# CENTRAL EYRE IRON PROJECT MINING AND DEVELOPMENT APPLICATION

## GOVERNMENT REQUEST FOR RESPONSE DOCUMENT LETTER

### Attachment 04

105 Public Submissions

Volume 2 of 4

Submissions 025 to 049

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Public Submission

Section A: Contact Details

Please complete the following information. Your contact details will be used by the South Australian Government to acknowledge your submission. Those marked with an asterix "*" are mandatory. Anonymous submissions will not be accepted.

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<thead>
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<th>Title</th>
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</tr>
</thead>
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<tr>
<td>*Name</td>
<td>Peter</td>
</tr>
<tr>
<td>*Surname</td>
<td>O'BRIEN</td>
</tr>
<tr>
<td>Organisation</td>
<td></td>
</tr>
<tr>
<td>*Street / PO Box</td>
<td>Box 153, Wudinna</td>
</tr>
<tr>
<td>*Town / Suburb</td>
<td>SA 5652</td>
</tr>
<tr>
<td>*Email Address (Mandatory for electronic submissions)</td>
<td></td>
</tr>
<tr>
<td>Telephone</td>
<td>86 802 364</td>
</tr>
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Please indicate below which of the applications your submission relates to:

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<tr>
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<th>Commonwealth EPBC Act (EIS)</th>
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</tbody>
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Select those (one or more) which apply to your submission

Section B: Privacy

Please select one of the following options:

- [ ] I understand that my submission, including my personal contact details, will be published on the government website and provided to the applicant.

- [ ] I understand that my submission will be published on the government website and provided to the applicant, but I require that the government withholds my name and contact details. I understand that it is my responsibility to ensure personal information is not included in the body of my submission, any footers or headers or any attachments.

Central Eyre Iron Project - Public Submissions

03/09/2016

Page 110 of 917
IMPACT ON STRUCTURE OF THE DISTRICT AND ITS FARMING COMMUNITY.

I welcome the opportunity to comment on the proposed mining structures and its impact on Warramboo area in general.

DISTRICT

Warramboo is a strong community. It has shown over 100 years and up to 4 generations of land owners to be productive and supportive to each other. At the present time the mine has left land owners on the mine lease, those working for them and farms in the shadow of the lease in a position of receiving no outcomes from Iron Road. The community is progressive and this will be ongoing. Warramboo has a Hall, Postal facilities, several businesses and a Sports Club. This is the hub of the district, social functions, farewells, funerals, get-togethers, along with sport clubs such as Cricket, Football, Tennis and District meetings use the facility.

AS A REGIONAL AREA, THE BIG LOSS OF LAND in this mining outcome (25,000 acres) it is possible that some families will move support to the south or north because of road structures and farming enterprises. There has been very little support shown by Iron Road. What will the mine do for this district of Warramboo as a regional area? Many mining towns face foreclosures in shops, business and population and loss of Agricultural production.

ROADS

Because of the mine lease shape, road structure for farmers north, south and east will be cut. Local town access will have miles added to the trip. Sport affected greatly, silos for grain affected with the loss of two important roads to south and west. Do rate payers have to come to the party to pay for road restructure outcomes? What is the impact on cost of production as well as the effects on timely seeding and harvesting of crops and stock returns with the loss of North/South road? School Bus timetables could be affected greatly.

CORRIDOR

Rail, Road, Power and water are proposed to come via a route through farming properties outside of the Hambridge Park. Land use, loss of time in crossing the corridor with stock or machinery will put the community at heavy expense. Could the proposal of the corridor be shifted to Hambridge Park or on its boundary?

WATER

Water in the region is basically reticulated from the Murray. It is totally used for stock, land use (spraying of crops) and domestic. It has been reticulated throughout the region with farmers homesteads and water points on farms in appropriate locations. As the water main goes through the mine lease, how will the adjacent farms have water scheme available to reticulate water to their properties and at who’s expense? As water from underground is also to
be used on mine site, salt extraction (4 times sea water) will be dispersed. Will the levels of
wash and run off be controlled? Will the Polda Basin (now at low levels) be contaminated
from under ground? This basin is only 25 kms to south/west and is limestone.

DRINKING WATER

Main concern is drinking water (domestic) the region runs domestically on Tank/Roof water.
How do we get clean drinking water free of dust and foreign material from tailings?

CROPPING

The district has an Agricultural Bureau. Its aim has been along with the use of research
centres to increase production from the land. Farmers have diversified over the years in both
types of crops grown and machinery. We could see a cost in production with losses from
contamination in both water and dust. Dust containing salts and heavy metals has outcomes
on crops and pastures spraying to control weeds and fungus spray will possibly not work.
Contamination of wool, meat, crops and drinking water (stock) will have to have outcomes.
Who will pick up the losses incurred on these issues?

MINE LEASE LAND USE

Mine lease contains the top Agricultural production land in the hundred. Not only does the
district lose production, so does Eyre Peninsular. The question I would like to bring to Notice
is the:-

(1) Land lease size (is this Iron Roads expectation?)

(2) Native Vegetation Clearance
   I applied for vegetation clearance in 1997 on an adjoining property and was refused.
   the answer being that the property had 10-12% of the hundred of Warramboos
   native vegetation. What is this clearance going to do to adjacent land holders in
dust, salts and environmental issues?

(3) WEEDS
   A lease of this size has issues in weed control. How will weeds and by whom be
   controlled, Skeleton weed, Caltrop, Onion weed and Horchound on site and in the
   corridor from impacting on adjacent land holders.

LAND VALUATIONS

I would like to question the loss of equity or even how to sell land adjacent to the mine lease.
We have several properties in the shadow of the proposed mine. The loss in values in shifting
or even relocating housing and sheds to another property is a BIG cost. The cost of travelling
around the mine site and relocation of one farming family (son) should be compensated. The
family have properties on both sides of the mine lease. Is this a reasonable question that Iron
Road won’t give us answers to.
Central Eyre Iron Project by IRD Mining Operations Pty Ltd and Iron Road Limited.

Central Eyre Iron Project - Public Submissions

Mining Proposal (MP) and Environmental Impact Statement (EIS)

Use this form to: Provide a written submission to the SA Government regarding the MP or EIS.

Iron Road's Central Eyre Iron Project (CEIP) is a proposed iron ore mining and infrastructure project located on Eyre Peninsula. The scope of the proposed project includes an iron ore mine (MP) to be located east of Warrambo near Wudinna and associated rail, power, water, port and accommodation infrastructure developments to be located between the proposed mine and proposed site of a new deep sea port near Port Neill (EIS).

The Government has received applications for these developments in accordance with the requirements of the Mining Act 1971 (for the mine), the Development Act 1993 (for the associated infrastructure) including actions that trigger the Environment Protection and Biodiversity Conservation Act (1999)(EPBC).

Written submissions are invited from members of the public on these applications.

Making a Submission

We value your input and look forward to reading your submission. Please follow the steps below to make an effective submission.

1. Review Iron Road's applications for the CEIP, available at www.ceipconsultation.sa.gov.au

2. Decide whether or not to include personal information in your submission


When you make a written submission, that submission becomes a public record. Your written submission will be provided to the applicant and will be published on the government CEIP consultation website. This includes:

- the content of your submission and any attachments - including any personal information about you which you have chosen to include in those documents.

If you wish for your personal information to be withheld, you must:

- request that your name and contact details be withheld from publishing by ticking the relevant box in the form below; and

- not include personal or identifying information in your submission or attachments.

We will not publish offensive, threatening, defamatory or other inappropriate material.

3. Make a submission

To make a written submission, you have the option to use this public submission form which includes a cover sheet.

Alternatively, make an online submission by accessing the government CEIP consultation website (www.ceipconsultation.sa.gov.au) and following the instructions.

Provide your written submission to government using any of the following methods:

By mail to: CEIP Submissions Mining Regulation Attn: Business Support Officer GPO Box 320 ADELAIDE SA 5001

By email to: ded.ceipconsultation@sa.gov.au

On line submission: www.ceipconsultation.sa.gov.au

Upload a pdf or word document at: www.ceipconsultation.sa.gov.au
Public Submission

Section A: Contact Details

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<thead>
<tr>
<th>Title</th>
<th>MRS</th>
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<tbody>
<tr>
<td>*Name</td>
<td>SHARON</td>
</tr>
<tr>
<td>*Surname</td>
<td>CRET TEN DEN</td>
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<tr>
<td>Organisation</td>
<td>SA CRET TEN DEN / CLEVE AUTO REPAIRS</td>
</tr>
<tr>
<td>*Street / PO Box</td>
<td>33 MAIN STREET</td>
</tr>
<tr>
<td>*Town / Suburb</td>
<td>CLEVE</td>
</tr>
<tr>
<td>*State</td>
<td>SA</td>
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<tr>
<td>*Postcode</td>
<td>5640</td>
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<tr>
<td>*Email Address (Mandatory for electronic submissions)</td>
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<tr>
<td>Telephone</td>
<td>08 86282822</td>
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<td>Submission Date</td>
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Section C: Your Submission

Points to consider when making your submission:

- Provide information on any aspect of the existing environment that either has not been included in the MP and/or EIS; or that you consider has been inadequately described
- Are there any environmental, social or economic impacts or benefits associated with the MP and/or EIS that have not been identified?
- If applicable, are the proposed environmental, social or economic outcomes acceptable? If not, try and describe what outcome you would find acceptable?

<table>
<thead>
<tr>
<th>Issue</th>
<th>Reference and Page No (if known)</th>
<th>Comment</th>
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<tbody>
<tr>
<td>Groundwater example</td>
<td>MP 7.1.3 p53</td>
<td>Example</td>
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<tr>
<td>Infrastructure example</td>
<td>EIS 6.3.2 p103</td>
<td>Example</td>
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I am a DECD bus driver covering the Alkabra Park bus route. My run starts at 7.35am and I believe I will have to cross the railway line at least twice on my current route. This will add time on to my trip. I do understand that DECD don't schedule routes to start earlier than 7.30am which I would have to do to get the children to school on time. I also worry about children crossing the railway either boarding or disembarking from the bus this adds pressure to us as drivers with duty of care. It is a high health risk to students.

