they participate;
6. Public participation provides participants with the information they need to participate in a meaningful way; and
7. Public participation communicates to participants how their input affected the decision (IAP2 2014).

The purpose of these core values is to help make better decisions which reflect the interests and concerns of potentially affected people and entities (IAP2 2014).

3.3 Stakeholder Groups

Table 1-2 identifies the initial list of key stakeholder groups considered as part of the SEP. It is to be acknowledged that this is an initial list and as the SEP is implemented further stakeholders and more specific stakeholder details will be added.

Table 1-1 Key Stakeholders

Group	Stakeholders
Pastoral Stations/Lease Owners	<ul style="list-style-type: none"> ▪ Old Mount Bunday Station ▪ McKinlay River Station
Indigenous Stakeholders, Traditional Owners or representative organisations	<ul style="list-style-type: none"> ▪ Northern Land Council ▪ Limilngan and Uqynmil Traditional Owners (Local Management Committees of the Mary River and Djukbinj National Parks)
Local and Regional Community	<ul style="list-style-type: none"> ▪ Community members who reside or work in the Marrakai-Douglas Daly and greater Darwin area or surrounding region
Local and Regional Supplier and Business Organisations	<ul style="list-style-type: none"> ▪ Marrakai-Douglas Daly-based suppliers ▪ Darwin-based suppliers ▪ Northern Territory Chamber of Commerce ▪ Any companies who have registered their details in the ICN gateway
Local Government	<ul style="list-style-type: none"> ▪ Unincorporated Marrakai-Douglas Daly (no dedicated city, shire or council). ▪ Local Government Association of the NT
Northern Territory Government Agencies	<ul style="list-style-type: none"> ▪ Aboriginal Areas Protection Authority ▪ Department of Environment, Parks and Water Security ▪ Department of Health ▪ Department of Industry, Tourism and Trade ▪ Department of Territory Families, Housing and Communities ▪ Department of Chief Minister and Cabinet ▪ Northern Territory Police, Fire and Emergency Services
Territory and Federal Politicians	<p>State</p> <ul style="list-style-type: none"> ▪ The Hon. Michael Patrick Francis Gunner MLA, Chief Minister ▪ The Hon. Nicole Susan Manison MLA, Deputy Chief Minister ▪ The Hon. Natasha Kate Fyles MLA, multiple ministerial titles ▪ The Hon. Eva Dina Lawler MLA, multiple ministerial titles ▪ The Hon. Laurant Jane Moss MLA, multiple ministerial titles ▪ The Hon. Selenia Jane Malijarri Uibo MLA, multiple ministerial titles ▪ The Hon. Paul Andrew Kirby MLA, multiple ministerial titles ▪ The Hon. Kate Jane Worden MLA, multiple ministerial titles ▪ The Hon. Chanston James Paech MLA, multiple ministerial titles <p>Federal</p> <ul style="list-style-type: none"> ▪ The Hon. Warren Snowdon MP, Federal Member for Lingiari ▪ The Hon. Sussan Ley MP, Federal Minister for the Environment
Federal Government	<ul style="list-style-type: none"> ▪ Department of the Environment and Energy ▪ Department of Defence (Mount Bunday Training Area)
Regional Agencies / Coordinating Bodies	<ul style="list-style-type: none"> ▪ Regional Development Australia Northern Territory
Neighbouring Commercial Businesses and Local Operators	<ul style="list-style-type: none"> ▪ Allan King & Sons Construction Pty Ltd ▪ Boral Resources Limited ▪ Halkitis Bros Pty Limited ▪ Mousellis & Sons Pty Ltd ▪ Ostojic Group Pty Ltd ▪ Tomazos Group Pty Ltd ▪ Corroboree Park Inn ▪ Mary River Wilderness Retreat ▪ Bark Hut Inn ▪ Wildman Wilderness Lodge ▪ Point Stuart Wilderness Lodge
Interest Groups	<ul style="list-style-type: none"> ▪ Amateur Fishermen's Association of NT (AFANT)
Public	<ul style="list-style-type: none"> ▪ General public

3.4 Level of Engagement

The Project consultation associated with the EIS and subsequent phases of the Project will be in accordance with the IAP2 principles to determine the appropriate levels of engagement (IAP2 2015). As the Project progresses, the level of engagement will be identified and determined on a case-by-case basis and certain stakeholders may be involved and collaborate on aspects of the Project. Stakeholder engagement is an essential component in the process of assessing the Project’s social, economic and environmental impact.

