

Twin Bonanza Restart Project

Application Number: **03108**

Commencement Date:
01/09/2025

Status: **Locked**

1. About the project

1.1 Project details

1.1.1 Project title *

Twin Bonanza Restart Project

1.1.2 Project industry type *

Mining

1.1.3 Project industry sub-type

Other

1.1.4 Estimated start date *

01/04/2026

1.1.4 Estimated end date *

01/04/2030

1.2 Proposed Action details

1.2.1 Provide an overview of the proposed action, including all proposed activities. *

Proposed Action Description

Prodigy Gold NL (Prodigy Gold) (formally ABM Resources) proposes to restart gold mining and processing operations within ML 33459 (previously part of ML29822) at the Twin Bonanza Gold Project located approximately 527km west of Tennant Creek and 15 km east of the Northern Territory and Western Australia Border. (Refer to Figure 1 of the Referral Supporting Material)

Purpose of Proposed Action

This Referral is for Stage 3 mining named the "Twin Bonanza Restart Project" and is the third stage of mining of the larger Staged Development Project, named 'Twin Bonanza Gold Mine Project' which was previously assessed and approved under Northern Territory and Federal Government approvals under a joint assessment (Bilateral agreement) between the Northern Territory (EIA approved May 2014) and Federal Government (EPBC 2013/6784). Stages 1 and 2 mining were completed from 2014-2016. (Refer to Figure 3 and Table 4.1 of the Referral Supporting Material).

Prodigy Gold is required to submit a new referral (this Referral) under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) for Stage 3 operations (this direction was given during a meeting between Prodigy Gold and the EPBC approval team on 6 August 2025) due to the fact the EPBC 2013/6784 expired on the 14 July 2024. Prodigy Gold will maintain the approved and existing Environmental Impact Assessment (EIA) approval from the Northern Territory Environmental Protection Authority (NT EPA), because the project's activities, footprint and direct and indirect impacts haven't changed since the original approval was granted. Prodigy Gold is required to update the existing Mine Management Plan under the new mining licensing framework in accordance with the EP Act 2019. (This direction was given during a meeting between Prodigy Gold and the Department of Lands Planning and Environment (DLPE) - Mines Division on 26 August 2025).

Project Disturbance Footprint -will remain the same as what was previously approved (257.4 ha)

Project Activities

Stage 3 mining activities will involve deepening of the open cut pits to continue high grade quartz vein mining at depth including an expansion of Stages 1 and 2 to allow for processing at an extraction rate of 200,000 tonnes of ore per annum and a mine life of 2 years. Ore processing and gold recovery (via a gravity circuit) will use the existing approved onsite infrastructure which will require refurbishment. Depending on overall gold recoveries an intensive cyanide leaching and elution circuit may be used on small volumes of concentrates. Tailings and waste rock produced will report to the purpose designed tailing dam and waste rock dumps, respectively.

Stage 3 Project Components are shown in Figure 3 of the Referral Supporting Material and include:

- processing facility,
- ROM pads,
- 2 x tailing dams,
- water storage dam,
- waste dumps,
- auxiliary infrastructure and equipment (excavator x 1, dump truck x 5 and ancillary equipment, generators, water bores, accommodation, access an haul roads, workshops and offices, sewage pond and landfill),
- light plane landing strip;
- site rehabilitation - completed under stage 1 and 2. Completion of mining five open pits including backfilling of the Old Glory Costean; Rehabilitation of two waste rock land forms; Rehabilitation of haul roads, contractors area, stockpile areas, explosives compound; Construction of abandonment bunds around the pits, and post closure monitoring programmes to complement existing baseline and operational programs.

A workforce of 40 will be required for operations and housed at the onsite accommodation village. during project implementation and operations economic benefits to the community and government will include employment, royalty payments, rates and taxes.

Direct and indirect impacts

The approved Project Area covers approximately a disturbance footprint total 257.4 ha and includes mining Stages 1,2 and 3 operations.

This referral addresses the potential for direct and indirect impacts to MNES (listed threatened and migratory species) resulting from project activities. The previous approved referral (2013/6784) also determined to have significant impacts on listed threatened and migratory species, which were successfully addressed during operations. To manage direct and indirect impacts, Prodigy Gold will maintain the existing programmes as approved under the EPBC Act and NT EP Act.

1.2.2 Is the project action part of a staged development or related to other actions or proposals in the region?

Yes

1.2.3 Is the proposed action the first stage of a staged development (or a larger project)?

No

1.2.4 Related referral(s)

| EPBC Number | Project Title |
|-------------|--|
| 2013/6784 | Twin Bonanza gold mining, processing & associated infrastructure project, NT |

1.2.5 Provide information about the staged development (or relevant larger project).

The Twin Bonanza Project has 3 Stages (Stages 1,2 and 3). Stages 1 and 2 are complete (2014-2016) and Stage 3 (known as the Twin Bonanza Restart Project) is to commence in 2026, subject to approvals. (Refer to Table 4-1 of the ATT_A_Twin_Bonanza_Stage_3_Supporting_Material).

1.2.6 What Commonwealth or state legislation, planning frameworks or policy documents are relevant to the proposed action, and how are they relevant? *

Previous approval overview

The Twin Bonanza Project was previously assessed and approved under a joint assessment (Bilateral agreement) between the Northern Territory and Federal Government.

Northern Territory assessment and approval

In May 2013, the *Northern Territory Environmental Protection Authority* (NT EPA) decided that the Twin Bonanza Project required assessment under the *NT Environmental Assessment Act* at the level of Environmental Impact Statement (EIS). The EIA was approved in May 2014 and mining activities were approved under Authorisation by the NT DITT under the (now repealed *Northern Territory Mining Management Act*).

Commonwealth assessment and approval

The project was a controlled action under *the Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) and was assessed through an accredited assessment process. The relevant controlling provision was listed threatened species and communities (section 18 and 18A). The Referral was approved in 2013: 2013/6784 and expired on the 14 July 2024.

The following summarizes the relevant Commonwealth and State legislation considered as part of this project.

Commonwealth Legislation

- *Aboriginal and Torres Strait Islander Heritage Protection Act 1984*
- *Aboriginal Land Rights (NT) Act 1976*
- *Environment Protection and Biodiversity Conservation Act 1999*
- Environment Protection and Biodiversity Conservation Regulation's 2000
- *National Environment Protection Measures (Implementation) Act 1998*
- *Native Title Act 1993*

Northern Territory Legislation

- *Bushfires Management Act 2016*
- *Crown Lands Act NT 1992*
- *Dangerous Goods Act 1998*
- *Environmental Assessment Act 1982* (repelled by the *Environment Protection Act 2019*).
- *Environmental Offences and Penalties Act 1996*
- *Environment Protection Act 2019* (EP Act) was passed in September 2019 and commenced on 28 June 2020. Shifted the regulatory responsibility for mining activities to a new framework, with transitional arrangements in place for existing authorisations until June 30, 2028.
- *Heritage Act 2011*
- *Local Government Act 2019*
- *Minerals (Acquisition) Act 1953*
- *Mineral Titles Act 2010*
- *Northern Territory Aboriginal Sacred Sites Act 1989* and Regulations
- *Pastoral Land Act 1992*
- *Public and Environmental Health Act 2011*
- *Soil Conservation and Land Utilization Act 1969*
- *Territory Parks and Wildlife Conservation Act/Bylaws/Regulations 1976*
- *Waste Management and Pollution Control Act 1998*
- *Water Act 1992*
- *Water Supply and Sewerage Services Act 2000*
- *Weeds Management Act 2001* and Regulations
- *Work Health and Safety (National Uniform Legislation) Act 2011*

Other Relevant Legislation

Other Northern Territory legislation that may be relevant to the Project includes the following acts and their associated amendments and regulations:

- *Control of Roads Act 1953*
- *Environmental Offences and Penalties Act 1996*
- *Miscellaneous Acts Amendment (Aboriginal Community Living Areas) Act 1989*
- *Traffic Act 1987*

1.2.7 Describe any public consultation that has been, is being or will be undertaken regarding the project area, including with Indigenous stakeholders. Attach any completed consultation documentations, if relevant. *

Prodigy Gold has been conducting stakeholder engagement and community participation activities since early 2012 for all their exploration and mining interests in the Tanami region. Prodigy Gold acknowledges that it conducts mineral exploration and mining on land owned by Traditional Owners and that Prodigy Gold access to this land is guided through progresses with the Central Land Council (CLC).

Prodigy Gold is committed to a close working relationship with the CLC, the local communities and the Traditional Owners and is committed to offer employment opportunities to people in local communities and the promotion of knowledge, understanding and respect for Indigenous Australians traditions and culture. For the Twin Bonanza Project Stages 1 and 2, Prodigy Gold employed local Indigenous businesses for land Management activities (Fire, pest and weed control programmes were conducted as part of managing threatened processes to Bilby populations in the local and regional area).

Prodigy Gold is committed to responsible exploration, development, operations and closure and is focused on conducting its business in harmony with stakeholders and the wider community's desire to conserve and protect the natural environment and community interests. (Refer to <https://www.prodigygold.com.au/about-prodigy-gold/corporate-governance/>).

Prodigy Gold Environment and Social Governance (ESG) reports covering 2022-2025, highlighting annual activities, community participation, employment opportunities, and efforts to respect and protect Indigenous heritage and the environment. (Refer to the <https://www.prodigygold.com.au/about-prodigy-gold/sustainability/>).

Engagement activities with regard to the Twin Bonanza Restart Project (Stage 3) is covered in the Referral Supporting Material Appendix D Consultation.

Engagement have focused on NT Departments, EPBC and Central Land Council (CLC) and are ongoing.

Project Stakeholder Groups

- Central Land Council (CLC)
- NT Minerals Council
- AMEC
- Balgo Community
- Lajamanu Community
- Billilunar Community
- Tanami Traditional Owners (Northern Territory)
- NT DLPE - Mines Division (Northern Territory)
- NT DLPE - Environment Division (Northern Territory)
- EPBC Approvals (Federal)
- Local NT Businesses
- Suplejack Station

1.3.1 Identity: Referring party

Privacy Notice:

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable.

By completing and submitting this form, you consent to the collection of all personal information contained in this form. If you are providing the personal information of other individuals in this form, please ensure you have their consent before doing so.

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Confirm that you have read and understand this Privacy Notice *

1.3.1.1 Is Referring party an organisation or business? *

Yes

Referring party organisation details

ABN/ACN 22343389310
Organisation name HORSNELL, SALLY JANE
Organisation address 0836 NT

Referring party details

Name sally Horsnell
Job title Ms
Phone 0455669600
Email sallyhorsnell@outlook.com
Address PO Box 1666, Humpty Doo, Northern Territory 0836

1.3.2 Identity: Person proposing to take the action

1.3.2.1 Are the Person proposing to take the action details the same as the Referring party details? *

No

1.3.2.2 Is Person proposing to take the action an organisation or business? *

Yes

Person proposing to take the action organisation details

ABN/ACN 58009127020
Organisation name PRODIGY GOLD NL
Organisation address 0800 NT

Person proposing to take the action details

Name Mark Edwards
Job title Managing Director
Phone 0407 715 112
Email medwards@prodigygold.com.au
Address Level 1, 67 Smith Street, Darwin, NT 0800

1.3.2.14 Are you proposing the action as part of a Joint Venture? *

No

1.3.2.15 Are you proposing the action as part of a Trust? *

No

1.3.2.17 Describe the Person proposing the action's history of responsible environmental management including details of any proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against the Person proposing to take the action. *

Prodigy Gold has a satisfactory record of responsible environmental management. There are no past or current proceedings under Commonwealth or State legislation for the protection of the environment or the conservation and sustainable use of resources against Prodigy Gold.