Thank you for reading my concerns.
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<th>Reference and Page No (if known)</th>
<th>Comment</th>
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<td><em>I am definitely not in favour of this venture going ahead in its current form. Much more consultation and compromise is needed for all parties to be happy.</em></td>
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Section D: Any other comments

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</table>
Once completed, return your submission by 2 February 2016:

By mail to:
CEIP Submissions
Mining Regulation
Attn: Business Support Officer
GPO Box 320
ADELAIDE SA 5001

Or by email to:
dsd.ceipconsultation@sa.gov.au

On line submission:
www.ceipconsultation.sa.gov.au

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South Australian Government agencies ensure the protection of personal information by adhering to the South Australian Department of the Premier and Cabinet Information Privacy Principles Instruction (http://dpc.sa.gov.au/sites/default/files/pbimages/Circulars/PC012_Privacy_0.pdf)

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<table>
<thead>
<tr>
<th>Title</th>
<th>MR</th>
</tr>
</thead>
<tbody>
<tr>
<td>*Name</td>
<td>Jason</td>
</tr>
<tr>
<td>*Surname</td>
<td>Burton</td>
</tr>
<tr>
<td>Organisation</td>
<td>Triple B Nominees</td>
</tr>
<tr>
<td>*Street / PO Box</td>
<td>455 Burton Road</td>
</tr>
<tr>
<td>*Town / Suburb</td>
<td>Rudall</td>
</tr>
<tr>
<td>*Email Address (Mandatory for electronic submissions)</td>
<td><a href="mailto:jasonburton@bigpond.com">jasonburton@bigpond.com</a></td>
</tr>
<tr>
<td>Telephone</td>
<td>0439 207 083</td>
</tr>
<tr>
<td>Submission Date</td>
<td>03/09/16</td>
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My Personal View

From when I was the age of 11 or 12 I remember I wanted to follow in the footsteps of my father, grandfather and great grandfather. I am the fourth generation Burton to run this property of 95 years. I have 2 sons and a daughter that also want to take on this sometimes very stressful job. Where does this Private Company, Iron Road get off in thinking they can come and take my hard earned land which has taken generations to build. This so called mine runs for 25 years but my farm will hopefully keep going for as long as my children and grandchildren want it to. As far as I am concerned there WILL NOT be a rail corridor on my property.

I find it a difficult situation that I need to spend hundreds of hours researching, going to meetings finding out legal stances, sleepless nights worrying, stress and being able to only have one chance to write a submission to hold onto some land we hold in our own name and have worked extremely hard to buy. Iron Road get two chances to respond to their submission so I think you should see through all the lies of their first attempt and squash it straight away. They have no right by law to take any of my dirt now or in the future.

After paying taxes and rates for 95 plus years how can Iron Road think they can split my farm and take my country from me.

This track will not go through section 37,38 of Smeaton or Section 27 of Rudall.

Employment

They say we need employment in the community. I reckon the Cleve community would have close to 100 percent employment. I need a new employee and am struggling to find one from our district. What happens when a mine starts and takes my employee of 15 years full time that I have now?

I agree that the Cleve Community needs some kind of injection to bring families into our district. But the mine will not create full time work in our region everything just passes through it.

Location of the Corridor

The mine starts in the North West side of Hambidge Reserve. The proposed train line runs along the Northern edge of Hambidge and stays on farming ground all the way through. Wouldn't the straightest track goes through Hambidge and Hincks Reserve down to the Port? It appears that the government pays "greenies" to have more say about my country than all the hard working farmers do. We know our country better than most and there is more wildlife and different fauna in and on the tree lines of the worked farming
land than there is in these reserve. There is no water in the reserve so the
wildlife does not survive out there on these hot days. Ask the National Parks &
Wildlife. They told us this when we were fighting a fire out in Hinks Reserve
one day. If the Reserves were cut in half it would also provide a good fire
access and help manage these in the future.

If the train corridor went through the parks it would split our community's to
help with natural traffic flow eg. Lock people would be West of the line and
Cleve people would be East of the line. At the moment the line splits the Cleve
Community in pieces.

If the line can't go through the parks why wouldn't it go on the train corridor
that exists at the moment? Start north of Darkes Peak through Kielpa, Rudell,
Verran then turn off to the mine. The locals then know where the train is as it
has run on this line for the 100 years. It would also help to improve our grain
rail corridor. They could run narrow and wide gauge tracks together makes a
lot of sense to me. This line already has a strategic grain site located at Rucall
which would be invaluable if they were going to allow grain out in the same
Port.

Driver River Concerns
I have huge issues for our environment if the track runs down the proposed
corridor as the Driver River Catchment runs right through the middle of it. The
continuous traffic from the train will compact the soil and alter the natural water
movement so who reimburse me in 10 years if we get salt damage, or any other
fall back from this mine. If you take a look from Iron Duke to Whyalla the Red
dust in the fauna is horrific and no doubt as much as they promise to not have
this happen it will occur over a period of time. The rest of the world buy our
produce out of One Port which is in Port Lincoln and the world will probably
keep buying our produce but if dust is found on any grain exported, they will
only buy it at a deducted price which would affect the whole of the Eyre
Peninsula grain growers.

Communication
There has been very minimal communication between Iron Road and the land
holders on the corridor. I am still up in the air as to where the train track would
run as a black texta mark on an A4 page containing multiple farms does not cut
it for me. If the track does not run right next to my fence but 100 metres out in
the paddock I would not just loose the 250 acres they are suggesting at the
moment, but it would turn into a lot more unusable land and I bet they don't
reimburse me for that. For example If I had 1 billion dollars to run a track
through North Adelaide and it happen to take your back swimming pool out and
I would only pay you council value for that land, which then halved your equity
in your property and then when I started laying the line it boundried right up to your back door, I don’t think you would be too happy about that. I bet there would be a lot of screaming from the locals. There is only one difference and that is population eg. If we had a bigger population over here there is no way this cheap proposal would ever go ahead.

The land they are supposedly going to put the track through is some of my finest farming country, not the lies and photos that they put in the Environmental Impact Statement book.

Local Community & Safety
In their proposal they have no thought for the locals. When they first come they told us they would build huge bridges in our paddocks to give us access and to stop any traffic hold ups. They would of made the track look like the South Road Freeway just to try and make us agree to them. I saw through them straight away. Stop signs just are not going to be enough on these tracks. At every crossing there needs flashing lights 500 metres either side, even on the dirt roads as through seeding and harvest we have millions of dollars of equipment and produce crossing them hourly and a simple sign is old age not modern. Imagine driving a 80 tonne load and you need to cross this track 5 times a trip, 6 trips a day. Either driver awareness or untimely trains will cause fatal incidences. You cannot get reimbursed for that.

We have major crossing issues as the line cuts one of our farms in half, so how do you expect us to manage this. We have set up our farms with a lot of expense to make it more efficient for seeding, spraying and harvest. Sheep movements will be bloody difficult as they sometimes have a mind of their own. They can spread out down a road up to 1 km long if a train is coming it is hard to push them all over in a hurry.

Iron Road Issues
So where exactly does the track run?

Who did the environment study? Was it a payed Iron Road person or a totally independent?

No one has checked out my place or even contacted me in over 12 months.

There are so many lies that have been told, who are we to believe?

If I run my business like this I would go broke.
Before anyone approves this proposal they should come over first hand and actually drive the corridor and talk to the land holders see our concerns and then they would see that the track needs to be shifted.

If you vote yes to the proposal you actually cut into my equity straight away. If I want to sell some blocks of dirt that have this submission on it any interested buyers would not pay for the country that the track is going on, and no doubt the banks will drop that country of their mortgages as well. I bet we don't get anywhere near the compensation we would deserve.

My thoughts on compensation are similar to the Governments 100 year lease. They take 250 acres or 100 hectares of mine. I lose $1000 per hectare per year of income which equals $100000 per year times by 100 years equals $10000000 compensation, good luck.

**Power Lines**
Recently I found that they are also going to run the power line through one of our blocks we have not been contacted about this. We already have plenty of power lines running through our country I understand they are necessary for a energy source but enough is enough.

**Salt Water**
I have seen the boars that have been drilled around our region. While they were working there, we caught up and spoke to the riggers and found out that the water is 12 times saltier than sea water. This water will be pulled up through the soil where will it finish. They will use it on the rail corridor and then where will the salt move? It will wash off to surrounding soil surfaces in time onto our topsoil making it unproductive.
It will be used in the mine and placed in ponds. Does this salt seep into our polder basin and contaminate this. Ever since Roxby Downs has been going it buggered the polder basin please don't salt it up also.
The over burden hill will be made of soil and salty water 300 m high 8 km long were does the salt go when it washes out that ugly hill. Nothing will grow on that hill and how ugly would it be.

Once the mine is complete who cleans up the mess? Is it the local council like so many mines in Queensland. This salt could go through the soil and end up anywhere please take a look in WA. They blame tree removal because every farmer is small they never mention the mines waters spillages and wasting, seepage etc.
Salt moves to the low areas. Imagine if it worked its way down south to the very wealthy Cummins country where there is already natural salt ponds. The
potential is that the state government will lose more yearly income from 
agriculture then it would ever see from an overseas business opening a small 
mine in Central Eyre Peninsula. This would be forever removing saline country 
back to productive ag soil. This does not happen so make sure their 
environmental statement is correct then double check it. These mines have the 
potential to ruin a lot of productive farming soil.

The fact that I have to write a reason to hold onto my land is very disturbing to 
me. It has been worrying me for a long time because I am no lawyer and if I 
don't get this right I will lose the country I love. This is frustrating and difficult 
to get the message across. If the whole community was up to date with a lot of 
the things happening in this project there would be a lot more backlash but this 
company is very good at hiding the truth.

In short
No mine full stop on good agricultural land let us feed the world.

If the mine goes ahead, the straightest route to port through national reserve 
cutting down on farm land wastage.

If not, use the existing rail corridor.

Please don't be afraid to contact me before you vote I will show you around.

Yours sincerely
Jason Burton.
My Submission

The __ Family have been farming in the Kielpa/Rudall District for nearly 100 years and we are all totally against and oppose the Iron Road Rail Line being on any part of our properties. We own our land under Private Freehold and therefore do not have to sell to any private company. My husband is the 4th Generation on the family farm and my children are 5th generation. We have no interest in this proposal and we will not sell any of our land as we work hard to build a future for a children on the farm.

This mining project will not even last one generation and we are entering our 5th on our farm.

There is 98.4 million hectares of land within SA and of this only 4.2 million hectares is used for agriculture. Why would a rail line need to be place in the middle of prime grain growing area. As farmers we are caretakers of the land and must resist to selling out to mining companies.

Food is the most valuable resource in the world and our industry provides income to many residents in our community.

Mining does not compliment our farming sector and could damage our “Clean Green” image forever. This rail line should not be near any agricultural land.

Following are a array of concerns that I have with the Central Eyre Iron Project.

Consultation Process

As stated in the Impact Statement (page 8-18) Iron Road does not have ownership or the right to access our property within the proposed infrastructure corridor. To this date there has been no negotiation and our last “On Farm” consultation was back on 3/10/13. They certainly have not developed strong relationships with landholder as they have stated.

This process has been disgraceful and utterly disappointing. To date we still have not seen a detailed map as to where the exact Rail Corridor runs on our properties. Figure 8-1 does not tell us as land holders where exactly it will run in relation to our fence lines and houses.

Meetings run by Iron Road have been full of false information and every time we met there was more misleading information given. We have felt bullied and intimidated by a certain Road representative who speaks no truth at all.

My husband was told at the Cleve Field Days in 2014 that the Rail Corridor would go through his property whether he liked it or not by Iron Road.

There has been no discussions around compensation and possible purchase of land and certainly no design solutions to assist with Stock access and movement, Machinery access, Farm access or general day to day business operations.