For the purpose of managing the level of engagement with stakeholder, stakeholders have been grouped as follows:

- Level 1: Landholders, Indigenous Stakeholders or Traditional Owners, surrounding tenure holders and Government;
- Level 2: Key interest groups (e.g. AFANT) and local communities; and
- Level 3: General public, community and special interest groups, wider region and Territory -based organisations.
- Approaches or requirements that must be implemented due to statutory obligations and regulatory requirements.

Table 3-1 provides the IAP2 spectrum’s level of engagement and Primary Gold’s relevant approach at each level. For Level 3 stakeholders the level of participation for this Project is anticipated to be inform and consult, for Level 2 stakeholders inform, consult and involve, and for Level 1 stakeholders, collaboration is anticipated.

Table 3-2 IAP2 Levels of Engagement



Level of Engagement	Stakeholder Level	Approach to the Community and Stakeholders
Inform	1, 2 and 3	Primary Gold will aim to keep stakeholders informed
Consult	1, 2 and 3	Primary Gold will keep stakeholders informed, listen to and acknowledge concerns and aspirations, and provide feedback on how stakeholder input influenced the decision.
Involve	1 and 2	Primary Gold will work with stakeholders to ensure that their concerns and aspirations are directly reflected in the assessment completed and control measures employed and provide feedback on how stakeholder input influenced decision.
Collaborate	1	Primary Gold will look to stakeholders for advice and innovation in formulating solutions and incorporate their advice and recommendations into the decisions to the maximum extent possible.
Empower	1	Primary Gold will implement relevant stakeholder decisions where appropriate and feasible.

Amended from IAP2 2015

The stakeholders’ ability to influence decisions depends on the decision type and what aspects of the Project are negotiable and what aspects are non-negotiable (refer to Section 2.2.1 and Section 2.2.2, respectively) (IAP2 2015). The process is intended to be flexible and open to including relevant stakeholders to the maximum extent possible, while maintaining focus on targeted engagement where it makes sense.

3.5 Identification of Potential Concerns and Opportunities

Potential concerns and opportunities that may be experienced by stakeholders during the lifecycle of the project have been outlined in Table 3-2 below. The purpose of this identification is to understand stakeholder perspectives on what may be of concern to them regarding the project so that Primary Gold can understand potential impacts to stakeholders and what may trigger potential risks. Understanding stakeholder concerns and their view regarding potential impacts (both actual and perceived) means that Primary Gold can tailor why and how it engages with stakeholders and control the key messages that are communicated. This is also critical to understanding potential stakeholder risks, which in many cases are driven by perceptions stakeholders have of things that are important to them and may often be emotive and subjective. Often these perceptions may not be 'actual impacts' or supported by technical studies but it is critical to understand these.

Table 3-2 is an initial identification of potential concerns and opportunities and as such must be re-visited once Primary Gold has undertaken more detailed engagement with stakeholders during the life of the Project. It is important that as part of this, environmental concerns and opportunities are identified as these are often key areas of interest for stakeholders. Although this SEP is focused on the pre-construction lifecycle phase, potential concerns and opportunities have been identified across the project lifecycle as these perceptions and potential impacts will influence how stakeholders need to be engaged from the beginning of the Project.

