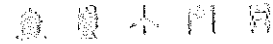


6 November 2013

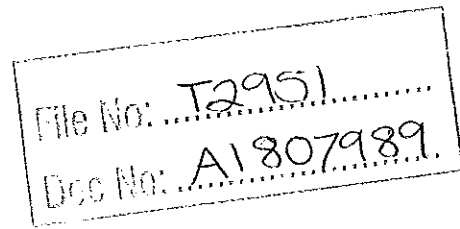


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**Submission on Rex Minerals Hillside Copper Mine  
Mining Lease Proposal & Management Plan  
Mining Regulation and Rehabilitation Branch  
DMITRE  
GPO Box 1264  
Adelaide SA 5001**



Dear Sir / Madam

**RE: Rex Minerals Hillside Copper Mine Mining Lease Proposal & Management Plan**

On behalf of the South Australian Freight Council Inc (SAFC) Membership I take this opportunity to thank you for the opportunity to comment on the Rex Minerals Hillside Copper Mine Mining Lease Proposal & Management Plan.

SAFC is the State's peak, multi-modal freight and logistics industry group that advises both the Federal and State governments on industry related issues, and is funded by both governments and industry. SAFC represents road, rail, sea and air freight modes and operations, freight service users, and assists the industry on issues relating to freight logistics across all modes.

SAFC believes that an efficient, effective, internationally competitive freight system is essential in enabling the State to achieve the social and economic future it demands. Major infrastructure such as ports, airports and key road and rail corridors are important to the movement of South Australian products and resources.

SAFC supports and recognises the growth in the exploration and mining in South Australia and the consequent implications for the major freight corridors and port facilities including those identified in the Rex Minerals Hillside Copper Mine Mining Lease Proposal and Management Plan. SAFC also acknowledges the potential for positive economic, social and environmental benefits to South Australia of this proposal more broadly.

SAFC is pleased to highlight the following key points and suggestions with respect to the Rex Minerals Hillside Copper Mine Mining Lease Proposal and Management Plan (Proposal and Plan):

- The existing and planned road network in the vicinity of the mine, including any proposed road diversions, must be maintained at current access standards, as a minimum, and enhanced to facilitate larger vehicles if at all feasible. In general this requires Performance Based Standard (PBS) level 2A for the Yorke Highway

- and PBS Level 3A for the Yorke and St Vincent Highways between Ardrossan and Port Giles.
- Any proposed highway diversions and road upgrades must not interfere with the current PBS Level 3 route designation between Ardrossan and the deep water port at Port Giles, which is particularly significant for the grain industry on Yorke Peninsula.
  - SAFC contends that further assessment of the impacts of the proposed mine construction and operations on Redding Road is necessary given the potential for this road to become an alternative "through" corridor following the diversion of the Yorke Highway. There is limited discussion or detail of the possible impacts on Redding Road documented in the Proposal and Plan.
  - Whilst not intending to cast any doubt on the viability of a passenger ferry service between Adelaide and Ardrossan, in the event that a ferry service does not become operational or capture the anticipated patronage, traffic would be expected to shift to Port Wakefield Road, and the Copper Coast and Yorke Highways to access the mine site. Such a shift would likely result in an increase in passenger vehicle numbers on the Adelaide to Ardrossan corridor with the potential to negatively impact the communities along the way. It is also possible that in the event a ferry service does not eventuate that pressure will be placed on accommodation options in the area, and there will be a consequential increase in demand for general freight (day-to-day living needs) increasing truck numbers.
  - Further discussion of the Port Operations to ensure that the local community understands the impact of the mine and port operations is suggested. Further discussion should include at a minimum, detail relating to:
    - Size of the vessels shipping concentrates from the Port
    - Time of day and the duration that the Port is expected to be in operation
    - Any port depth and tidal limitations associated with shipping movements
    - Capacity of the Port to facilitate shipping movements into and out of the port along with the proposed passenger ferry services.
  - There is a need for more information and discussion associated with the movement of freight via road to and from the mine, including:
    - Product types and volume that will be moved to the mine emphasising separately, the construction and operations phases of the mine.
    - The extent of the requirement for the movement of over-dimensional loads to the mine and port facility particularly during the construction phase.
  - Traffic counts taken on Sandy Church Road and Pine Point Road occurred during the cooler months resulting in a likely underestimation of the impact of haulage during peak grain harvest periods.
  - In line with State Government policy SAFC believes it is appropriate that in this instance Rex Minerals cover the costs of any and all road upgrades associated with this proposal. Nonetheless, SAFC contends that any additional investment in the network which is not of direct benefit to the mine and port operations should be provided by Governments.

SAFC strongly encourages and supports the upgrade of the freight corridor between Port Wakefield and Ardrossan from PBS 2 to PBS 3 standard to facilitate the use of Double Road Train and B-Triple vehicles on this corridor and beyond. Moreover, SAFC also contends that in order to facilitate a shift of freight from road to rail that strong consideration should also be given to an upgrade to PBS 3 road access between Port

Wakefield and the Bowmans Rail Terminal to capitalise further on the increased economic, environmental and social benefits associated with modal transfer. The upgrade of these freight corridors to PBS Level 3 may also benefit Rex Minerals in both the mine establishment and operational phases.

Should you wish to discuss any aspect of this submission, or require clarification of any matter raised, feel free to contact me by telephone on [REDACTED] or Email:

[REDACTED]

Yours faithfully

[REDACTED]

Neil Murphy  
Chief Executive Officer  
SA Freight Council Inc

[REDACTED]

[REDACTED]

Port Adelaide SA 5015

[REDACTED]

[REDACTED]