They have left no paper trail. From my understanding they should have had a Form 21 each time they come onto our Farm. This is very convenient for them.

An Impact Management Plan has not been developed for our properties. Factual information has not been provided and we have no idea how they can be stating these things have been done.
How Do We Farm With The Rail Corridor?

Our machinery that is used all year round is only getting bigger. We have headers with 40 foot fronts (36metres), an Airseeder that is 80 foot wide, and Boomsprays that are 100 foot wide. Crossing the line is going to be impossible. The realisation of the size of crossings we are going to need just to get from paddock to paddock over the line just isn’t there. Size of Crossings within our farming land hasn’t been documented anywhere. During seeding and harvest we would need to cross the line many many times a day as we have land on both sides of the line. Refer to page 3 for photos of our machinery.

What about the “bits of” land left where they have cut paddocks off. These will become unusable as we will not be able to access them. Who is going to pay for that loss of productive land??

Over passes and stock crossings were promised, but no mention of these in the Impact Statement. How do we go moving Sheep over the line, or what happens if our sheep wander on the rail line? Are we going to be held responsible. Sheep jump fence and get out all the time.

Contamination from the Iron Ore Dust—Are we guaranteed that this will not occur. There is a lot of grain, wool and meat produce on the Eastern Eyre Peninsula and if it becomes contaminated who will pay the price. Does Iron Road have Insurance for this? Have the Wagons in Figure 4-41 been trialled and tested?

Crossings

"Passive Level Crossings” are not going to be adequate. “Active Crossings” should be at all crossings giving warning to all drivers whether they are on a main highway or a rubble road. With a train moving at 80kms per hour, 12 times a day past one crossing in a major agricultural area where there will be cars, utes, tractors, trucks and roadtrains.

During harvest we run Road Trains on non gazetted routes with a permit from the District Council of Cleve and the National Heavy Vehicle Regulator. Iron Road told us they would get Road Trains banned from these roads. Can they do that? How do we deliver our grain to Viterra?

Salt Water

Salt water and Agriculture are not two words that you put together. To run a pipeline of salt water through farming land that is 12 time saltier than sea water is only going to cause problems. And then to dump the excess salt near prime cropping land will have a detrimental effect on the Grain production in our area.

What happens if the pipeline bursts?

Also the compaction caused by the continuous trains along the line will have an adverse effect on the water tables bringing more salt to the surface in our prime cropping land. Especially over the Driver River where there is already high salt water tables. This will make areas uncroppable and therefore we lose more land due to this Corridor.
Power Transmission Lines

I refer to Figure 4-17. The proposed power transmission line. Looking at the diagram it actually runs through our property next to the existing power line. We have heard nothing about this or the loss of productive farming land where this will run.

Another concern is the erosion that this will cause as the soil type is very sandy and we are still having problems from when lines were constructed many years ago. Heavy construction equipment throughout our paddocks will cause a lot of irreparable damage.

Primary Production & Agriculture

The Eyre Peninsula is responsible for nearly half of South Australia’s wheat production. Why would we want to destroy what we have and able to produce. The Rail Corridor will interfere with this production and as you can see by the photos on the next page the Corridor is going through some of our most productive and valuable land. Our soil is certainly not nutrient poor as stated in 8.2.1.

And how are we going to pay our bills if during construction the majority of land in the CEIP will be unavailable to farming 8.2.7. and “where practical” reverted to agriculture use. We have no idea how many acres this will be that we will loose.

How much land will we actually loose for the corridor? We have no idea. Plus how many acres will be left by the means of long strips or corners that we will not be able to access to farm. Will we be compensated for this?

Nature Conservation

Section 8.2.2 refers to conservation areas and nature reserves (Hambrige and Hinks) that has species considered to be endangered and vulnerable. Well there is a diverse population of birdlife on Pederson Road which is considered vulnerable. Residents in the are have photos of Crimson, Yellow, White and Orange Chats, Pardalotes, Woodswallows, Budgerigars and Cockatiels. A Rail Corridor will not doubt affect these populations. Also Eucalyptus Cretata (Darke Peak Mallee) is along this road side. This is considered to be rare.

At least if the Rail Corridor went through these reserves it would provide a fire break and access for the emergency services. There is more fauna living on farming land than there is in Reserves.

Noise

Where the Corridor goes through Section 37 Hundred of Smeaton we have a house that is currently occupied. We have no idea how close the Corridor will be but we are sure the vibration and noise from the train with be quiet evident.
Above: Harvest 2015. 3 of the largest John Deere Headers, 2 Chaser bins, 2 Road trains, 2 Chassy Grain Bins

Above: Canola grown on Section 27 of Rudall in 2014. Averaged 1.5t per hectare.

Below: Wheat grown on Section 27 of Rudall in 2014. Averaged 3t per hectare.
Above: Beans grown on Section 37 Hundred of Smeaton in 2015. Averaged 1.5t per hectare
Darke Peak Range visible in the background.

Below: Lupins grown on Section 37 Hundred of Smeaton in 2015. Averaged 1.5t per hectare
Mental Health

Farmer/Primary Producers are very proud souls. They work extremely hard for their families and to build up their own empire. They do not want anyone telling them that they have to sell their lard for something that they see no gain. It is effecting our health, our relationship and our children. The suicide rate of farmers is concerning anyway, so added extra pressure can be enough to tip them over the edge.

We as a community have formed a Mental Health Group to help our members deal with their problems. This Rail Corridor will only create more as there are many generations of farmers that are very proud of what they have built up and refuse to have it taken away. It is very personal and we are sickened by it. Have Iron Road even considered the feelings of those effected? We are human.

School Buses

Kids on the Eyre Peninsula have some of the longest bus runs in South Australia. Adding several crossings to the route, increasing their time on the bus isn’t fair to our children. My kids leave home at 7:30am as it is.

Our bus run on Swaffer Road will cross the Rail line twice a day. It isn’t even an “Active Crossing”. Shouldn’t Iron Road be made to place these on all School Bus runs where they cross the line to keep our children safe.

Local Businesses

There will be long term effects on our local community which I feel will be all negative. Although they say in 22.5.1 that there will be a lot of extra employment this will drag from existing business in our local community who wont be able to compete with Iron Road or they will employ Fly In Fly Out employees. Having a detrimental effort on our small community. An influx of strangers into the community, especially during construction stage will mean increased crime rates and need for a stronger Police presence. It is hard to protect your farming equipment and produce as you cannot keep it under lock and key. Does this mean we need to install video cameras on all properties? More expense for us. They only discuss the benefits. As long term residents we do not see it that way.
In Closure

Grain Production and Mining cannot occupy the same land asset, it is just not going to work. Open cut mining is invasive and destructive of the soil and the environment.

We are very disappointed in Iron Road and the way in which they think they can come in and buy what is ours that IS NOT FOR SALE. We know that if the Corridor goes ahead the value of our land will decrease and therefore putting more pressure on us from the bank to pay our mortgage.

The timing for these submissions was not in our favour as we have just finished 3 months of our busiest time, harvest, looking for a break over Christmas and New Year and we had to have the extra stress of writing these submissions.

We would like to see the Corridor moved to either follow the existing Corridor through Darke Peak and Rudall or to be put through Hambidge and Hinks Reserves.

If either of these don’t happen then at least the Corridor could follow along the edge of existing roads so that minimal Primary Production Land is disturbed.

I have grave concerns for my family, especially my children who we are building a strong farming enterprise for them only to have a Private Company with no right to take it away. We do not want the Corridor anywhere near us and we will fight till the end.
Above: Wheat grown on Section 27 Hundred of Rudall in 2015.

Below: Barley grown on Section 27 Hundred of Rudall in 2015.
<table>
<thead>
<tr>
<th>Issue</th>
<th>Reference and Page No.</th>
<th>Comment</th>
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</thead>
<tbody>
<tr>
<td>Groundwater example</td>
<td>MP 7.3.9 p3</td>
<td>Example</td>
</tr>
<tr>
<td>Infrastructure example</td>
<td>FS 6.2.2 p03</td>
<td>Example</td>
</tr>
<tr>
<td></td>
<td></td>
<td>I am horrified that the Government is considering passing an Iron Ore mine and rail corridor through Agricultural land. Australia has the world reputation of having the cleanest, greenest wheat and barley in the world and mining should not occur anywhere near agriculture.</td>
</tr>
</tbody>
</table>
Central Eyre Iron Project byIRD Mining Operations Pty Ltd and Iron Road Limited.

**USE THIS FORM TO:** Provide a written submission to the SA Government regarding the MP or EIS

Iron Road's Central Eyre Iron Project (CEIP) is a proposed iron ore mining and infrastructure project located on Eyre Peninsula. The scope of the proposed project includes an iron ore mine (MP) to be located east of Warramboo near Wudinna and associated rail, power, water, port and accommodation infrastructure developments to be located between the proposed mine and proposed site of a new deep sea port near Port Neill (EIS).

The Government has received applications for these developments in accordance with the requirements of the Mining Act 1971 (for the mine), the Development Act 1993 (for the associated infrastructure) including actions that trigger the Environment Protection and Biodiversity Conservation Act (1999)(EPBC).

Written submissions are invited from members of the public on these applications.

**Making a Submission**

We value your input and look forward to reading your submission. Please follow the steps below to make an effective submission.

1. **Review Iron Road's applications for the CEIP**, available at www.ceipconsultation.sa.gov.au

2. **Decide whether or not to include personal information in your submission**


When you make a written submission, that submission becomes a public record. Your written submission will be provided to the applicant and will be published on the government CEIP consultation website. This includes:

- the content of your submission and any attachments - including any personal information about you which you have chosen to include in those documents.

If you wish for your personal information to be withheld, you must:

- request that your name and contact details be withheld from publishing by ticking the relevant box in the form below; and
- not include personal or identifying information in your submission or attachments.

We will not publish offensive, threatening, defamatory or other inappropriate material.

3. **Make a submission**

To make a written submission, you have the option to use this public submission form which includes a cover sheet.

Alternatively, make an online submission by accessing the government CEIP consultation website (www.ceipconsultation.sa.gov.au) and following the instructions.