Prodigy Gold gained Environmental Impact assessment and previous EPBC approval as part of the Twin Bonanza Project. Prodigy Gold also has held exploration licence permits for various exploration projects in the Tanami and Northern Territory Government Mining authorisations for the Twin Bonanza Project. (Refer to <https://www.prodigygold.com.au/about-prodigy-gold/sustainability>)

1.3.2.18 If the person proposing to take the action is a corporation, provide details of the corporation's environmental policy and planning framework

Prodigy Gold Tanami Environmental Management System resides on the Prodigy Gold Website (<https://www.prodigygold.com.au/about-prodigy-gold/sustainability/>) and includes:

- Prodigy Exploration EMS
- Biodiversity MP 2026
- Waste MP 2026
- Ground Disturbance MP 2026
- Fire MP 2026
- Weed MP 2026
- Archeology and Heritage MP 2026
- Community and Environmental Policy

The following mining management plans (MMPs) are approved by the Northern Territory Department of Environment, Parks and Water Security (DEPWS) under the previous *Mining Management Act* 2001. Prodigy Gold can operate under existing authorisations though is in the process of applying for an environmental mining license for its Stage 3 operation, in accordance with the NT *Environment Protection Act*, 2019).

- Twin Bonanza Deemed Mining Licence (DML) 2019 (Mining Management Plan)
- Tanami West DML 2021 (Exploration Management Plan)
- Tanami North DML 2023 (Exploration Management Plan)
- Hyperion DML 2024; (Exploration Management Plan)

- Environmental Social Governance Reports 2022,2023,2024, 2025

-Community and Environmental Policies

To deliver Prodigy Golds commitment to stakeholders and the environment, Prodigy Gold will:

- Comply with legislative and regulatory requirements for the environment.
- Proactively develop and maintain management systems to measure and continually improve environmental performance.
- Operate in a responsible manner to minimize impacts on the environment and prevent pollution.
- Care for the environment and its heritage value.
- Work closely with the community and governing bodies to ensure that a good approach is always followed relating to environmental protection.
- Encourage employees to value the heritage and the environment in which we work.
- Reduce waste, recycle and recognize the by-product of our consumables. Periodically audit Prodigy Gold's environmental systems and performance to further improve environmental outcomes.
- Report to the relevant authorities any serious non-compliance to these commitments or to anything as required under current authorisations or agreements
- Maintain an open consultation process with regulators, the community and stakeholders.
- Minimise workplace exposure to hazards, ecosystem disturbance or degradation.
- Re-establish disturbed areas as sustainable ecosystems and community assets.
- Facilitate the training of employees and contractors in relation to their roles and responsibilities to environmental management.

1.3.3 Identity: Proposed designated proponent

1.3.3.1 Are the Proposed designated proponent details the same as the Person proposing to take the action? *

Yes

Proposed designated proponent organisation details

| | |
|-----------------------------|-----------------|
| ABN/ACN | 58009127020 |
| Organisation name | PRODIGY GOLD NL |
| Organisation address | 0800 NT |

Proposed designated proponent details

| | |
|------------------|---|
| Name | Mark Edwards |
| Job title | Managing Director |
| Phone | 0407 715 112 |
| Email | medwards@prodigygold.com.au |
| Address | Level 1, 67 Smith Street, Darwin, NT 0800 |

1.3.4 Identity: Summary of allocation

✔ Confirmed Referring party's identity

The Referring party is the person preparing the information in this referral.

| | |
|----------------------------|--|
| ABN/ACN | 22343389310 |
| Organisation name | HORSNELL, SALLY JANE |
| Organisation address | 0836 NT |
| Representative's name | sally Horsnell |
| Representative's job title | Ms |
| Phone | 0455669600 |
| Email | sallyhorsnell@outlook.com |
| Address | PO Box 1666, Humpty Doo, Northern Territory 0836 |

✔ Confirmed Person proposing to take the action's identity

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

| | |
|----------------------------|---|
| ABN/ACN | 58009127020 |
| Organisation name | PRODIGY GOLD NL |
| Organisation address | 0800 NT |
| Representative's name | Mark Edwards |
| Representative's job title | Managing Director |
| Phone | 0407 715 112 |
| Email | medwards@prodigygold.com.au |
| Address | Level 1, 67 Smith Street, Darwin, NT 0800 |

✔ Confirmed Proposed designated proponent's identity

The Person proposing to take the action is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

Same as Person proposing to take the action information.

1.4 Payment details: Payment exemption and fee waiver

1.4.1 Do you qualify for an exemption from fees under EPBC Regulation 5.23 (1) (a)? *

No

1.4.3 Have you applied for or been granted a waiver for full or partial fees under Regulation 5.21A? *

No

1.4.5 Are you going to apply for a waiver of full or partial fees under EPBC Regulation 5.21A?

No

1.4.7 Has the department issued you with a credit note? *

No

1.4.9 Would you like to add a purchase order number to your invoice? *

No

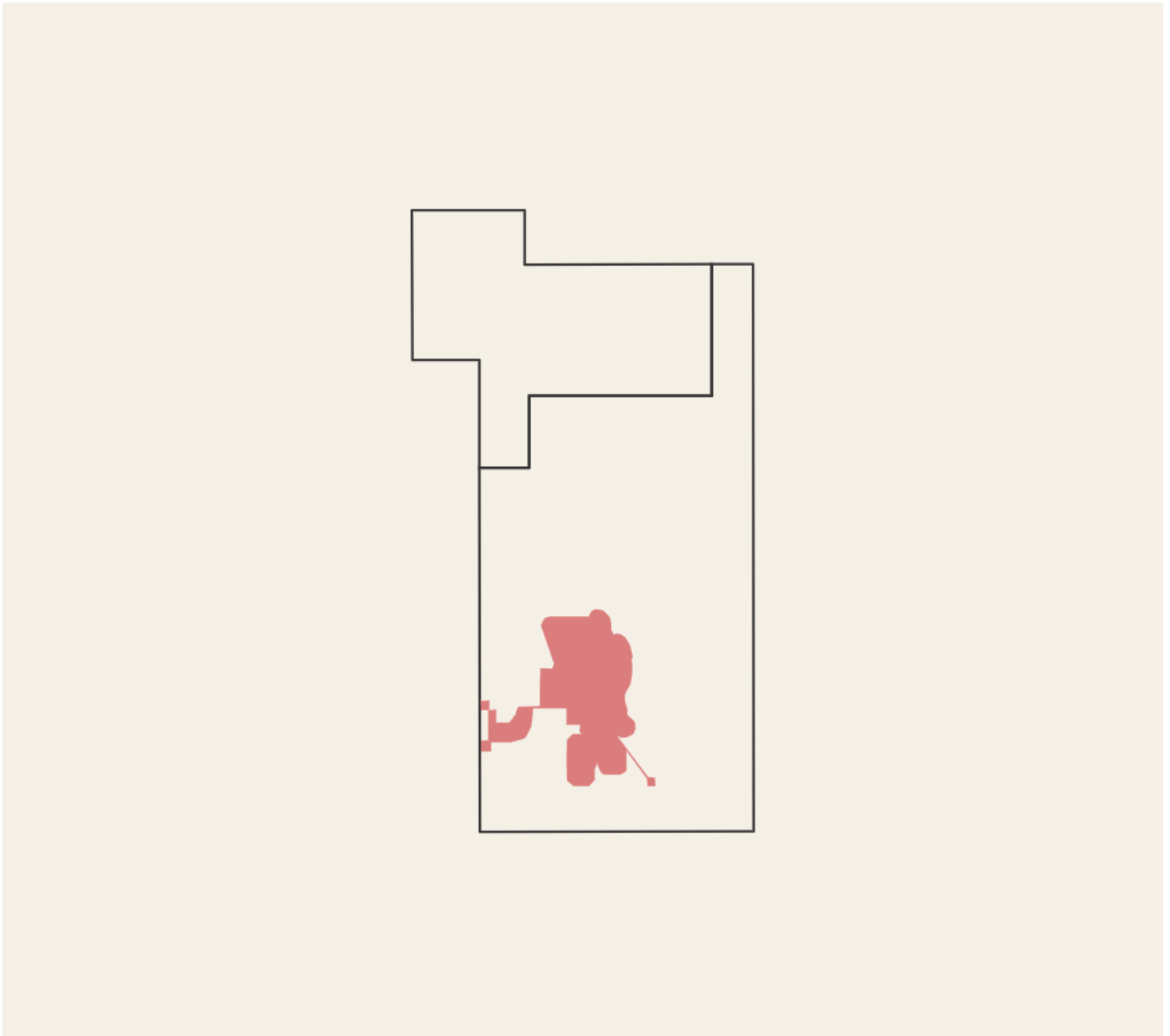
1.4 Payment details: Payment allocation

1.4.11 Who would you like to allocate as the entity responsible for payment? *

Person proposing to take the action

2. Location

2.1 Project footprint



Project Area: 3267.82 Ha **Disturbance Footprint:** 258.15 Ha

2.2 Footprint details

2.2.1 What is the address of the proposed action? *

There is no street address for the Twin Bonanza entrance, though entry is at Lot 8189 along the Ta

2.2.2 Where is the primary jurisdiction of the proposed action? *

Northern Territory

2.2.3 Is there a secondary jurisdiction for this proposed action? *

No

2.2.5 What is the tenure of the action area relevant to the project area? *

The projects DML covers EL28322, ML29822 and ML33459.

Land underlying the Project is Aboriginal freehold land (owned by the Mt Frederick No 2 Aboriginal Land Trust) that is used by the Traditional Owners, for traditional purposes, and is held as inalienable freehold title under the *Aboriginal Land Rights Act 1976* (Cwth) (ALRA). Land leased under the Act (Section 19) is used for accessing groundwater bores, services to and from the bore and access and maintaining an airstrip.

Aboriginal rights and interests in land are also recognised under the *Native Title Act 1993* (Cwth) (NTA).

3. Existing environment

3.1 Physical description

3.1.1 Describe the current condition of the project area's environment.

Location and Access

The Twin Bonanza Project includes ML33459 (2352ha), ML29822 (906ha) and EL 28322, though all mining disturbances are to occur on ML33459, with the exception of the Haul Road. The approved mine disturbance footprint is approximately 257.4 ha (Assessment Report 74 [NT EPA, 2014]; EPBC2013/6784). There is no street address for this location, though entry to the Project is located on Lot 8189 via the Tanami Road. This access road is located along an unsealed road 15km east of the Western Australian border.

The closest major settlement is Lajamanu is 263km to the northeast, Tennant Creek, 527km to the east. Alice Springs is 617km to the south-east and Darwin 874km to the north. The nearest aboriginal community is Balgo, some is 120km to the west of the project area. Prodigy Gold provided career opportunities for the community. A Regional Location Map is included in Figure 4-1 of ATT_A_REDACTED_Twin_Bonanza_Stage_3_Supporting_Material

Underlying Land Use

Land underlying the project area is Aboriginal freehold land (Mt Frederick [No 2] Aboriginal Land Trust) that is used by the Traditional Owners, for traditional purposes, and has previously been explored and mined. A communication log is maintained by Prodigy Gold which has been redacted from ATT_A for cultural reasons.

No pastoral activities are present with the primary land use associated with traditional land practices and management.

Regional Infrastructure

There is minimal regional infrastructure, with dirt roads passing the access track to the ML. The Tanami Road passes through the Western Australian border and links to the Lajamanu Road. The project is surrounded by mining and exploration projects at various stages of their lifecycle.

Current Condition

The Twin Bonanza Project (Stage 1,2 and 3) received formal approval from the NT and federal Governments in 2014 with open cut mining commencing from 2014-2016. Stage 3 operations did not commence. Continuous rehabilitation and care and maintenance activities and reporting have occurred from 2017 to date under the Northern Territory (DML 0909-01) Site Mine Management Plan (Environmental Mining Licence); and up to 14 July 2024 EPBC (2013/6784) Conditions.