Table 3-3 Potential Concerns and Opportunities that may be Experienced by Stakeholders

Project Phase	Potential concerns (perceived or actual)	Potential opportunities (perceived or actual)
Pre-construction (includes approvals)	<ul style="list-style-type: none"> ▪ Potential water quality / run-off impacts caused by access to the Project area for pre-construction surveys ▪ Potential introduction of invasive weeds from access to the site for pre-construction surveys ▪ Potential minor contamination and land degradation from access for surveys ▪ Potential introduction of invasive fauna species from access to the site for pre-construction surveys ▪ Potential direct mortality of fauna from vehicle access ▪ Potential dust created by site vehicles ▪ Potential dust release from pre-construction investigation vehicle movements ▪ Potential stress for surrounding landholders if there are impacts to their lifestyles or livelihoods ▪ Potential increase in house and land values ▪ Potential to disturb unidentified Indigenous and non-Indigenous cultural heritage items through initial surveys and investigations ▪ Potential for minor rubbish from initial investigative surveys and site investigations 	<ul style="list-style-type: none"> ▪ Greater understanding of the hydrological environment / condition of the site due to Project investigations ▪ Surveys build understanding of activities likely to be impacting greater regional environment ▪ Build understanding of the fauna condition and habitat values of the greater area ▪ Greater understanding of site and regional fauna due to Project investigations ▪ Protection of fauna habitat due to any offsetting ▪ Greater understanding of the publicly accessible viewpoints surrounding the site ▪ Greater understanding of site and regional aspects likely to promote reduced air quality ▪ Increased training and employment opportunities improving capabilities and skills in local and regional areas ▪ Increase in the local and regional socio-economic conditions ▪ Opportunities for local suppliers and contractors ▪ Employment and business opportunities for Indigenous community members ▪ Potential opportunities to improve internal road infrastructure
Construction (construction of the Project)	<ul style="list-style-type: none"> ▪ Potential lack of water availability for downstream users during construction ▪ Potential water quality impacts, resulting from watercourse disturbance, accidental pollutant and contaminant releases ▪ Exposure of soil to erosive factors during earthworks, resulting in soil erosion and sediment transport ▪ Potential contamination of land through contaminant release (e.g. diesel leakage) ▪ Site clearance and resulting environmental impact ▪ Disturbance to habitat connectivity ▪ Potential spread and introduction of weeds during construction ▪ Potential fire as a result of construction leading to destruction of habitat and fauna mortality ▪ Potential fauna mortality through vehicle collision ▪ Excessive noise during construction potentially leading to species fragmentation ▪ Visual amenity impacts from earth moving and construction vehicles ▪ Visual amenity impacts of cleared area ▪ Potential air pollution and dust release from construction and vehicle movements ▪ Potential human respiratory impacts ▪ Potential dust on leaves and settling on surrounding areas impacting flora ▪ Potential stress for surrounding landholders if there are impacts to their lifestyles or livelihoods ▪ Change to the character of the area ▪ Potential safety concerns for the community due to increased traffic ▪ Potential for inappropriate behaviour of contractors and employees ▪ Potential increase in housing values ▪ Potential disturbance of unidentified Indigenous and non-Indigenous cultural heritage items (despite cultural heritage clearance) ▪ Potential increase in local waste volumes during construction ▪ Increased odour and pest species resulting from waste ▪ Increase in traffic volume causing disruption to flow and delays ▪ Potential impact to road safety 	<ul style="list-style-type: none"> ▪ Data from monitoring health of water resources during construction ▪ Ability to rehabilitate degraded drainage lines and reduce erosion ▪ Ability to maintain the site which may already be subject to erosive factors ▪ Greater understanding of ecological environment due to any ongoing Project investigations ▪ Management and protection of fauna habitat remain on site ▪ Greater understanding of the existing local meteorological conditions ▪ Increased training and employment opportunities improving capabilities and skills in local and regional areas ▪ Increase in the local and regional socio-economic conditions ▪ Potential 'positive' feel in the immediate locality and region ▪ Potential increase in housing values ▪ Opportunities for local suppliers and contractors ▪ Employment and business opportunities for Indigenous community members ▪ Protection of any identified items of cultural heritage significance ▪ Clean-up of historic material in the Project area
Operations (operations of the Project)	<ul style="list-style-type: none"> ▪ Potential lack of water availability for surrounding users during operation ▪ Potential water quality impacts, resulting from watercourse disturbance, accidental pollutant and contaminant releases ▪ Modification of natural overland flow paths resulting in potential soil erosion and sediment transport ▪ Inability to bind soil (e.g. restricted vegetation growth) promoting wind erosion ▪ Potential contamination of land through contaminant release (e.g. diesel leakage) ▪ Potential impact on other land users (e.g. perception that Primary Gold may impact water sources used by surrounding land users) ▪ Disturbance to habitat connectivity ▪ Potential spread and introduction of weeds during operation ▪ Potential fire as a result of operations leading to destruction of habitat ▪ Site clearance and resulting environmental impact ▪ Potential fauna mortality through vehicle collision ▪ Noise during operation potentially leading to species fragmentation ▪ Potential fire as a result of operation leading to fauna mortality ▪ Restriction of fauna movement through site fencing ▪ Reduced habitat adversely impacting fauna survivability ▪ Visual amenity impacts from the Project associated infrastructure 	<ul style="list-style-type: none"> ▪ Ability to monitor health of water resources during operation ▪ Ability to maintain the site which may already be subject to erosive factors ▪ Management and protection of remaining flora on site ▪ Greater understanding of ecological environment due to any ongoing Project investigations ▪ Management and protection of fauna habitat remaining on site ▪ Potential to provide visual amenity management measures ▪ Increased training and employment opportunities improving capabilities and skills in local and regional areas ▪ Increase in the local and regional socio-economic conditions ▪ Potential 'positive' feel in the immediate locality and region ▪ Potential increase in housing values ▪ Opportunities for local suppliers and contractors ▪ Employment and business opportunities for Indigenous community members ▪ Protection of any identified items of cultural heritage significance ▪ Potential increase in local waste service companies