Provide your written submission to government using any of the following methods:

**By mail to:**
CEIP Submissions
Mining Regulation
Attn: Business Support Officer
GPO Box 320
ADELAIDE SA 5001

**File No:** ...102894....
**Doc No:** ...A2630543..

**By email to:**
dsc.ceipconsultation@sa.gov.au

**On line submission:**
www.ceipconsultation.sa.gov.au

**Upload a pdf or word document at:**
www.ceipconsultation.sa.gov.au

"RECEIVED 28 JAN 2016"
Public Submission

Section A: Contact Details

Please complete the following information. Your contact details will be used by the South Australian Government to acknowledge your submission. Those marked with an asterisk (*) are mandatory. **Anonymous submissions will not be accepted.**

<table>
<thead>
<tr>
<th>Title</th>
<th>Mr + Mrs</th>
</tr>
</thead>
<tbody>
<tr>
<td><em>Name</em></td>
<td>Ken-Liz</td>
</tr>
<tr>
<td><em>Surname</em></td>
<td>Nield.</td>
</tr>
<tr>
<td>Organisation</td>
<td>Mallee Hill Farming</td>
</tr>
<tr>
<td><em>Street / PO Box</em></td>
<td>186 Nield Rd. (Box 18)</td>
</tr>
<tr>
<td><em>Town / Suburb</em></td>
<td>Rudall</td>
</tr>
<tr>
<td><em>State</em></td>
<td>SA</td>
</tr>
<tr>
<td><em>Postcode</em></td>
<td>5642</td>
</tr>
<tr>
<td><em>Email Address (Mandatory for electronic submissions)</em></td>
<td><a href="mailto:keni012@bigpond.com">keni012@bigpond.com</a></td>
</tr>
<tr>
<td>Telephone</td>
<td>08 86720205</td>
</tr>
<tr>
<td>Submission Date</td>
<td>2/2/16</td>
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</tbody>
</table>

Please indicate below which of the applications your submission relates to:

<table>
<thead>
<tr>
<th>S.A. Mining Application (MP)</th>
<th>S.A. Development Application (EIS)</th>
<th>Commonwealth EPBC Act (EIS)</th>
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Select those (one or more) which apply to your submission

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Section B: Privacy

Please select one of the following options:

☑️ I understand that my submission, including my personal contact details, will be published on the government website and provided to the applicant.

OR

☒ I understand that my submission will be published on the government website and provided to the applicant, **but** I require that the government **withholds my name and contact details**. I understand that it is my responsibility to ensure personal information is not included in the body of my submission, any footers or headers or any attachments.
We would like to state that we are emphatically opposed to this rail corridor and have stated adamantly to Iron Road from the beginning that we do not want this rail corridor going through our properties or anywhere near them. Our position has not changed and nor will it. We have written to and approached politicians, lawyers and the media expressing this and will continue to do so.

We do not believe that this mine or corridor should be anywhere near agricultural, cultivated land and do not believe the government should be putting our food bowl at risk and sell or lease Australian Tax Payers land to foreign ownership when our politicians are not the owners of this land but the servants of us the tax payers.

We are not aware of any law that states the government has the right to acquire or use our land on behalf of a private entity, so cannot see how Iron Road can have this proposal passed when the majority of land owners are vehemently opposed to this proposal.

We and our lawyer have asked Iron Road under what act they plan to do this rail corridor and they won’t reply either. The Australian public will be very interested in this if the government can purchase land, businesses and homes on behalf of private entities!!

Iron Roads refusal to give us any written negotiations or suggestions is disgraceful. Our lawyer has also asked them for written documentation and has received nothing. Every time we have met with Iron Road the corridor changes or they cannot give us answers. This whole process has been an absolute time waster for us and has caused nothing but anxiety and stress. The government should look at why companies have the right to approach people as Iron Road have done to us and after 3 years we still don’t understand or know what they really intend to do other than they intend to put a rail corridor through our land.
• **Consultation:** We had an initial visit from Ben Vincent representing Iron Road 3 years ago. He came into our back veranda, introduced himself and laid out a map on our pergola table and told us we’d have an Iron Ore train running through our farm within a few years. We objected and said we would not let that happen and he said we had no choice. We said they could go around us and he said the route he had was not up for discussion and was unchangeable [then they moved it onto more of our land]. He said they’d offer us crossings but we’d have to ring the rail company every time we wanted to cross! He also told us the rail corridor would have a pipeline and electricity towers running through it too. We told him they could move their rail line away from our property!

• Ben came back some 6 months later to say they’d be putting a bridge over the current rail line so we’d be able to go underneath. We’d be given a 2 metre clearance!!

• Liz attended an information night Iron Road held at the Rudall Community Sports Club in Feb 2015. At this meeting she saw the proposed corridor map. It was now going on a different route [after we were emphatically told it wouldn’t move], now avoiding some people’s farms and was now going through another of our properties and only 300 metres from the double brick 4 bedroom home on our property at Section 35, Verran. When she questioned them [Iron Road] about this they said the route had to be changed. She asked why it was now going only 300 metres from the home and they said they’d tested noise levels and that was quite OK. She also commented they had no crossovers marked on any of their land, not even one to the home on Section 35 and was told that we’d have to go around via the backroad to access the home. Liz told them they could move their railroad off their farms altogether!

On the 16th September 2015 we had a visit from Iron Road rep Tim Scholz. Once again we told him we were not happy about
the massive impact this rail corridor would have upon our farming enterprise. He showed us another map and this time the map showed the corridor was taking more of our land and taking a huge chunk of our home farm. We told him they could go around us and go away with their rail line and he seemed to not take us seriously at all and actually laughed about it. We estimate they are now taking some 200 acres of our land and it goes right through the middle of all our properties. It will be about 700 metres from our home and about 600 metres from the home on Section 38 and about 300 metres from our home on Section 35, Verran. There were no crossovers or holding yards for stock marked on the map and Tim still couldn’t tell us how or when we could cross the rail line with big machinery let alone with a mob of 600 sheep with lambs.

We cross all of our properties regularly in 9 different locations and at this stage there are no crossings marked on Iron Road’s maps. We would need these 9 locations to remain.

- At the government’s suggestion we all freeholded our land many years ago at great cost. What difference has it made if the government allows a company to come through and put a rail corridor through it all? *Maybe not now but someone will be called to explain this at some stage.*

- We are Australian Tax Paying Citizens, paying Tax annually, with running costs and wages going back into our local economy.

**FOOD SECURITY**

- The world needs food—particularly wheat and meat. Mining and its appendages jeopardises this. Agriculture will continue to boom and foreign companies know this. They are buying our agricultural land as fast as they can. They want our food as they know it’s as clean and as green as you can get. We can’t eat iron ore and until someone finds a way around that, mining
should stay away from agricultural land. Farming lasts forever, mining is 1 shot!

- Our farming practices now have made our land more and more productive. We have crops where the proposed rail corridor is going which produced 4.0 to 4.5 tonne hectare in 2015.

![Crop looking South East where proposed corridor will go. August 2015](image)

**NOISE AND VIBRATION**

- Noise and vibration will be tremendous through our homes. How do we sleep with a train of such magnitude running 24 hours a day? It will be running through our home property only 700 metres from our house. We have a prefab home and we know that trucks on our road rattle our house so what will a train do!

- It also is proposed to run only 300-350 metres from Section 35 home which is currently tenanted and our 12 year old son plans to move into this when he’s 18. This is a double brick 4 bedroom home and there’s no way it will handle having a train
line that close without damage not to mention how can anyone be expected to live in it with that noise and vibration 24 hours a day. Even our Adelaide airport doesn’t run 24 hrs a day!

**DANGERS TO OUR COMMUNITY:**

- This railway will be a danger to our family, workforce and livestock. Iron Road have given us no indication where we will be able to cross let alone how we can cross with big machinery. We would require 60 foot wide access points.

- We need to move large mobs of sheep and lambs regularly and this will be impossible if the train is running so often a day. As we own Section 40 Rudall as well as Lot 1, Lot 2 and section 37 Rudall we will have to cross this rail line up to 20 times a day...more than the train will be crossing! It literally splits us in half! We will have 2,800 acres each side of the proposed rail corridor as well as it running right through the entire front section of our property at Section 35 Verran. At Section 35 of Verran we will have to cross the rail line twice to access it from our home property. Our main water supply for spraying is on Lot 1 [section 38] Rudall, so when spraying the boom spray could be crossing the rail corridor 10 times a day and spraying occurs all year!

- If the government pass this, we would need more police in this area as we are worried about theft from the building of this corridor. We will have an influx of unknown workers to our property.

- We will need to spend hundreds of thousands of dollars on securing our homes, sheds and livestock to protect against possible theft. Our actual homes would be unliveable without serious modifications.
DESTRUCTION OF OUR BUSINESS:

- There’s been no discussion of any compensation for such a massive impact on our business which we hope will last for generations. It’s taken my husband and his father 65 years to get our land close together. We’ve paid top prices to get our land all together. Kenny left school early to shear to earn money to keep the farm going. Iron Road have had no mention of how they will compensate for loss of land for countless generations, loss of income for generations and the damage that will be caused. We understood that we lived in a nation where if someone takes something without proper negotiations for compensation it’s called stealing!! How can a company approach you saying they want to go through your land with not one written document or agreement and the government are listening to these people first! We finally managed a meeting with DIPTI in Cleve in December but as far as we are aware this is the first time they had contact with the landholders but they have been meeting with Iron Road. Is this fair?

- We have no guarantees about anything. What if rail workers leave gates open on the crossing and stock wander onto it? What sort of fencing will they fence with? Will it keep sheep and even children out? Who will control the weeds along the corridor?

- Whoever buys this corridor will have to have adequate staffing to maintain fencing and check gates etc.

- We have machinery sheds on all of our properties so are constantly working on all properties. This is another factor which will affect our business making it difficult to farm.
• There's been no discussions from IR on who compensates farmers for:
  • Loss of our time waiting for such a busy rail line
  • Stock that get hit
  • How do they expect shorn sheep and lambs to graze near a fast moving train?
  • Paying wages for staff who are waiting for this train
  • Sleep deficit.
  • There's been no discussions with us as to whether these carriages on train will be covered. If iron ore gets over our crops, pastures and sheep we'd be unable to sell produce.
  • Who will compensate for loss of income/time if the train has an accident or breaks down?
  • Weeds growing along the corridor: We spend weeks spot spraying weeds along fence lines. Who will spray along the corridor?
  • Loss of assets: Our asset will be devalued markedly if this corridor is even approved let alone built. Will the government compensate us for the devaluation of our land once it is earmarked with a potential rail corridor going through it? We have debts and a mortgage. The banks will want to be guaranteed that our asset hasn't been devalued.
  • Loss of income: This corridor would have a massive impact on our business. This is not a temporary loss either. Farms are set up for generations so the loss would be over generations to come not just ours.
  • If salt compacts and spreads into surrounding paddocks will we be compensated?
- We feel horrified that this project has been able to even be submitted to the government without any proper consultation with farmers. 3 visits is really almost laughable and for Tim Scholz to come back to our house 5 weeks before they put their application in to the government with no idea of crossings, with the route changed yet again, no idea of any compensation and saying we don’t eventually have a choice about whether we want this or not is laughable and sickening!

- We have a 17 year old daughter who still lives at home who has had constant back/headaches for the past 3 years as a result of the stress this has caused her. She has written passionately about this in English competitions and now has to see doctors regularly and a chiropractor every fortnight. Our 12 year old son who passionately wants to farm has sleepless nights worrying about how he will cope with this corridor and suffers from a nervous eczema condition. We also spend many sleepless nights and both feel very sickened by this whole proposal.
Another photo of crop on Section 37 where proposed corridor would run. Looking South East. Sept 1\textsuperscript{st} 2015
Double brick home on Section 35 Verran. Proposed corridor will be 350 metres from this building. Iron Road have also told us we will have no access from the bitumen road to this home and we have spent a lot of money on fencing raceways and rubble to this home.

