



Modification 16 Northern Tailings Storage Facility Buttress Optimisation

Submissions Report



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1 INTRODUCTION

Cadia Valley Operations (hereafter referred to as Cadia) is an existing mining operation located approximately 25 kilometres south-west of Orange, within the Blayney and Cabonne Local Government Areas in the Central Tablelands of New South Wales (NSW) (Figure 1-1).

Cadia Holdings Pty Limited (CHPL) is a wholly owned subsidiary of Newmont Corporation (Newmont). CHPL is the owner and operator of Cadia.

Project Approval 06_0295 (PA 06_0295) for Cadia was granted by the NSW Minister for Planning under Part 3A of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) on 6 January 2010.

PA 06_0295 includes the Cadia East Underground Mine, the Cadia Hill Open Cut Mine (now used to store tailings), the Ridgeway Underground Mine, the concentrate dewatering facilities east of Blayney (Cadia Valley Operations Dewatering Facility), and a wide range of ancillary and supporting infrastructure (Figure 1-2). These integrated operations are herein referred to as Cadia.

CHPL is seeking a modification to PA 06_0295 (the Modification), under section 4.55(2) of the EP&A Act. The main elements of the Modification include:

- using recovered sand to buttress the southern wall of the Northern Tailings Storage Facility (NTSF);
- emplacing/stockpiling excess recovered sand within the approved Southern Tailings Storage Facility (STSF) disturbance footprint; and
- integrating the recovered sand demonstration embankment approved under Modification 15 to PA 06_0295 with the proposed NTSF southern wall recovered sand buttress, with the integrated structure to remain and form part of the final landform.

The Modification Report was placed on public exhibition by the Department of Planning, Housing and Infrastructure (DPHI) from 10 March 2026 to 31 March 2026. During the public exhibition period, submissions on the Modification were received from NSW Government agencies, relevant local councils, organisations and the public.

On 1 April 2026, DPHI requested that CHPL prepares and submits a Submissions Report for the Modification (this Report). Accordingly, this Submissions Report provides CHPL's responses to the submissions received on the Modification. It has been prepared in consideration of the *State significant development guidelines – preparing a submissions report* (DPHI, 2026).



Source: NSW Spatial Services (2020);
Department of Primary Industries and Regional Development (2025)



- LEGEND**
- Mining Lease Boundary
 - Local Government Area
 - Road
 - Railway
 - NSW State Forest
 - NPWS Reserve

Newmont
CADIA

CADIA VALLEY OPERATIONS
Regional Location

Figure 1-1

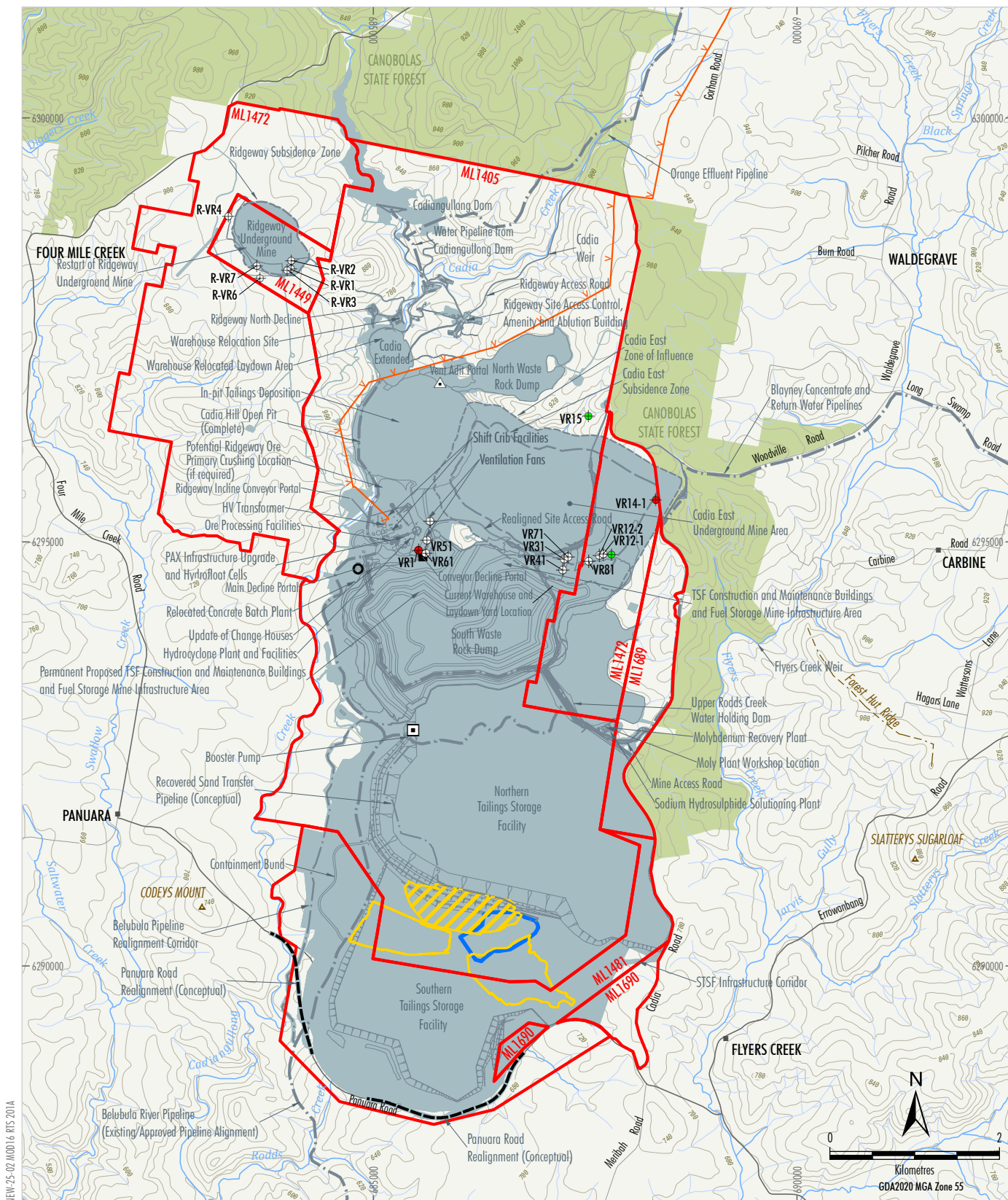


Figure 1-2

1.1 APPROVED CADIA OVERVIEW

Under PA 06_0295, CHPL is currently approved to:

- undertake mining operations until 30 June 2031;
- underground mining of approximately 525 million tonnes (Mt) of ore from the Cadia East Underground Mine deposit using the panel caving mining method and approximately 96 Mt of ore from Ridgeway Underground Mine (inclusive of Ridgeway Deeps);
- underground crushing, handling and conveyor systems to transfer ore and waste rock to the surface;
- supporting infrastructure for underground mining including multiple ventilation shafts and personnel and equipment access systems;
- ore processing facilities of up to 35 million tonnes per annum (Mtpa) subject to Condition 6A of Schedule 2 of PA 06_0295;
- a Molybdenum Recovery Plant and trucking of molybdenum products off-site;
- placement of waste rock produced by the Cadia East Underground Mine in the existing South Waste Rock Dump;
- raising of the existing NTSF and STSF embankments to accommodate approximately 674 Mt of tailings;
- buttressing of the NTSF and STSF embankments;
- deposition of tailings within the Cadia Hill Pit Tailings Storage Facility (PTSF) up to a level of approximately 713 metres Australian Height Datum (m AHD);
- Cadia water management/supply system including additional pipeline/pumping systems and raising of the Upper Rodds Creek Water Holding Dam;
- re-alignment of a section of Cadia Road and a section of Panuara Road;
- the CVO Dewatering Facility to the east of Blayney;
- a concentrate pipeline and return water pipeline between Cadia and the CVO Dewatering Facility;
- rail transportation of dewatered mineral concentrate (i.e. copper and gold concentrate) from Blayney to the eastern seaboard;
- augmentation, relocation and upgrade of supplementary surface facilities including workshops, administration and site access roads;
- pre-conditioning of overburden above the Cadia East Underground Mine deposit;
- recovered sand demonstration embankment, including pipeline and pumping infrastructure (i.e. booster pump); and
- other associated ancillary and supporting infrastructure, plant, equipment and activities to allow mining of the Cadia East Underground Mine deposit and integration with the approved Cadia.

1.2 MODIFICATION OVERVIEW

In summary, the Modification would include the following changes to PA 06_0295:

- using recovered sand to buttress the southern wall of the NTSF;
- emplacing/stockpiling excess recovered sand within the approved STSF disturbance footprint; and
- integrating the recovered sand demonstration embankment approved under Modification 15 to PA 06_0295 with the proposed NTSF southern wall recovered sand buttress, with the integrated structure to remain and form part of the final landform.

The Modification would not change the following approved components:

- Existing/approved disturbance footprint.
- Mining method.
- Cadia East Underground Mine and Ridgeway Underground Mine footprint/dimensions.
- Processing rate.
- Mine life.
- Maximum approved heights of the Tailings Storage Facilities (TSFs) embankments.

A summary of the approved Cadia and comparison of the Modification is provided in Table 1-1 with key elements of the Modification shown on Figure 1-2.

1.3 STRUCTURE OF THE DOCUMENT

The remainder of this Submissions Report is structured as follows:

Section 1	Provides an introduction and overview of the Modification.
Section 2	Presents an analysis of the submissions received by DPHI during the public exhibition period.
Section 3	Summarises the actions taken since lodgement of the Modification Report, including additional engagement activities and further refinements and assessment of the Modification.
Section 4	Provides responses to agency submissions.
Section 5	Provides responses to local government submissions.
Section 6	Provides responses to organisation and public submissions.
Section 7	Presents an updated justification of the Modification.
Section 8	Presents an evaluation of the Modification.
Section 9	Lists the documents referenced in the Submissions Report.

Table 1-1
Comparison of the Approved Cadia Operations and the Modification

Project Component	Approved Cadia*	Cadia Incorporating the Modification
Mining Methods	Cadia Hill Open Cut Mine - conventional open pit mining methods (mining now completed). Ridgeway Underground Mine - underground sub-level and block caving with development of associated surface subsidence zone. Cadia East Underground Mine - underground panel caving with development of associated surface subsidence zone.	No change.
Life of Mine Cadia East and Ridgeway Ore Production	Approximately 525 Mt of Cadia East Ore. Approximately 96 Mt of Ridgeway Ore.	No change.
Waste Rock Management	Deposition in the North and South Waste Rock Dumps and mined-out void of the Cadia Extended open pit. Cadia East waste rock to be deposited in the South Waste Rock Dump. Material for the construction of the NTSF encapsulation and STSF embankment construction to be sourced from Non-acid forming (NAF) material from the site waste rock dumps.	No change.
Life of Mine	Mining up until approximately 2031. Project Approval until June 2031.	No change.
Tailings Management	Use of the NTSF and STSF and raising of these storages via centreline/downstream embankment lifts. Installation of additional buttressing of the STSF embankment. Deposition of tailings in the Cadia Hill open cut mine to its full capacity, to a (pre-consolidation) level of approximately 713 m AHD. Cumulative tailings disposal volume of 674 Mt from 2013. NTSF repairs to restore embankment by encapsulation of majority of the slumped section. Additional material (i.e. rock buttressing) to be placed on the exterior embankments of the NTSF and STSF, such that the embankment and associated disturbance area extents include areas outside of the southern extent of Mining Lease 1481. Construction of a recovered sand demonstration embankment. Working hours for TSF construction 7:00 am to 10:00 pm.	Recovered sand would be used as buttressing material for a portion of the NTSF southern embankment and would be located within the approved STSF disturbance footprint. Emplacing/stockpiling of recovered sand not used for buttressing, within the approved STSF disturbance footprint. Placement of recovered sand occurring 24 hours a day, seven days per week for the recovered sand buttress (along the NTSF southern wall), excess recovered sand stockpiles/emplacement and the recovered sand demonstration embankment area. No change to working hours for STSF rock buttressing and previously approved NTSF rock buttressing.
Ventilation Adit	The mining complex includes several ventilation adits/shafts for ventilation of underground mining areas. Decommissioning and closure of existing adit VR101 located within the Cadia Hill open cut mine. Ventilation shaft within the current approved mine disturbance footprint to replace adit VR101.	No change.

