

ENVIRONMENTAL IMPACT ASSESSMENT

Prepared on behalf of Kunguard Pty Ltd

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ENVIRONMENTAL IMPACT ASSESSMENT

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State: Queensland

PROJECT DETAILS

Project	<i>ML100490 and ML100523</i>
Tenement Holder	<i>Kunguard Pty Ltd</i>
Tenements Reviewed	<i>ML100490 and ML100523</i>

PURPOSE

This impact assessment has been prepared to evaluate the potential environmental implications of a proposed variation to Standard Condition A13 (*Eligibility criteria and standard conditions for exploration and mineral development projects—Version 2*) under the *Environmental Protection Act 1994* (EP Act).

The proposed variation seeks to enable Kunguard Pty Ltd (Kungaurd) the ability to access deposits enabling project delivery (resource would be sterilized otherwise), while maintaining equivalent or improved environmental protection outcomes, consistent with the environmental management objectives of the EP Act. Specifically the variation would reduce the buffer distance between small-scale alluvial gold mining activities and the nearby Category B Environmentally Sensitive Area (ESA) [endangered ecological community (EEC)].

PROPOSED VARIATION

The ESA's affected by this variation are classified as Category B only, as defined under relevant State mapping (DETSI, Mining Environmentally Sensitive Areas report 2026) and have been verified against current State mapping layers (*Queensland Globe*, accessed April 2026). No Category A ESAs are present within or adjacent to the proposed activity area.

Justification for the variation is listed below:

- The Category B ESA classification for adjacent vegetation (EEC) does not arise from aquatic ecosystems, wetlands, watercourses, or declared conservation areas; and
- No Category A ESA occurs within or adjacent to the proposed disturbance area.

The proposed variation seeks to amend Condition A13 to read:

A13: The holder of the environmental authority must not carry out activities:

- 1. in, or within 2 kilometers of, a category A environmentally sensitive area.*
- 2. Activities may occur within *10 metres of a Category B Environmentally Sensitive Area, provided that:*
 - (a) no disturbance occurs within the ESA;*

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- (b) physical exclusion measures are implemented prior to works; and
 (c) sediment, erosion, and spill controls are maintained for the duration of the activity.

Prior to carrying out activities in a category C environmentally sensitive area, the holder of the environmental authority must consult with the relevant administering authority. If it is determined through consultation that additional conditions are necessary, the holder must comply with those conditions.

*Varied from 1 kilometer (1,000 m) to 10 meters.

This assessment considers the potential impacts to environmental values if the variation was endorsed. It identifies:

- environmental values;
- considers how the proposed variation would alter emissions and releases;
- outlines waste minimisation measures;
- details rehabilitation efforts;
- evaluates the environmental and statutory risks associated with the proposed variation; and
- describes the potential magnitude of impacts.

This assessment has incorporated environmental management practices consistent with best-practice alluvial mining to support the endorsement of the proposed variation.

LEGISLATION

The proposed variation to Standard Condition A13 has also been considered against the following legislative requirements (refer Appendix A for complete assessment):

- Protection of environmental values (s 125 EP Act);
- Compliance with the general environmental duty (s 319 EP Act);
- Consistency with the remainder of the standard EA conditions for mining activities;
- Prevention of environmental harm; and
- Rehabilitation to a safe, stable and non-polluting condition.

BACKGROUND

MINING OPERATIONS

The proposed mining activities are designed to be precise and low impact, targeting small areas of high gold concentration. Methods include using a 6-tonne excavator to remove topsoil and access gravel and clay layers where gold may be concentrated. The extracted material is scanned via metal detectors to recover free gold.

All materials are to be handled on-site. No permanent infrastructure is required. Existing tracks on the property will be used for access, primarily from Rubyvale Road. No processing plants or additional facilities are planned.

EXISTING MITIGATION MEASURES

Larger trees are preserved in situ and disturbance to existing landforms such as ridges, flats, and small drainages is avoided as far as is practicable. Topsoil and overburden will be temporarily stockpiled beside excavation sites. Gravel and clay layers will be carefully processed, and overburden will be replaced in the reverse order to excavation once mining

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is complete. Shallow pits and trenches are re-filled in reverse order of excavation also, ensuring minimal long-term impact on the land and allowing for more effective rehabilitation. Rehabilitation will be conducted progressively, immediately after areas are mined. Methods include:

- Refilling excavated pits and trenches.
- Returning stockpiled topsoil over the disturbed area.
- Scattering removed vegetation across the rehabilitated areas.
- Seeding with native species to support regrowth.