	<ul style="list-style-type: none"> ▪ Artificial light spill on the environment potentially disturbing and altering behaviour of a range of species ▪ Potential air pollution and dust release from vehicle movements ▪ Potential human respiratory impacts ▪ Potential dust on leaves and settling on surrounding areas impacting flora ▪ Change to the character of the area ▪ Potential safety concerns for the community ▪ Potential for inappropriate behaviour of contractors and employees ▪ Potential disturbance of unidentified Indigenous and non-Indigenous cultural heritage items (despite cultural heritage clearance) ▪ Potential increase in local waste volumes during operation ▪ Potential water and land contamination ▪ Increased odour and pest species resulting from waste ▪ Increase in traffic volume causing disruption to flow and delays ▪ Potential impact to road safety 	
Decommissioning	<ul style="list-style-type: none"> ▪ Loss of jobs and employment 	<ul style="list-style-type: none"> ▪ Rehabilitation of the Project site and habitat ▪ Potential re-use of Project components

3.6 Level of Engagement and Activities

Based on the analysis above, the following levels of engagement have been identified for stakeholder groups. These levels are based on the principle that engagement will be tailored by considering levels of stakeholder impact, interest and influence, and risk – with the assumption that the higher the level of impact and risk – the deeper the level of engagement required. This approach needs to be flexible based on each specific stakeholder group and potential changes in stakeholder expectations and risk. Description of engagement levels and example activities are provided in Table 3-4.

Engagement levels are outlined below.

Table 3-4 Different depths of engagement / communication

Level of engagement	Description	Example Activities
<ul style="list-style-type: none"> ▪ General 	<ul style="list-style-type: none"> ▪ Generalised provision of project information and updates (this includes overview of potential impacts and mitigation / management strategies) ▪ Opportunities to provide feedback through general activities and communication mechanisms (e.g. via website, email, as part of statutory consultation approach) ▪ Audience: all stakeholders have access to information and activities 	<ul style="list-style-type: none"> ▪ Website ▪ Project information sessions ▪ Media releases ▪ Public consultation process
<ul style="list-style-type: none"> ▪ Targeted 	<ul style="list-style-type: none"> ▪ Targeted engagement and communications specific to stakeholder group ▪ Targeted engagement and communication activities designed to gain specific feedback ▪ Ongoing opportunities to provide feedback and discuss key project elements (e.g. how potential impacts to a specific value could be managed) ▪ Audience: while information may or not be publicly available activities are targeted towards specific group of stakeholders and are generally not open to 'general public' 	<ul style="list-style-type: none"> ▪ Targeted group briefings or presentations ▪ Targeted group or individual meetings ▪ Targeted information portal e.g. ICN ▪ Access to all general activities
<ul style="list-style-type: none"> ▪ Individualised 	<ul style="list-style-type: none"> ▪ Engagement and communications developed for needs and expectations of specific stakeholder ▪ Focus on gaining specific feedback and input from individuals / small group of individuals ▪ Information in the form it was provided only accessible to specific party with which it was shared e.g. while a Minister may be provided information about jobs etc. that is available to the public the content of the conversation will be confidential 	<ul style="list-style-type: none"> ▪ One-on-one meetings focused on specific topic of interest for both parties e.g. negotiation of lease agreement or cultural heritage agreement ▪ Negotiation of formal contract or partnership (e.g. supplier agreement) ▪ Shared value definition workshop / partnership regarding social investment ▪ Personalised email / phone conversations
<ul style="list-style-type: none"> ▪ Regulatory 	<ul style="list-style-type: none"> ▪ Ongoing interaction with the regulator. This will be tailored depending on agency roles ▪ More structured and individualised engagement will occur with lead agency ▪ Ongoing opportunities to provide feedback 	<ul style="list-style-type: none"> ▪ Structured meetings and communication schedule with lead agency ▪ One-on-one / group meetings as required ▪ Ongoing email and phone communication as required