Table 1-1 (Continued)
Comparison of the Approved Cadia Operations and the Modification

Project Component	Approved Cadia*	Cadia Incorporating the Modification
Ore Processing	On-site processing of up to 32 Mtpa of gold/copper ore. Increasing the on-site ore processing to 35 Mtpa is subject to Condition 6A of Schedule 2 of PA 06_0295. Refinement to the process of recovering sand by maintaining the separation of the coarse and fine tailings fractions. The coarse tailings portion (recovered sand) would be dewatered using hydrocyclones.	No change.
Concentrate Transport and Dewatering	Gold/copper concentrate is transported from the ore processing facilities via a concentrate pipeline to the Blayney Dewatering Facility (now decommissioned). The CVO Dewatering Facility to the east of Blayney and the subsequent decommissioning of the existing Blayney Dewatering Facility (now complete). Concentrate pipeline from Cadia to the CVO Dewatering Facility. Transport of dewatered mineral concentrate by rail to the eastern seaboard up to 24-hours a day, seven days per week.	No change.
Process Consumables	Use of various chemicals and reagents typically used in gold/copper mining and processing. Sodium Hydrosulphide (NaHS) Solutioning Plant (located adjacent to the Molybdenum Recovery Plant) to produce NaHS on-site to meet Cadia's operational requirements. Upgrades to the PAX facility.	No change.
Water Supply and Management	Water supply sourced from the Cadiangullong Dam, Flyers Creek Weir, Cadia Creek Weir, Orange Sewage Treatment Plant treated effluent, Blayney Sewage Treatment Plant treated effluent, on-site groundwater bores, Belubula River, Cadia Extended open pit and site runoff. Additional pipeline/pumping systems and raising of the Upper Rodds Creek Water Holding Dam. Contingent transfer of supernatant tailings water from STSF and NTSF to Cadia Hill open cut mine for water management. Internal tailings return water pipeline and pumping systems from Cadia Hill open cut mine. Further realignment of a portion of the Belubula River pipeline.	Construction of NTSF buttress underdrainage system and toe collector drain. No change to the overall management of supernatant and/or decant water within the STSF.
Power Demand and Supply	Peak demand to 194 megawatts (using existing power supply infrastructure). 132 kilovolts (kV) electrical substation. Expansion of the existing 132 kV electrical substation.	Minor increase in electricity usage associated with the pumping of recovered sand.

Table 1-1 (Continued)
Comparison of the Approved Cadia Operations and the Modification

Project Component	Approved Cadia*	Cadia Incorporating the Modification
Employment	An average of approximately 1,090 to 1,140 employees with an additional construction/development workforce of up to approximately 970 personnel. Intermittent shutdown periods require a nominal workforce of approximately 300 to 700 additional personnel during these periods.	No change.
Final Landform	Includes South Waste Rock Dump, North Waste Rock Dump, NTSF, STSF, Cadia East Subsidence Zone, Ridgeway Subsidence Zone, Cadia Hill open cut mine, Cadia Extended open pit, Cadiangullong Dam, Upper Rodds Creek Water Holding Dam and other water management infrastructure. The final landform of Cadia Hill open cut mine would be a pit lake (i.e. a wet cover). No intersection between the Cadia East Underground Mine subsidence zone and Cadia Hill open cut mine in the long term and, therefore, two separate final void waterbodies (smaller in extent compared with the approved subsidence zone) (as described in Modification 13).	Buttressing the southern embankment of the NTSF with a gentler slope with the toe of the buttress largely contained within the approved buttress footprint. Integrate the approved recovered sand demonstration embankment with the proposed sand buttress at the southern embankment of the NTSF, the integrated buttress to form a permanent feature of the final landform.

* PA 06_0295 for the Cadia East Underground Mine, as modified by section 75W Modifications numbered 1 to 10, section 4.55(1A) Modification numbers 11 to 13 and 17 and section 4.55(2) Modification numbers 14 and 15. Consistent with Clause 3BA of Schedule 2 of the *Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017*, the consent authority is required to satisfy itself that any consent as modified would result in the Cadia East Underground Mine remaining substantially the same development as was last modified under section 75W (i.e. Modification 10), inclusive of consideration of the changes arising from the previously approved modifications (i.e. Modifications 11 to 15 and 17).

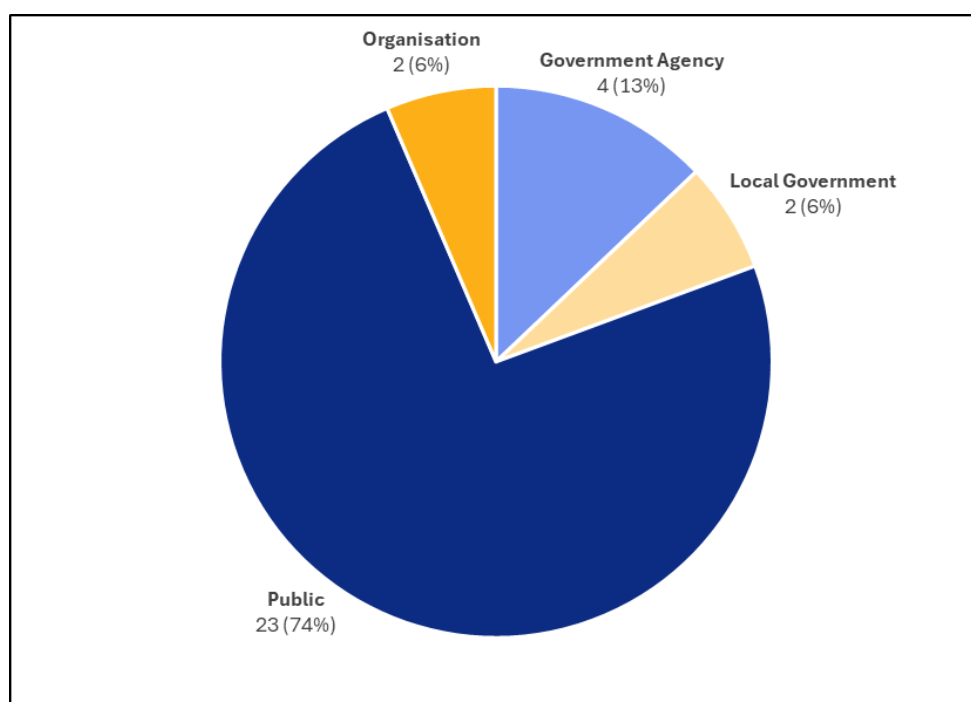
2 ANALYSIS OF SUBMISSIONS

2.1 NUMBER OF SUBMISSIONS

A total of 31 submissions on the Modification Report were received from NSW government agencies, local government (Cabonne Council and Blayney Shire Council [BSC]), local organisations and members of the public. The following provides a breakdown of the submissions by submitter category (Chart 1):

- four submissions (13 percent [%]) from government agencies;
- two submissions (6%) from local government;
- two submissions (6%) from organisations; and
- 23 submissions (74%) from members of the public.

Chart 1
Summary of All Submissions



Of these submissions:

- Eight submissions (26%) commented on the Modification, including:
 - four from government agencies;
 - two from local government; and
 - two from members of the public.
- One submission (3%) from a member of the public supported the Modification.
- 22 submissions (71%) objected to the Modification, of which two were from organisations and 20 from members of the public.

Attachment 1 lists all submissions received on the Modification, including where responses to any comments received are addressed within this Submissions Report.

2.2 SUMMARY OF GOVERNMENT AGENCY SUBMISSIONS

A total of four submissions were received from NSW government agencies. It is a requirement for the relevant government agencies to provide a submission on the Modification. Therefore, the four agency submissions are mandatory. Two submissions were also received from local government in the region (Cabonne Council and BSC).

The following agencies and local government authorities advised they had no comment on the Modification, and hence, no formal response from CHPL is provided in this Submissions Report (Section 4.4 and 5):

- NSW Resources;
- Cabonne Council; and
- BSC.

The following government agencies provided comments on the Modification, or recommended post-approval management requirements (Sections 4.1 to 4.3):

- NSW Environment Protection Authority (EPA);
- Department of Climate Change, Energy, the Environment and Water – Water Group (DCCEEW Water); and
- NSW Resources Regulator.

DPHI received a supplementary submission from the EPA on 16 April 2026 following the completion of the Modification public exhibition period. For the purpose of this Submissions Report, the two submissions received from the EPA have been considered and addressed as a single integrated submission.

2.3 SUMMARY OF ORGANISATION AND PUBLIC SUBMISSIONS

Two submissions were received from organisations objecting to the Modification. A total of 23 submissions were received from members of the public, of which one supported, 20 objected to the Modification and two provided comment on the Modification (Chart 2).

Chart 3 presents a summary of the public and organisation submissions by location. Public and organisation submissions were received from a range of locations including Orange, Blayney, Cabonne, Bathurst, other NSW locations and other states.

2.4 KEY MATTERS RAISED IN SUBMISSIONS

The most commonly raised matters from organisations and members of the public in relation to the Modification are illustrated in Chart 4.

Agency submissions were not included in the matters summary as each government agency focuses and assesses the Modification based on its specific subject matter (i.e. Heritage NSW would only comment and assess heritage matters). Therefore, to allow an accurate representation of key matters raised from the Modification, only organisation and public submissions were analysed.