Climate type - Semi Arid, Temperature - Minimum mean temperature is in June of 17.2 degrees C and Maximum mean temperature is in December of 43.7 degrees Celsius (*data taken from Rabbit Flat Station (15666) BoM, 2025) daily Rainfall -015666- BoM*)

Rainfall - season is split into wet season (November to April rainfall of 19.3-131.3mm and annual mean of 489.7mm) and Dry season (May-October with a seasonal mean rainfall of 0.0-20.4 mm and annual mean of 489.7mm) (*data taken from Rabbit Flat Station (15666) BoM, 2025) daily Rainfall -015666- BoM*)

Evaporation - Minimum mean in June of 4.4 mm (avg mm) and Maximum mean in November of 10.3 (avg mm). (*Reference. Draft EIS 2012*)

Landscape and Soils The Tanami Desert comprises predominantly semi-arid sand plain. The project occurs within the Tanami sand plains region, characteristics include sand plains with minor longitudinal dunes in the south, floodplains and floodouts on the margins (Pg. 3 of ATT_B_EcOz_Sep2012_Dry_Season_Fauna_Survey)

Flat sandplains predominate but are punctuated by high ranges of both basement complexes and younger sedimentary successions, particularly further south in the Arunta (e.g. Mt Doreen, Reynolds Range, Harts Range). Incised drainage systems are common in these areas of higher relief. The geomorphology consists of saprock (>50%), colluvial sediments (20-50%) and saprolite (<20%). Broad scale soils are sand, loamy sand or clayey sand (<10%) with a pH of less than 4.3. (*Reference. Old Pirate Prospect, Tanami Desert, NT. Prepared for Prodigy Gold*)

Geology The regional geology of the project area is almost exclusively on Proterozoic age marine turbidite sediments, of the Dead Bullock Group and Killi Killi formations and intruded by the Buccaneer Monzogranite in the northwest of the project area. To the east the Killi Killi formation transitions to the Dead Bullock Group. Air-photo interpretations and field mapping show low-levels of outcrop outside of the main Old Pirate trend. The rocks are all Proterozoic age with deposition 1900 to 1800Ma and intrusions / mineralisation 1800Ma to 1790Ma.

Locally, the Old Pirate anticline can be traced 2.5km south and 5km north of the main deposit area. Recent work has shown that dolerites are increasingly common, particularly in the south and east of the Old Pirate area. From low confidence mapping, some of the dolerites appear to conform with bedding, however previous mapping in excavated pits shows clear intrusive relationships. At Golden Hind, there is a thick, very coarse-grained immature sandstone that may be of fluvial origin. The sequence is folded into a moderately south plunging anticline. From lithological relationships, it is clear that quartz veins have been introduced into the system prior to deformation, with evidence to support further introduction of veins at the time of folding, and during subsequent ductile (shear) and brittle (fault) episodes. (*Reference. ABM 2017 MMP*)

Local Hydrogeology

1. Fractured and weathered rocks
2. Unconsolidated sedimentary aquifer hosted within tertiary to recent paleochannels. Regionally most of the groundwater is contained in paleochannels (or paleo drainage systems) which are ancient river systems. Paleochannels located to the east and west of the project are defined as higher order paleochannel (Mine Management Plan, 2019) and are characterised by surficial deposits of aeolian sand, alluvial sand/silt/clay, gravel, calcrete and silcrete. (*Reference: Water Account in Mine Management Plan, 2019*)
3. *Yield* - There are three extraction bores and 14 monitoring bores that were installed in July 2014 as part of the then ground water objectives of the management plan. Monitoring bores have been located within the shallow paleochannels aquifer (3- 6m calcrete aquifers; 5- 10m in alluvial systems) and deep fractured weathered rocks (90- 150m). Pumping yields for the following bores are as follows: Corsair bore 110 KL/ day (1L/sec); Wilsons Bore 86 KL/ day (1.3L/ sec); Timmys Bore 432 KL/ day (5L/sec). (*Reference: AMB 2017 MMP*)
4. *Groundwater flow direction* - Regionally, majority of ground water is contained within paleochannels which are ancient river systems. There are two paleochannels located to the east and the west of the project (*Reference: Mine Management Plan, 2017*)
5. Declared Use - Nil
6. Water Values - 8 ground water samples were collected in 2015 for baseline data. The results were predominantly below detectible limits though some analytes were naturally elevated, these included TDS, sulphate, arsenic, uranium, selenium and fluoride. Groundwater quality monitoring continued during operations from 2014-2025 (*Reference: Mine Management Plan, 2017*)
7. GDE's - There are no Ground Water Dependent Ecosystems within the ML, however there are several paleochannels that pass the ML.
8. Groundwater drawdown - Previously, no mine pit dewatering occurred, as groundwater within the pit areas is approximately 7080 mbgl, while pit shells extended to a maximum depth of 50 mbgl. (*Reference: ABM 2017 MMP*)

Local Hydrology

1. Catchment Name - Lake Mackay (NT). (*Reference: NR Maps (2025). Retrieved from NR MAPS. Viewed on 4 September 2025*)
2. Stream Order - Two stream order 1 are recorded to potentially to occur within the ML, located northwest and east of the project. However, due to its elevation in the landscape, sheet flow is the predominant surface drainage with some accumulation of flows during storm events. (*Reference: Draft EIS (2012)*)
3. Surface water flow direction - There are no permanent natural surface water features within the mineral lease area. All-natural surface water runoff is of an ephemeral (temporary) nature and largely consists of sheet flow over the primarily diverging slope surfaces. Temporary surface water flows with the potential to interact with site infrastructure areas have been diverted. Most surface water monitoring sites are

located at either end of diversion structures and at the base of WRD. Regionally surface water flows concentrate along topographic depressions formed by the paleochannels. Two large Cenozoic paleochannels in the region, one west-trending and the other south trending, which converge between Rabbit Flat and Tanami Downs and then head southwards towards Lake Mackay, incorporating additional tributaries on the way. (*Reference: Draft EIS (2013)*).

4. Declared Use -Nil

5. Water Values -The project falls within the Tanami Bioregion (Bioregions and SOCS of the Northern Territory). This bioregion covers all of Prodigy Golds tenements of the Tanami project and has an area of approximately 258,224km². The terrain is mostly flat red sand plains with exposed rock occurring at hills and ranges within the area. The dominant vegetation is hummock grassland with paths of open Eucalyptus forests on a grassey understory. Despite the arid climate, this bioregion is home to two nationally significant wetlands: Lake Surprise (Yinapaka) and the Lake Gregory area. Additionally, there are a range of smaller wetlands over 20 km away. The majority of the bioregion appears in good condition with little major development. Development in the area is mostly associated with cattle production and mining. Current threats to the bioregion are changed fire regimes and the introduction of exotic plants and animals. The Tanami bioregion includes the catchments of the Barkly Basin, Georgina River, Mackay Basin and the Wilson Basin (*Reference ABM 2017 MMP*)

3.1.2 Describe any existing or proposed uses for the project area.

Prodigy Gold is assessing the potential for underground mining. There is no known proposed industrial, economic or social uses for the project area. At closure, any residual infrastructure may be used by Traditional Owners in the future including water bores, access roads which all reside on aboriginal land and the general public are precluded from entry without a permit.

3.1.3 Describe any outstanding natural features and/or any other important or unique values that applies to the project area.

No outstanding natural features have been recorded within the Project disturbance area.

3.1.4 Describe the gradient (or depth range if action is to be taken in a marine area) relevant to the project area.

This question is not relevant as the Project will not be taken in a marine area.

3.2 Flora and fauna

3.2.1 Describe the flora and fauna within the affected area and attach any investigations of surveys if applicable.

Throughout all mining phases- planning, operations, rehabilitation/closure, care and maintenance the Twin Bonanza Project has had comprehensive mitigation and management measure implemented to reduce impact from its mining activities. Biodiversity monitoring and other management actions have occurred over these phases as part of its commitments during the draft EIS and its commitments to the EPBC offsets (EPBC Act; EPBC 2013/6784). Biodiversity objectives have been set for the Project and inform all other environmental management and mitigation. A summary of monitoring, management and compliance for each mining phase has been provided below:

Baseline Monitoring

1 Baseline wet season and two dry season flora and fauna surveys-

- 2012 Dry season fauna survey (ATT_B_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan)
- 2012 Wet season flora and fauna survey (ATT_C_GHD_Apr2012_Vegetation_Flora_And_Fauna_Survey)
- 2013 Dry season flora and fauna survey (ATT_D_EcOz_May2013_Flora_and_Fauna_Report_Dry_Season)

2. Biodiversity monitoring programmes-

- Dec 2014 (ATT_E_LES_Dec2014_Biodiversity_Monitoring_Program)

3. Development and update of the Biodiversity Management Plan-

- 2013, 2014

Operations (13 months)

4. Biodiversity monitoring programmes-

- Jun 2015 (ATT_F_LES_Jun2015_Biodiversity_Monitoring_Program)
- Dec 2015 (ATT_G_LES_Dec2015_Biodiversity_Monitoring_Program)

5. Update of the Biodiversity Management Plan-

- 2015, 2016

6. Annual Compliance Report (EPBC 2013/6784)-

- Feb 2016, May 2016

7. Offset program to financially support research into the greater bilby within the Tanami region-

- *'The availability and use of root-dwelling larvae as a food source for the greater bilby, Macrotis lagotis, in the fire prone Tanami Desert of the NT'* (Liddle, 2016; Appendix B of ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan).

8. Twin Bonanza Predator Control Programme–

- predator control campaign, Desert Wildlife Services, Apr 2015, Apr 2016.

9. Twin Bonanza Weed Control Programme–

- Reports, Central Land Council, 6 weed campaigns (May, Aug, Oct and Dec 2015 and Mar 2016).

Rehabilitation and Care and Maintenance

10. Biodiversity and rehabilitation monitoring programmes-

- Jun 2016 (ATT_I_LES_Jun2016_Biodiversity_Monitoring_Program)
- Dec 2016 (ATT_J_LES_Dec2016_Biodiversity_Monitoring_Program)
- Jun 2017 (ATT_K_LES_Jun2017_Biodiversity_Monitoring_Program)
- Aug 2018 (ATT_L_LES_Aug2018_Biodiversity_Monitoring_Program)
- Aug 2019 (ATT_M_LES_Aug2019_Biodiversity_Monitoring_Program)

- Aug 2023 (ATT_N_Horsnell_and_Marr_Aug2023_Environmental_Mining_Report; ATT_N_Horsnell_and_Marr_Aug2023_Environmental_Mining_Report_Appendices)

11. Update of the Biodiversity Management Plan-

- 2017, 2017, 2018, 2019, 2026

12. Annual Compliance Report (EPBC 2013/6784)-

- Feb 2017, May 2017

Threatened Flora

No threatened flora species are known to occur within the Twin Bonanza MLs. During the 2025 search of threatened species (Protected Matters Search Tool [PMST] and Flora Atlas [NR Maps]), a dwarf desert spike rush (*Eleocharis papillosa*; Vulnerable under EPBC Act) was listed as potentially occurring within 20km of the mine footprint (Appendix D of ATT_A_REDACTED_Twin_Bonanza_Stage_3_Supporting_Material). A likelihood of occurrence assessment determined that the species is unlikely to occur within the ML due to its rare sightings in the northern Tanami Desert and preference to predominantly freshwater and semi-saline swamps (Savannah Roots, 2025; Attachment A of ATT_A_REDACTED_Twin_Bonanza_Stage_3_Supporting_Material). During site surveys, no threatened flora species were identified.

Culturally important flora species, the desert walnut (*Owenia reticulata*) was also not identified within the MLs. Other larger trees (Hakea spp., Grevillea spp., Eucalyptus spp., and Corymbia spp.) are potentially of importance to Traditional Owners, and consultations were undertaken to determine the level of significance and measures to protect them within the mine footprint.

Threatened Fauna

A likelihood of occurrence was recently conducted to determine the potential for new threatened species to be within 20km of the Project, since the last search was conducted (GHD, 2012). Both territory and commonwealth databases were used, along with site-based fauna/ biological monitoring surveys and observations.

The 2025 protected matters search tool (PMST) showed an increase in the potential presence of threatened and MNES listed species. The search found 22 threatened, migratory and marine species may occur within 20km of the Project, this is an increase from the 11 species identified in the 2012 search (DCCEEW, 2012). A total of 24 species from the 2025 and 2012 search and MNES species observed during operations were included into the likelihood of occurrence assessment.

