

Kate Van Schaik
Black Point SA



Mark Howe
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Dear Mr Howe

Please give full and careful consideration to the following information in respect to the application for a Mining lease for the Rex Mining Hillside project proposed at Ardrossan/Pine Point , Yorke Peninsula.

As a local resident of central Yorke Peninsula, currently residing at Black Point SA , I remain concerned that the application (MLP) at this time, does not satisfy key principles of precaution, namely that sufficient measures are in place to prevent degradation to the community and the environment.

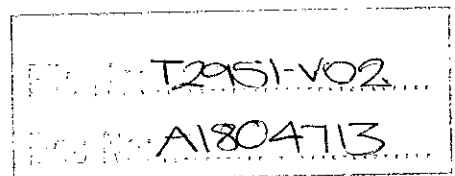
With any development or change, the principle of *sustainability* should be paramount.

Comprehensive assessment must be given to the *immediate* risks and benefits to the environment, the existing community, industry, people, economy, however it is also critical that inter-generational equity underpins any decisions about the Hillside project. The need to ensure that health, biological and ecological integrity, and productivity of the environment is maintained or enhanced for the benefit of future generations must be demonstrated.

I consider there are both significant risks and benefits for the Central Yorke community as a result of this project, but do not have sufficient detail to confidently support or oppose the project. The following provides comment about aspects of the development and the MLP that I consider have not been comprehensively addressed by the proponent and I present this information for you, as the regulatory authorities, to consider in your deliberations and recommendations to the Minister.

Yorke Peninsula's soil history gives clear evidence of the devastation that simple tree felling (in a concentrated period between approx 1912-1920), resulted in widespread increase in soil salinity and subsequent decades of remediation and modification . The impact of development of new industry does produce positive benefits as can be seen as a result of the existing mining development (dolomite) at Ardrossan. This community operates with an established port and service township, that might otherwise would not have been realized or upgraded without this development. A project and population expansion of this size, does potentially reduce the risk to the local hospital services, which have in recent years, come under threat-so again there are clearly benefits and risks that can be identified from the various perspectives.

So decisions of today- have significant impact, not only for the proposed mine life, but for decades beyond.



Issues with management of the community consultative process.

Rex Mining proposed the establishment of a Community Consultative group (CCG) to promote "community voice" and so that is reflected in their planning and application for the Mining Licence.

Thus emergent responsibilities of the group have been significant- and create a major burden on those members- who reasonably have many questions and apprehensions regarding how best to determine the risks and or benefits of the project.

Membership of the CCG comprised a range of individuals as representatives of different groups within the community. As voluntary members, each with different perspectives as it relates to them personally, professionally, they joined without prejudice and all without any detailed knowledge or understanding of the mining industry.

For many, in fact DMITRE- could well have been be the name of a hardware store!

Thus over a two year period, this group (whose membership and participation has changed over time, due to personal and professional commitments) have attempted to identify the benefits, the risks, the RIGHT questions, learn a new "language" and develop understanding of the details and implications of such a major project and industry. I have attended meetings regularly with this group since the beginning of 2013, to obtain information to identify the implications for the Black Point community and also to consider the implications for early childhood services, from a professional perspective.

The challenges for a group of approx. 20 people, to successfully disseminate such a vast amount of information in such a way that all members of the community can access, understand and make an informed decision- are immense and not practicable, especially as information constantly changes.

While it is desirable and practical to think that people have had considerable time to gather, digest and assess the implications of a project, the reality is that "learning is individual, contextual and is self-directed and largely have not engaged in the process, until recent weeks.

While unfortunate for the decision making process- it is only NOW that there is the beginning of some collective knowledge and assessment of this project within the community, despite the efforts of the CCG.

The groundswell of community knowledge has only just commenced. As all residents (both permanent or part time members of the community) are now accessing information about the potential impact of this project, It is therefore unreasonable to consider that 6, 8 or even 12 weeks might be sufficient for a public consultation period, especially during a Harvest and end of year peak period, when most people cannot devote the time necessary to the research and analysis of the project.

I acknowledge that DMITRE has extended the consultation period by 2 weeks , in excess of the recommended time provisions as deemed by regulations and policy, however , the impact of changes in policy or procedures and extending the period is marginal in comparison to ensuring that the community is fully informed about the project.

