

## Submission on Supplement to the Draft Environmental Impact Statement (EIS)

### Primary Gold Pty Ltd - Rustlers Roost and Quest 29 Open-Cut Mine Redevelopment

This submission is made under regulation 140 of the Environment Protection Regulations 2020

**Government authority:** Department Industry Tourism and Trade (DITT) – Mining Operations

**Summary:** DITT has reviewed the Supplement to the EIS and comments for each of section previously commented on in the Draft EIS is provided below

Section of Referral	Theme or issue	Comment
Appendix H – Water Balance and Groundwater Modelling Report; Appendix I – Water Management Plan	Water considerations	<p>In response to DITT comments, Primary Gold Pty Ltd (Primary Gold) has indicated that general water management practices will continue to be employed including:</p> <ul style="list-style-type: none"> <li>Monitoring all dam levels and pumping contained water when and where appropriate. Daily checks of all water holding facilities will be conducted during the wet season. When significant rainfall events are forecast, pumps are to be used to increase water storage capacity and reduce risk of overflow.</li> </ul> <p>DITT considers Primary Gold’s response is a high-level objective for management of water inventory and is appropriate for the stage of the project.</p> <p>DITT will consider the operational details during assessment of the project under the <i>Mining Management Act 2001</i>(MMA). Detailed site layout will inform identification of the ‘high level’ objectives against which detailed Trigger, Action and Response Plans (TARPs) will be required for each water holding structure to achieve effective water inventory management on site.</p>
Appendix B – Risk Assessment Register	Seepage risk and controls for the TSF	<p>The information provided by Primary Gold (Table 1.1, Appendix G) indicates seepage mitigation controls proposed for the TSF include:</p> <ul style="list-style-type: none"> <li>Basin liner</li> <li>Embankment design, allowing for upstream face of the TSF to be lined with HDPE geo-membrane; cut-off trench</li> <li>Tailings underdrainage system</li> <li>Leachate Collection and Recovery System</li> </ul> <p>DITT considers the controls proposed to be consistent with ANCOLD 2012/2018 guidelines.</p>

Section of Referral	Theme or issue	Comment
Appendix J – Mine Closure Plan	Information gap	<p>While further information provided by Primary Gold in the Supplement EIS demonstrates sufficient volumes of Non-Acid Forming (NAF) waste rock is available for rehabilitation purposes, a number of deficiencies remain.</p> <p>Primary Gold states that:</p> <ul style="list-style-type: none"> <li>• The waste rock classification system is based on a two-tier system of PAF/NAF, with 0.2 wt% Total S being used as a criterion to distinguish between PAF and NAF, together with NAGpH.</li> <li>• For the materials that are classified as NAF (i.e. &lt;0.2 wt% Total S), the information provided indicates 31 Mt (Table 7.29, Appendix I) of material being available.</li> </ul> <p>However, it has not been established that the full 31 Mt of NAF available is suitable for use in rehabilitation. The materials characterisation report (Appendix F, Table 7) indicates five-phase geochemical testing program was undertaken which included:</p> <ul style="list-style-type: none"> <li>• Batch leach test program with de-ionised water</li> </ul> <p>However, the water testing was not undertaken based on the low paste EC results (Section 6.9, Appendix F). As the water testing was specifically precluded, it is unknown whether the NAF materials are leachable in water, and this is important given the NAF wastes are generally associated with the weathered zone of the deposit. As such, DITT considers that the total inventory of 'suitable' NAF materials has not been adequately established.</p> <p>DITT considers further testing is required to:</p> <ul style="list-style-type: none"> <li>• Establish whether the two-tier PAF/NAF waste rock classification is suitable or whether additional criteria need to be included to differentiate the proportion of NAF that is potentially leachable in water and therefore unsuitable for use in rehabilitation.</li> </ul>
Appendix L – Erosion and Sediment Control Plan	Erosion and Sediment controls	<p>For all proposed structures, especially those in close proximity to the mineral leases, Primary Gold has applied a 50m buffer as a commitment.</p> <p>DITT also notes the type of sediment dam (Type D) proposed for the project is inconsistent with the types (Type A or Type B) recommended by best practice for the prevailing site conditions.</p> <p>DITT advises that the management of erosion and sediment will be required to meet best practice for implementation, under the MMA.</p>
Appendix U – Commitments Register	Information gap	<p>The response provided by the Primary Gold is considered acceptable.</p>