A comparison between the 2013 EPBC referral (which includes the 2012 search) and the 2025 assessment shows some similarities between species occurrences. Both assessments identify the greater bilby (*Macrotis lagotis*) known to be present and the great desert skink (*Liopholis kintorei*) to potentially occur within Twin Bonanza. Some differences are the brush tailed mulgara and the grey falcon (*Falco hypoleucos*) threatened species. The 2013 assessment noted the brush tailed mulgara to be present though it is no longer listed as a threatened species under the EPBC Act. The 2025 assessment considered the grey falcon is likely to be present though for foraging purposes and no suitable habitat for roosting occurs on the Project.

Species included during the 2025 likelihood of occurrence assessment has been included in Section 4 of this referral and Appendix A of ATT_A_REDACTED_Twin_Bonanza_Stage_3_Supporting_Material.

Existing management controls/programmes

Field surveys/studies/projects conducted from 2012-2025 identified the presence of the Greater Bilby within/adjacent to the Project area during operations. Existing management and controls that protect the greater bilby, other threatened species and migratory and marine are:

- Honors Thesis Research Project in 2016 (Appendix A of ATT_A_REDACTED_Twin_Bonanza_Stage_3_Supporting_Material),
- Baseline flora/fauna surveys (2012-2013),
- Annual Biodiversity Surveys (2014-2023),

- Greater Bilby management Plan (Appendix B of ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan)
- Threatened Species Management Plan (Appendix C of ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan)
- Migratory and Marine species (MNES) Management Plan (Appendix D of ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan)
- Quarterly cat control programmes (2015-2017; Appendix F of ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan),
- Quarterly weed control programmes (2015- 2017; Appendix G of ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan),
- Fire Management (Appendix H of ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan)
- Land Clearing Procedure (Appendix I of ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan)
- General sighting during operations and rehabilitation (2014-2025).

3.2.2 Describe the vegetation (including the status of native vegetation and soil) within the project area.

Vegetation structures

Geology, landform, and soils have a dominant influence in shaping the vegetation types present within the Project area. Additionally, fire also strongly influences the structure and composition of the vegetation in the region (Mine Management Plan, 2017) which makes some boundaries of vegetation types difficult to distinguish (from both in the field and aerial imagery). Previous vegetation surveys identified and described five vegetation types within the Twin Bonanza area. All vegetation types are widespread within the bioregion. Vegetation associated with the paleochannel land unit has been considered an important vegetation type due to biodiversity values, and cultural importance. In the general vicinity of the Old Pirate mining area the most extensive vegetation type is vegetation type 3, which is associated with lateritic and loamy sand plains. The operation largely falls within vegetation types 1 and 2, as these communities were associated with rocky hills land units that are associated with the target ore resource. (Refer to Table 5.1 and Figure 5.2 of ATT_A_REDACTED_Twin_Bonanza_Stage_3_Supporting_Material)

Vegetation Type 1 - Low *Eucalyptus brevifolia* isolated trees ± mid high *Acacia lysiphloia* or low *A. hilliana* isolated shrubs over *Triodia basedowii* open hummock grassland. Occurs on rocky outcropping. (559Ha)

Vegetation Type 2 - *Triodia basedowii* and *T. intermedia* mid open hummock grassland with *Acacia minutifolia* and *A. adoxa* var. *adoxo* low open shrubland. Occurs on gravel flat to gentle relief. (264Ha)

Vegetation Type 3 - Open *Triodia* spp. hummock grassland ± low *Eucalyptus brevifolia* or *Hakea lorea* isolated trees with tall ± *Grevillea wickhamii* or *Acacia* spp. open shrubland. Occurs in sand plains. (2251Ha).

Vegetation Type 4 - Low *Corymbia opaca* or *Eucalyptus victrix* ± *Eucalyptus brevifolia* open woodland with tall *Acacia sericophylla* open shrubland over *Triodia pungens* open hummock grassland. Occurs in Paleochannels and drainages. (183Ha)

Vegetation Type 5 - *Acacia aneura* woodland over mixed tussock grass. Occurs within a variety of landform, present on heavy soils with high clay content. (1Ha).

Sensitive or Notable Vegetation Communities

There are no threatened ecological communities or significant habitat types within the Site. However, the Tanami Desert is regarded collectively as being a “significant habitat” for several threatened species and a diversity of native species (SEWPaC 2013). Key habitat types within this part of the Tanami Desert would include ephemeral wetlands, ephemeral salt lakes, and paleochannels. These habitats are known for their importance in supporting a diversity of native species (including threatened species) and providing general refugia during dry periods. Additionally, these habitats are not widespread like sand plain habitats and also have the potential for fragmentation due to a relatively linear landform structure. The Project approved disturbance footprint is adjacent to a paleochannel but no disturbance is proposed within a paleochannel.

Paleochannels (or paleo drainage systems) are characterised by being the surface expressions of ancient drainage systems. There are two distinctive types described by Lundie-Jenkins (1989). Type 1 is the saline system associated with salt lakes, and soils affected by various salts including sodium chloride and gypsum and others. Type 2 is the drainage depressions which today appear not to be so affected by salinity, or where the salinity has been masked by overlying sediments such as aeolian or alluvial sands. Vegetation and habitat surveys of the paleochannel located to the west of the Site fit the description of a Type 2 paleochannel system.

During the mining period which ceased in March 2016, water extracted from the paleochannel resulted in the temporary lowering of the water table in one location by 1.77 metres. Groundwater levels measured in 2019 at Strezza's Bore indicate a continuation of a gradual falling trend at Monitoring Bores BF01, BF02, BF03A and BF04. Saprolite (2019; included in the Mine Management Plan, 2019) report that there is no observable trend between ground water levels and groundwater abstraction and suggest the limited decline may be the result of continued below average rainfall and reduced aquifer recharge. Plant stress was widely observed across the project area in 2017/18, however LES (2019) reported that Average Tree Health scores increased at all monitoring bore sites except analogue site BF01 in 2018/19. Declines in tree health and vegetation abundance

are likely a response to below average rainfall in the past 2 years, and the ongoing impacts of widespread fires across the site in 2015 (LES 2019). When flood events occur, the paleochannels flow in a southerly direction. The receiving saline lake environment is approximately 50km from the Site and no clear linkage is evident.

3.3 Heritage

3.3.1 Describe any Commonwealth Heritage Places Overseas or other places recognised as having heritage values that apply to the project area.

Searches of the following historical heritage databases have been undertaken:

- UNESCO World Heritage List (UNESCO)
- EPBC Act PMST (DCCEEW)
- Australia's National Heritage List (DCCEEW)
- Register of the National Estate (DCCEEW)
- Commonwealth Heritage List (DCCEEW)
- National Trust of Australia (NT)
- NT Heritage Register
- NT WWII Historic Places

Commonwealth Heritage

No National or Commonwealth heritage places were identified within or adjacent to the Project Area.

Northern Territory Heritage

No Northern Territory heritage places were identified within or adjacent to the Project Area.

Local Heritage

No local heritage places were identified within or adjacent to the Project Area.

3.3.2 Describe any Indigenous heritage values that apply to the project area.

Prodigy Gold holds a Sacred Sites Clearance Certificate (SSCC) for the Twin Bonanza project showing the full area of the ML's. There are no restricted work areas or exclusion zones on the leases.

Prodigy Gold holds an Aboriginal Areas Protection Authority (AAPA) certificate for the area; there are no restricted work areas or no-go areas on the ML.

The certificates and information contain culturally sensitive information and therefore have been excluded from this Referral.

3.4 Hydrology

3.4.1 Describe the hydrology characteristics that apply to the project area and attach any hydrological investigations or surveys if applicable. *

Surface water

The Tanami Desert Region average annual rainfall in the region ranges from 400-500mm, and approximately 85% of these falls between November and April. Summer rainfall is characterized by infrequent, but intense rainfall events, with single events delivering > 50mm in 24 hours on average at least once per year. Average pan evaporation is approx 2,800 mm/yr, far exceeding the average annual rainfall (Draft EIS, 2012).

Flood analysis studies were carried out both locally and regionally using digital elevation models to define catchment boundaries and evaluate surface flow patterns and flood risk areas across the project area. The analysis indicated that the project is situated relatively high in the landscape, with no regional-scale surface water features intersecting the site. The study concluded that a 1:100 year flood event would not significantly impact the site and infrastructure area. Most of the main infrastructure areas are located on topographic highs within localised catchments, resulting in inundation of no more than 100mm. Due to the landscape's shape, sheet flows are the dominant surface drainage process, with water accumulating in low-lying areas following a large storm and onsite drainage control structures managing flows. The bore field and some sections of the main access road that intersect regional paleochannels have higher 1:100yr flood levels, with the potential of reaching 1-2 metres.

Onsite Infrastructure-water storage and water usage. (Refer to Figure 4.3 of ATT_A_Twin_Bonanza_Stage_3_Supporting_Material)

Tailings dam cells

Purpose: Receives tailings slurry from the processing plant. Decant water is collected and returned to the process circuit.

Physical attributes: Two cells, above and below ground components, staged construction. Each above ground cell 370 x 370 m (500,000 m³) ≥ 150 cm freeboard.

Water storage dam

Purpose: Temporary storage of water used in the processing plant. This may be groundwater, or recycled water from other areas of site

Physical attributes. Fully lined with HDPE 91 x 91 m (10,000 t) > 150 cm freeboard

Concentrate retention dam

Purpose: Temporary storage of dense tailings concentrate that has undergone cyanide leaching. 1-2 tonnes deposited daily and evaporated.

Physical attributes: Fully lined with HDPE 190 x 190 m (50,000 m³) ≥ 150 cm freeboard

Sewerage pond/ wastewater treatment

Purpose: Storage and treatment of domestic waste from accommodation camp

Physical attributes: Earth-lined turkeys nest pond for disposal of treated sewage effluent

Sediment traps

Purpose: Temporary storage of runoff water from main infrastructure areas. These are designed as flow-through systems during intense rainfall.

Physical attributes: Earth-lined ponds

Diversion banks/ drains

Purpose: Divert clean stormwater around the main disturbance areas

Physical attributes: Water Management Plan

Water Account

The water account includes water inputs and outputs. Most of the water supply is sourced from ground water with a contribution from rainfall. Total annual water inputs during operation's were 104.9ML from Strezzas Bore of 69.6ML, Wilsons bore 6ML, Corsair Bore 26.7ML and rainfall runoff 2.6ML. Water outputs were a total of 107.4 ML mainly used for dust suppression 75.04 ML and evaporation 20.3mL, followed by domestic use and Reverse Osmosis outputs were 4.7ML and 7ML respectively.

Monitoring

A Surface Water Monitoring Plan and Programme exist for the Project. Surface and groundwater monitoring was completed during operations and in 2023 and 2025 under care and maintenance. There are 8 monitoring locations including onsite water structures and sediment traps and 12 surface water diversions and outlets in 12 local catchments that ranged between 150m- 760m in length and 1- 1.6m in height. The catchment areas matched locations around each mine domain- plant, camp, workshop, WRD1, North Pit etc. Four sediment traps for the plant, workshop/ offices, Run of Mine pad and camp. Monitoring of the water storage dam, sullage leach/ evaporation pond, base of WRDs and pit voids were sampled. Sediment traps and surface water diversions and outlets were visual inspection.

Surface water diversion and sediment control

An approved Sediment and Erosion Control Plan exist for the Project and includes mine area, camp and haul road. There are existing and operational water diversions in place to divert sheet flow away from disturbed areas. During the course of operations and rehabilitation, Environmental Improvements Plans (EIP) were developed to address environmental risks including the installation of diversion drains to intercept and redirect flows to natural overland sheet flow zones to protect recent rehabilitation. An example of a EIP done in September 2017, involved minor remedial erosion works on the Golden Hind abandonment bund perimeter drain. The EIP's are submitted to the Northern Territory Mines Division for approval with follow-up annual site inspections.

In summary, the following steps were taken to minimise sediment fluxes during operations:

- Site layout designed to minimise interaction with surface water flows. The majority of the main infrastructure areas are located on local topographic highs or diverging slope areas, where the potential for converging surface water flows is minimal.
- Diversion structures to redirect any "clean" surface water flows around the main site areas. This minimises the potential for erosion by limiting the amount of water flowing through the disturbance areas, and also protects infrastructure from flooding during extreme events.
- Any sediment-laden water generated within the main operational areas will be captured and treated in sediment traps to minimise the amount of sediment released into the surrounding environment.