A greater period of time for the whole community to engage and consider this project, with information from all stakeholders, is requested to enable the community at large to fully assess the project. I appreciate that the Mining licence remains subject to further approvals and the development of management plans and PEPR as the next stage in the process, before construction or mining activity is permitted. Despite this- the community deserves a greater time period to consider the feasibility and the Mining Licence application that will potentially impact on our region for 40+ years. The community also requires opportunity for further consultation at each stage of the process.

In addition to requesting a further extension of time until March 2014,

I would ask that all subsequent reports and responses from Rex Mining AND the summary of feedback and all issues raised during consultation (from both relevant departments and the community) is made available to the general public and distributed each individual /group who has lodged a submission.

The proponent's description of the existing environment relevant to the proposed project

This project if realised, will dramatically change the profile of this region across so many areas:

- Balancing 3 major industries- between the established agricultural landscape and that of copper and gold, dolomite mining and tourism.
 - maintaining the current level and quality of agricultural production and available land for food production
 - maintaining the integrity and quality of the crops currently produced
 - maintaining and increasing Tourism and the associated direct and indirect economic benefits
 - Local and State Economy- benefits and risks (investment, employment, export)
 - The environment- natural fauna and flora, marine environment, emissions controls (dust, noise, light, protection from potential copper toxicity)
 - The visual profile and topography of the land
 - Hydrology and subsequent change in quality and supply of water
 - The health and wellbeing of people living in the area
 - Population planning – impact of population expansion across the region
 - Transport- roads, access, maintenance, emergency services access
 - Zoning, land value, rating, property market
 - Secondary industry- potential growth and challenges/demand/growth on existing services (workforce sustainability)
 - Employment: the impact on existing job seekers, employers, current industry and opportunities for growth
 - Social services- education, police, medical. child care, recreational facilities and activities- implications of adequacy of service provision in an existing urbanised location and as a result of increased population and the introduction of a 24 hour operational industry
 - Cultural heritage- generational history of farming landowners and Aboriginal Heritage
 - Utilities and supply- water, electricity
- and more.

The impacts have potential for positive growth and enhancement for the region, opportunity for investment for individuals and provides some improved

infrastructure such as water and power supply (that will remain post mine in the region); however the risks are equally significant and require stringent controls.

Regulations and enforcement

Much of the mining lease application refers to existing controls and requirements in accordance with EPA and Mining legislative requirements.

With the continued pressure to reduce the size of the public service sector, this has a direct impact on the ability to manage the critical monitoring of compliance by any mining operator, with the environmental regulations.

What evidence can SA government a, DMITRE, EPA and other relevant authorities, to have sufficient human and financial resources to adequately monitor and enforce compliance by the mining operators in accordance with regulations and prescribed control measures?

How does DMITRE, EPA and relevant authorities ensure that preventative systems are implemented and that there is no or minimal lag time in response to addressing breaches /excedences of environmental standards?

The proponent has outlined that all control measures will be detailed within Management Plans that will be developed subject to the outcome of this mining lease application. I understand that this is an extensive process, that will require further consultation, expert advise and detailed strategies to consider all aspects of treatment measures. The lack of the detail, however at this time, does not enable the community to make informed decisions.

proposed environmental factors and mitigation measures

Unlike other Mining projects which, by enlarge, are developed in more isolated or remote locations, this project is based within a prime agricultural region, bordered by 5 established township/holiday settlement communities. The location of the mine is directly adjacent to Gulf St. Vincent.

While the company has undertaken to complete modelling and analysis of the risk associated with dust, noise and light emissions. **The sampling and modelling (and acceptable limit levels within the regulated standards) is questionable for this particular region and context** . Of most concern is the potential toxicity of the copper and uranium dust emissions and the long term impact on the health, protection and preservation of the environment for people, marine ecosystem, fauna, flora and agricultural food production.

The company has engaged some assessment of risks of occurrences of excedences of recommended PM 10 levels associated with airborne particles. While this has considered some local sampling and Bureau Meteorology data, this has not been analysed in consideration of the mining emissions **in conjunction** with other industry or local factors comprehensively. Similarly this was modelled on the initial design of the mine. Since feedback from your department about the proposed height and profile of the Waste Dumps- the design model has been significantly changed, encompassing a greater footprint area. Inadequate testing and modelling has been undertaken since the changes to the design and area of the proposed mine.

For example, the proposed development of a Wind Farm, comprising 190+ turbines. (Ceres Project) is currently being considered by the DAC. This Central Yorke Peninsula project is to be located on the immediate southern border of the proposed Mining area. The combination of this project (if realised) will dramatically influence the wind patterns, flow and conditions within the region and the subsequent impact of emissions of dust and sound.