Chart 2
Summary of Submission Type for Organisation and Public Submission

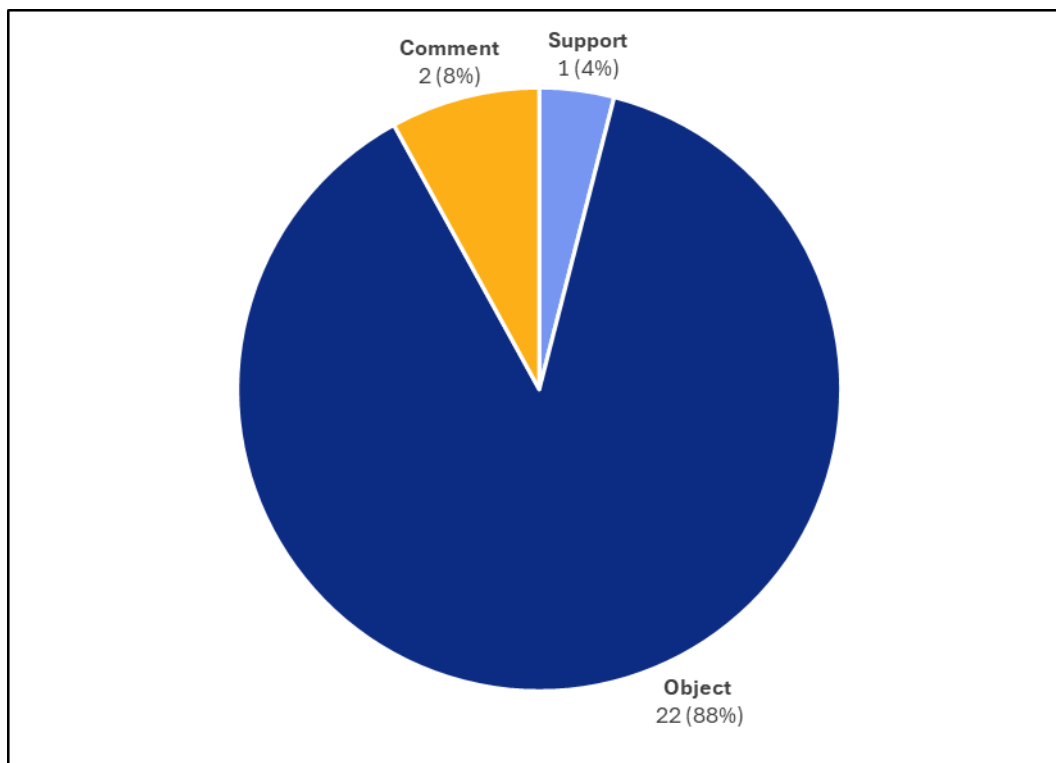


Chart 3
Public and Organisation Submissions by Location

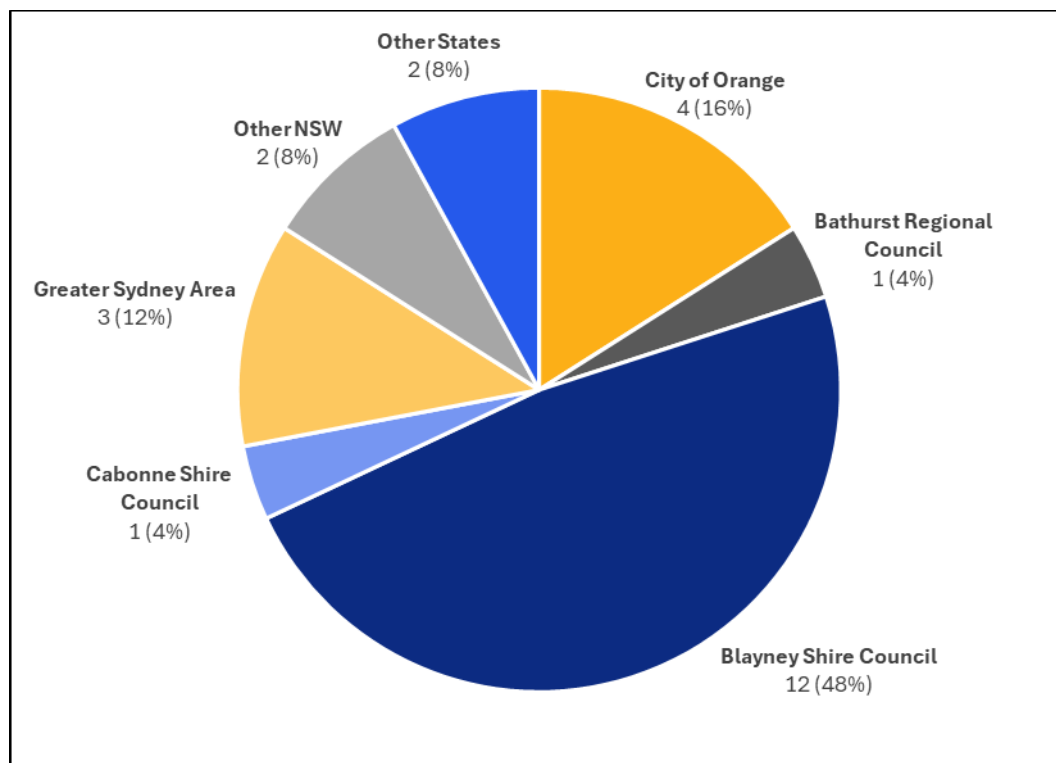
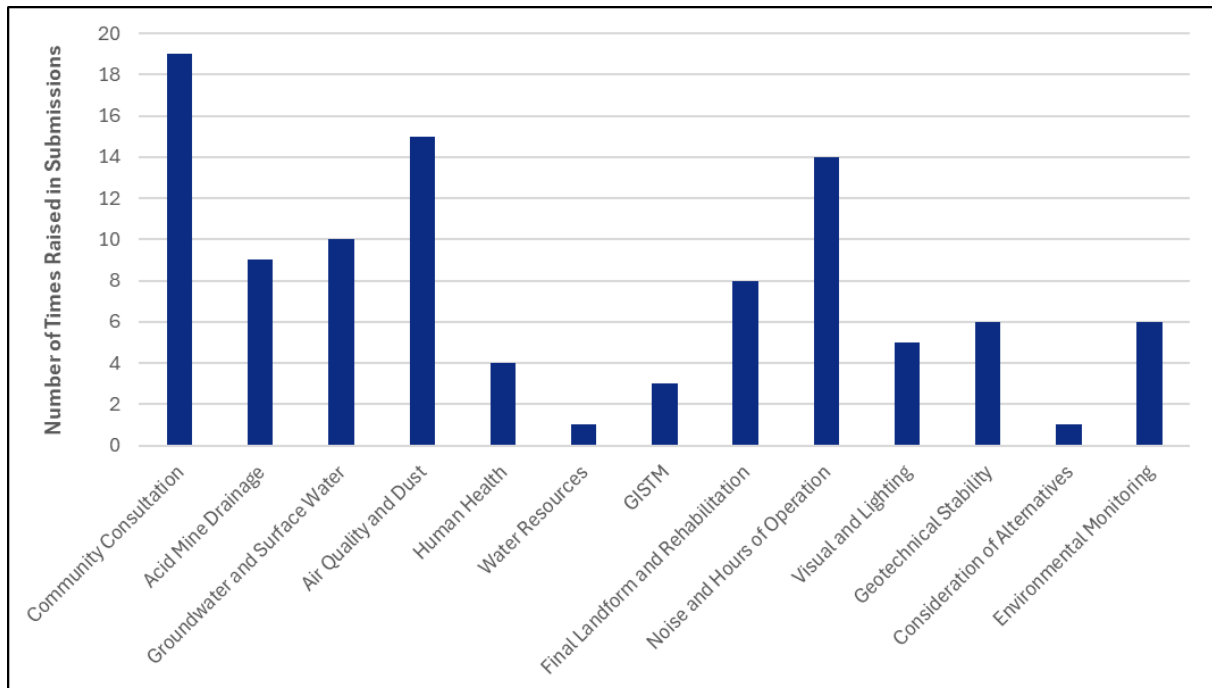


Chart 4
Key Matters Raised by Organisation and Public Submitters



The following key matters were raised in the submissions:

- Community Consultation.
- Acid Mine Drainage.
- Groundwater and Surface Water.
- Air Quality and Dust.
- Human Health.
- Water Resources.
- Global Industry Standard on Tailings Management (GISTM).
- Final Landform and Rehabilitation.
- Noise and Hours of Operation.
- Visual and Lighting.
- Geotechnical Stability.
- Consideration of Alternatives.
- Environmental Monitoring.

CHPL notes that submitters have referenced unrelated matters to the Modification, including legal proceedings and technologies proposed for the Cadia Continued Operations Project (CCOP). As these matters are irrelevant to the Modification, they are not addressed in the context of these responses to submissions.

Responses to the key matters raised by organisation and public submissions are provided in Section 6 of this Submissions Report.

3 ACTIONS TAKEN SINCE LODGEMENT OF THE MODIFICATION

3.1 REFINEMENTS OF THE MODIFICATION

No refinements are considered necessary to address the submissions received and therefore no further refinements to the Modification are proposed.

3.2 ENGAGEMENT ACTIVITIES

Since the lodgement of the Modification application, CHPL has continued to undertake consultation regarding the Modification. An overview of key recent consultation is provided below.

3.2.1 Government Agencies

On 11 February 2026, members of the DPHI attended a site visit at Cadia which included a presentation on the Modification at the Cadia (Ridgeway) Offices and a site inspection of the Cadia surface facilities and TSFs.

3.2.2 Public Consultation

As required under the EP&A Act, notification of the Modification public exhibition period was advertised on the 6 and 7 March 2026 in the Blayney Chronicle and Central Western Daily, respectively. In addition, email notifications were sent to the 318 Cadia District community members on 13 March 2026 notifying them the Modification was on public exhibition.

CHPL's newsletter, *The Cadia Scoop*, was sent via email to the Cadia District community members on 10 March 2026 and published on the Cadia website¹. The newsletter included details on upcoming drop-in sessions and provided updates on the Modification.

A Cadia Community Consultative Committee (CCC) meeting was held on 17 March 2026 which included discussion and updates on the Modification. Meeting minutes from the Cadia CCC meeting are available on the Cadia website.

A Cadia district residents drop-in session was held on 24 March 2026 at the Cadia (Ridgeway) Offices. The meeting provided the attending residents with an update on Cadia's current operations, environmental management, and ongoing social performance activities. The session also included a site flyover animation incorporating the Modification components.

Two community members were engaged in email correspondence with CHPL on 24 and 31 March 2026. The two community members were advised to submit comments on the Modification through the DPHI submission page and were provided the link.

3.3 FURTHER ENVIRONMENTAL ASSESSMENT

No further environmental assessment has been undertaken to support the Modification since lodgement of the Modification Report.

¹ Cadia Website: <https://www.cadiavalley.com.au/newcrest/cvo>

4 RESPONSE TO AGENCY SUBMISSIONS

This section provides a response to each of the three agency submissions which made substantive comments on the Modification during the public exhibition period.

4.1 NSW ENVIRONMENT PROTECTION AUTHORITY

4.1.1 Hydrocyclone Sands Tailings Performance Report

1. Matters to be addressed prior to determination

a. Hydrocyclone sands tailings pilot plant

The EPA understands condition 50B included in the Consolidated Approval for PA 06_0295, requires the Applicant to submit a report on the performance of the Hydrocyclone Sands Tailings Pilot Plant. The EPA understands the Applicant is yet to provide the Performance Report, and it is unclear if the hydrocyclone sands tailings pilot plant has been completed. Condition 50B also requires the Applicant to provide a geochemical evaluation to assess any acid generating and acid neutralising potential from the pilot in the Performance Report. As Modification 16 seeks approval for the continued use of this method on a long-term large scale basis, the Applicant should demonstrate the proposed technique to be used for the final landform is robust and mitigates any environmental risk. The EPA believes it is important to review the Performance Report and other related documents to understand the outcomes of the pilot and to ensure there is no potential risk of harm to human health or the environment prior to approving an expansion of this tailings management technique.

Recommendation:

The EPA recommends that DPHI seek clarification on the completion of the Hydrocyclone Sands Tailings Pilot Plant and the Performance Report required under Condition 50B, and a copy of this report be provided to the EPA for review to allow an adequate assessment of the proposal.