Groundwater

A Groundwater Monitoring Plan and Programme exist for the Project. A groundwater monitoring bore network was setup in association vegetation and groundwater monitoring to measure the effects of water extraction on vegetation near production bores in paleochannel aquifers, as per agreement with the Central Land Council to monitor paleochannels as water is extracted. A TARP details management actions (e.g. reducing pumping rates) or additional water sources to reduce the effect on the aquifer.

Work in 2013 focused on collating available literature and data in the vicinity of the Site. Ground water studies in 2014 focused on collecting an initial set of baseline results comprising physical and chemical parameters. The objective of monitoring in 2015/16 was to build upon existing data to create an understanding on natural conditions overtime, set warning limits for future monitoring and to potentially detect any changes overtime in the mine impacted areas. Monitoring during 2016/17 was to monitor effects of water abstraction for mining on water aquifers in both fractured rock and paleochannel environments. Saprolite (2017) have commented that comparison of pre operational monitoring results and with those from the analogue bores in both fractures and paleochannel aquifers (and accounting for natural fluctuations) suggest the original objective of maintaining a similar level of water quality post closure has been met. Biodiversity monitoring of paleochannel tree health confirms the absence of impacts to vegetation.

Raw water dam has been used as a water storage dam for operations. Regular water samples were collected from the facility to assess potential gravity tailings reactions were occurring and the effects of mixing bore water from Strezza's, Corsair and Wilson's bore. TSF dam water quality ranged between 8.15 and 8.84 due to bore input, temperature changes, and high evaporation. The water samples were tested for a full suite of dissolved metals, TDS, major ions, petroleum hydrocarbons and general parameters (e.g. pH and electrical conductivity).

As limited baseline data was available at the commencement of operations and the Project occurs in a mineralised geological system with some analytes having naturally higher concentrations, the 2015 sampling data has been used to define warning and trigger levels.

Water quality results were initially sourced from Corsair and Wilson's bores and later from Strezza's bore, due to improved water chemistry and is the primary production bore used for operations. Water quality results from surface features i.e. water dam and camp water supplies are characteristic of a combination of groundwater and rainfall/evaporation.

Bore water quality fluctuated across the bores from pH 6.02 to 8.03 and remained alkaline throughout the year. The bores located in fractured rock aquifers exhibited higher EC, TDS and major cations in comparison to the paleochannel aquifer which is a shallow annual recharge aquifer. TDS values declined from 6,160 mg/L to 1,160 mg/L and sulfate concentrations dropped sharply from 1,320 mg/L to 190 mg/L, reflecting the larger combined water input from Corsair (196mg/L to 361mg/L) and Strezza's (9mg/L to 109mg/L) bores. Chloride also showed a similar trend, however fluoride increased from 0.9 to 1.2 with high fluoride concentrations in the paleochannel aquifer (Strezza's bore). The majority of metals recorded values below or just above the limits of detection for arsenic, barium, uranium and boron.

Arsenic (0.119mg/l -0.049mg/L)

Barium- (0.08mg/l – 0.48mg/L)

Uranium- (0.045mg/L -0.012mg/L)

Boron- (0.89mg/L -0.38mg/L)

Groundwater quality indicates slightly alkaline conditions reflective of groundwater chemistry of other upper catchment paleochannels seen in the Tanami region. Most metals were below or just at detection levels potentially indicating that limited metals are present and/or groundwater conditions are not conducive for metal liberation.

4. Impacts and mitigation

4.1 Impact details

Potential Matters of National Environmental Significance (MNES) relevant to your proposed action area.

| EPBC Act section | Controlling provision | Impacted | Reviewed |
|-------------------------|--|-----------------|-----------------|
| S12 | World Heritage | No | Yes |
| S15B | National Heritage | No | Yes |
| S16 | Ramsar Wetland | No | Yes |
| S18 | Threatened Species and Ecological Communities | Yes | Yes |
| S20 | Migratory Species | Yes | Yes |
| S21 | Nuclear | No | Yes |
| S23 | Commonwealth Marine Area | No | Yes |
| S24B | Great Barrier Reef | No | Yes |
| S24D | Water resource in relation to large coal mining development or coal seam gas | No | Yes |
| S26 | Commonwealth Land | No | Yes |
| S27B | Commonwealth Heritage Places Overseas | No | Yes |
| S28 | Commonwealth or Commonwealth Agency | No | Yes |

4.1.1 World Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

4.1.1.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.1.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Project is unlikely to have a direct or indirect impact as there are no World Heritage areas located in the Project Area .

The nearest World Heritage areas include Purnululu National Park located 300km NW of the Project area and Uluru-Kata Tjuta National Park located 593km SE of the project area.

4.1.2 National Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.2.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.2.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Project is unlikely to have a direct or indirect impact as there are no National Heritage places located in the Project Area .

The nearest National Heritage places include Purnululu NP located 360km NW of the Project area and Wave Hill Walk off Track located 360km north east of the project area.

4.1.3 Ramsar Wetland

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

4.1.3.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.3.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Project is unlikely to have a direct or indirect impact as there are no Ramsar wetlands located in the Project Area.

The Northern Territory have 2 areas listed under RAMSAR and include Cobourg Peninsula RAMSAR wetland which is over 1000km north east of of the Project area and Kakadu National Park RAMSAR wetland which is located over 900km north east of the Project Area. In Western Australia the closest RAMSAR wetland is the Ord River Floodplain located 530km north west of the Project Area.

4.1.4 Threatened Species and Ecological Communities

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Threatened species

| Direct impact | Indirect impact | Species | Common name |
|---------------|-----------------|---------------------------------|--|
| No | No | <i>Aphelocephala leucopsis</i> | Southern Whiteface |
| No | No | <i>Calidris acuminata</i> | Sharp-tailed Sandpiper |
| No | No | <i>Calidris ferruginea</i> | Curlew Sandpiper |
| No | No | <i>Eleocharis papillosa</i> | Dwarf Desert Spike-rush |
| No | No | <i>Erythroriorchis radiatus</i> | Red Goshawk |
| Yes | Yes | <i>Falco hypoleucos</i> | Grey Falcon |
| Yes | Yes | <i>Liopholis kintorei</i> | Great Desert Skink, Tjakura, Warrarna, Mulyamiji, Tjalapa, Nampu |
| Yes | Yes | <i>Macrotis lagotis</i> | Greater Bilby |
| No | No | <i>Pezoporus occidentalis</i> | Night Parrot |
| No | No | <i>Polytelis alexandrae</i> | Princess Parrot, Alexandra's Parrot |
| No | No | <i>Rostratula australis</i> | Australian Painted Snipe |

Ecological communities

—

4.1.4.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

Yes

4.1.4.2 Briefly describe why your action has a direct and/or indirect impact on these protected matters. *

The Project involves activities that have the potential to directly or indirectly impact on threatened species. The projects potential direct and indirect impacts to the relevant threatened species are summarised below. (Refer to Appendix A ATT_A_REDACTED_Twin_Bonanza_Stage_3_Supporting_Material)

A summary of direct impacts include:

- Lead to a long-term decrease in the size of an important population through clearing of 7.9% of the Mineral Lease. 257.4ha will be used/ cleared for the project site, of the 3,258 ha mineral leases.
- Clearing rehabilitated areas
- 25.68ha of Haul Road (within the Twin Bonanza Project) and 8.8ha of internal roads are potentially planned. Not all roads/ haul roads were installed in previous operations
- Clearing of preferred habitat (greater bilby) of open tussock grassland, Mulga *Acacia aneura* woodlands and shrublands and hummock grasslands (DEPWS, 2021c)
- Clearing during breeding periods, impacting burrow accessibility/ availability
- Introduction of weed species through vehicles and machinery
- Introduction of feral cats
- Contribute to climate change through greenhouse gas emissions and energy consumption
- Impact to nesting grey falcons on man maid infrastructure (comms tower)
- Clearing of preferred habitat of open shrubland that is dominated by spinifex hummock grasses with scattered shrubs (greater desert skink)
- Overuse of water impacting on groundwater levels and functionality of paleochannels/ drainage systems.
- Loss of knowledge, capacity and access to manage country

A summary of indirect impact include:

- Disrupt breeding cycles from blasting, noise and vibration
- Modify or remove the availability or quality of habitat by reducing fire frequency that ultimately reduces fire- promoted vegetation availability
- Modify or remove the availability or quality of habitat through increased wildfire frequency and intensity
- Modify or remove the availability or quality of habitat through inappropriate fire regimes, impacting long term availability of prey, particularly lizards and small mammals
- Modify or remove the availability or quality of habitat through inappropriate fire regimes, impacting on vegetation cover over burrow entrances
- Result in invasive species that are harmful by altering vegetation dynamics, creating high intense fires
- Result in the introduction of invasive species that are harmful to the species habitat
- Result in the introduction of invasive species that are harmful to the species (cats, wild dogs, hoofed animals)
- Result in the modification of population and density of predator species through human activity and poor environmental management. i.e. using camp as habitat, feeding on food scraps in onsite landfill, personnel feeding animals.

4.1.4.4 Do you consider this likely direct and/or indirect impact to be a Significant Impact? *

No

4.1.4.6 Describe why you do not consider this to be a Significant Impact. *

A Significant Impact Assessment (SIA) was completed for each of the three threatened species known or likely occur within the Disturbance footprint in accordance with the Commonwealth Significant Impact Guidelines 1.1 MNES (Dept of the Environment, 2013). Refer to Appendix A, ATT_A_REDACTED_Twin_Bonanza_Stage_3_Supporting_Material

Stage 3 of operations will manage impacts to these species by committing to the current and approved plans and programmes successfully implemented in Stages 1 and 2 mining under the 'Twin Bonanza Gold Mining, Processing, and Associated Infrastructure Project (EPBC 2013/6784, Conditions and Offsets Programme)', and 'Twin Bonanza Mine Management Plan (Authorization 0909-01)'.

The SIA for Greater bilby, grey falcon and the great desert skink concluded that the proposed Action is unlikely to have a significant impact due to:

- 7.9% of the Twin Bonanza Project (both MLs) will be impacted and revisited with 257.4ha of 3,258ha used for mining operations. 69% of the mineral leases is covered by Vegetation Type 3 which occurs on sand plains and suitable for the greater bilby. Most of the mine footprint is covered by Vegetation Type 1 and 2 which are located on rocky outcrops and gravel flat to gentle relief (refer to Section 5 of the Supporting Material)
- Greater bilby presence was recorded within the Projects MLs during multiple field surveys from 2012 to 2023 during Stage 1 and 2 mining and their populations and preferred habitat on the Project area is well understood and documented.
- Infrastructure (Haul Roads and Waste Rock Dumps and tailings dam) was altered at the approval stage for a compact design, reducing habitat fragmentation, so not to impact Bilby preferred habitats (lateritic sand plains) from (Australian Government, 2016). This design revision not only applies to the greater bilby but also other species that use the Projects leases as habitat or foraging.
- The Twin Bonanza project site was showcased in '*Leading Practice Sustainable Development Program for the Mining Industry*' as an example of bilby habitat avoidance due to its revised layout and processing decisions (Australian Government, 2016).
- During Stage 1 and 2 mining the offsets programme and management plans were successfully implemented.
- The Federal Government and NT Government were provided with annual Compliance performance reports which were all approved.
- Due to overall success of the Greater Bilby management and monitoring programme, Prodigy Gold has committed to continue the programmes for Stage 3 operations and confident that due to preferred habitats in the Projects MLs, the proposed action is unlikely to have a significant impact on the Greater Bilby.
- The Twin Bonanza Project has undergone intensive on ground targeted surveys prior to and during operations to record presence and activity.
- No bilby activity (burrows or sightings) was noted within the project site during any of the 14 targeted monitoring or general observations.
- No bilby burrows have been recorded in the mine area. Several active burrows were recorded within 300m of a previously mined pit. These series of burrows were noted before mining occurred and during a 2025 field trip which were noted to still be active.
- A recent field trip targeted rehabilitated and areas yet to be cleared as part of upcoming operations. Observations targeted potential greater bilby occurrence (tracks/ burrows) by walking mined areas and setting up cameras at burrows and sites of animal activity. No greater bilby activity on tracked areas, though logged other fauna burrowing and scratching. A camera was set up at the known active bilby burrows to the east of the project. No activity was captured.
- Prior to operations, the bilbies at these eastern burrows vacated for at least 4 to 6 months before mining commenced. (ABM Resources, 2017).
- For the cat campaigns Central Land Council rangers located an area of bilby activity approximately 6km east-southeast of mining operations. Night cameras recorded three distinct individuals.
- Field surveys conducted to identify "active zones" to determine if direct impact to these species could be avoided preclearing. Survey results identified that greater bilby burrows were concentrated in lateritic

sand plains to the east of the proposed open cut pits and not in rocky hills land units that are associated with target ore resource (ABM Resources, 2017)