Table 3-5 Engagement Activities by Stakeholder Groups

Group	IAP2 Stakeholder Level	Engagement Level	Potential Engagement Activities ⁴
Pastoral Stations/Lease Owners	Level 1	Individualised	<ul style="list-style-type: none"> ▪ One-on-one meetings ▪ Ongoing communication via email, phone etc. ▪ Statutory consultation period (General) ▪ Website (General)
Indigenous Stakeholders, Traditional Owners or representative organisations	Level 1	Individualised	<ul style="list-style-type: none"> ▪ Ongoing communication via email, phone etc. ▪ One-on-one meetings (where relevant) ▪ Partnerships with employment agencies / contractors ▪ Statutory consultation period (General) ▪ Website (General) ▪ Media releases and media appearances (General)
Local and Regional Community	Level 2	General	<ul style="list-style-type: none"> ▪ Communication via email, phone etc. (where enquiry received) ▪ Statutory consultation period (General) ▪ Website (General) ▪ Media releases and media appearances (General)
Local and Regional Supplier and Business Organisations	Level 3	General	<ul style="list-style-type: none"> ▪ Partnerships with employment agencies / contractors ▪ Statutory consultation period (General) ▪ Website (General) ▪ Media releases and media appearances (General)
Territory and Federal Politicians	Level 3	General	<ul style="list-style-type: none"> ▪ Communication via email, phone etc. (if required) ▪ Statutory consultation period (General) ▪ Website (General) ▪ Media releases and media appearances (General)
Northern Territory Government Agencies	Level 1	Regulator	<ul style="list-style-type: none"> ▪ One-on-one meetings ▪ Technical meetings and briefings if required following review ▪ Formal agency comments period ▪ Ongoing email / phone communication ▪ Website (General) ▪ Media releases and media appearances (General)
Federal Government	Level 1	Regulator	<ul style="list-style-type: none"> ▪ Communication via email, phone etc. ▪ Technical meetings and briefings (if required) ▪ Website (General)

⁴ Note – these are potential engagement activities and not all activities may be undertaken for each stakeholder group. For example, should communication via email be considered sufficient to convey project understand and obtain necessary feedback, a one-on-one meeting may not be warranted.

Group	IAP2 Stakeholder Level	Engagement Level	Potential Engagement Activities ⁴
Regional Agencies / Coordinating Bodies	Level 3	General	<ul style="list-style-type: none"> ▪ Statutory consultation period (General) ▪ Website (General) ▪ Media releases and media appearances (General)
Neighbouring Commercial Businesses and Local Operators	Level 2	Individualised	<ul style="list-style-type: none"> ▪ Communication via email, phone etc. ▪ One-on-one meetings (if requested) ▪ Statutory consultation period (General) ▪ Website (General) ▪ Media releases and media appearances (General)
Interest Groups	Level 2	General	<ul style="list-style-type: none"> ▪ Communication via email, phone etc. (specifically for AFANT) ▪ One-on-one meetings (if requested by AFANT) ▪ Statutory consultation period (General) ▪ Website (General) ▪ Media releases and media appearances (General)
Public	Level 3	General	<ul style="list-style-type: none"> ▪ Website (General) ▪ Statutory consultation period (General) ▪ Media releases and media appearances (General)