Crop on Section 35 Verran in August 2015. Looking south on proposed rail corridor. Note the tress!
Crop[ September 2015] on Section 35 Verran. Proposed rail corridor to go through this paddock.

ENVIRONMENTAL IMPACT/ EROSION?SALT:

If you look at aerial photos of this region in the 1980s you will see huge areas of drift. Farmers have modified our farming practices to stop this occurring. This has been a costly but worthwhile exercise to preserve our soils. We have also spent time and money on fencing trees and planting salt bush to control erosion and the spread of salt.

We are extremely worried about the compaction of the railway corridor causing the spread in salt. You only have to look at council culverts in road ways and see how salt spreads out rapidly where there has been a heavy impact on the road ways. This quickly spreads to nearby paddocks.

On Lot 1 and Section 37 Rudall, Iron Road have proposed going through a stretch of our land which is lovely loamy flats but on sandy rises. We know from experience that as soon as they begin excavating near this sand it will drift to massive proportions and you
cannot stop drift. Once it starts it can spread for hundreds of metres. We will then be left with a mess.

The trouble is that in many places, if the corridor goes through we will be turning large heavy airseeders, boomsprays on sandy exposed rises and the drift problem will intensify. Currently we turn heavy machinery in the paddock they propose to go through on Section 37 on a heavy flat. If the corridor goes ahead we’d be turning on a major sandhill.

When we have spoken to Ben, Larry Ingle and Tim Scholz about this they seem to be clueless as to the massive environmental impact this could create.

They really don’t understand how fragile our soils are when they make comments like 17.7.6[ Environmental Impact Statement] about Dune Instability. Ask any farmer what happens when you plough through sand dunes. You end up with an uncontrollable mess. From experience you don’t stop it easily with fences and clay! It is an expensive and ongoing process and who pays for this?

- Iron Road will require massive amounts of rubble to build this rail corridor. Where are they getting this from? They won’t tell us. They certainly won’t be getting it off our farms!
- Iron Road have not explained where all their heavy earthmoving machinery would go/ work from to build such a rail corridor. You can’t just turn such heavy machinery like that on our soils without massive compaction and wind erosion problems.
Proposed corridor would run through this paddock on the Eastern End of Section 37 ... currently in clover medic pasture for sheep grazing. The land rises into sand [left of photo]. Drift would in our opinion be uncontrollable.

Looking West from the bottom corner of Section 37 Rudall. The thicker greener medic pasture is in the forefront of this photo. Note the colour change of pasture as it rises to the sand rise. If the proposed corridor goes ahead this would drift uncontrollably and we will be turning heavy machinery on it.
Crop along Allotment 1 Deposited Plan 93519 HD Rudall [looking south] where proposed corridor will run.

Crop looking north East across proposed rail corridor on Section 37 Rudall. You can see this is beautiful farming country.
Crop on northern end of Section 35. [looking south] Proposed corridor will cross Bakers Road and enter farm through this paddock, once again losing valuable farming land.

Track and fencing that has been done up from bitumen Road to access house on Section 35 Verran. The proposed corridor will run along here only 350 metres from double brick home. Iron road has not marked any entry point for us to access this home from bitumen Road.
Crop through Section 35 Verran where proposed corridor will run. Looking south West.

Water:

We have spent much time and money over the years fencing salt areas and planting salt bush and trees to ease the spread of salt erosion/damage to farming land. How Iron Road can state in their Impact Statement that removing such vast amounts of salt water from aqua ducts will have such little effect. We find the comment on page 17-15 that "If elevated soil salinity off-lease does occur, the consequences are considered to be minor; limited to localised areas and able to be remediated." absolutely laughable and shows how little research these people have done. Salt is the largest threat to our agricultural sustainability and why should this cost come back onto farmers when we have tried to reduce this risk for years. The problems of salt may not show up for years so who will guarantee this will be monitored over years?
Dumping salt water on the mine site is a massive risk to our underground fresh water supply on Eyre Peninsula. Our underground water system is all connected and where does this salt go to after rain?

The families at the proposed mine site itself have suffered terribly from the stress this has caused them and their lives basically put on hold.

Interesting that Iron Road are spinning how much support this mine and rail corridor have and yet at the public meetings with DIPTI held in December at Pt Neill, Cleve and Wudinna there seemed to be a huge amount of people against this mine/corridor than were for it!

**Conclusion.**

*We are horrified that at our meeting with DIPTI in Cleve in December these young men from DIPTI said that the whole process was out of their hands. It is not at all....you have the power to stop this now.*

**Mining should not occur in our valuable agricultural land.**

The decision you make now will affect not only us but generations of Australians.

*We don’t understand why Iron Road get the opportunity to respond to our submissions yet this is our only chance to respond.*

I am sure we will have more to say!

Thank you.

Kenny and Liz Nield

Rudall SA
Response to Iron Roads Mining Proposal at WARRAMBOOL.

COMMUNICATION.

We are concerned landowners who have property that backs onto the land that will be used by Iron Road. (Section 16)

The communication with us from Iron Road has been nonexistent. We have had no one from Iron Road ring us, or come and see us about what will happen and how it will affect us as landowners.

The closure of Dolphin Road must not happen. If this road is closed, access to our paddocks along this road will not be able to happen. We use this road, especially at harvest time for trucks to enter and take our grain away. This is our only route for this to happen.

This road is also used by other farmers to transport machinery from farm to farm. If roads are closed that have been there for decades, farmers will have longer times - mileage to transport machinery. This will cause holdups with traffic on the main highway (BOD HIGHWAY) due to oversize machinery.

EQUITY.

What will the Iron Road mine have on the value of our land? Will the value on the land be devalued?
Land around other mines have been either devalued or unsalable in other states.

DUST

We have been told that dust + noise will have no affect to the land. It is evident that they have not been here when we have had a North West wind blowing, especially in a very dry year (drought). Our land will be right in its path.

What happens when the mine starts up + there is dust? You just need to see the dust that is at Iron Knob.

What will happen to our crops, pasture + sheep in these paddocks? Will lambing averages drop with the noise?

We think the green + clean image of Eyre Peninsula will be lost.

What will happen to the land when the mine ceases? It will not be the same ever again, and the land will be lost to agriculture forever.

What will happen to the Warramboo Cemetery? Will the continual blasting and vibrations underground have any effects on the stability of the ground? Who will cover the costs to have repairs done? We have family members here.

We feel the Government should not allow good farming land to be mined.
Submission to the CEIP mining proposal.

As a result of the Iron Road mining proposal being released at the busiest time of year for us all - harvest, Christmas, New Year and annual family time away after a busy year, and other family issues, we have not had time to get hold of a copy to read. We have had an opportunity to flick through someone else’s copy for half an hour. This makes it extremely difficult to put in a submission. Iron Road have again disappointed us and shown us complete disregard at releasing the proposal at this time. This has happened time and time again through the process. We have asked numerous times to do these things through our quiet times of the year.

- Why was the proposal released at this time of year?
- Why wasn’t it withheld until January?
- Was our community and those affected taken into consideration regarding the time of year the proposal was released?
- If not why?
- Was the health and wellbeing of all taken into consideration? If not why?
- Why were we again shown complete disrespect?
- Do Iron Road believe that the Warrnambool community have their trust? If yes, why do they believe this?

Honesty, respect, trust, and regard for others are important values which Iron Road are very much lacking.

We are fourth generation farmers. We were brought up on the family farm, farming is our life, our business and our choice of career. Those affected have no idea where they will go and what they will do. Iron Road states “negotiations for the acquisition of land within the mining lease will be undertaken with the expectation that any final purchase price will be the same or better than the current market prices”. As it is not the landholders choice not to move, they also need to take into consideration the landholders costs of selling eg stamp duty. In over seven years that we have been attending meetings for this process, we have never seen any compassion or understanding from any Iron Road employees to the affected people.

Some of our questions regarding honesty, trust and respect are,

- why were we told by Iron Road employee that the mine pit would be filled in after mining was complete and that we would be able to farm the land again after? It was clearly evident to us that this would not be the case.
- why have questions been answered by Iron Road when they don’t know the answers?
- why have Iron Road employees been answering questions that they are not qualified to answer?
- why did compensation to an affected family take months to be paid?
- why, when an affected family member complained about noise, due to lack of sleep, was she only given a set of ear plugs and not taken seriously?
- why was a community member told they were difficult, after having only one phone call from them?
- why were we told by neighbours and not Iron Road that our farm would be impacted?
- Why does Iron Road say that there are only 6 families affected, when clearly there are other family units within these families?

The past seven years for these people and the rest of us who are not directly impacted have been absolute hell. This is where the extended families and friends have had to support their families. The counselling offered was not adequate. We used the local counsellor as we needed face to face talks which the phone service could not offer. We found these sessions of very little benefit. We asked Iron Road to get some experts into our community. This was extremely important as a lot of people were not coping. Again we were let down!
We personally are not classed as one of the affected families as we are not in the first stage of the mine proposal. So
- why were we sent a notice of entry in 2010?
- why were these other stages explored and drilled at the same time as stage 1?
- how many stages are there?
- when will the other stages be explored again?
- how long will this process take?
- it is evident that we will have to go through the whole process again. Why?
- how much more stress do we have to go through?
- why were we told six years ago not to upgrade our infrastructure (eg new sheds, fencing, roads etc) if we were not in
  stage 1?

If we have to go through this whole process again, we find this extremely unfair. We know that the other stages of the
mine are not impacted at this stage, but in reality, we have been affected since day one, as with the rest of the community.

We are not anti-mining and we realise it is a necessity and that the process takes time, but this amount of time is ridicu-
los. The process needs to be looked at as to how mining companies deal with the landholders to make the process easier
on them. We own our land, but seem to have little rights. The amount of damage that has been left behind after the drilling
at some of the sites is unforgivable. Rules and regulations have not been abided by. Mining and exploration need to be more
strictly regulated by the regulators.

As we can’t put in a submission to the mining proposal, due to the timing of the proposal being released, we do however
have some concerns we would like answers to.

A huge issue we have is on compensation.

We have asked numerous times at meetings as to who is entitled to compensation. We have been told time and time
again that no one outside the mining lease is entitled to any compensation.

- We have a number of times asked about our local cemetery, and have been told that they won’t be damaged. As it is
  within a five km from the mine site, and with blasting occurring we find this difficult to comprehend. We have three genera-
tions buried here and it is of major concern for us.
  - how much damage is going to be incurred on the graves?
  - will sinking of graves occur?
  - will there be photos taken and assessments done before mining starts? If not why?
  - will Iron Road compensate for any damage incurred from mining? If not why?
  - will this be monitored on a regular basis?

- The same questions should apply to people that have stone or brick buildings, cement flooring in sheds, our local
  sporting complex, the hall, the old school and other buildings in the vicinity.
  - We are extremely concerned about dust and water impacts on our farming enterprise and the compensation for this.
  - What compensation is available not only for the farms immediately surrounding the mine but further afield?

Our biggest issue is the lack of respect shown to the families impacted and the entire community.