Response

Condition 50B of Schedule 3 of PA 06_0295, requires that the performance report is submitted within three months of the completion of works. EPA is correct in noting that the recovered sand buttress and emplacement/stockpiles would use elements of the recovered sand demonstration embankment, however, these elements (described in Section 1.1.7 of the Modification Report) are currently under construction. Accordingly, the requirement for the Hydrocyclone Sand Tailings Performance Report has not been triggered as the recovered sand demonstration embankment approved under Modification 15 has not been constructed.

At the time of writing, construction of the required infrastructure is expected to be completed by the end of 2026, with the demonstration embankment occurring in 2027. This being the case, CHPL expects the performance report would be submitted in late 2027.

Please also refer to the response provided to the EPA in Section 4.1.2 regarding the geochemistry and acid mine drainage (AMD) and Section 4.1.3 regarding the Human Health Assessment.

It is also noted that the sand buttress and stockpiles/emplacement areas are entirely contained within the existing STSF and would utilise the existing TSF management controls and measures, as described in the *Water Management Plan* (CHPL, 2023).

4.1.2 Recovered Sand Chemical Composition and Dispersive Characteristics

b. Chemical composition and dispersive characteristics of the recovered sand

The EPA notes the Modification Report does not include information on the chemical composition or dispersive characteristics of the recovered sand produced by the hydrocyclone process. Additional detail is required on the chemical composition and dispersive characteristics of the sand, including any potential traces of elements such as metals and silica, to assess possible impacts to human health and the environment.

Recommendation:

The EPA recommends further information is provided on the chemical composition and dispersive characteristics of the recovered sand, including the particle sizes of the elements. Depending on the results, the EPA may require revision of the air quality impact assessment.

Response

Recovered sand is the coarse fraction of tailings, which is separated from the remainder of the tailings stream (fine tailings) by mechanical separation. Recovered sand contains minimal fines, which is generally defined as being 75 micro metres (µm) in size. Generally, recovered sand targets less than 15% fine tailings material, with median (50 percentile) particle sizes of approximately 100 µm and maximum particle sizes of up to approximately 1 millimetre.

As discussed in Section 1.1.7 of the Modification Report, the existing ore processing circuit involves the separation of the tailings into coarse and fine fractions via the existing coarse ore flotation cells (including the Hydrocyclones), before being recombined, and pumped for emplacement within the approved TSFs. As part of the recovered sand demonstration embankment, the process of recovering sand from the tailings stream has been refined to maintain the separation of the coarse and fine tailings fractions, instead of recombining into a tailings slurry. The coarse tailings portion (recovered sand) would be further dewatered using cyclones within the existing processing area (prior to being pumped via pipeline to the demonstration embankment).

The recovered sand production and transport process and associated infrastructure described above would be used for the Modification. This process allows accurate separation of recovered sand from the separate fine tailings stream.

Geochemistry test work of tailings at Cadia has been ongoing since prior to the commencement of operations in 1998. MESH Environment Inc. (2009) characterised Cadia East tailings (i.e. slurried tailings incorporating both the coarse and fine components) as likely to be NAF and very similar to those currently produced from the Cadia Hill and Ridgeway orebodies (i.e. most of the sulphides contained in the ore reports to the concentrate rather than the tailings).

More recently, CHPL (2024) submitted a response to DPHI Request for Information (RFI-70322967) regarding AMD risk of tailings for Modification 15. The response summarised findings from The University of Queensland (UQ) Sustainable Minerals Institute (2023) *Cadia Operations Tailings Assessment* and Golder (2020) *Sand Embankment TSF: Laboratory Testing of Tailings Sand and Slimes Cadia Gold Mine*, stating that Cadia's tailings (across assessed size fractions) are classified as NAF, supported by geochemical characterisation and acid-base accounting (ABA) results.

Golder (2020) undertook geochemical ABA testing on Cadia tailings materials to assess their potential to generate acid mine drainage, including testing of coarse tailings (sand fractions) prepared in October 2019 and April 2020 and fines tailings samples prepared in June 2020. The testing demonstrated that all tailings samples assessed, irrespective of particle size fraction, were classified as NAF. The results indicate that Cadia tailings, including sands proposed for use in embankment or buttressing applications, do not have the capacity to generate AMD under the conditions assessed, with the acid generation potential results confirming that none of the tested materials plotted within the potentially acid forming field.

A detailed geoenvironmental and geochemical assessment of the coarse tailings (HydroFloat tailings) was undertaken by UQ (2023). Mineralogical characterisation (Mineral Liberation Analysis [MLA] and X-ray Diffraction [XRD]), bulk geochemistry and Net Acid Generation (NAG)/Net Acid Producing Potential (NAPP) static testing demonstrate that the HydroFloat tailings are predominantly NAF, with low overall sulphide contents and sufficient carbonate buffering capacity present across all size fractions. Although minor pyrite is present, sulphides occur at low modal abundance and are commonly coarse and partially locked, limiting reactivity; this is supported by alkaline NAG pH values, strongly negative NAPP values, and negligible NAG in all static tests. On this basis, the coarse tailings (sands) are not expected to generate acid or acidic leachate under expected deposition and storage conditions.

UQ (2023) included consideration of elevated metals in its study. The study had a focus on the potential for critical minerals within the tailings and indicated that the bulk concentration of these elements are low (typically below that of average continental crustal values), however there were metals present in quantities above average crustal abundance such as gold, copper and molybdenum which remained in the tailings after processing.

Copper, manganese and vanadium were considered to pose potential water quality risks relative to conservative Australian and New Zealand Environmental and Conservation Council guidelines (UQ, 2023). However, since the recovered sand would be deposited in a closed catchment (i.e. within the STSF), surface water would be contained within the STSF. Similarly, the STSF's seepage controls would mitigate risk of seepage of leachate from the proposed recovered sand buttress.

In terms of the potential for recovered sand particles to dry out and contribute to airborne pollution, dispersion modelling² and wind tunnel testing undertaken to support the Air Quality Impact Assessment (Airen Consulting [Airen], 2025) indicate that the wind speed required to initiate dust lift-off from recovered sand is higher than that for fine tailings. This means that the recovered sand has a lower propensity to be a source of wind erosion-generated dust than fine tailings (or a combined slurried tailings which forms the surface of the STSF and NTSF). In addition, armouring (general fill) would be installed over the recovered sand surface upon completion of the buttress, further reducing the potential for dust lift-off. Airen (2025) indicated that no exceedances of air quality criteria at all private receivers would occur due to the Modification.

Silica in the form of quartz, albite, and microcline is present in tailings at Cadia. However, in terms of respirable silica (which is generally defined as particles of less than 10 µm), the recovered sand production reduces the amount of smaller sized particles in the sand product relative to the fine and mixed tailings streams. Modelling by Airen shows that PM_{2.5} air quality criteria are met for the Modification.

The recovered sand buttress, stockpiles/emplacements are located entirely within the existing STSF and would utilise the existing TSF management controls and measures, as described in the *Water Management Plan* (CHPL, 2023).

² It is assumed that the EPA is referring to air dispersion, rather than dispersive characteristics (i.e. erodibility). Information on the latter is provided in Section 4.3.1 of this Submissions Report.

4.1.3 Human Health Risk Assessment

c. Human Health Risk Assessment

Based on the Modification Report, the EPA notes that an updated human health risk assessment has not been provided which considers the chemical composition of the recovered sand.

Recommendation:

The EPA recommends that DPHI consider if an updated Human Health Risk Assessment is required that identifies and assesses human health risks associated with the construction, operation and long-term rehabilitation of this modification. If required, the assessment must be undertaken in accordance with Environmental Health Risk Assessment: Guidelines for assessing human health risks from environmental hazards (enHealth) and must include the inhalation of criteria pollutants and exposure from all pathways i.e., inhalation, ingestion and dermal, specific to the results of the chemical composition of the recovered sand.

Response

CHPL consults with the EPA and NSW Health in relation to air and water quality as required. Consequently, the following studies have been undertaken:

- a 24-month particulate characterisation study conducted by the Australian Nuclear Science Technology Organisation (ANSTO) (*ANSTO 12-month Final Report: Cadia PM2.5 Study* [ANSTO, 2023]; and
- an assessment of the potential risks to human health within the community surrounding Cadia from operating emissions undertaken by Sage Environmental Services Pty Ltd (SAGE Environmental Services) (*Cadia Valley Operations – Human Health Risk Assessment* [SAGE Environmental Services, 2023]).

In addition, the EPA and NSW Health have commissioned and undertaken their own studies to review the pollution and health implications of Cadia, including:

- The EPA conducted a review of the environment protection licence (EPL), including consultation with community members, which is described in EPA (2024a) *Review of Cadia Mine Environment Protection Licence*. Cadia's EPL 5590 was varied in December 2024 to include additional monitoring requirements for air, surface water and groundwater.
- The EPA also commissioned Jacobs Group (Australia) Pty Ltd (Jacobs) to review air quality at Cadia (Jacobs, 2025). Overall, the independent Jacobs review and modelling were reported as being consistent with Cadia's air quality studies.
- The EPA conducted a lead isotope sampling program and published the *Cadia Region Lead Isotope (tank sediment testing) Report* (2024b). The study found that lead in soil and tank sediments mainly matched natural background levels.
- NSW Health (2025) published the *Cadia Deep Dive Investigation – Summary Report* (July 2025). Key findings were that environmental samples did not identify significant contamination (with metals generally consistent with expected background levels and below health-based thresholds) and clinical assessments did not identify definitive adverse health effects related to metal exposure. The report concluded there was no indication of a risk requiring further health action and no reason for wider community testing for heavy metals.

A summary of the timeline and outcomes of the studies and other relevant developments can be found in Table 4-1.

Table 4-1
Key Independent Environmental Studies

Timeline	Key Summary
July 2023	Results from the ANSTO (2023) study to assess the mines contribution to the regional air shed determined that Cadia contributed to a small portion of the soil particulate matter with <10% of particles. Metals of concern, like selenium, nickel and chromium were not significant drivers of the soil fingerprint.
August 2023	EPA (2023a) concluded work on soil sampling entitled <i>An investigation into metals in soil around the Newcrest gold mine in Cadia</i> and states: <i>The EPA has compared the results of the soil sampling program to the national guidelines for contaminants in soil, known as the National Environment Protection (Assessment of Site Contamination) Measure 1999. These guidelines define health investigation levels (HILs) for soil contaminants for common land uses. The relevant HILs applied for soil sampling in Cadia were HIL-C (developed open space or recreational areas). The EPA has also compared the results to the most stringent guideline value, HIL-A (low-density residential land with accessible gardens) as residential land is in the vicinity.</i> ... <i>Key observations from the results are:</i> <i>1. There were no exceedances of HIL-A or HIL-C for soil samples collected as part of this program, either from the surface or at depth (Table 1).</i> <i>2. Soil metal concentrations did not vary significantly for surface samples or at depth.</i> <i>3. Soil metal concentrations did not vary significantly in relation to the distance from the mine.</i> <i>4. Soil metal concentrations were similar to levels reported in the area before the Cadia gold mine began operating.</i> <i>5. Soil lead concentrations for Cadia are orders of magnitude lower than those reported for residential properties affected by the lead mine in Broken Hill.</i> The report also concluded: <i>Elevated levels of the metals of concern were not observed in surface soils or at 50 cm depth in the area surrounding the Newcrest gold mine in Cadia. None of the samples had metal concentrations that exceeded even the most conservative guideline concentrations (HIL-A). Furthermore, all metal concentrations were at a similar level observed prior to operation of the Cadia gold mine. This provides an important line of evidence to suggest that dust deposition from the mine has not increased metal concentrations in soil in the area.</i>
September 2023	An expert human health report (SAGE Environmental Services, 2023) concludes risks from air and dust/particulate emissions from Cadia are low and acceptable when measured against Australian health standards.
October 2023	EPA presented to the Parliamentary Inquiry committee and stated the following in relation to their findings regarding water tanks metal concentrations (Parliament of NSW, 2023): <i>There are a range of heavy metals in the sediment and the particles in those tanks. We've given that data to the EPA expert panel. That data has also gone to the health expert panel. There was no concern expressed by both of those panels in range to the sediment concentrations. The sediment concentrations were typically what we see in the literature from sediment in tank samples from around Australia.</i> <i>The advice is from the enHealth guidelines in 2010, Guidance on use of rainwater tanks on page 24. The way that you minimise your exposure is you should inspect your tanks every two to three years to remove the sediment particles from the bottom of the tanks.</i>

