

14 November 2025



Minerals Business Centre

Department of the Environment, Tourism, Science and Innovation

PO Box 7230

Cairns QLD 4870

By Email: ESCairns@detsi.qld.gov.au

CC: Mikaela.Dry@detsi.qld.gov.au

3 Water Street Red Hill 4059

T: +61 7 3368 1033

E: information@ardent-group.com.au

W: ardent-group.com.au

ABN: 38 609 696 764

Dear Sir/Madam,

**RE: Savannah Goldfields Pty Ltd,
EA and PRC Plan Application; P-EA-100326888
Notice of Change to Application**

We confirm that we are engaged by Savannah Goldfields Pty Ltd (**Savannah**) in the capacity of its environmental management consultants.

We refer to the EA application made by Savannah on 29th March 2022. Since this time the Administering Authority has sought requests for information (RFI) that have been responded to in previous correspondence. The most recent version of the EA application submitted to DETSI was Version 3, dated October 2023. Furthermore, since the original EA application, SVG has made changes to the mine plan and the rehabilitation methods, in response to previous RFI's. Currently the application is in the Decision Stage, where the end of the decision period has been extended by agreement until 12 January 2026.

This letter provides notice as per section 132 of the *Environmental Protection Act 1994* (EP Act) of this change to the application.

A summary of the change to the application (since Version 3.0, dated October 2023) is provided in the table below;

Table 1 – Summary of Changes to the EA, PRCP Application

Item	Change to the Application
Applicant	No change
ERA's	No change
Mining / Production Capacity	No change
Processing	No change (no processing on site)
Mining Disturbance Area	Increase from 57.2ha to 68.45ha (<i>11.25ha increase</i>) Approximately 6ha of this increase is a result of the detailed survey of disturbance completed as part of EEO STAT-E-100918194.

Item	Change to the Application
	The remainder of the increase relates to the enlarging of Pit 1 and Pit 2, to merge to ensure efficient mining of the gold resource.
Exploration Disturbance Area	10ha (not separately included in previous EA application)
Mining Method	No change. Improved sequential mining of pits to enable progressive rehabilitation
Mining duration	No change, (approx. 3years)
Equipment type, size, number	No change
Workforce	No change
PMLU	Change to Native Ecosystem
Rehabilitation Method	Open pits to be completely backfilled and rehabilitated to a PMLU of Native Ecosystem. No residual void or residual high walls. Only one waste rock dump remaining in post mining landform.

Consideration of minor change definition

The EP Act requires any change application to be considered against the section 131 *Meaning of minor change*. To assist DETSI in this assessment, we have considered section 131 and how it relates to the changed application in the table below;

Table 2 – Consideration of EP Act Minor Change Definition

EP Act reference	EP Act wording	Savannah Comment
131 (1)a	a change that merely corrects a mistake about the name or address of the applicant;	Not applicable
131 (1)b	a change of applicant;	Not applicable
131 (1)c	a change that merely corrects a spelling or grammatical error;	Not applicable
131 (1)d	a change that the administering authority is satisfied would not adversely affect the ability of the authority to assess the changed application.	The changes described in Table 1 would not adversely impact on the ability of the authority to assess the changed application. The project remains largely unchanged, and the environmental impact is not materially different to that described in the initial application. The passage of time between the last version of the application has

EP Act reference	EP Act wording	Savannah Comment
		improved the assessment of waste rock, surface water and groundwater with an additional few years of sample results available for interpretation. The changes to the application have improved the rehabilitation outcomes for the project, with the PMLU of native ecosystem and the post mining landform design which will result in all pits being backfilled and rehabilitated to native ecosystem.

If the application were decided as a minor change, and remains in the decision stage, this would not prevent DETSI from requesting additional information on the application from Savannah, nor requesting an extension to the decision period (which Savannah would agree to any reasonable request).

Consideration of public notification

Should DETSI decide that the change is an “other change”, then consideration of the EP Act 134 is required to determine if the notification stage will need to be repeated. To assist DETSI in this assessment, we have considered the relevant parts of section 134 and how it relates to the changed application in the table below.

Table 3 – Consideration of EP Act Effect on Assessment Process

EP Act reference	EP Act wording	Savannah Comment
134 (1)a 134 (1)b	the change is not a minor change; and the administering authority has not given its written agreement to the change.	Part (a) is yet to be determined. DETSI has not given its written agreement to the changes described in Table 1
134 (3)	Subsection (4) applies to a changed application or proposed PRC plan if— (a)the assessment process has stopped under subsection (2) for the application or proposed PRC plan; and (b)the notification stage applied to the original application; and (c)the change was made during the notification stage or after the notification stage ended.	The notification stage applied to the original application The changes were made after the notification state ended.

EP Act reference	EP Act wording	Savannah Comment
134 (3)	The notification stage must be repeated unless the administering authority is satisfied the change would not be likely to attract a submission objecting to the thing the subject of the change, if the notification stage were to apply to the change.	The changes to the application have been summarised in Table 1 above. The material changes have included; • Increase in disturbance area • Improvement in PMLU to native ecosystem • Improvement to rehabilitation landform design to fully backfill all pits, remove all but one waste rock dump from the landscape and leave no remnant highwalls. Since there were no objections registered during public notice to the disturbance areas, Savannah submit that the change in disturbance area is not likely to attract an objection if it were to be re-notified. Since the change to the PMLU and landform design have been a direct result of DETSI information requests and formal correspondence, Savannah submits that these changes are not likely to attract an objection if it were to be re-notified. Since there is no change to mining production, mining method, processing, workforce etc., the specialist assessments have determined that there is no change to the outcomes of noise and air emission assessments. Therefore no potential future submissions can be entertained in regards to noise and air emissions as this aspect of the project has not been the subject of the change.

It is therefore Savannah's view, that should the change to the application be decided as "other change", that the notification stage should not apply to the change.

Application Documents and Files

Enclosed with this letter are the following application documents;

- Agate Creek EA Application Supporting Information Report V4.0
- Agate Creek Progressive Rehabilitation Closure Plan V6.4
- Agate Creek PCRP Schedule V6.4.

Due to the size of the documents, a download link has been provided to DETSI with the email accompanying this letter. This download link includes all relevant appendices and GIS files. Digital data will also be submitted to; spatialsubmit@des.qld.gov.au

Should the Department have any questions or require any further information, please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in blue ink, appearing to be 'RD' with a horizontal line underneath.

Richard Davis

Director

Ardent Group Pty Ltd