Rehabilitation will aim to restore the sites to their pre-mining condition.

ENVIRONMENTALLY RELEVANT ACTIVITY

The proposed variation request does not involve any material change to the Environmentally Relevant Activity (i.e. does not involve an increase in production, additional disturbance footprint, chemical processing, or introduce new mining methods). The variation request is limited only to works within a reduced buffer (variation to Condition A13), supported by additional, targeted mitigation measures (refer Mitigation Measures section below for more detail).

ENVIRONMENTALLY SENSITIVE AREAS

ML100490 supports areas mapped as “Category B ESA – Regrowth”. This indicates that the site has been historically disturbed and does not represent a remnant tract of vegetation. Regardless, this area will be excluded from disturbance and demarcated in the field to ensure activity in this area is prohibited.

To the immediate east of the fenced boundary of ML100490, located off tenement within another Lot/ Plan is an area of EEC, mapped as a Category B Environmentally Sensitive Area. The EEC is listed as “11.11.16/ 11.11.1/ 11.4.9” and is comprised of a composite regional ecosystem (RE) type of *Eucalyptus cambageana*, *Acacia harpophylla* open forest to woodland on old sedimentary rocks with varying degrees of metamorphism and folding (11.11.16, Of Concern), *Eucalyptus crebra* +/- *Acacia rhodoxylon* woodland on old sedimentary rocks with varying degrees of metamorphism and folding (11.11.1, Least Concern) and *Acacia harpophylla* shrubby woodland with *Terminalia oblongata* on Cainozoic clay plains (11.4.9, Endangered).

Occurrences of this same composite RE, Category B ESA are located immediately to the north of the fenced boundary of ML100523. The Category B ESA is located off tenement within another Lot/ Plan also.

Activities proposed outside a 10m buffer of the Category B ESA (Regional Ecosystem) are limited in scale, duration, and intensity, and include:

- Temporary exploration activities only (small scale alluvial mining, access, rehabilitation activities)
- No permanent disturbance extending into the ESA
- No vegetation clearing, excavation, or stockpiling within the ESA

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ENVIRONMENTAL ASPECTS (VALUES)

DESCRIPTION OF ENVIRONMENTAL VALUES

Environmental values that may be affected by the variation request include the following:

- Biodiversity values, including native vegetation and habitat values associated with the nearby Regional Ecosystem endangered ecological community;
- Land environmental values, including soil structure, land stability, and erosion susceptibility;
- Surface Water values, including surface water quality, natural drainage patterns, hydrological connectivity and sediment regimes (surface water quality); and
- Ecosystem integrity values, particularly the avoidance of fragmentation, or indirect impacts affecting the EEC such as weed invasion.

Groundwater values and wetlands are not considered to be relevant due to the nature of the activity (shallow alluvial gold mining) and location in the landscape (no wetland features in the locality).

POTENTIAL IMPACTS

EMISSIONS AND RELEASES

In accordance with *Eligibility criteria and standard conditions for exploration and mineral development projects—Version 2*, the variation to Condition A13 will not materially change the expected emissions and releases. No material change to activity is proposed.

The approved Environmentally Relevant Activity (ERA) '*Non-Scheduled- Mining Activity – Mining Lease (ML)*' is expected to generate only minor, managed emissions. These are limited to:

- Suspended sediment (surface runoff) during active ground disturbance from active work areas;
- Short-term noise emissions from small mechanical equipment (e.g. pumps, generators, small excavators) limited to intermittent and daylight hours only;
- Minor exhaust emissions from low-horsepower engines;
- Incidental hydrocarbon release, associated with fuel, oils and greases handling and use; and
- Minor turbidity increases where water is recirculated within wash-down systems.

The varied buffer width of 10 meters, continues to operate as a control to protect the above identified environmental values. The change in buffer width will not materially increase environmental risk for the following reasons:

- Category B ESAs are not subject to the same level of protection as Category A ESAs;
- The proposed activities do not involve direct disturbance to the ESA; and
- Potential impact pathways (sediment, runoff, accidental spill) will be effectively managed through additional controls (mitigation measures), rather than reliance on buffer distance alone.