Table 4-1 (Continued)
Key Independent Environmental Studies

Timeline	Key Summary
November 2023	EPA (2023b) published a report titled <i>An investigation into metals in domestic tank water around the Newmont gold mine in Cadia</i> and states: <i>Key observations from the results of the EPA's tank water testing in the Cadia valley area are as follows:</i> <i>There were exceedances to the health based ADWG values for lead (2.7% at kitchen tap, 14% in tanks), nickel (0.9% at kitchen tap) and cadmium (1.7% in tanks).</i> <i>Concentrations of key metals found in this investigation are within typical concentrations found in Australian rainwater tanks. It is likely that many or all of the exceedances found are from domestic and local sources of contamination such as roofing, plumbing and other atmospheric fallout such as that from aircraft emissions, industrial and roadside dust.</i> <i>Exceedances of the ADWG were most common for lead; however, the percentage of exceedances for lead found in this investigation were within typical levels found in Australian rainwater tanks.</i> <i>These results indicate the importance of maintaining catchments, tanks and tank water distribution systems in accordance with guidance provided by NSW Health, including first-flush diverters, regular tank cleaning and flushing. Property owners may also consider installing filtration to reduce potential contamination of their drinking water.</i> <i>No statistically significant relationship was found between concentrations of metals in water samples (from water tanks and kitchen taps) and distance or direction from the mine. No statistically significant relationship was found between concentrations of metals in soil samples and distance or direction from the mine.</i>
November 2023	EPA (2023c) published a report titled <i>An investigation into metals in sediments from domestic rainwater tanks around the Newmont gold mine in Cadia</i> and states: <i>Key observations from the results of the EPA's testing of sediments in tanks in the Cadia Valley area are:</i> <i>Concentrations of metals in sediments is not widely researched, but the concentrations of key metals found in this investigation are within typical concentrations found in Australian rainwater tanks.</i> <i>No statistically significant relationship was found between concentrations of metals in sediment samples and distance or direction from the mine.</i> <i>Resuspended sediment has the potential to contaminate the water column and tanks should be examined for accumulation of sludge at least every 2–3 years. If sludge is present in the tank it should be removed by siphon or by complete emptying of the tank (desludging).</i> <i>These results indicate the importance of maintaining catchments, tanks and tank water distribution systems in accordance with guidance provided by NSW Health, including first-flush diverters, regular tank cleaning and flushing. Property owners may also consider installing filtration to reduce potential contamination of their drinking water.</i> The EPA's report also states: <i>There are no relevant guideline values comparable to the sediment samples. The Australian drinking water guidelines provide a basis for determining the quality of water to be supplied to consumers in all parts of Australia. They are intended to provide a framework for the good management of drinking water supplies that, if implemented, will assure safety at the point of use (NHMRC 2011). The Australian and New Zealand sediment quality guidelines are for the protection of aquatic ecosystems and livestock (ANZG 2018) and therefore they are not suitable to use for sediments collected from rainwater tanks or for protection of human health. In the absence of suitable guideline values we have compared the concentrations of metals in tank sediments collected around Cadia Valley Operations to those measured in other parts of Australia.</i>

Table 4-1 (Continued)
Key Independent Environmental Studies

Timeline	Key Summary
May 2024	CHPL (2024) submitted a response to a DPHI Request for Information (RFI-70322967) regarding AMD risk of tailings for Cadia Modification 15. The response summarised findings from UQ Sustainable Minerals Institute (2023) <i>Cadia Operations Tailings Assessment</i> and Golder (2020) <i>Sand Embankment TSF: Laboratory Testing of Tailings Sand and Slimes Cadia Gold Mine</i> , stating that Cadia's tailings (across assessed size fractions including coarse and fine tailings) are classified as NAF, supported by geochemical characterisation and ABA results.
June 2025	Jacobs (2025) completed the Air quality impact assessment independent review for the EPA, which included (i) an independent technical review of air quality impact assessments prepared for Cadia generally over the 2020–2023 period and (ii) an independent atmospheric dispersion model simulating particulate emissions (PM ₁₀ and PM _{2.5}) from Cadia, commissioned following community concerns regarding the accuracy of air quality data used in the human health risk assessment (HHRA). As part of this study Jacobs (with EPA) undertook a site visit (including the NTSF, STSF and the meteorological and ambient air quality monitoring stations) and developed the dispersion model using a ground-up approach; inputs were sourced from Bureau of Meteorology data and Cadia monitoring and activity/equipment information that was independently verified; and modelled PM ₁₀ /PM _{2.5} concentrations were compared to measured concentrations at monitoring sites and were found to predict slightly higher levels (more conservative), providing a worst-case estimate of ambient impacts around Cadia. Overall, the independent Jacobs review and modelling were reported as consistent with Cadia's air quality studies, while providing an independently constructed and conservatively calibrated model set-up.
July 2025	NSW Health published the <i>Cadia Deep Dive Investigation – Summary Report</i> (July 2025), an in-depth investigation responding to community concerns about potential health risks from metal exposure due to dust emissions at the Cadia mine. The investigation assessed 14 participants from seven properties and included environmental assessments sampling indoor dust, soil, point-of-use water, homegrown produce and paint (where relevant), and clinical toxicology assessments. Key findings were that environmental samples did not identify significant contamination (metals generally consistent with expected background levels and below health-based thresholds) and clinical assessments did not identify definitive adverse health effects related to metal exposure; the report concluded there was no indication of a risk requiring further health action and no reason for wider community testing for heavy metals at that time.
September 2025	Jacobs provided the EPA with an addendum after identifying a technical refinement/inconsistency in some emission-rate inputs used in the dispersion model. Jacobs confirmed this refinement did not alter the overall outcomes or recommendations of the original report.

The submission refers to the enHealth (2012) guideline “*Environmental Health Risk Assessment: Guidelines for assessing human health risks from environmental hazards*”, which includes guidance on when to undertake risk assessment. EnHealth (2012) states:

risk assessments will be needed for products, processes, situations and activities where there is a plausible case that there could be an increased risk of significant health consequences for the human population from the product, process, situation or activity.

In view of the foregoing, Cadia considers that the HHRA is not required because:

- As outlined in Table 4-1, multiple relevant investigations have already been completed (including independent studies on air, water and potential exposure pathways.
- CHPL has already completed a HHRA (SAGE Environmental Services, 2023) assessing risks to the surrounding community from operating emissions.
- Independent evidence indicates low/acceptable risk; the SAGE HHRA concluded risks from air and dust/particulate emissions are low and acceptable when assessed against Australian health standards.

- Regulator-commissioned work supports existing conclusions; the EPA-commissioned Jacobs independent review and modelling was reported as consistent with Cadia's air quality studies, while providing an independently constructed and conservatively calibrated model.
- NSW Health's investigations did not identify a public health basis for broader action; NSW Health's Cadia deep dive investigation concluded there was no indication of a risk requiring further health action and no reason for wider community testing for heavy metals at that time.

In addition, there is nothing proposed as part of the Modification that would give rise to significant health consequences:

- The buttress and emplacement/stockpiles would use recovered sand, which is the coarse portion of the tailings currently emplaced within the TSFs at Cadia. This whole tailings size fraction has been deposited in the STSF since it was commissioned, hence, storage of this material at this location is not new.
- Potential pathway mechanisms are well understood and have been assessed in the Modification:
 - Surface water runoff from the Modification activities would be controlled by the STSF water management system.
 - Groundwater/seepage management would be as per the existing controls in the STSF as per the existing *Water Management Plan* (CHPL, 2023).
 - Air quality modelling shows that potential dust emissions from the recovered sand would be minor, not cause exceedances at any modelled private receiver and would be mitigated by use of armouring (general fill) over the recovered sand buttress.

Based on exposure pathway screening, the Modification does not introduce materially different human health exposure pathways to those already assessed within the Modification.

4.1.4 Potential Recovered Sand Dust Impacts

d. Potential risk for dust

The EPA notes from Section 3.2.5 Rock Armouring that the recovered sand buttress will be covered with a layer of rock, and Section 3.2.6 Buttress Rehabilitation mentions the capping with topsoil for revegetation. The EPA acknowledges the intention of the rock armouring and buttress rehabilitation. However, the activity may generate dust during the construction phase, with the potential for off-site impacts in the short- to longer-term, which must be appropriately managed. Also, the length of time of sand exposure prior to rock capping and revegetation may increase the risk of particulate matter migrating from the site.

Recommendation:

The EPA recommends DPHI seeks further information on the design of the rock armouring and details of the proposed capping, such as layering and thickness, including any mitigation measures proposed during construction. The EPA also requests information on the length of time of sand exposure on the tailings dam walls and any required mitigation measures to ensure dust generation of these exposed areas is appropriately managed. The EPA may require revision of the air quality impact assessment depending on the information provided by the Applicant.

Response

The placement of recovered sand and construction of the buttress is expected to occur over an approximate two-year period (see Table 3-2 of the Modification Report). As detailed in the Geotechnical Assessment prepared by GHD (2025) (Appendix A of the Modification Report) armouring (general fill) would be deposited on the exterior wall of the recovered sand buttress as early as practicable. The NAF material used for capping would be sourced directly from the existing North and South Waste Rock Dumps. The armouring layer would be approximately one metre thick and include topsoil and seeding with native grass to stabilise the surface, mitigate dust and minimise the risk of erosion.

As detailed in the *Air Quality Impact Assessment* prepared by Airen (2025) (Appendix C of the Modification Report) CHPL has carried out wind tunnel studies to determine wind speed thresholds, surface erosion, and dust extinction moisture related to tailings. These studies (Tunra, 2024a and 2024b) consistently showed that the wind speed threshold of tailings (that is, the wind speed before lift-off occurs) is dependent on the composition of the tailings. The fine tailings have a lower wind speed threshold (in the order of 1 to 2 metres per second [m/s]) and coarse tailings (recovered sand) which would be used to construct the buttress typically have a higher wind speed threshold (in the order of 4 to 7 m/s). The armouring over the recovered sand surface on the buttress would further reduce potential air quality emissions (this was conservatively excluded from the modelling i.e. the worst case scenario has been presented). Airen (2025) concluded that the Modification would not cause exceedances of air quality criteria at any of the modelled private dwellings.