- Management of blasting times and noise disturbance in the Noise Management Plan
- Access roads will be maintained and used as a fire break to prevent spread of wildfire
- Fire is managed in consultation with the Traditional Owners and Fire Management Plan
- All land clearing is per Prodigy Gold Land Clearing Procedure
- No grey falcons noted within the mining footprint during any of the 14 occasions of monitoring or general observations.
- No suitable habitat for the grey falcon occurs within the Twin Bonanza Project. The species prefers sparsely timbered lowland plains along inland drainage systems in areas of rainfall less than 500mm (DEPWS, 2021).
- Unconfirmed sightings were recorded on the Tanami Downes Road, <50km from Twin Bonanza Project.
- Nests are generally built by other birds in tallest trees along watercourses. There are no watercourses at the Twin Bonanza Project. A buffer zone will be implemented if grey falcon nests are built on newly installed communication towers.
- The project site layout was revised in 2014 to minimise impact from clearing and infrastructure (haul roads, waste rock dumps, tailings dam) was redesigned for a compact design, reducing habitat fragmentation (Australian Government, 2016). This not only applies to the greater bilby but also other species that use the Lease as habitat or foraging.
- This species was identified as potentially occurring within the ML, no great desert skink (burrows or sightings) were noted within the project site during any of the 14 occasions of monitoring or general observations.
- Additional searches for the great desert skink did not result in their presence in site habitats (ABM Resources, 2017)
- No great desert skink burrows recorded in the project site though several active sightings were recorded along roadways <40km north of the Twin Bonanza Project.
- The great desert skink is endemic to arid zones on red sandplains/sand ridges. Sightings recorded along the Tanami Road, ~40km from the Twin Bonanza Project.
- Preferred habitat for the great desert skink includes spinifex sandplains and adjacent dune swale swales and rarely in dune fields or rocky outcrops. Most habitats are on low nutrient soils derived from laterites, sandstones and quartzites, supporting low, open shrubland dominated by spinifex hummock grasses, scattered shrubs including various *Acacia*, *Eucalypt*, *Grevillea* and *Hakea* species.
- Baseline vegetation surveys identified five vegetation types across the Twin Bonanza Project. >80% of the ML is described as hummock grassland (Vegetation Type 1, 2, 3). Veg type 1 and Veg type 2 are mostly found across the project site. These veg types are associated with rocky hills land units.
- Vegetation type 3 is suitable habitat for the great desert skink and covers most of the Project MLs. and classified as open *Triodia* spp. hummock grassland, low *Eucalyptus brevifolia* or *Hakea lorea*, isolated trees with tall *Grevillea wickhamii* or *Acacia* spp. open shrubland. Occurs in sand plains.
- The great desert skink was noted in paleo drainage areas in slightly saline depressions (Indigenous Desert Alliance, 2022). The nearest paleochannel drainage is at Strezzas/ Timmys Bore, off the Mineral Lease.
- Vegetation and groundwater monitoring will be done concurrently to measure effects of water extraction on vegetation within the vicinity of production bores, installed in paleochannel aquifers. There is an agreement with the Central Land Council that these paleochannels are monitored during operations. Previous operations found no correlation between extraction rates and standing water levels.
- Water monitoring shows no correlation between standing water levels and extraction rates during previous operations and levels remained within natural fluctuations (Saprolite Environmental Ltd, 2017). Paleochannel vegetation monitoring identified no adverse impacts to the aquifer from mining operations (Low Ecological Services, 2019; included in the Mine Management Plan, 2019).
- Main food source for the great desert skink is termites and plant material, invertebrates and vertebrates (Indigenous Desert Alliance, 2022) which is found over much of the Project and further Tanami region.
- Clearing done prior to wet season (October- April) to avoid Great desert skinks breeding (late September- early October and young are hatched in December (Indigenous Desert Alliance, 2022). Site

access restrictions and environmental impact from sediment and runoff.

- Management measures for blasting times and noise disturbance included in the Noise Management Plan
- Four cat control campaigns done during Stage 1 and 2 by Desert Wildlife Services with Central Land Council Traditional rangers.
- A Pest Management Plan to manage predation pressure on threatened species (such as the great desert skink)
- Weed control on buffel grass. Four campaigns conducted in 2016 (ABM Resources, 2017)
- 2025 fauna sightings noted a female, male, and four dingo pups at Wilson's Camp, with anecdotal observations from Prodigy Gold staff noting the presence of dingo pups in the previous year. Dingo paw prints detected throughout the mine disturbance area, suggesting predation pressure on small mammals and lizards.

4.1.4.7 Do you think your proposed action is a controlled action? *

Yes

4.1.4.8 Please elaborate why you think your proposed action is a controlled action. *

Although Stages 1,2 and 3 were formally assessed and approved under NT (Assessment Report 74) and commonwealth (EPBC2013/6784) legislation, some risks are still present. The previous EPBC approval assessed all stages as a controlled action under the provision of listed threatened species and communities (Sections 18 and 18A) of the EPBC Act.

Since the previous referral, significant work has been conducted at the Twin Bonanza Project in the threatened species space, namely the greater bilby and its habitat. Outcomes of the Assessment Report and EPBC offsets were included in management of the greater bilby. Some of these have been applied to the newly identified threatened species that may or are likely to occur within the Twin Bonanza Project.

The EPBC offsets programme Biodiversity Monitoring Programme including the research activities and abatement programmes were successfully managed. The Federal Government and NT Government were provided with annual Compliance Performance Reports which were all approved. Threatened species, communities and threats at the Twin Bonanza Project (both MLs) is well understood and documented. Due to overall success of the Biodiversity Management and Monitoring Programme and associated activities during mining, Prodigy Gold has committed to continue the programmes for Stage 3 operations.

4.1.4.10 Please describe any avoidance or mitigation measures proposed for this action and attach any supporting documentation for these avoidance and mitigation measures. *

The Biodiversity Management Plan (Refer to Appendix B and C of the ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan) provides further detail of management and mitigation measures for threatened species including other Management Plans indirectly involved in the protection of threatened species (i.e. Pest Management Plan; Fire Management Plan). There are two standalone threatened species Management Plans and includes: Greater Bilby Management Plan; and Threatened Species Management Plan assessed to have the potential to occur at the Twin Bonanza project

Greater Bilby Environmental Management, Monitoring Controls (Appendix B, ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan)

- Burrow and Activity Avoidance When Locating Mining Infrastructure - locate mining infrastructure in areas where no burrows or diggings occur.
- Adherence to Agreed Clearing Boundaries -All land clearing activities associated with the project will require completion and compliance of Prodigy Gold Land Clearing Procedure (Appendix I of ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan), which is based on existing Northern Territory Land Clearing Guidelines (Department of Environment and Natural Resources, 2019).
- Controlled Burn and Pre-Clearance Inspection Prior to Vegetation Clearing - Controlled and restricted burning (in association with the Traditional Owners) will be undertaken within the planned clearing areas immediately prior to land clearing activities.
- Predator Control - A Pest Management Plan is in place to ensure that predation pressure on threatened species (such as the greater bilby) is not increased as a result of the mining operation. The Pest Management Plan details management actions applicable to protecting threatened species from predation pressure from pest species.
- Other activities or occurrences related to the mining operation that require management to minimise impact to the greater bilby include accidental bush fire, noise disturbance and vibrations from blasting activities. Management and mitigation measures are covered in the respective management plans.
- Vehicle Movement Restrictions - Bilby mortality due to nighttime vehicle collisions on haul roads have been documented in the Tanami Desert (Pavey, 2006a). Night driving outside the mining area is to be avoided where possible and will be conducted at a lower speed when necessary. A night speed limit of 60 km/hour will be adopted for roads within the project area; this allows individual bilbies to avoid vehicles and vehicle drivers to make a safe adjustment to avoid a collision should a bilby be sighted.
- Monitoring and inspections include preclearance inspections prior to land clearing in an area not already surveyed, an on-ground pre-clearance survey. Activity plot monitoring to estimate activity and populations of the greater bilby and other threatened species within the Twin Bonanza project. The monitoring program was adapted from methods described by Colleen O'Malley and Rachel Partridge (Pavey, 2006a). Vegetation Monitoring Program to monitor vegetation condition across the site.
- Landfill and Camp Area Inspections for Pest Species as part of the Activity Plot Monitoring program.
- Injury or death of a Greater Bilby due to mining activities (i.e. vegetation clearing, haul trucks traffic, and light vehicle traffic) will be immediately reported to DLPE and DCCEEW. All near misses and collisions with bilbies will be recorded in a register, with all incidents reported within the Environmental Mining Licence, this information will be supplied to other relevant agencies. Reporting incidents externally will be undertaken in accordance with relevant legislation (e.g. Section 225 of the Environmental Protection Act). Incidents will be investigated, and corrective actions will be implemented.
- Predatory pest species (cats, feral dogs and dingoes) during site inspections of camp area and landfill site, this will trigger a review, in association with regulatory agencies, of appropriate control programs that do not provide access to native species.

Threatened Species Environmental Management, Monitoring Controls (Appendix C, ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan)

- Habitat avoidance - Areas to be cleared are inspected for burrows prior to vegetation clearing. Signs of suspected Great Desert Skink burrows are to be identified by a qualified and experienced ecologist. Where active habitation by Great Desert Skink is identified, reassessment into risk and impact must be undertaken. Avoid any disturbance to paleochannels and elevated drainage depressions. If a Grey

Falcon nest or suspected nest is encountered, a minimum buffer distance of 300m will be maintained to reduce disturbance. Avoid removing any large trees in the area.

- Adherence to Agreed Clearing Boundaries -All land clearing activities associated with the project will require completion and compliance of Prodigy Golds 's Land Clearing Procedure (Appendix I of ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan), which is based on existing Northern Territory Land Clearing Guidelines (Department of Environment and Natural Resources, 2019).
- Controlled Burn (Appendix H of ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan) and Pre-Clearance Inspection Prior to Vegetation Clearing - Controlled and restricted burning (in association with the Traditional Owners) will be undertaken within the clearing areas immediately prior to land clearing activities. If skinks or grey falcons are present, this may encourage individuals to move from the area as the potential food source has been removed. The burnt site will be inspected for burrow presence by an experienced ecologist, and if deemed clear (i.e. no evidence of threatened species), the topsoil will be immediately removed and stockpiled.
- Predator Control -A Pest Management Plan (Appendix F of ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan) is in place to ensure that predation pressure on threatened species is not increased as a result of the mining operation.
- Non-Specific but Related Management Items
- Water testing as per water management plan will be implemented to monitor water quality of the Water Dam, sewerage ponds and tailings storage dam. Water triggers for Cyanide will be included in the Water Management plan.
- Other activities - Other activities or occurrences related to the mining operation that require management to minimise impact to threatened species include accidental bush fire, noise disturbance and vibrations from blasting activities. These impacts will be mitigated via existing management plans that have been developed for the Twin Bonanza Project
- Vehicle Movement Restrictions-Night driving outside the mining area is to be avoided where possible and will be conducted at a lower speed when necessary. The implementation of nighttime speed restrictions can significantly lower the risk of fatal strikes of threatened species. A night speed limit of 60 km/hour will be adopted for roads within the project area; this allows individual threatened species to avoid vehicles and vehicle drivers to make a safe adjustment to avoid a collision should threatened species be sighted.
- Monitoring and inspections include on-ground pre-clearance survey will be conducted in order to determine if threatened species are present.
- Activity Plot Monitoring to estimate activity and populations of the threatened species within the Twin Bonanza project. The monitoring program was adapted from methods described by Colleen O'Malley and Rachel Partridge (Pavey, 2006a).
- Buffer zone around communications tower if a grey falcon nest is present
- Vegetation Monitoring Program to monitor vegetation condition across the site.
- Landfill and Camp Area Inspections for Pest Species.
- Injury or death of a threatened species due to mining activities (i.e. vegetation clearing, haul trucks traffic, and light vehicle traffic) will be immediately reported to DLPE and DCCEEW. All near misses and collisions will be recorded in a register, with all incidents reported within the Environmental Mining Licence, this information will be supplied to other relevant agencies. Reporting incidents externally will be undertaken in accordance with relevant legislation (e.g. Section 225 of the Environmental Protection Act). Incidents will be investigated, and corrective actions will be implemented.
- Predatory pest species (cats, feral dogs and dingoes) during site inspections of camp area and landfill site, this will trigger a review, in association with regulatory agencies, of appropriate control programs that do not provide access to native species.