3.7 Monitoring and Evaluation

Primary Gold will maintain a stakeholder management register to record external stakeholder interactions for the Project (pre-construction, construction, operation). It is important that this register is updated by all team members following engagement activities so these can be adequately monitored and any stakeholder concerns or opportunities followed up. This is particularly important for the approvals process as records of engagement activities need to be summarised and provided as part of approvals documents to demonstrate adequate engagement has been undertaken.

From a risk management perspective, this is also important for Primary Gold as/if issues arise there is a formal record of engagement that has been undertaken, and how these issues have been closed out as appropriate. If Primary Gold undertakes broader sustainability reporting at a corporate level, these type of records can also be drawn on to align with Corporate.

With regards to monitoring the effectiveness of this plan, the implementation shall be reviewed quarterly. The plan should be revised, including the stakeholder analysis, prior to the commencement of each Project stage to incorporate lessons learned, stakeholder feedback and evolving issues, opportunities and risks that may have arisen.

Any review should consider the following:

- Feedback from the regulator, external stakeholders, Primary Gold employees and contractors;
- Any complaints or findings from audit, review and inspections;
- The outcomes of any incidents and how they can be managed / mitigated in the future;
- Changes in Primary Gold organisation structures, roles and responsibilities; and
- Changes in regulation and guidelines that may impact engagement expectations of the regulator and community.

Section 4 Community and Stakeholder Consultation Program

The following consultation program establishes the activities to be undertaken and key project milestones. All consultation activities undertaken for the Project are provided in the register located in Appendix A.

Table 4-1 Consultation Phases

Stage	Description	Who	Activities	Progress
Pre-EIS Site Investigation and Survey Stage	<ul style="list-style-type: none"> Initial regulatory engagement to outline the project and confirm necessary inclusions in the assessment; and Early engagement with pastoral leaseholders regarding proposal. 	<ul style="list-style-type: none"> Pastoral Stations/Lease Owners Northern Territory Government Agencies 	<ul style="list-style-type: none"> Communication via email, phone etc. One-on-one meetings 	Complete
Draft EIS Development Stage	<ul style="list-style-type: none"> Activities to improve general stakeholder awareness of the project and avenues for providing input; Targeted engagement and communications specific to stakeholder groups; Targeted engagement and communication activities designed to gain specific feedback to inform the Draft EIS. 	<ul style="list-style-type: none"> Pastoral Stations/Lease Owners Indigenous Stakeholder and Traditional Owners Northern Territory Government Agencies Local and Regional Community Territory and Federal Politicians Federal Government Neighbouring Commercial Businesses and Local Operators Interest group(s) (AFANT) 	<ul style="list-style-type: none"> Communication via email, phone etc. One-on-one meetings Technical meetings and briefings Website (General) 	Complete
Post-Draft EIS Stage (Supplement Stage)	<ul style="list-style-type: none"> Update the Stakeholder Engagement Plan as necessary; and Undertake additional targeted consultation as necessary to address specific issues raised in comments on the Draft EIS. 	<ul style="list-style-type: none"> Pastoral Stations/Lease Owners Indigenous Stakeholder and Traditional Owners Northern Territory Government Agencies Local and Regional Community Territory and Federal Politicians Federal Government Neighbouring Commercial Businesses and Local Operators Interest group(s) (AFANT) 	<ul style="list-style-type: none"> Communication via email, phone etc. One-on-one meetings Technical meetings and briefings Website (General) 	Pending