Iron Road have been rude, arrogant, manipulative, continually lied to us and let us down constantly over the last seven
years. For all of us and our health and wellbeing we need things to change. Please Iron Road show us some respect and under-
standing!
Other questions we have are,

- Has there been a study done on the local silos as to what damage could be caused, especially when they are full, from blasting?
  - What effects on the silos will blasting have?
  - What impacts will this have on the town, its staff, the residents and road users? (ie if blasting causes them to split or burst)
  - What safety precautions do you have in place?

- Has there been a study on the wider community as to how many of its current residents will relocate elsewhere because they don't want to live in a mining town?

- Why is productive farming land being sacrificed for mining, when less than 5 percent of our state is used for growing the nations and other parts of the world with our much needed food? This not only applies for our mines, but all mines in South Australia's agricultural areas.

- Why aren't Iron Road mining their tenement at Tarcoola and leaving the productive land alone?

- Why have we been told that farming and mining can co-exist, yet there is no real evidence of this?

4

We ask that the Government, the regulators and Iron Road and will listen to our concerns and take them seriously. We look forward to hearing from you. Thank you for your time.
25 January 2016

Dear Sir/Madam,

The District Council of Cleve would like to make the following comments in relation to the Central Eyre Iron Mining Lease Proposal and Environmental Impact Statement public consultation and assessment process.

Infrastructure Corridor

Council is disappointed that Iron Road was not permitted to explore the possibility of the Infrastructure corridor going through the Hambridge Conservation Park. Whilst it is understood that it is preferential for Conservation Parks to remain untouched, corridor alignment through the park would have had the following advantages:

- As this is the most direct route, a reduction in emissions from the trains which will run day & night for the duration of the mine
- Create a fire break through the park with a water pipe line that could be suitably equipped for fire fighting purposes
- Reduce the amount of valuable viable farming land lost to the creation of the corridor.

Council currently has a number of its land owners/rate payers who's properties will be effected by the proposed Infrastructure Corridor. Those land owners are at various stages of negotiations in relation to the acquisition or use of their land. The District Council of Cleve does not consider it appropriate to get involved in this process which is a decision that each individual land owner must make. Council also acknowledges that a change to the corridor alignment will simply move the issue from one land owner to another and therefore has no further comment on this issue.

Road / Rail crossings

There are 15 proposed rail crossings within the District Council of Cleve.

An Active Level Crossing is proposed for the one crossing with a State Road in Council's area, the Birdseye Highway. Council considers that this crossing MUST be upgraded to a grade separation crossing. The Birdseye Highway is the only East/West, 'Coast to Coast' route in Central Eyre Peninsula connecting the Lincoln, Todd & Flinders Highways. In addition to this, Viterra has recently expanded the nearby Rudal Grain Handling Facility, confirming the status of this site as one of the Strategic Grain Handling Facilities on Eyre Peninsula. This will further add to the mix of traffic in the immediate vicinity that is not conducive to a high use Active Level Crossing.
Of the remaining 14 crossings on Council local roads, 12 are proposed to be Passive Level Crossings. Council requests that consideration be given to these crossings to be ungraded to Active Level Crossings. While Council does not wish to burden this project with what some may consider unnecessary infrastructure expenses, the safety of our community must be given the highest priority.

Regardless of the type of crossing, Council requests that the following be included in the crossing detailed design:

- Road realignments so that at least 50m of road on either side of the crossing is at 90° to the rail
- 100m either side of the crossing to be sealed with the first 15m to be hot mix asphalt and the remaining 85m to be 2 coat seal
- Iron Road to remain responsible for road reserve maintenance 5m either side of the crossing
- Iron Road to remain responsible for vegetation clearances to maintain at least minimum required site distances at crossings

The full life of the mine is yet to be determined but is expected to be somewhere between 20 & 50 years. The reality therefore is once the rail corridor is constructed it will be in place forever. It is impossible to determine what traffic movements there will be on any particular road so far into the future. It is on this basis that Council makes the above infrastructure requirement requests.

Module Haul Process

The Module Haul Process has the potential to cause significant delays (& frustration) for commuters. Council recommends that the applicant be required to maintain a dedicated web site, which is accessible to the public, displaying real time satellite tracking of the Modules. This will allow the general public to remain fully informed of the current and expected location of Modules along the haul route and make alternative travel arrangements if required.

Overall Project

While some of the above comments can be interpreted as being negative towards the project, Council is supportive of the overall project proposal. The District Council of Cleve views the success of the Central Eyre Iron Project as being critical for the long term economic prosperity of the Eyre Peninsula. The project was considered at length at a recent meeting of Council where it was resolved 'that Council includes in its submission support for the overall project acknowledging the regional economic benefits and employment opportunities expected'.

Should you require any further information in relation to any of the matter raised please contact myself or Council's Works Manager Ivan Noble at Council.

Yours faithfully

Peter J Arnold
Chief Executive Officer
Central Eyre Iron Project (CEIP) – Iron Road

This submission is prepared by Global Maintenance USG (GMUSG) in support for approval of Iron Road Limited’s Central Eyre Iron Project (CEIP), involving:

1. a mining lease under the SA Mining Act 1971 for an open cut magnetite iron ore mine and processing plant.
2. And Development Approval for:
   a. a new deep water port facility in Spencer Gulf 7 km south of Port Neill;
   b. a new 145 km heavy haul rail line from the mine to the port;
   c. a new water supply borefield;
   d. new electricity supply infrastructure; and
   e. an accommodation village located in the township of Wudinna.

Global Maintenance USG is a resources and energy supply-chain cluster with more than 100 member firms drawn from the Upper Spencer Gulf, other regions and Adelaide. GMUSG has a mission to maximise regional and South Australian supplier participation within resources and energy projects and ongoing maintenance markets. Naturally, GMUSG and its member firms have a strong interest in seeing South Australian resources and energy projects progress through approval and development.

The Iron Road Limited CEIP is an important project for South Australia and of significant importance for employment and business opportunities on Eyre Peninsula and the Upper Spencer Gulf. GMUSG has closely monitored progress on CEIP and continues to engage with Iron Road with an aim to maximise local, regional and South Australian content throughout the development and production phases of CEIP.

We note with interest the commitment of Iron Road to work with local businesses and the Industry Capability Network (ICN SA), to maximise local content. We also commend Iron Road in developing an Australian Industry Participation Plan.

South Australia has developed robust and internationally respected approval processes for mine licensing and major project development. We can therefore confidently support this important project knowing that regulators within DSD and DPTI will thoroughly assess its merits from an objective and evidence based
perspective. Iron Road’s presentations and EIS demonstrates they are committed to addressing the needs and concerns of local residents, both at the mine site and along the infrastructure corridor. This approach is commendable and necessary for large scale mine development occurring within rural communities.

The resources and energy sector is inherently cyclical and we have entered a period of constrained growth and low commodity prices. However, longer term prospects for mining in South Australia remains positive. It is therefore imperative that we enable development of greenfield proposals well ahead of the next upcycle. A positive and speedy assessment of the CEIP proposal will enable Iron Road to undertake the necessary work to ensure this project is approved and development-ready at the correct time in the resources business cycle.

In closing we want to reiterate our support for the CEIP approval and encourage the South Australian Government to expedite assessment and approval of this important project.

Should you require additional information or comment from GMUSG please feel free to contact me on 0419 820 641 or our Chairman, Greg Clothier, on 0439 843 570.

Yours Sincerely

Mark Malcolm
Manager
Email mark@markmalcolm.com.au
Phone 0419 820 641
Cover Sheet

Section A: Contact Details

Please complete the following information. Your contact details will be used by the South Australian Government to acknowledge your submission. Those marked with an asterisk ** are mandatory. Anonymous submissions will not be accepted.

<table>
<thead>
<tr>
<th>Title</th>
<th>Mrs</th>
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<tbody>
<tr>
<td>*Name</td>
<td>Georgina</td>
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<td>*Surname</td>
<td>Veitch</td>
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<td>clo Meller Olsson Lawyers, Level 5, 80 King William Street</td>
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<td>*Street / PO Box</td>
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<tr>
<td>*Town / Suburb</td>
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<td>*Email Address (Mandatory for electronic submissions)</td>
<td><a href="mailto:cl-atelley@melleroisson.com.au">cl-atelley@melleroisson.com.au</a></td>
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<td>2 February 2016</td>
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Please indicate below which of the applications your submission relates to:

<table>
<thead>
<tr>
<th>S.A. Mining Application (MP)</th>
<th>S.A. Development Application (EIS)</th>
<th>Commonwealth EPBC Act (EIS)</th>
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Select those (one or more) which apply to your submission

Section B: Privacy

Please select one of the following options:

✔ I understand that my submission, including my personal contact details, will be published on the government website and provided to the applicant.

OR

I understand that my submission will be published on the government website and provided to the applicant, but I require that the government withholds my name and contact details. I understand that it is my responsibility to ensure personal information is not included in the body of my submission, any footers or headers or any attachments.

✔ I have attached my written submission
2nd February 2016

Public Submission

To whom it may concern

I would like to take this opportunity to provide you with my written public submission that can be published on the government website and can be viewed by Iron Road Limited (IRD).

Kind regards

Georgina Veitch
TIMING OF MINING LEASE PROPOSAL
The timing of the Iron Road Limited (IRD) submission to the State Government has left us very time poor to do total justice to the response we provide for the submission. Firstly, it collided with harvest, then school holidays, Christmas and New Year. On top of this our legal adviser has had difficulty assisting us as he is taking his well earned leave. It feels unfair that the mining company can be given as much time as they want to complete their reports for the State Government, but we, the affected parties, are on a strict time limit for a response. We personally are trying to multi-task submission writing with family life (after all, our children only get one childhood) and operating and conducting our own businesses.

I was also greatly disappointed when I put in a request to both IRD and DSD that if I wanted a hard paper copy for my legal adviser of the Mining Lease Proposal (MLP) I was expected to pay approximately $500. This, in my opinion, seemed ludicrous! If IRD want to have negotiations with me, my lawyer will be involved, so, could they please explain why one wasn’t one issued? To me this would have signified their intent of goodwill and fostering a healthy relationship.

SUMMARY OF KEY CONCERNS
I have a number of concerns in relation to the proposed mine, but my particular concerns are set out below:-

1. The impact on what is left of our land
Firstly, there are a number of ways in which we will be impacted if the mine proceeds. Our dwelling is less than 4 kilometres from the proposed mine site. If the mine proceeds we will have to put up with noise, dust, light spill and having the relaxing environment we currently enjoy changed dramatically forever. We will be going from a scenic area without heavy industry around us to having a large mine immediately next door.