4.1.4.11 Please describe any proposed offsets and attach any supporting documentation relevant to these measures. *

Prodigy Gold has committed to continue the conditions and offset programme under (EPBC 2013/6784) for the Stage 3 operations.

The Conditions include:

1. Within 10 days after the commencement of the action, the Prodigy Gold will advise the Department in writing of the actual date of commencement of the action.
2. Prodigy Gold will maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the management plans, required by this approval, and make them available upon request to the Department. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the Departments website. The results of audits may also be publicised through the general media.
3. Within three months of every 12-month anniversary of the commencement of the action, Prodigy Gold will publish a report on their website addressing compliance with each of the conditions of this approval, including implementation of any management plans as specified in the conditions. Non-compliance with any of the conditions of this approval must be reported to the Department at the same time as the compliance report is published. Prodigy Gold will continue to annually publish the report on their website addressing compliance with each of the conditions of this approval until such time as agreed to in writing by the Minister.
4. Prodigy Gold will notify any non-compliance with this approval to the Department in writing within 2 business days of Prodigy Gold becoming aware of non-compliance.
5. Upon the direction of the Minister, Prodigy Gold will ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister. The independent auditor must be approved by the Minister prior to the commencement of the audit. Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister.
6. If Prodigy Gold wishes to carry out any activity otherwise than in accordance with the management plans as specified in the conditions, Prodigy Gold will submit to the Department for the Minister's written approval a revised version of that management plan. The varied activity shall not commence until the Minister has approved the varied management plan in writing. The Minister will not approve a varied management plan unless the revised management plan would result in an equivalent or improved environmental outcome over time. If the Minister approves the revised management plan, that management plan must be implemented in place of the management plan originally approved.
7. Prodigy Gold may revise a management plan to correct a minor error in or make an administrative change to the document. Where Prodigy Gold revises a management plan, Prodigy Gold must provide to the Department within 14 days of revising the document:
 8. A copy of the management plan, marked up to show the revisions, in both hard copy and electronic copy; and
 9. A clear summary of all the revisions that have been made to the management plan, and the reasons for these revisions.
10. If the Minister believes that it is necessary or convenient for the better protection of listed threatened species and communities to do so, the Minister may request that Prodigy Gold make specified revisions to the management plans specified in the conditions and submit the revised management plans for the Minister's written approval. Prodigy Gold will comply with any such request. The revised approved management plans must be implemented. Unless the Minister has approved the revised management plans, then Prodigy Gold will continue to implement the management plans originally approved, as specified in the conditions.
11. If, at any time after five years from the date of this approval, Prodigy Gold has not substantially commenced the action, then Prodigy Gold will not substantially commence the action without the written agreement of the Minister.

12. Unless otherwise agreed to in writing by the Minister, Prodigy Gold will publish all management plans referred to in these conditions of approval on their website. Each management plan must be published on the website within one month of being approved by the Minister and implemented prior to commencement of the action.

Greater Bilby

1. To protect the Greater Bilby (*Macrotis lagotis*) and its habitat, Prodigy Gold will locate infrastructure to avoid known Greater Bilby burrows, as illustrated in Annexure 1.
2. To protect the Greater Bilby and its habitat, the following management plans must be implemented:
 - Greater Bilby Management Plan
 - Palaeochannel Management Plan
 - Pest Management Plan
 - Weed Management Plan
 - Fire Management Plan

Offsets

Include:

12. To offset residual impacts as a result of the temporary loss of approximately 234.8ha and the permanent loss of approximately 22.6ha of Greater Bilby habitat, Prodigy Gold will:

(a) Develop and implement a cat and fox control program. This program must:

1. be consistent with the *Threat Abatement Plan for Predation by Feral Cats, 2008* and the *Threat Abatement Plan for Predation by the European Red Fox, 2008*.
2. cover an area defined by a 15km radius from the centre of the project site, as illustrated in [Annexure 2](#), with accessibility determined by the presence of roads.
3. be undertaken with the involvement of appropriately skilled traditional owner(s).
4. consist of at least four cat and fox control campaigns per year for as long as mining activities occur within the project site.
5. not use poisoned baits (except within the landfill site(s)) to ensure that native species are not harm

(b) Develop and implement a weed control program. The program must:

1. cover a corridor of 50m along roads used during the implementation of any mining activities within the project site and the access road from the project site to Tanami Road, including the junction of the access road and Tanami Road, as illustrated in Annexure 2.
2. be undertaken with the involvement of appropriately skilled traditional owner(s).
3. consist of at least four weed control campaigns per year for as long as mining activities occur within the project site or until the area described
 - is determined to be weed free by a suitably qualified person.
 - Provide at least \$20,000 per calendar year to Greater Bilby Research for as long as mining activities occur within the project site. The research must: focus on the Tanami Desert region and/or mining-related interactions; and be published within 12 months of research being completed and provided to the Department within one month of publication.

4.1.5 Migratory Species

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

| Direct impact | Indirect impact | Species | Common name |
|----------------------|------------------------|----------------------------|------------------------------------|
| No | No | <i>Actitis hypoleucos</i> | Common Sandpiper |
| No | No | <i>Apus pacificus</i> | Fork-tailed Swift |
| Yes | Yes | <i>Calidris acuminata</i> | Sharp-tailed Sandpiper |
| No | No | <i>Calidris ferruginea</i> | Curlew Sandpiper |
| No | No | <i>Calidris melanotos</i> | Pectoral Sandpiper |
| No | No | <i>Charadrius veredus</i> | Oriental Plover, Oriental Dotterel |
| No | No | <i>Glareola maldivarum</i> | Oriental Pratincole |
| No | No | <i>Hirundo rustica</i> | Barn Swallow |
| No | No | <i>Motacilla cinerea</i> | Grey Wagtail |
| Yes | Yes | <i>Motacilla flava</i> | Yellow Wagtail |

4.1.5.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

Yes

4.1.5.2 Briefly describe why your action has a direct and/or indirect impact on these protected matters. *

The Project involves activities that have the potential to directly or indirectly impact on migratory species with these summarised below. Based on the Likelihood of Occurrence assessment, completed as part of the referral process (Appendix A, ATT_A_Twin_Bonanza_Stage_3_Supporting_Material), 2 migratory species (Yellow Wagtail and Sharp-tailed sandpiper) were assessed as likely/may occur within the Project area. Whilst there is currently no suitable foraging habitat for any water bird, with the construction of water infrastructure, suitable habitat may then occur during operations.

Two marine species were observed and recorded during previous operations at the projects raw water dam and camp area including the Red capped plover (*Charadrius ruficapillus*) and Cattle Egret (*Ardea ibis* (previously *Bubulbus ibis*)) which was listed in the marine species list of the PMST. The Likelihood of Assessment determined:

- The Cattle egret may occur, and although sightings in arid areas are rare (DCCEEW, 2025) the species was sighted at Wilsons camp in 2015. This species may use the project site for foraging.

-The Red plover may occur, and although not listed as suitable foraging, the species was found over several days at the project sites water dam.

Direct impacts to migratory and/ or marine species include (Appendix D, ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan):

- Creation of foraging habitat from mining activities (positive)
- Mortality due to consumption of poor water quality

Indirect impacts to migratory and/ or marine species include:

- Vehicle strike
- Light pollution
- Predation by feral animals such as cats
- Sickness due to consumption of poor water quality
- Change of surface hydrology through placement of infrastructure
- Contamination of waterbodies by accidental spills of hydrocarbons and chemicals
- Loss of habitat through introduction of aquatic weeds and terrestrial weeds that may establish along water edge

The Projects approved Biodiversity Management Plan (BMP) (Refer to ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan) includes a Sub Plan for Water bird/Migratory Birds directly/indirectly affected by project activities. The BMP initially developed during the previous operations in 2015/2016, is updated for Stage 3 Twin Bonanza Restart Project operations. The Sub Plan includes: identified impacts, objectives, KPI's, management/monitoring activities including TARPS and reporting requirements.

4.1.5.4 Do you consider this likely direct and/or indirect impact to be a Significant Impact? *

No

4.1.5.6 Describe why you do not consider this to be a Significant Impact. *

A Significant Impact Assessment (SIA) was completed for each threatened flora and fauna species known to occur or likely/may occur within the disturbance footprint in accordance with the Commonwealth Significant Impact Guidelines 1.1-MNES (Department of the Environment)

The Project will manage impacts to the below through the implementation of the approved Biodiversity Management Plan Refer to ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan), which includes a Sub Plan for Water bird/Migratory Birds directly/indirectly affected by project activities. The Sub Plan includes: identified impacts, objectives, KPI's, management/monitoring activities including TARPS and reporting requirements.

Significant Impact Assessment on Migratory Species

Yellow Wagtail,

The SIA for the Yellow Wagtail concluded that the Proposed action is unlikely to have a significant impact due to:

- The species was not recorded within the Project Area, however given its widespread distribution, it could not be dismissed that the mines proposed water holding impoundments (tailings dam, raw water dam) within the disturbance footprint may provide a suitable stop over habitat during flyway migratory trips.
- This species is known to occur along coastal areas of northern and western Australia, whereas the Projects location is situated approximately 575km inland of the northern territory coastline. There are no listed critical habitat or important populations for this species in the region and the dams created for mining would not be considered important habitat for the species. As a result, the Project will not adversely modify, destroy, or isolate important habitat for the species.
- With no sightings of the species in the area of interest, an ecologically significant proportion of the species population is not expected to occur.
- Due to its distribution range, known to occur along coastal areas of northern and western Australia. The species may use the ML as a flyway

Sharp-tailed sandpiper,

The SIA for the Sharp-tailed sandpiper concluded that the Proposed action is unlikely to have a significant impact due to:

- The species was not recorded within the Project Area, however given its widespread distribution and its several sightings at the Tanami Mine located 100km from the Project area, it could not be dismissed that the disturbance footprint may provide a suitable stop over habitat during flyway migratory trips.
- This species is known to occur along coastal areas of northern and western Australia, whereas the Projects location is situated approximately 575km inland of the northern territory coastline. There are no listed critical habitat or important populations for this species in the region and the dams created for mining would not be considered important habitat for the species. As a result, the Project will not adversely modify, destroy, or isolate important habitat for the species.
- With no sightings of the species in the area of interest, an ecologically significant proportion of the species population is not expected to occur.
- Due to its distribution range, known to occur along coastal areas of northern and western Australia. The species may use the ML as a flyway

Several observations have been recorded on the Lajamanu Road in 2005 and the Tanami Road/ Mine as early as 2001, >100km from the Twin Bonanza ML. Foraging occurs in fresh and hypersaline environments along the edge of mudflats, inland wetlands and sewerage ponds. It feeds on seeds, worms, molluscs, crustaceans and insects.