CHPL would continue to operate in accordance with the approved *Cadia Air Quality and Greenhouse Gas Management Plan* (Newmont, 2025a), current Trigger Action Response Plans (TARPs) that identify specific forecast meteorological conditions that required action for dust management. This early warning system allows mitigation measures to be applied in advance of the forecast conditions and planning for operational changes that would be implemented should high risk dust conditions eventuate. and would be reviewed and, if necessary, updated to reflect the Modification. Near-field (i.e. operational) and far-field (compliance) dust monitors are incorporated into the Dust TARP and are setup to provide an early warning to allow the implementation of proactive responses to dust lift off events to minimise the risk of non-compliance with air quality criteria beyond the boundary of the mine.

CHPL would also implement adaptive management to comply with air quality criteria this would include refinement to onsite air quality mitigation measures and mine operating procedures. The range of mitigation measure that would be implemented should adverse meteorological conditions be experienced include:

- relocation of the sand discharge spigots to dry cells;
- use of water carts with cannons to wet dry cells; and
- application of hydromulch and/or binding agent.

4.1.5 Consultation with the NSW Resources and the NSW Resources Regulator

2. Other matters

a. Resources Regulator at NSW Resources

The EPA understands that the Resources Regulator is the appropriate regulatory authority responsible for overseeing the safe design, construction, operation and decommissioning of tailing storage facilities in New South Wales.

Recommendation:

The EPA recommends DPHI consult with the Resources Regulator for advice regarding the engineering suitability of this proposal for long-term rehabilitation of the tailings dam.

Response

As described in Section 5 of the Modification Report, CHPL undertook consultation with NSW Resources and the Resources Regulator in November and December 2025. NSW Resources has since reviewed the information supplied in relation to the Modification and based on the review has no specific comments in relation to *Mining Act 1992* considerations and raises no issues regarding the Modification.

See Section 4.3 of this Submissions Report for CHPL's responses to the NSW Resources Regulator comments on the Modification.

4.1.6 Construction Noise

Construction Noise

The EPA notes that the Modification Application is seeking to allow buttressing and stockpiling works associated with the tailings dam during the night-time period. A justification for this aspect of the proposal is that these works combined with normal operations can satisfy the existing night-time noise limits.

Prior to this aspect of the modification application being considered, the EPA recommends that DPHI require the proponent to examine the character (frequency content, temporal variations etc) of noise from these proposed activities and determine whether they are typical of operational noise emissions from the premises at night, or whether they are of different character and may be perceived by the community as clearly non-operational noise sources. Where the character of noise is different, the proponent should provide compelling justification for undertaking the works during the night-time period.

Response

A Noise Impact Assessment was undertaken by RWDI Australia Pty Ltd (RWDI) (RWDI, 2025) and is presented in Appendix B of the Modification Report. The assessment was conducted in accordance with the *Noise Policy for Industry* (EPA, 2017) and the *Voluntary Land Acquisition and Mitigation Policy* (NSW Government, 2018).

RWDI (2025) found that the operational noise predictions would comply with the noise impact assessment criteria at all privately-owned residential receivers and during day, evening and night periods (Appendix B of the Modification Report).

The equipment and plant noise emitters associated with the Modification consists of tractors, an excavator, a dozer and booster pumps. All equipment would operate 24 hours a day, seven days a week, with the exception of the dozer which is limited to generally daytime use only. The character of the noise associated with the equipment and plant described in the Modification would be consistent with that already used for the existing surface operations which includes the operation of the TSF which are approved to operate 24 hours a day, seven days a week. RWDI (2025) concluded that it is unlikely any of the noise-sensitive receivers surrounding the site would be subject to dominant low-frequency content.

The commissioning, buttressing and recovered sand deposition works (including tractor and excavator use) would be undertaken 24 hours a day, seven days a week meeting mill production and operability requirements. The recovered sand would be hydraulically transported via pipeline from the Existing Coarse Ore Flotation Circuit to the recovered sand buttress, and the operation of the Coarse Ore Flotation Circuit occurs 24 hours a day, seven days a week. Accordingly, there is no feasible alternative to the pumping and tractor/excavator also being used 24 hours a day, seven days a week.

CHPL would continue to implement the existing noise management and monitoring measures described in the *Noise Management Plan* (CHPL, 2026a), with revision as necessary under the modified development consent conditions.

4.1.7 Noise Management

Noise Management

Should the modification be approved, the EPA recommends that DPHI requires the proponent to:

- a) Modify and implement the Trigger Action Response Plan and Noise Management Plan to include measures and protocols that ensure compliance with the noise limits under all applicable meteorological and operating conditions; and*
- b) Review and confirm or modify, as appropriate, noise monitoring locations in the Trigger Action Response Plan and Noise Management Plan.*

Response

Noted and CHPL would continue to implement the existing the Cadia TARP (CHPL, 2026b) and *Noise Management Plan* (CHPL, 2026) and would be reviewed and, if necessary, updated to reflect the Modification.

4.2 NSW DEPARTMENT OF CLIMATE CHANGE, ENERGY, THE ENVIRONMENT AND WATER – WATER

4.2.1 Revised Water Management Plan

1.1 Recommendation – post approval

That Department of Planning, Housing and Infrastructure requests the proponent to update the Water Management Plan (WMP) to:

- *Include detail of the sand buttressing and excess sand placement areas, additional underdrainage systems and collector drains, and associated monitoring and management requirements.*
- *Identify the location of the Werribee Fault Zone and include details of the expanded groundwater monitoring network west of the Southern Tailings Storage Facility.*
- *Complete WMP updates and commencement of groundwater monitoring within 6 months of approval of the modification.*

Response

As per Section 6.4.4 and 6.5.4 of the Modification Report, CHPL would continue to implement existing *Water Management Plan* (CHPL, 2023) and would be reviewed and, if necessary, updated to reflect the Modification.

4.3 NSW RESOURCES REGULATOR

4.3.1 Recovered Sand Buttress Information Request

Based on a review of the Mod 16 Report, the Regulator is of the view that there is insufficient information in regards to rehabilitation. Section 3.2.5 states that the sand buttress would be armoured with a layer of rock, but thickness is not disclosed. Section 3.2.6 then states that buttress would then be capped with topsoil and seeded with native grasses.

Therefore, the Regulator requests further information in relation to the following:

- *the proposed capping over the reclaimed sand buttress, thickness, types of materials and proposed source(s);*
- *dispersive characteristics of the reclaimed sand and if problematic, how will this be addressed in the final landform design/capping and surface water management design; and*
- *further details on conceptual surface water management for the final landform associated with the reclaimed sand buttress, and the TSF generally, in the event further modifications are not progressed.*

Response

A Geotechnical Assessment for the Modification was undertaken by GHD (2025) (Appendix A of the Modification Report) and provides detail on the recovered sand buttress construction. The Geotechnical Assessment included an Emerson Class and pinhole dispersion tests. The results indicated the material is Emerson Class 4 (exhibit a non-dispersive behaviour when exposed to standing water). However, the pinhole dispersion test classified the material as dispersive (susceptible to erosion and piping) (GHD, 2025).

To mitigate the risk of erosion, armouring (general fill) would be deposited on the exterior wall of the recovered sand buttress as early as practicable. As detailed in Appendix A of the Modification Report, this layer would be approximately one metre thick and include topsoil and seeding with native grass to stabilise the surface, mitigate dust and in addition to minimising the risk of erosion.

The Modification proposes an underdrain system below the buttress to capture excess water from the recovered sand slurry during deposition (Figure 4-1). The underdrain system is designed to manage excess water and aid in the consolidation of the recovered sand, the underdrain system would be redundant after construction is completed, in addition a layer of general fill would be added on the buttress surface as early as practicable.

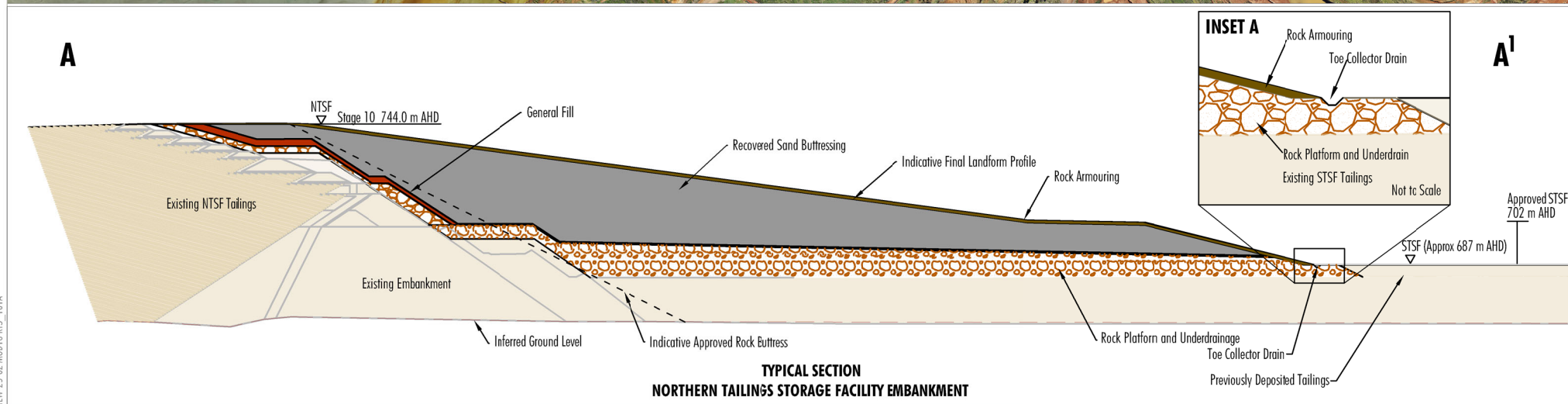
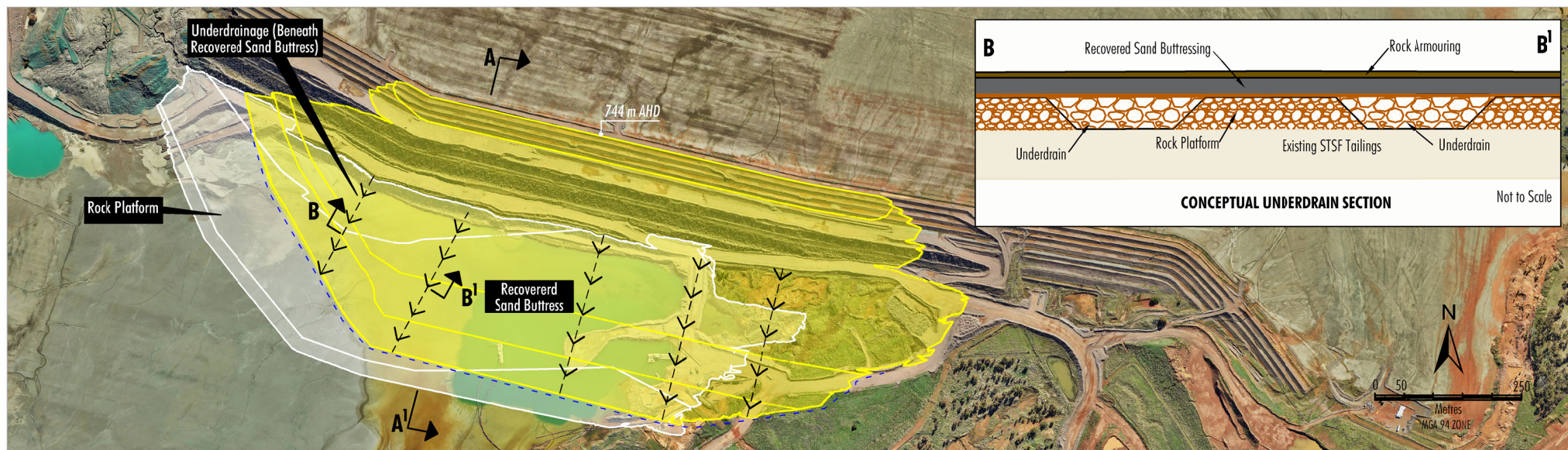
Water captured by the underdrainage system would flow into the collector drain located along the toe of the recovered sand buttress (Figure 4-1). Water would drain to the existing decant ponds within the STSF and be returned to the Mine Water Management System for reuse within the ore processing circuit.