What is proposed will:-
   a. Impact our drinking water due to the dust generated. We rely on rainwater for our drinking water;
   b. Result in noise being generated around the clock from a 24 hour per day, 7 day a week mining operation. We have no doubt that in an open area like this the noise will carry to us, particularly as the steps being taken are to ‘reduce’ noise to come within EPA Guidelines, not eliminate it. With the around the clock operations, we will get no respite from the constant noise, in a location where currently the only noise generated comes from farming equipment during daylight hours. There won’t be any more tranquil rights sitting outside anymore;
   c. Result in an area which is illuminated every night, all night. It is acknowledged by Iron Road that this will have a medium impact, although we suspect it will be more significant than suggested.
Furthermore, the views that we currently get to enjoy will be obliterated due to the integrated waste landform (IWL), which will be 135-150 metres above natural ground level. To put this in some context, this will be higher than the tallest building in the Adelaide CBD, Westpac House, which is 132 metres tall. This, however, will not be limited to the size of a building - it is expected to be over an area of 1,970 hectares. Having a 50 metre buffer will be of little consequence in respect of the visual impact of the IWL - as indicated in the MLP, it will be visible for at least 30 kilometres. It will dramatically, and permanently, change the landscape (not to mention the impact of having a mine that will be left as a hole in the ground once the mining has ceased).

Secondly, the mining operations are likely to increase the amount of dust on our crops and livestock. The value of our wool will be decreased if the dust gets onto our sheep. In respect of the crops, there is a strong risk to yields if dust reaches the crops as it will impact on plant growth. What is important is that there is no suggestion that dust won’t be created and won’t impact us. The only comments are that steps will be taken to ‘reduce’ dust emissions. This doesn’t actually indicate how much dust will be created, nor if this dust will include any by-products from mining. There is a comment in the MLP (at Section 15.7.6) that there is a risk of a greater impact on crops from dust if crops are more sensitive than anticipated or dust deposition outside the mine is higher than anticipated, which poses great concern for us - particularly as it is acknowledged that there is some uncertainty as to the level at which dust deposition does impact yields for specific crop types.

The third unknown is what impact the mine will have on the biodiversity in the area and what impact this will have on our crops. It may be that the mining operations introduce more pests and diseases to the area - being on adjoining land will mean we are the most likely to be impacted by this.

A final issue of concern is that at the moment we are unable to invest in our property or our business, as we are not sure whether the mine will be proceeding and, if so, whether we will be compensated for any investment we make.

2. The viability of farming land
In addition to the issues mentioned above, the viability of our farm is also an issue. The farm supports a number of family members and is viable due to the large land holdings- there are economies of scale. We have serious concerns that if we lose a significant portion of our farming land we will be left with an area that is too small to be viable. This will potentially be exacerbated if further areas become less productive because of the introduction of pests, diseases and dust impacted yields.

There is also a potential impact on us selling our crops, livestock and wool. As the land will be located near a mine site, there is the risk that our products will no longer be seen as being clean and green. This impact has not been considered at all.

In addition, there will be a severe impact on our neighbours farming practices. This will be in a number of ways. Firstly, the IWL will overshadow cropping land (see Section 21.7.4). Whilst it is suggested the impact will be minimal, it will have an
impact on the amount and duration of light access obtained by any crops. This will have an ongoing and permanent impact on the return from any crops planted, particularly given the extent of shadowing of land (see Figure 21-5). Whilst sun-shadow diagrams have been taken for the winter and summer solstice, it would have been useful to have some idea as to what occurs during the cropping season, so one can ascertain the real impact of the IWL throughout this period.

3. The impact on the community
Another concern we have is the long term impact of the mine and what happens when it shuts down. In all likelihood the mining land is not going to be any good for agriculture. There will therefore be pressures put on the surrounding landowners in terms of the viability of their farming enterprises. If the farms aren’t viable, these people will have to move elsewhere - there is therefore the strong potential that there will be fewer people in the community or, even if those people do remain, that they will have less viable enterprises and not be able to put back into the community as they do currently. Whilst the mine might provide some economic boost in the short term (25 years), agricultural enterprises will be going for many decades after that.

RELATIONSHIPS
In Section 5.5.2 Page 5-10 it states:-

| Establishing strong relationships with landowners whose properties lie within, or are adjacent to, the proposed mining lease, together with directly affected community members, has been a priority for Iron Road |

I do acknowledge we have an association with IRD, however, I would not define it as a “strong relationship”. If anything it is a one-sided relationship whereby we wear all the costs of lawyer’s and self-education and take unknown risks on our land, as the PEPR’s have never been made available to us. We also have our business plans interrupted as we have to attend IRD meetings (often at inappropriate times) with little notice and never any remuneration. _Could IRD please explain if they think they have gone out of their way to foster a strong relationship with us?_

EXISTING ENVIRONMENT
The proposed mine is located in an agriculture only area that has been tightly held by farming families for up to four generations. It has a wonderful tight knit community that supports each other. All of the people living and working on the land that IRD wants do contribute socially, economically and voluntary to the district whether through sport, church, school, supporting local shops – to name just a few. Up until the recent threat of mining, it has been a well sought out area by farmers as it is renowned for its reasonable crops and reliable returns. I would like you to refer to the below article that lists the neighbouring town of Kyancutta (5651) this is very similar to the farming practices/income of those in Warramboo (5650).
The Roxby Downs township and Leigh Creek township (just to name a few) were built with the purpose of supporting those mining families. Warramboo has never had mining and for now it remains exempt land. Does IRD realise how hard it may be for them to achieve social cohesion when they are changing so much of the structure of the district? Warramboo farmers are proud of their farming heritage. Just because we have not had significant public protesting (which just isn’t our way), please do not underestimate how much the land encompasses our identity, our lifestyle choice and our mental and spiritual well-being.

IMPACT ON STATES ECONOMY AND POPULATION

In Section 5.4 MLP pages 5-4:

“The proposed mining lease will cover an area of 8,458 ha, the majority of it on agricultural land held under freehold tenure by six different farming families. There are also portions of road reserves within the boundary of the proposed mining lease under the care, control and management of the Wudinna District Council (DC).”

This paragraph brings me several questions i.e.:-

- How many businesses are directly impacted or associated with those “six different farming families within the mine site”?
- How many people are directly impacted or associated with those “six different farming families within the mine site” (indirect effect multipliers)?
- How many businesses around the mine site may be impacted by IRD activities?
- How many people around the mine site may be impacted by IRD activities?
I would like to bring to your attention a couple of extracts from Bank SA’s economic bulletin, *Trends*, December 2015, titled “Premium food for thought Opportunities for South Australia in the Asian dining boom.”

A key side-effect of the rise of emerging Asia in recent years was the remarkable impact it had on capital spending by businesses here in Australia. But much of that was in mining, and South Australia’s relatively small mining sector means that it didn’t see the same run up in capex as was true at the national level. Equally, having not risen as high in the first place, this State is better protected amid the downswing in engineering construction currently being felt in the likes of Western Australia and Queensland.

I interpreted from this article that South Australia was lucky.

In Section 22.7.5 MLP p 22-62 I have come across this which reads:-

As noted in Section 22.3.1, the Wudinna DC has experienced population losses of around 40% from 1975 to 2011. Potentially, the mine’s operation may attract new people to live and work in the area and reverse this population decline.

This seems to differ with the “Trends article, December 2015” that states:-

The slowdown in Australia’s population growth has been concentrated in the mining jurisdictions of Western Australia, Queensland and the Northern Territory. In contrast, South Australia’s population growth has remained relatively steady of late, although it still remains notably lower than the matching national population growth rate.

I can see why IRD used the word “may”.

In Section 22.3. 1 of the MLP it is of my opinion that if the last 15 years of ABS data is used, (2000-2015), rather than the last 40 years (1976-2015), any decline in the population has been minimal. Greater reductions in the population through the 1970’s, 1980’s and 1990’s may have also been linked to the migration off the land with the OPEC crisis, improved and more efficient farming practices and the “recession we had to have”, which resulted in many farmers in many districts throughout Australia moving to larger population centres in the hope of work.

I have included another graph which goes a bit further than that of the CEIP version. *Could IRD please extend their graph too? What happens once the mine closes?* I have tried to illustrate that here:-
LAND ACQUISITION

I also read with interest in Section 22.7.5 MLP p 22-63

Iron Road is willing to discuss and negotiate land acquisition with those landowners that are adjacent to the proposed mining lease if those landowners wish to move because mining operations are impacting negatively on the use and enjoyment of their land.

This is not the impression I have been given in my dealings with IRD.

- Does the land get valued at the point of time the mining licence is granted and then would it have the value of the CPI indexed?
- Will this only take place in a court environment?
- How many years will a landholder have to live there to prove there is an impact?
- Will it be a fair and equitable transaction or one whereby the landholder be bought at a marginally reduced price as they simply have had enough?
- What will IRD do to farmers like us who will no longer be viable as the majority of their farm holding has been purchased and they will be left with a minimal amount to farm?
- Will IRD buy all of the land we farm to give us an opportunity to have a fresh start somewhere else?
- Will IRD pay the difference to us if our land becomes devalued if we live so close to a mine and therefore have less people interested in the land that normally ups the market price value?
DUST ON WHEAT

In MLP Section 15.7.6 “Impacts to Agricultural Values (Reduced Yields) due to Dust Generated from Proposed Mine” on p 15-33 and p 15-34 I do not feel comfortable that an assessment appears to be only done on “Model predications”. A study on a reasonable worst-case-scenario would provide much illumination on the issue. For farmers, being able to know if our crop will be affected is paramount. We change crops and varieties to maximise our opportunity of income based on past performance and future predictions. At the moment the future predictions seem highly optimistic.

How much more assessment should be required before approval is given if at the moment the two programs that IRD are offering will only be “detailed in the PEPR should the CEIP be granted government and Iron Road Board approvals”? Could IRD please explain where is the surety for adjacent landholders?

With regards to the Jacobs report which features the following:-

6. Future Monitoring Activities - A comprehensive baseline air monitoring program is planned to commence 12 months prior to the start of construction, and will consist of upgraded instrumentation and an expanded geographical study area. It is intended that a key long term monitoring site will be established near the Warrambro community which will serve as a point of reference for the project duration. This will consist of Australian Standard (AS) compliant monitors for PM10 and PM2.5, an AS compliant meteorological station and instrumentation for dust deposition and TSP. Smaller monitoring sites equipped with either PM10 and / or dust deposition gauges will be located at key locations around the mining lease.

The question I have here is why hasn’t it already happened? Surely there is benefit in knowing what the targets are before approving the project. Meeting these AS targets may be a major driver of the mines environmental responsibilities.

COMMUNITY CONSULTATION

Initially, I was a member of the CEIP CCC, however, I resigned as I felt that IRD spent far too much time “informing us” rather than “involving us”. It is of my opinion that the CEIP CCC really serves no other purpose than that of allowing the mining company a means of informing the locals without true consultation. An open public meeting is to me of far more benefit to the whole community. Could IRD please inform us of when they will have their next public meeting? They have been very quiet in the community since the MLP and EIS came out.

I feel that the CEIP CCC failed to meet some of its expectations to achieve community consultation. Term of Reference Point 2.4 states the aim of the CEIP CCC is to:-

“Provide recommendations on relevant aspects of the project”.