Notification of Approval and Conditions	<ul style="list-style-type: none"> Update the Stakeholder Engagement Plan as necessary; Undertake activities to inform stakeholders of the approval and conditions; and Provide information to stakeholders on the next steps and project schedule. 	<ul style="list-style-type: none"> Pastoral Stations/Lease Owners Indigenous Stakeholder and Traditional Owners Northern Territory Government Agencies Local and Regional Community Territory and Federal Politicians Federal Government Neighbouring Commercial Businesses and Local Operators Interest group(s) (AFANT) Local and Regional Supplier and Business Organisations Public 	<ul style="list-style-type: none"> Communication via email, phone etc. Website (General) 	Pending
Construction Stage	<ul style="list-style-type: none"> Update the Stakeholder Engagement Plan as necessary; and Early notification to key potentially affected stakeholders (e.g. local community) of project construction commencement and actions being implemented to manage risks; and Undertake stakeholder and community engagement as required to satisfy approval conditions and achieve compliance with statutory obligations for construction. Provide general awareness of the avenues for stakeholder complaints. 	<ul style="list-style-type: none"> Pastoral Stations/Lease Owners Indigenous Stakeholder and Traditional Owners Northern Territory Government Agencies Local and Regional Community 	<ul style="list-style-type: none"> Communication via email, phone etc. One-on-one meetings Website (General) 	Pending
Operational Stage	<ul style="list-style-type: none"> Update the Stakeholder Engagement Plan as necessary; and Undertake stakeholder and community engagement as required to satisfy approval conditions and achieve compliance with statutory obligations for the operation; Undertake activities to maintain community and stakeholder awareness regarding avenues for project information and complaints. 	<ul style="list-style-type: none"> Pastoral Stations/Lease Owners Indigenous Stakeholder and Traditional Owners Northern Territory Government Agencies Local and Regional Community 	<ul style="list-style-type: none"> Communication via email, phone etc. One-on-one meetings Website (General) 	Pending
Decommissioning	<ul style="list-style-type: none"> Update the Stakeholder Engagement Plan as necessary; and 	<ul style="list-style-type: none"> Pastoral Stations/Lease Owners Indigenous Stakeholder and Traditional Owners 	<ul style="list-style-type: none"> Communication via email, phone etc. One-on-one meetings 	Pending

	<ul style="list-style-type: none"> ▪ Notification of closure of the facility to relevant stakeholders; ▪ Inform local and regional community of ongoing site management following closure. 	<ul style="list-style-type: none"> ▪ Northern Territory Government Agencies ▪ Local and Regional Community 	<ul style="list-style-type: none"> ▪ Website (General) 	
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Section 5 References

International Association for Public Participation (IAP2) 2015 *Quality Assurance Standard for Community and Stakeholder Engagement*, viewed 21 June 2021, Available: International Association for Public Participation Australasia, https://www.iap2.org.au/Tenant/C0000004/00000001/files/IAP2_Quality_Assurance_Standard_2015.pdf

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Northern Territory Environment Protection Authority (NT EPA 2021a), *Preparing an environmental impact statement (EIS) – Environmental impact assessment guidance for proponents*, viewed 21 June 2021, Available: https://ntepa.nt.gov.au/_data/assets/pdf_file/0009/818217/preparing-an-environmental-impact-statements.pdf.

NT EPA 2021b, *Stakeholder Engagement and Consultation – Environmental impact assessment guidance for proponents*, viewed 21 June 2021, Available: https://ntepa.nt.gov.au/_data/assets/pdf_file/0005/884696/guidance-proponents-stakeholder-engagement-and-consultation.pdf.

Appendix A – Consultation Register

Stakeholder	Date	Description of Engagement	Stakeholder Comments/Issues	Consideration in the Draft EIS
Old Mt Bunday Station	15/8/2016	Meeting on site. Discussed livestock access to Toms Gully in particular access to the Oxbow area at Mount Bunday Creek and water quality at Rustlers Roost that meets livestock drinking quality.	Pastoralist indicated that stock had not gone through the fence at Toms Gully and also the paddock covering the oxbow was not used as the vegetation made the mustering and management of stock hard.	Ongoing management of stock exclusion at Toms Gully
Old Mt Bunday Station	13/12/2016	Telephone conversation	Concerns were raised about vegetation across Toms Gully and next to infrastructure.	Pastoralist contracted to spray vegetation around infrastructure, maintain firebreaks and undertaken controlled burning during cooler months to limit fire load.
Old Mt Bunday Station	28/6/2017	Onsite meeting	Details on the proposed acid and metalliferous drainage baseline testing and water quality at Toms Gully. Waste rock dump drilling and tailings sampling were discussed and the reasons why.	Consultation ongoing regarding on site acid and metalliferous drainage conditions and assessments.
Old Mt Bunday Station	15/12/2016	Telephone conversation	Pastoralist interested in using treated water for pasture irrigation and use for mango production. Water needs to be of appropriate quality.	Water treatment needs to be “fit for purpose”.
NT EPA	3/6/2018	Meeting. PGO provided an update on EIS Supplement preparation, requirements for the Section 14A, proposed water and tailings treatment option	The NT EPA raised the matter of providing a level of certainty when presenting environmental and closure outcomes.	Further baseline geochemical and water studies completed to inform closure planning. Throughout the risk assessment process and within the completion criteria in the EIS supplement, PGO has justified the level of certainty for residual risk levels relating to closure.