4.1.5.7 Do you think your proposed action is a controlled action? *

No

4.1.5.9 Please elaborate why you do not think your proposed action is a controlled action. *

The Twin Bonanza Project (Stages 1,2 and 3) were formally assessed and approved under the now repealed *Mining Management Act* 2001, replaced by the EP Act and associated regulations on 28 June 2020; and the EPBC referral process. A revision during the Supplementary EIS included changes to the approved mine design footprints (tailings dam, waste rock dumps) and mining operations to reduce its extent. Stage 3 will be maintained within the same project footprint and approved operations.

During Stage 1 and 2 mining, the EPBC offsets programme Biodiversity Monitoring Programme (see monitoring in Table 5-1, ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan) including the research activities and abatement programmes were successfully managed. The Federal Government and NT Government were provided with annual Compliance performance reports which were all approved. Threatened species, communities and threats at the Twin Bonanza Project area is well understood and documented.

This referral includes the PMST search outcomes and includes all the previous approvals and activities conducted during Stage 1 and 2 mining. Due to overall success of the Biodiversity Management and Monitoring Programme and associated activities during mining, Prodigy Gold has committed to continue the programmes for Stage 3 operations.

4.1.5.10 Please describe any avoidance or mitigation measures proposed for this action and attach any supporting documentation for these avoidance and mitigation measures. *

The Biodiversity Management Plan (Refer to ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan) provides further detail of management and mitigation measures for migratory and marine species including other Management Plans indirectly involved in the protection of migratory and marine species (i.e. Pest Management Plan; Fire Management Plan).

Migratory and Marine Species Environmental Management and Control (Appendix D, ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan)

- Water testing as per water management plan will be implemented to monitor water quality of the Water Dam, sewerage ponds and tailings storage dam. Water triggers for Cyanide will be included in the Water Management plan.
- A Pest Management Plan has been developed for the Twin Bonanza project to ensure that predation is not increased as a result of the mining operation. The Pest Management Plan outlines measures designed to protect species from the threat of predators by managing pest populations
- Ongoing rainfall monitoring at site captures rainfall frequency and totals. This information will be kept with the existing rainfall excel database. Surface water drainage and water diversion is understood with the water management plan identifying flood risk and elevation of the project.
- A night speed limit of 60 km/hour will be adopted for roads within the project area; this allows birdlife to avoid vehicles and vehicle drivers to make a safe adjustment to avoid a collision should a bird be sighted.
- Hazardous materials and waste will be stored within appropriately labelled containers within bunded dangerous goods storage areas. The areas will be self-bunded, ventilated and compliant with AS1940:2017 Storage and Handling of Flammable and Combustible Liquids. Fuel sources for diesel gensets and any small quantities of hydrocarbons will be stored in bunded areas onsite. Spill trays will be used when re-fueling. Open trays will be avoided to prevent water holding receptacles.
- As part of regular monitoring of the water dams and sewerage dam, the presence of water bird/migratory species and evidence of illness or fatalities will be recorded. An identification guide will be made available that describes common susceptible species of birds likely to occur at the water/tailings dam and sewerage treatment facilities.

Personnel, who patrol the facilities as part of their normal duties, ideally first thing in the morning, will be made aware of the identification guide. Personnel will report mortalities and visits during their regular patrols. All mine staff will be encouraged to report incidental sightings of water birds and migratory birds.

- General sightings of all fauna will be recorded in the Projects fauna register. The activity of the species (flying, foraging, wading), time, date and location will be logged. This information will be uploaded to NT Wildwatch website and annual regulatory reporting.
- Supernatant water will be sampled and analysed for arsenic, cyanide and other analytes. Water quality results will be recorded in the Projects water quality database. Trends in water quality will be assessed regularly and included in annual reporting requirements.
- For events where there are observed large bird aggregations occurring at sewage dams then bird deterrent activities, such as use of bird scarers, can be introduced.
- Bird mortality/sickness the incident will be investigated, and suitable measures implemented based on consultation with experts in the field and relevant regulators.

4.1.5.11 Please describe any proposed offsets and attach any supporting documentation relevant to these measures. *

No offsets are proposed for the migratory species.

4.1.6 Nuclear

4.1.6.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.6.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Proposed Action does not involve or include nuclear actions.

4.1.7 Commonwealth Marine Area

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.7.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.7.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Proposed Action does not involve or include any Commonwealth marine area.

4.1.8 Great Barrier Reef

4.1.8.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.8.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Proposed Action is not directly located within the Great Barrier Reef Area

4.1.9 Water resource in relation to large coal mining development or coal seam gas

4.1.9.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.9.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Proposed Action will not involve coal seam gas developments or large coal mining developments.

4.1.10 Commonwealth Land

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.10.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.10.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Proposed Action will not be located on Commonwealth Land.

4.1.11 Commonwealth Heritage Places Overseas

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

4.1.11.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.11.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Proposed Action is not located on a Commonwealth heritage place overseas.

4.1.12 Commonwealth or Commonwealth Agency

4.1.12.1 Is the proposed action to be taken by the Commonwealth or a Commonwealth Agency? *

No

4.2 Impact summary

Conclusion on the likelihood of significant impacts

You have indicated that the proposed action will likely have a significant impact on the following Matters of National Environmental Significance:

None

Conclusion on the likelihood of unlikely significant impacts

You have indicated that the proposed action will unlikely have a significant impact on the following Matters of National Environmental Significance:

- World Heritage (S12)
- National Heritage (S15B)
- Ramsar Wetland (S16)
- Threatened Species and Ecological Communities (S18)
- Migratory Species (S20)
- Nuclear (S21)
- Commonwealth Marine Area (S23)
- Great Barrier Reef (S24B)
- Water resource in relation to large coal mining development or coal seam gas (S24D)
- Commonwealth Land (S26)
- Commonwealth Heritage Places Overseas (S27B)
- Commonwealth or Commonwealth Agency (S28)

4.3 Alternatives

4.3.1 Do you have any possible alternatives for your proposed action to be considered as part of your referral? *

No

4.3.8 Describe why alternatives for your proposed action were not possible. *

The mineralisation is specifically located mineral resources, highlighted by the previous works (Stage 1 and 2). This means there are no alternative locations for the mine project. Considered processing at an alternate site, but none are located within a suitable distance or are not operational.

5. Lodgement

5.1 Attachments

3.1.1 Current condition of the project area's environment

| | Type | Name | Date | Sensitivity | Confidence |
|-----|----------|--|------------|-------------|------------|
| #1. | Document | ATT_A_REDACTED_Twin_Bonanza_Stage_3_2012.pdf This document is a supporting document for varying sections of the online referral submission. It includes maps, figures, tables, assessments and a previous study | 24/09/2012 | No | High |
| #2. | Document | ATT_A_Twin_Bonanza_Stage_3_Supporting_Material.pdf This document is a supporting document for varying sections of the online referral submission. It includes maps, figures, tables, assessments and previous studies | 14/02/2012 | Yes | High |
| #3. | Document | ATT_B_EcOz_Sep2012_Dry_Season_Fauna_Survey.pdf This is a fauna survey that was conducted during the late dry season across the Twin Bonanza Project Area. | 30/11/2012 | No | High |

3.2.1 Flora and fauna within the affected area

| | Type | Name | Date | Sensitivity | Confidence |
|-----|----------|--|------------|-------------|------------|
| #1. | Document | ATT_C_GHD_Apr2012_Vegetation_Flora_and_Fauna_Survey.pdf Preliminary wet season flora and fauna survey | 01/06/2012 | Yes | High |
| #2. | Document | ATT_D_EcOz_May2013_Flora_and_Fauna_Survey.pdf Flora and fauna survey in dry season (May 2013) | 24/08/2013 | Yes | High |
| #3. | Document | ATT_E_LES_Dec2014_Biodiversity_Monitoring_Report.pdf Biodiversity monitoring results for December 2014 | 04/05/2015 | No | High |
| #4. | Document | ATT_F_LES_Jun2015_Biodiversity_Monitoring_Report.pdf Biological monitoring results for June 2015 | 04/10/2015 | No | High |
| #5. | Document | ATT_G_LES_Dec2015_Biodiversity_Monitoring_Report.pdf Biological monitoring results for December 2015 | 01/03/2016 | No | High |
| #6. | Document | ATT_I_LES_Jun2016_Biodiversity_Monitoring_Report.pdf Biological and rehabilitation monitoring results for June 2016 | 07/09/2017 | No | High |
| #7. | Document | ATT_J_LES_Dec2016_Biodiversity_Monitoring_Report.pdf Biological and rehabilitation monitoring results for December 2016 | 01/05/2017 | No | High |
| #8. | Document | ATT_K_LES_Jun2017_Biodiversity_Monitoring_Report.pdf Biological and rehabilitation monitoring results for June 2017 | 01/08/2017 | No | High |

| | | | | |
|------|----------|---|------------|------|
| #9. | Document | ATT_L_LES_Aug2018_Biodiversity_and_Rehabilitation_Monitoring_Program.pdf | 15/11/2018 | High |
| | | Biological and rehabilitation monitoring results for August 2018 | | |
| #10. | Document | ATT_M_LES_Aug2019_Biodiversity_and_Rehabilitation_Monitoring_Program.pdf | 05/12/2019 | High |
| | | Biological and rehabilitation monitoring results for August 2019 | | |
| #11. | Document | ATT_N_Horsnell_and_Marr_Aug2023_Environmental_Monitoring_Report.pdf | 12/11/2023 | High |
| | | Environmental monitoring, including biological, for August 2023 | | |
| #12. | Document | ATT_N_Horsnell_and_Marr_Aug2023_Environmental_Monitoring_Report_High_Appendices.zip | 16/11/2023 | High |
| | | Appendices A, B, C, D, E, F to support ATT_N | | |

4.1.4.11 (Threatened Species and Ecological Communities) Proposed offsets relevant to avoidance or mitigation measures

| | Type | Name | Date | Sensitivity | Confidence |
|-----|----------|--|------------|-------------|------------|
| #1. | Document | ATT_H_Twin_Bonanza_Stage_3_Biodiversity_Management_Plan.pdf | 09/12/2026 | High | |
| | | This document is a biodiversity management plan that consolidates management for the greater bilby, threatened species, migratory and marine MNES species, palaeochannel, pest, weeds and fire | | | |

5.2 Declarations

Completed Referring party's declaration

The Referring party is the person preparing the information in this referral.

| | |
|----------------------------|--|
| ABN/ACN | 22343389310 |
| Organisation name | HORSNELL, SALLY JANE |
| Organisation address | 0836 NT |
| Representative's name | sally Horsnell |
| Representative's job title | Ms |
| Phone | 0455669600 |
| Email | sallyhorsnell@outlook.com |
| Address | PO Box 1666, Humpty Doo, Northern Territory 0836 |

Check this box to indicate you have read the referral form. *

Check this box to confirm these are the correct identification details. *

By checking this box, I, **sally Horsnell of HORSNELL, SALLY JANE**, declare that to the best of my knowledge the information I have given on, or attached to this EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. *

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your profile.

Completed Person proposing to take the action's declaration

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

| | |
|----------------------------|-------------------|
| ABN/ACN | 58009127020 |
| Organisation name | PRODIGY GOLD NL |
| Organisation address | 0800 NT |
| Representative's name | Mark Edwards |
| Representative's job title | Managing Director |

Phone 0407 715 112
Email medwards@prodigygold.com.au
Address Level 1, 67 Smith Street, Darwin, NT 0800

- Check this box to indicate you have read the referral form. *
- Check this box to confirm these are the correct identification details. *

I, **Mark Edwards of PRODIGY GOLD NL**, declare that to the best of my knowledge the information I have given on, or attached to the EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. I declare that I am not taking the action on behalf or for the benefit of any other person or entity. *

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your profile.

Completed Proposed designated proponent's declaration

The Proposed designated proponent is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

Same as Person proposing to take the action information.

- Check this box to indicate you have read the referral form. *
- Check this box to confirm these are the correct identification details. *
- I, **Mark Edwards of PRODIGY GOLD NL**, the Proposed designated proponent, consent to the designation of myself as the Proposed designated proponent for the purposes of the action described in this EPBC Act Referral. *

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your profile.