Similarly, the company cites that truck and road/mine transport is the predominant contributing risk factor to dust emissions. The Main Coast Road borders the mine site and is the major carriage way for all grain transport by road from local farms to YP ports and grain stores. This major road provides the access to and from the mine site and is also the highway for access to seaside communities for residents and tourists to the region. In addition Arrium mining is also in the process of expanding their operations at Ardrossan, also situated near the Main Coast road and Ardrossan Port precinct.

Road traffic in the area has been estimated to increase by more than 50% during the construction phase for the mining project. As a prime tourist region for SA, the volume of traffic on Main Coast Road as the major access road to the seaside settlements is significant (Television news reports of major congestion at Port Wakefield , relating to travelers to YP during holidays times is clear evidence of this issue). With dust emissions from vehicles cited as a significant factor related to dust emissions and disbursement, the intense traffic from the combination of road users related to all industry in this concentrated area is a critical factor for considering mitigation measures.

The combination of the 5 major industries –namely Wind farm + agriculture+ dolomite mining + tourism road activity + Hillside copper/gold mining and the meteorological conditions should be the baseline for testing and modelling for emission control and not based solely on the mining project in isolation.

Thus the **combination of industrial /commercial activities**, with real time sampling is required in order to accurately assess the risks and control measures necessary to reduce pollutant and nuisance emissions satisfactorily. Technical sampling should be conducted in the entire surrounding region and most especially in peak periods (harvest, peak travel dates for tourism).

Economic risks and benefits

The relative quiet of coastal communities like Black Point is likely to be significantly impacted by the proposed Mine, both during the construction phase and the subsequent operational phase. The impact of traffic congestion, blast and drilling noise, light emissions-while considered to be acceptable levels as “nuisance”- will still impact on the community. This again will have flow-on effects in terms of loss of income from tourism, and from spending by owners during their visits to Black Point

Agriculture and economic considerations

The conflict with a key objective of the State Government Development Plan “to retain and strengthen the economic potential of high quality agricultural land”

Here in South Australia, mining is not permitted in the wine growing regions of Barossa Valley and McLaren Vale – and for good reason. These regions are prime agricultural areas, fundamentally important for the State’s export income and its tourist industry. The Yorke Peninsula region is fundamentally important to the State for exactly the same reasons. Yorke Peninsula contributes more than \$400 million to the State’s economy per annum (2) and receives more than 1.3 million tourists and holiday makers each year who contributed an estimated \$104 million directly to the local economy in 2003 and at least another \$200 million in indirect benefits.

What modelling has been done on the economic impact on agricultural production? ABS data shows that the farm lands of Yorke Peninsula consistently produce around 25% of the State’s annual grain production. The proponents of the Hillside have submitted that the mine area is 2.4km x 1km with additional production processing and waste management area. As per ASX presentations to potential investors by the Rex Minerals Manager, this is the first of potentially up to 10 sites that will emerge from this enterprise. Thus the full scope of the current and proposed expansion of the mining projects must be considered.

Request that an independent assessment is undertaken by SA Centre for Economic Studies to independently assess the long and short term benefits and risks for the Yorke Peninsula area (agriculture and tourism/mining) and the state economy.

The proponent’s identification of the potential impacts on the biophysical and social environment that may arise from the proposed operations

The socioeconomic baseline assessment and impact assessments undertaken for the project were constructed on outdated (2006 ABS census) data and with limited consultation with key stakeholders. The current demand for social services is not accurately reflected- as unlike metropolitan area, where waiting list, lag time for service provision are usual indicators of supply and demand. In rural areas, where communities have full knowledge of the available supply –it is commonplace for people to “stop asking” for services. Thus the need and demand for improved service provision does exist and is significant - but data is not easily obtained, without specific surveys and direct consultation with existing service providers. Thus the true scope impact on education, health, police, accommodation, housing, child care and recreation services has not been accurately assessed.

Consultation with both the local service providers and the relevant lead agencies and departments, who resource the services in this region, should be consulted and involved in population and service planning to ensure the social infrastructure needs are accurately identified.

This submission does not address all aspects of the MLP which warrant further interrogation, a number of which are being presented by other, YP Landowners group, District Council YP, CCG and individual members of our community, however aims to highlight some of the issues relating to the proponent's application.

I submit this information for your close consideration.

Yours sincerely

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