Stakeholder	Date	Description of Engagement	Stakeholder Comments/Issues	Consideration in the Draft EIS
	20/07/2021	Meeting. PGO provided an update on studies being prepared to inform the Draft EIS and sought feedback on specific aspects. PGO also provided details of the Project that had been updated since referral of the Project.	The NT EPA identified that the changes from the version of the Project submitted in the referral likely constituted a significant variation. It was confirmed the pipeline being progressed by a third-party could be considered separately from the Draft EIS.	The Draft EIS has been prepared to account for the revised Project arrangement
Allan King & Sons, Bark Hut Inn, Tomazos Group	1/7/2021	Telephone discussion	No response from stakeholder other than to pass on their contact details	The Draft EIS has identified all known surrounding operators and activities. Consideration has been given to surrounding operators position in relation to the Project and the potential for direct, indirect and cumulative impacts to affect local stakeholders. While each key environmental factor section considers the surrounding environment and users, Section 7.6 specifically identifies potential impacts to the surrounding community and includes avoidance, mitigation and management measures to prevent or minimise impacts. Activities of the surrounding extractive operators have been considered with regard to potential cumulative impacts in the environmental assessment. Regarding the use of local material and supplies, PGO have included a commitment to develop and implement a procurement policy that prioritises local and Northern Territory procurement.
Corroboree Park Inn, Mary River Retreat, Ostoic, Boral	2/7/2021	Telephone discussion	No response from stakeholder other than to pass on their contact details	
Halkitis, Mousellis & Sons, Point Stuart Lodge, Wildman Lodge	6/7/2021	Telephone discussion	No response from stakeholder other than to pass on their contact details	
Bark Hut Inn, Boral, Corroboree Park Inn, Mary River Retreat, Old Mt Bundey Station, Ostoic, Tomazos Group	6/7/2021	Email with attached overview flyer of the project	Only response was related to utilising local material for the Project and opportunities to supply the Project.	
Allan King & Sons, Halkitis, Mousellis & Sons, Point Stuart Lodge	11/7/2021	Email with attached overview flyer of the project	No responses to date	
McKinlay River Station	21/7/2021	Posted overview flyer of the project	No responses to date	

Stakeholder	Date	Description of Engagement	Stakeholder Comments/Issues	Consideration in the Draft EIS
Old Mt Bunday Station	18/8/2021	Letter from PGO to Pastoral Leaseholder about the repair of the culvert bridge over the Mt Bunday Creek.	Pastoral Leaseholder signed the letter and agreed to the repairs.	Consideration of surrounding pastoral activities and downstream beneficial use of watercourses intersected by the Project for stock watering.
AFANT, Allan King & Sons, Bark Hut Inn, Tomazos Group, Corroboree Park Inn, Mary River Retreat, Ostoic, Boral, Halkitis, Mousellis & Sons, Point Stuart Lodge, Old Mt Bunday Station	30/8/2021	Email with attached information about the Significant Variation	No responses to date	Various uses of the downstream receiving environments have been identified in the Draft EIS (including recreational fishing, tourism, cultural heritage activities). The potential for the Project to impact such activities has been considered in the assessment. Downstream receiving environment water quality has been a key focus of the assessment.
McKinlay River Station	1/9/2021	Posted information about the significant variation	No responses to date	As above.

Appendix B – Disclaimer and Limitations

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