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The Category B ESA (EEC) represents a high-value conservation asset due to its endangered status, and the proposed 10 m buffer will continue to provide functional separation between mining activities and the identified environmental values of this EEC. The EEC is situated off tenement within another Lot/ Plan. No direct disturbance, vegetation clearing, or infrastructure placement is proposed within the 10m buffer. Therefore the environmental values of the ESA will be protected through the identified risk-based management measures included in the proposed variation, consistent with best practice environmental management.

RISK ASSESSMENT

The primary pathway for potential impacts on the EEC resulting from the buffer reduction is indirect, rather than direct disturbance. The variation (reduction) in buffer distance does not materially alter the nature or scale of the activity. Regardless, potential impact pathways have been assessed and are described in more detail below in Table 1:

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Table 1: Risk Assessment

Impact	Likelihood	Consequence	Overall Risk
Sediment migration – ecological function	Unlikely	Minor	Very low
Sediment migration – surface water quality	Low	Minor	Low
Hydrological interference	Unlikely	Minor	Very low
Noise disturbance	Low	Minor	Low
Air Quality – emissions	Unlikely	Minor	Very low
Hydrocarbon release	Unlikely	Minor	Very low

The magnitude of potential impact on environmental values overall, is assessed as low to very low, given:

- the small-scale and temporary nature of activities;
- absence of direct disturbance to the EEC;
- continued maintenance of a substantial buffer (10 m); and
- implementation additional mitigation measures to the standard EA controls.
- the absence of chemical processing; and
- the limited duration of individual works.

MITIGATION MEASURES

Regardless of the low initial risk the proposed variation would poses on the Category B ESA, additional controls employed to further reduce the potential impacts are described in more detail below. The activity will comply with standard EA conditions and best-practice mining controls, including:

- Defined works boundaries, supported by onsite demarcation (fencing);
- Erosion and sediment controls, including sediment sumps as needed, and progressive backfilling;
- Water management controls, ensuring no direct discharge of turbid water beyond the disturbance footprint;
- Fuel and chemical management, including secondary containment, spill kits/ spill response equipment and refueling away from drainage lines;
- Operational restrictions, cease-work procedures during heavy rainfall or flood conditions;
- Vehicle access controls, prohibiting unauthorised access off mining lease;
- Waste generated is expected to be minimal, however the following will be undertaken:

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- Inert material (overburden) will be reused onsite for backfilling and landform restoration;
- General waste will be collected and removed from site regularly for disposal;
- Hydrocarbon wastes will be captured and disposed of via licensed contractors;
- No burial or burning of waste will occur; and
- Waste generation will be minimised through limited onsite storage of materials and supplies.
- Progressive rehabilitation following completion of each relevant activity, and will include:
 - Backfilling of excavations to restore original or stable land contours;
 - Re-spreading of topsoil where available;
 - Stabilisation of disturbed surfaces to prevent erosion;
 - Removal of all ancillary areas and temporary access tracks no longer required;
 - Encouragement of natural regeneration, supplemented by revegetation if required; and
 - Inspection of rehabilitated areas to confirm stability and non-polluting condition.
- Regular general environmental inspections, with corrective actions implemented as required.

These practices are consistent with Kunguard's operations, and will remain in force for the duration of the works programs for ML100490 and ML100523.

CONSISTENCY WITH ENVIRONMENTAL AUTHORITY

The proposed variation to Standard Condition A13 (reduction of buffer distance to 10meters for Category B ESA - EEC) does not materially increase environmental risk and is considered highly unlikely to adversely impact identified environmental values.

The proposed variation achieves an equivalent (or in fact improved) environmental outcome when compared to compliance with the unvaried standard condition, because:

- Protection of environmental values is achieved through active controls, rather than separation distance alone;
- The ESA is physically protected from disturbance and indirect impacts; and
- Environmental risks associated with operations are reduced to an acceptable level through the mitigation measures included in the proposed variation, which are proportional to the activity risk profile.

Accordingly, the intent and objective of Condition A13 are maintained.

Further, the proposed variation is consistent with:

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- The standard criteria under the EP Act;
- The principle of best practice environmental management; and
- A risk-based regulatory approach, appropriate for low-risk, well-controlled activities.

Refer to Appendix A for more detail.