The recovered sand buttress would be constructed predominately on the rock platform approved under Modification 15 (Figure 4-1). As the sand buttress is constructed on the surface of the STSF, the deposition of tailings within the STSF would progressively rise up the sand batter. Appropriate measures (i.e. armouring) would be installed to prevent scouring and erosion at the interface of the sand buttress and STSF deposited tailings. It is noted that, should the CCOP be approved and STSF Extension constructed, the buttress would be largely covered with tailings and therefore, the rehabilitation outcome may be different to that currently proposed.

As detailed in Section 3.6 of the Modification Report, the approved conceptual Final Landform for the TSFs would be updated to incorporate the minor changes proposed by the Modification. Given these minor changes, the key features of the approved final landform would not change, including the water management features shown on Figure 6.5 of PA 06_0295.

4.4 NSW RESOURCES

NSW Resources did not provide any comments or objections to the Modification. As such, no further response is required.



- LEGEND
- Approved Elements
 - Proposed Modification 16 Elements
 - Conceptual Underdrain
 - Toe Collector Drain

Source: GHD (2025)

Newmont
CADIA
CADIA VALLEY OPERATIONS
Conceptual Recovered Sand Buttress Cross
Section and Water Management System

Figure 4-1

5 RESPONSE TO LOCAL GOVERNMENT SUBMISSIONS

The Cabonne Council and BSC did not provide any comments or objections to the Modification. As such, no further response is required.

6 RESPONSE TO PUBLIC AND ORGANISATION SUBMISSIONS

The Modification received 23 public and two organisation submissions. Table 6-1 below provides a response to key issues/matters that are raised in each submission.

Table 6-1
Public and Organisation Submissions Matters Summary

Matter	Submitter ID	Description	Response
Community Consultation	P1, P3, P4, P5, P6, P7, P8, P11, P12, P14, P16, P17, P19, P20, P21, P22, P23, O1, O2	Submitters provided comment about the engagement and consultation mechanisms used, specifically the move from community presentations and question-and-answer sessions to drop-in sessions when compared to previous modifications and the CCOP.	Engagement with the community and stakeholders during the preparation of the Modification was undertaken in consideration of <i>Undertaken Engagement Guidelines for State Significant Projects</i> (NSW Department of Planning, Industry and Environment, 2024). In 2025, CHPL conducted two Cadia district-specific residents meetings instead of the three-town hall-style meetings that were undertaken in 2024, in addition to these, two area specific meetings were conducted. The change in format was in response to feedback from some community members that the lecture-style presentations at public meetings did not give them the opportunity to have topic-focused conversations with subject matter experts. It is noted that, of the submitters who raised community consultation in their submission, many have access to multiple engagement activities: - two attended the Cadia residents drop-in session; and - three submitters are also members of the Cadia CCC and have access to CHPL to seek clarification during these meetings. Alternatively, other submitters are located remotely and are unlikely to have attended engagement sessions regardless of the format: - three submitters listed their location, which is more than four-hour drive away and hence are unlikely to attend in person presentations; and - one submitter listed their location as Western Australia. Section 3.2 of this Submissions Report provides details on CHPL's additional engagement undertaken with the community and stakeholders since the lodgement of the Modification Report.

Table 6-1 (Continued)
Public and Organisation Submissions Matters Summary

Matter	Submitter ID	Description	Response
Acid Mine Drainage	P2, P6, P8, P11, P16, P22, P23, O1, O2	Submitters provided comment regarding the potential for AMD associated with recovered sand, and requested geochemical assessment and controls to demonstrate acid mine drainage risks would be avoided and appropriately managed.	Refer to the response provided to the EPA in Section 4.1.2 regarding the geochemistry and AMD.
Groundwater and Surface Water	P2, P7, P8, P11, P16, P19, P22, P23, O1, O2	Submitters provided comment about potential contamination of groundwater and surface water.	The recovered sand buttress is located entirely within the existing STSF and would utilise the existing TSF management controls and measures, as described in the <i>Water Management Plan</i> (CHPL, 2023). The current groundwater and seepage controls at the Cadia TSFs include (CHPL, 2020): • General sub-excavation within storage areas to remove topsoil and, if required, any loose or weak soils which may allow shallow, lateral migration of tailings water beneath the storage embankment. • Construction of a low permeability clay core embankment and foundation cut-off key beneath the embankment. • Placement of reworked in-situ clay blanketing in selective areas of the storage floor, where and if required. • Deposition of the tailings into the storages in a manner that maximises storage densities and reduces tailings permeability. The proposed underdrainage system below the recovered sand buttress which comprises a series of drains to manage water from the sand cells and incident rainfall, during construction phase. Water captured by the underdrainage system would flow into the collector drain located along the toe of the recovered sand buttress (Figure 4-1). Water would drain to the existing decant ponds within the STSF and be returned to the Mine Water Management System for reuse within the ore processing circuit. Given there is no new disturbance, and all activities are located within the current water management systems, CHPL would continue to implement the current management, mitigation and monitoring measures described in the <i>Water Management Plan</i> (CHPL, 2023) and would be reviewed and, if necessary, updated to reflect the Modification.

Table 6-1 (Continued)
Public and Organisation Submissions Matters Summary

Matter	Submitter ID	Description	Response
Air Quality and Dust	P3, P6, P7, P8, P11, P13, P16, P17, P18, P19, P20, P21, P22, P23, O2	Submitters provided comment regarding air quality and dust impacts from recovered sand emplacement, stockpiling and associated vehicle movements (including respirable silica, heavy metals and Perfluoroalkyl and polyfluoroalkyl substances [PFAS]).	Refer to the response provided to the EPA in Section 4.1.4 regarding potential recovered sand dust impacts and Section 4.1.2 regarding the Recovered Sand chemical composition. PFAS monitoring requirements has recently been added for selected water quality monitoring locations. The <i>Cadia 2025 Annual Review</i> (CHPL, 2025) reports that the majority of analytes were below the limit of detection for the TSF western and southern zones.
Human Health	P6, P8, P13, P16	Submitters provided comment the Modification could impact human health through increased dust and degraded air quality, noise disrupting sleep and wellbeing, and contamination of water and food sources.	Refer to the response provided to the EPA in Section 4.1.3 regarding potential human health impacts.
Water Resources	P11	The submitter provided comment water resource impacts and potential increase in water usage for dust suppression of recovered sand.	Other than the already approved practice of watering of haul roads where waste rock would be transported for construction, the Modification does not propose the use of water for dust suppression of the recovered sand buttress, given it is a “wet” process. Since less waste rock would be needed than the approved buttress, as recovered sand would be the primary construction material, it follows that less water would be required for dust suppression for the Modification. See EPA response (Section 4.1.4) for further details on the dust suppression mitigation proposed for the Modification.
GISTM	P3, P5, P16	Submitters provided comment that the Modification does not demonstrate compliance with the GISTM.	In 2023, Newmont committed to implementing the GISTM and working towards conformance to the GISTM (at priority TSFs). Newmont annually reviews and updates the GISTM conformance self-assessments and tailings disclosure and is made available on the website ³ . The Modification components would be subject to Newmont’s annual GISTM conformance self-assessments and tailings disclosure.

³ Newmont Environment Website: <https://www.newmont.com/sustainability/Environment/default.aspx>

Table 6-1 (Continued)
Public and Organisation Submissions Matters Summary

Matter	Submitter ID	Description	Response
Final Landform and Rehabilitation	P3, P7, P8, P11, P16, P21, P22, O2	Submitters provided comment about the lack of detail and certainty regarding rehabilitation and final landform outcomes for recovered sand buttress and stockpiles, including the absence of a final landform evolution model and rehabilitation plan.	As detailed in Section 3.6 of the Modification Report, the approved conceptual Final Landform for the TSFs would be updated to incorporate the minor changes proposed by the Modification. Given these minor changes, the key features of the approved final landform would not change, including the water management features shown on Figure 6.5 of PA 06_0295. Should the CCOP be approved and STSF Extension constructed, the buttress would be largely covered with tailings and therefore, the rehabilitation outcome may be different to that currently proposed. Any changes to the final landform associated with CCOP would be assessed in that separate application.
Noise and Hours of Operation	P4, P5, P6, P8, P11, P12, P13, P16, P18, P19, P20, P22, P23, O2	Submitters provided comment about increased noise and disturbance associated with 24-hour operation of machinery and associated equipment for recovered sand handling.	A Noise Impact Assessment was undertaken by RWDI (2025) and is presented in Appendix B of the Modification Report. The assessment was conducted in accordance with the <i>Noise Policy for Industry</i> (EPA, 2017); and the <i>Voluntary Land Acquisition and Mitigation Policy</i> (NSW Government, 2018). The commissioning, buttressing and recovered sand deposition works (including tractor and excavator use) would be undertaken 24 hours a day, seven days a week meeting mill production and operability requirements. It is also noted that that surface operations which include deposition of tailings in the TSF and the use of mobile plant are currently approved under PA06_0295. RWDI (2025) found that the noise predictions would comply with the noise impact assessment criteria at all privately-owned residential receivers during day, evening and night periods. CHPL would continue to implement the existing noise management and monitoring measures described in the <i>Noise Management Plan</i> (CHPL, 2026), with revision as necessary under the modified development consent conditions.
Visual and Lighting	P5, P11, P18, P22, O2	Submitters provided comment about visual and lighting impacts associated with recovered sands infrastructure and night works.	The potential night lighting source is associated with the Modification relate to operation of tractors (typically four) and one excavator (central to the Cadia site and approximately 2 km from the nearest private receiver). The potential impact of which is expected to be negligible compared with existing operations from potential off-site viewer locations. Fugitive lighting at Cadia would continue to be managed in accordance with the <i>Fugitive Lighting Management Plan</i> (Newmont, 2025b) and would be reviewed and, if necessary, updated to reflect the Modification.