CONCLUSION

The variation does not introduce new environmental risks and does not compromise the protection of environmental values. The variation:

- Relates only to Category B ESA (EEC)
- Does not authorise disturbance within the Category B ESA (EEC)
- Maintains equivalent environmental protection outcomes

Furthermore, with the continued implementation of site-based mitigation measures carried out by Kunguard, the proposed variation:

- satisfies the general environmental duty under the EP Act.
- does not/ is unlikely to result in environmental harm.
- maintains protection of environmental values via additional mitigation measures;
- avoids direct impacts to the endangered ecological community;
- retains a substantial exclusion buffer; and
- complies with all other Standard Conditions;

Based on the above, the proposed variation to Condition A13 is appropriate, protective of environmental values and subsequently justified.

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APPENDIX A

PROPOSED VARIATION AND RISK TO VALUES ASSESSMENT

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Assessment Criterion	Relevant Environmental Values	Potential Impact of Proposed Amendment	Management & Mitigation Measures	Residual Risk	Consistency with EA Standard Conditions
Protection of Environmental Values (EP Act s125)	Biodiversity values associated with endangered ecological community; land and water values	No direct disturbance to the endangered ecological community ESA. The reduced buffer increases proximity only, not disturbance footprint or activity intensity.	Maintenance of a minimum 10 m buffer; physical exclusion to ensure no activities within EEC; erosion and sediment controls; operational restraint during unsuitable conditions (cease works during high rainfall)	Likelihood: Low Consequence: Minor Risk: Low	Consistent with EA outcome requiring protection of environmental values and avoidance of environmental harm
General Environmental Duty (EP Act s319)	All environmental values potentially affected by mining activities	Amendment does not increase emissions, disturbance area, or introduce new activities	Implementation of best-practice controls; proactive inspections; spill prevention; cease works during wet conditions	Likelihood: Low Consequence: Minor Risk: Low	Satisfies duty to take all reasonable and practicable measures to prevent environmental harm
Release of contaminants to land or waters	Surface water quality; soil and sediment stability	Minor, localised, suspended sediment during active works only	Sump-based water management; adequate erosions and sediment controls; no direct discharge of water off lease; spill containment and response	Likelihood: Low Consequence: Minor Risk: Low	Aligns with standard EA conditions limiting contaminant release
Noise emissions	Acoustic amenity; fauna disturbance	Intermittent noise from small mechanical equipment	Daylight-only operations; low-powered equipment; no blasting	Likelihood: Low Consequence: Minor Risk: Low	Satisfies standard EA noise management conditions
Fuel and chemical handling	Soil and water quality	Incidental hydrocarbon spill risk	Bunded storage; drip trays; spill kits; re-fueling away from drainage lines	Likelihood: Unlikely Consequence: Minor Risk: Low	Consistent with EA hazardous materials management conditions

Direct impacts to endangered ecological community	Threatened ecological values	No clearing, access, or works within EEC	Physical exclusion of EEC from works; GPS mapping; site induction for operators	Likelihood: Unlikely Consequence: Minor Risk: Negligible	Consistent with avoidance-based EA outcome
Indirect impacts to biodiversity (sediment, hydrology)	Ecosystem function supporting EEC	Potential indirect impacts if poorly managed	Erosion controls; no alteration of natural drainage; weather-based stop-work triggers; maintain 10m exclusion buffer	Likelihood: Unlikely Consequence: Minor Risk: Low	Meets EA conditions requiring prevention of indirect impacts
Land stability and erosion	Landform and soil values	Temporary disturbance of alluvial soils	Progressive backfilling; contour restoration; surface stabilisation	Likelihood: Unlikely Consequence: Minor Risk: Low	Consistent with EA land disturbance and stability conditions
Rehabilitation requirements	Post-mining land use values	Short-term disturbance only	Progressive rehabilitation; backfilling; removal of infrastructure; land left stable and non-polluting	Likelihood: Unlikely Consequence: Minor Risk: Low	Fully consistent with standard EA rehabilitation outcomes
Waste management	Land and water values	Minor general and hydrocarbon waste	Waste removal from site; reuse of inert material; no burial or burning	Likelihood: Unlikely Consequence: Minor Risk: Low	Consistent with EA waste minimisation hierarchy
Cumulative impacts	Combined environmental values	Amendment does not increase cumulative disturbance	Disturbance remains within existing approved limits	Likelihood: Unlikely Consequence: Minor Risk: Negligible	Consistent with cumulative impact assessment principles