Table 6-1 (Continued)
Public and Organisation Submissions Matters Summary

Matter	Submitter ID	Description	Response
Geotechnical Stability	P6, P7, P21, P22, O1, O2	Submitters provided comment regarding geotechnical stability of the proposed recovered sand buttress.	A Geotechnical Assessment for the Modification was undertaken by GHD (2025) (Appendix A of the Modification Report) which was peer reviewed by Blackrock Mining Solutions Pty Ltd (Blackrock, 2025) (Attachment D of the Modification Report). Blackrock's peer review concluded that: <i>The stability analyses indicate that the recovered sand buttress achieves Factors of Safety that meet or exceed applicable ANCOLD criteria for drained, undrained, seismic, and post-liquefaction conditions across the assessed sections. The proposed construction approach, drainage measures, monitoring framework, and dust mitigation controls are considered appropriate for the intended stabilisation purpose.</i>
Consideration of Alternatives	P7	The submitter provided comment that alternatives have not been adequately considered or compared to the proposed recovered sands methodology.	The Modification aims to utilise technologies and methodologies previously approved under Modification 15. The use of recovered sand as the primary material for NTSF buttressing reduces the need to transport waste rock, reduces scope 1 greenhouse gas emissions, increases the stability of the NTSF southern embankment, and is consistent with the approved final landform outcomes and buttressing objectives. Section 1.4 of the Modification Report provides additional details of key issues considered and an analysis of Modification alternatives.
Environmental Monitoring	P5, P7, P8, P21, P22, O2	Submitters requested stronger environmental monitoring and transparency, including additional monitoring locations, real-time public reporting of results and exceedances, and clear trigger/action response requirements. Additionally, submitters referenced recommendations of the independent Hydrobiology assessment and requested that its monitoring and management recommendations be implemented.	Environmental monitoring data (including real-time air quality data) and monitoring plans are available on the Cadia website⁴. The EPA commissioned independent environmental consultants, Hydrobiology, to review the groundwater, surface water, and aquatic ecosystem monitoring programs at Cadia. The report (Hydrobiology, 2025) and recommendations are to inform the EPA's water technical specialists to ensure that any future EPL variations are evidence based and reflect environmental monitoring best practice. CHPL would update its groundwater, surface water, and aquatic ecosystem monitoring plans to reflect EPL variations, as appropriate.

⁴ Newmont Cadia Monitoring Website: <https://www.cadiavalley.com.au/newcrest/cvo/environmental-management/monitoring>

Table 6-1 (Continued)
Public and Organisation Submissions Matters Summary

Matter	Submitter ID	Description	Response
Matters not related to the Modification			
Legal Action	P16, P17, P18, P20, P22, O2	Submitters refer to legal proceedings as part of their submission.	References to legal proceedings are not relevant to the assessment of the Modification and are therefore not addressed in these responses to submissions.
New Technology/CCOP Concerns	P3, P4, P5, P6, P8, P16, P23, O1	Submitters provided comment that the Modification represents a 'backdoor' approval of recovered sand technology proposed for the CCOP and argued the technology and associated risks should be assessed with an appropriate level of scrutiny.	The Modification does not propose the use of any new technologies as the production and use of recovered sand has previously been approved under Modification 15 (i.e. the recovered sand demonstration embankment). This Modification is a separate application to CCOP. CHPL reiterates that the Modification is to use recovered sand as part of NTSF buttressing only as described in Section 3 of the Modification Report (i.e. inclusive of a rock underdrainage layer and armouring) and is not being used as the primary embankment material as its in CCOP. Given CCOP is a separate application stakeholders would be provided the opportunity to provide comment during the CCOP public exhibition process.

7 UPDATED MODIFICATION JUSTIFICATION

The Modification addresses three key areas that are central to sustaining operations at Cadia:

- using recovered sand to buttress the southern wall of the NTSF;
- emplacing/stockpiling excess recovered sand within the approved STSF disturbance footprint; and
- integrating the recovered sand demonstration embankment approved under the previous Modification 15 to PA 06_0285 with the proposed NTSF southern wall recovered sand buttress, with the integrated structure to remain and form part of the final landform.

The Modification would allow for the efficient buttressing of the NTSF southern embankment within the STSF footprint and meet the approved environmental performance criteria described in PA 06_0295, and buttressing objectives.

Overall, the Submissions Report does not change the justification for the Modification because:

- the submissions received have been addressed by providing clarifications to environmental assessment matters, however did not change the overall conclusions or mitigation measures; and
- engagement undertaken since the Modification Report has provide an opportunity to clarify and further explain key aspects of the Modification and has not resulted in any changes to the Modification.

No updated mitigation measures for the Modification are proposed.

8 PROJECT EVALUATION

The Modification Report was placed on public exhibition by DPHI from 10 March 2026 to 31 March 2026. Submissions on the Modification were received from NSW Government agencies, relevant local councils, organisations and the public.

Since lodgement of the Modification Report, CHPL has continued to undertake consultation regarding the Modification, including (Section 3.2):

- CHPL's newsletter, *The Cadia Scoop*, was sent to 318 Cadia District members on 10 March 2026;
- a Cadia CCC meeting was held on the 17 March 2026;
- a Cadia District Residents Drop-in Session was held on 24 March 2026 at the Cadia (Ridgeway) Offices, during the exhibition period; and
- individual engagement with community members via email correspondence on the 24 and 31 March 2026.

A total of 31 submissions on the Modification Report were received from NSW Government agencies, local government (Cabonne Council and BSC), community organisations/groups and members of the public. These comprised of four submissions (13%) from government agencies, two submissions (6%) from local government, two submissions (6%) from organisations and 23 submissions (74%) from members of the public. The main issues raised by organisations and members of the public were:

- Cadia's community consultation engagement mechanisms used for the Modification;
- air quality impacts and perceived human health risks from dust; and
- potential noise impacts and hours of operation associated with Modification activities.

As an integral part of the local community and a large employer in the region, community engagement and transparent relationships with or near neighbours, local community and stakeholders is something that CHPL values.

In response to submissions received, CHPL has produced this Submissions Report. This Submissions Report provides responses to submissions provided by government agencies, local councils, organisations and members of the public during the exhibition period for the Modification Report and has been prepared in consideration of the *State significant development guidelines – preparing a submissions report* (DPHI, 2026).

Subsequent to submission on the Modification Report, no refinements are considered necessary to address the comments received and therefore no further refinements to the Modification are proposed.

Overall, the Submissions Report does not change the overall conclusions of the Modification Report, which were:

In weighing up the main environmental and socio-economic aspects impacts (costs and benefits) associated with the Modification, as assessed and described in this Modification Report, the Modification, on balance, is considered to have merit and be in the public interest.

9 REFERENCES

- Airen Consulting (2025) *Cadia Modification 16 Air Quality Impact Assessment*.
- Australian Nuclear Science Technology Organisation (2023) *ANSTO 12-month Final Report: Cadia PM2.5 Study*.
- Blackrock Mining Solutions Pty Ltd (2025) *High-level Geotechnical Review of NTSF Buttress Optimisation, Cadia Valley Operations*.
- Cadia Holdings Pty Limited (2020) *Cadia Modification 14 Processing Rate Modification – Submissions Report*.
- Cadia Holdings Pty Limited (2024) *Request for Information (RFI-70322967) Acid Mine Drainage Risk of Tailings Cadia Modification 15*.
- Cadia Holdings Pty Limited (2025) *Cadia 2025 Annual Review*.
- Cadia Holdings Pty Ltd (2026a) *Cadia Noise Management Plan*.
- Cadia Holdings Pty Ltd (2026b) *Cadia Trigger Action Response Plan*.
- Department of Planning, Housing and Infrastructure (2026) *State significant development guidelines - preparing a submissions report*.
- Department of Planning, Industry and Environment (2024) *Undertaking Engagement Guidelines for State Significant Projects*.
- enHealth (2012) *Environmental Health Risk Assessment – Guidelines for assessing human health risks from environmental hazards*.
- GHD (2025) *NTSF Buttress Optimisation Design Report*.
- Golder (2020) *Sand Embankment TSF: Laboratory Testing of Tailings Sand and Slimes Cadia Gold Mine*.
- Hydrobiology (2025) *REVIEW OF CADIA VALLEY OPERATIONS ENVIRONMENTAL MONITORING PROGRAM DESIGN AND DATA*.
- Jacobs Group (Australia) Pty Ltd (2025) *Air Quality Impact Assessment Independent Review*.
- MESH Environmental Inc. (2009) *Cadia East Project: Geochemical Characterisation of Mine Rock and Tailings*.
- New South Wales Environmental Protection Authority (2017) *Noise Policy for Industry*.
- New South Wales Environmental Protection Authority (2023a) *An investigation into metals in soil around the Newcrest gold mine in Cadia*.
- New South Wales Environmental Protection Authority (2023b) *An investigation into metals in domestic tank water around the Newmont gold mine in Cadia*.
- New South Wales Environmental Protection Authority (2023c) *An investigation into metals in sediments from domestic rainwater tanks around Newmont gold mine in Cadia*.
- New South Wales Environmental Protection Authority (2024a) *Review of Cadia mine environment protection license*.

New South Wales Environmental Protection Authority (2024b) *Cadia Region Lead Isotope (tank sediment testing) Report.*

New South Wales Environmental Protection Authority (2025) *Air dispersion model: Cadia Valley Operations.*

New South Wales Government (2018) *Voluntary Land Acquisition and Mitigation Policy For State Significant Mining, Petroleum and Extractive Industry Developments.*

Newcrest Mining Limited (2023) *Water Management Plan.*

Newmont Corporation (2025a) *Cadia Air Quality and Greenhouse Gas Management Plan.*

Newmont Corporation (2025b) *Fugitive Lighting Management Plan.*

NSW Health (2025) *Cadia deep dive investigation – Summary report.*

Parliament of NSW (2023) *Transcript of Proceedings: Portfolio Committee No.2 - Inquiry into current and potential impacts of gold, silver, lead and zinc mining on human health, land, air and water quality in New South Wales.*

RWDI Australia Pty Ltd (2025) *Cadia Modification 16 Cadia Valley Operations – Noise Impact Assessment.*

SAGE Environmental Services (2023) *Cadia Valley Operations – Human Health Risk Assessment.*

Tunra (2024a) *Wind speed threshold, Surface Erosion, and Dust Extinction Moisture testing.*

Tunra (2024b) *Wind speed threshold, and Surface Erosion testing: Weathered Samples KWC10, KWC11, KWC12.*

University of Queensland Sustainable Minerals Institute (2023) *Cadia Operations Tailings Assessment.*

ATTACHMENT 1
REGISTER OF SUBMISSIONS

Table A1-1
Register of Submissions

Group	Submitter	View	Section Comments are Addressed
Agencies	NSW Environment Protection Authority	-	Section 4.1
	DCCEEW Water	-	Section 4.2
	Resources Regulator	-	Section 4.3
	NSW Resources	-	Section 4.4
Local Government	Cabonne Council	Comment	Section 5
	Blayney Shire Council	Comment	Section 5
Organisation	ECCO Orange Inc.	Object	Section 6
	Cadia Community Sustainability Network	Object	
Public	Name Withheld (P1)	Object	Section 6
	Name Withheld (P2)	Object	
	Name Withheld (P3)	Object	
	Mark Ellis (P4)	Comment	
	James Patrech (P5)	Object	
	Name Withheld (P6)	Object	
	Name Withheld (P7)	Object	
	Name Withheld (P8)	Object	
	Name Withheld (P9)	Comment	
	Daniel Mendes (P10)	Support	
	John Gerathy (P11)	Object	
	Name Withheld (P12)	Object	
	Roy Cottage (P13)	Object	
	Robin Gunning (P14)	Object	
	Name Withheld (P15)	Object	
	Tom Harris (P16)	Object	
	Harry Grey (P17)	Object	
	Allan Colman (P18)	Object	
	Susan Dietz (P19)	Object	
	Robert Greenough (P20)	Object	
	Name Withheld (P21)	Object	
	Name Withheld (P22)	Object	
	Dominique Hes (P23)	Object	



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Burruguu Art