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For example, the Independent Chair of the CCC did not have the group gather to do an EPBC referral for the transport corridor as:

"The EPBC referral was related to the infrastructure corridor and that is not currently an area the CCC is focussing on." email dated Friday, August 08, 2014

I understood that in the "Terms of Reference" for the CEIP CCC in the Introduction Point 1.0 states the transport corridor is "in the Warramboo region". I also believe the transport corridor itself also begins in Warramboo. I believe the CEIP Infrastructure EPBC Act Referral is a relevant aspect of the project.

Point 4.0 states:

"Representation includes: landholders on transport routes".

The CCC has members whom fit into this category of landholders. However, even after I pointed this out nothing was put forward from the CEIP CCC for any of the EPBC Referrals (i.e. Mining or Transport). I believe the same will apply to the MLP.

MISCELLANEOUS INFORMATION

In Section 2.2.1 MLP p2-4 the services that were not included were electrician, carpet cleaning, sandblasting, engineering, Viterra, Cash for Scrap, plumber, fencing/stock contractor, cleaner of the Warramboo public toilets and cleaner of the Warramboo Club. Additionally, Lock also does have a public swimming pool. Could IRD please inform me how they missed so many of the local services?

In Section 2.2.2 MLP p 2-6 I note that we have the "Name of person entitled to exemption". Could all future references include only our CT title and not our company name or personal names? A previous discussion with a DSD employee identified that the companies are all publically listed, but even so I believe that the name of the current owners really has little bearing on the outcome. At the time when I set up my business I never anticipated it being part of a MLP. Why didn't IRD communicate with landholders about this? If I was to publish their details in such a manner I do not think it would be warmly received.

In Section 3.1.2 how has the determination been made as to what soils and subsoils are "benign waste rock with topsoil/subsoil"?

In Section 3.3.1 it states the only soil type in the mine site is Calcarosols. The majority of the land we own in the mine site is sand on clay or sodosols chromosols tenosols and not Calcarosols which we have on other properties. How did IRD form this conclusion?

Will the area of the MLP become an aviation exclusion zone? What happens to those landholders who may need to do seasonal aerial spraying which is often a norm when you have peas? Can there please be clarification of this?

MALLEE FOWL. I noted that IRD included their EPBC information so I have attached my response at the end of this document. I am still very surprised that the Mallee Fowl n our
area are being ignored at a Federal level and that IRD don’t seem to have mentioned that they will do an induction to their mine staff about them being in the vicinity. In my opinion they seem sadly forgotten.

CONCLUSION
Please consider my thoughts when making this decision of approval for this mine.

Having a 24 hour mine in the area is not enhancing our farming practices, instead detracting from it. When you read the submission there is just too many unknowns and a lot of methods are dependent on “modelling” as opposed to “real life” scenarios.

The risks to surrounding farmland is high and the determination needs to be made as to whether this is the best usage of the land as it may well never be suitable for growing anymore after the mine ceases.

I have heard comments of people passing through about how beautiful our district is; as we don’t have the ugly mines and therefore our clean, green, image to date has been untarnished. This sadly may be a thing of the past and with it my children’s future prosperity.
14 October 2014

Email to: epbc.referrals@environment.gov.au

Dear Sir

EPBC REFERRAL 2014/7349

INTRODUCTION

Thank you for allowing me the opportunity to respond to the EPBC Referral 2014/7349 by Iron Road Limited. As a result of the proposed action of an open cut mine in an agricultural zone, I am concerned with the effects this will have on not only the local EPBC protected flora and fauna but also that of state significance and what makes up the biodiversity within this region. Native vegetation communities (including Native pine and Mallee) will be further fragmented and have irreversible effects leading to the loss of important flora and fauna communities, EPBC listed species and valuable habitat not only for the protected Mallee Fowl but also other native species.

MY OBSERVATIONS FROM THE REFERRAL CENTRAL EYRE IRON PROJECT MINE SITE EPBC ACT (Referral)

With regards to Page 7-8 of the Referral I would like to know why the reference to 480 million tonnes of salt has not been mentioned in this report. This information has been disclosed to the community via the "Central Eyre Iron Project Community Consultative Committee Meeting, February, 20th 2014 Responses provided by Iron Road either at the meeting or followed up post meeting". I would like to know what the perceived environmental long term impact will be of this and how it is to be managed to minimise the effects on the flora and fauna.

It is understood that there is a presence of Uranium in the area. Could you please refer to the attachment from SAR/G on the “Progress Report to Licence Surrender for the Period 20/5/1971 to 18/9/1971 submitted by Meekartha Minerals (Australia) Pty Ltd 1971” (Page 7).

Whilst the wetlands in the region are not RAMSAR classified (Page 14 of the Referral), they do form an integral part of the ecological environment of this region. I do believe further research is required as this area has been somewhat glossed over.

When you look at Google Earth you will see that there is a series of lakes ie Lake Warrambo (at Warramboo), Lake Wannamanna (between Kyangutta and Wudinna) and Lake Yaninee that all line up with each other. What studies have the company done to see if any inter-relationships exist? Do they have common flora and fauna?
On Page 23 of the Referral the company states "the climate of the study area is arid with mean annual rainfall of approximately 330 mm at Warramboo (BCM 2013)". According to the Native Vegetation of the Eyre Peninsula, South Australia book by Todd Berkshaw (Page 4) our area is semi-arid not arid. "Semi-arid: lower rainfall areas receiving between 250-350 millimetres annual average rainfall."

On Page 24 of the Referral the company states "Apart from several small patches of mallee, Southern Cypresspine and Boree, almost all of the remaining vegetation is regrowth from previous clearance." I would like to disagree with this statement as what vegetation remains on roadside and sandhills and other uncleared patches of farmland is indicative of what was originally here and it is not "regrowth from previous clearance" except where the council has done excavations for road works. The majority of farmers knew it was best to leave some areas covered with vegetation due to the nature of the soil. Clearing land was hard work so there was no justification to do any more than what was absolutely necessary as the priority was to grow a crop and provide an income for their family. Residents who have been here for over 70 years have clarified this.

On Page 27 it states that "It is not anticipated the CEIP Mine will have any effect on these areas due to their distance from the mine site. While the boundary of Hambidge is 4km from the ML boundary, it is outside the expected groundwater drawdown area of 7 km from the actual mine pits". On Page 23 of the Referral it states "During mining and following mine closure, a cone of groundwater drawdown from pit dewatering is expected to develop, eventually extending up to 9km from the pits (over hundreds of years)". The question I have is what is the truer figure 7km or 9km? Water is one concern that the company lists but what about noise, fugitive dust, light, vibrations (as a result of blasting) etc generated from the mine, and that associated with the trains via heavy duty rail. "Seepage from tailings and waste rock" (Page 10 of the Referral) is another I thought would have been
listed as an impact to Hambidge. Could you please seek clarification from the company how it will not impact on the existing flora and fauna?

**MY OBSERVATIONS FROM THE CENTRAL EYRE IRON PROJECT: MINE SITE ECOLOGICAL SURVEY (company survey)**

On Page 8 of the company survey it states “The CEIP is a collection of three iron deposits, namely Warramboo, Kopi and Hambidge”. The company have just extended their tenement to border Hambidge Wilderness Protection Area on three sides (Exploration Licence 2014/0095).

To illustrate the importance of Hambidge I have obtained the following information from the “Mallee Parks of the Central Eyre Peninsula Management Plan 2007” Page 2 and Page 12.

“Hambidge Wilderness Protection Area is dominated by mallee, with a small portion covered by woodland or shrubland. It also protects several species of conservation significance, including the Malleefowl, which is vulnerable at a national and state level. The reserve also potentially supports populations of the Sandhill Dunnart (Sminthopsis psammophila). This area “does not allow for access under state mining legislation.” (Page 2).

“Plants Species of Conservation Significance Recorded in Hambidge Wilderness Protection Area” are “Rein Wattle, Yellow-flower Sour-bush, Large-fruit Crassula, Darke Peak Mallee, Dogwood Haecckeria, Showy Lawrenicia, Pointed-leaf Honey-myrtle, Williamson’s Riceflower, Yellow Swainson-pea and Spiny Templetonia”. (Page 12).

Due to the mine sites close proximity to Hambidge it may be possible that some of these species are present and thriving in our area and we don’t even know it!

On Page 42 of the company survey it states “the average condition of roadside blocks (i.e. most of Sites A-J) was relatively poor. These sites were often long and thin with high edge effects and significant influence from adjacent land uses (e.g. herbicide use, weeds, dust, roadside drainage, cuttings, rubbish, grazing)”. For a company survey as significant as this, could not more appropriate sources of the vegetation been found that was not roadside? Roadside vegetation often suffers from the effects of dust, increased weeds, edge effects and noise which may impact the local fauna and flora.

With regards to the following I have made some observations and quoted from page 40 of the company survey:

- “Flora site B is a thin remnant scrub block of approximately 5ha on dune crest bordering Lock Road.” (This is not intact vegetation. Could another site have been used?)
- “Flora site C is a thin remnant scrub block of approximately 9ha on dune crest bordering Lock Road.” (This is devoid of understory and intact vegetation. If this site is moderately grazed could you please ask the author of the report to clarify by what fauna? Therefore could another site not have been used?)
- “Flora site F is located on a thin strip of roadside vegetation on Kimba Road.” (This site you will note has a narrow service road through it for the water utilities (hence the small track).

With regards to Flora site C and D the landholders did not give permission for entry so therefore the 38 hectares ie C and D added together could only have been viewed by the roadside. Could you please clarify with the company how this area was in fact surveyed?
What must also be taken into consideration is that according to Page 5 of the company survey the “flora and fauna survey was undertaken between 10 and 14 October 2011”. When you take the time to check the rainfall records from the Australian Bureau of Meteorology for Warramboo in 2011, an above average rainfall year, the flowering period of the EPBC Act listed orchids would have been in late winter to early spring as plants would have had adequate soil moisture, and also due to local conditions plants tend to flower early in the range of specified flowering periods. For example, in the case of the Greencomb Spider Orchid it may have been present but would be difficult to find when plant surveys were undertaken in October as according to the EPBC Act information “Flowering in the species is reported to occur from late August-October (Bates 2009), September – November (Blackhouse & Jeanes 1995) and September-October (Todd 2000)”.

“The Hale Dwarf Greenhood has been located in” “Hambidge Wilderness area (ADHERB 2008 cited in TSSC 2008agd)” (EPBC Act information) so it would be good to recheck its existence. “The Hale Dwarf Greenhood flowers from August-September and usually occurs as small, discrete, clonal colonies (SA DEH 2008c)” sourced from EPBC Act information. The opportunity to see this may have been missed.

On Page 7 of the company survey it states “no evidence of Malleefowl was found”. On the 26th November, 2013 I had a personal sighting of a Mallee Fowl (see photo below). Therefore I don’t think it is conclusive, as stated by the company survey, that Mallee Fowls are not present in this area.

![Mallee Fowl sighting](image)
I do believe further research needs to be made on the way the groundwater works as in wetter years fresh water lays in the paddocks resulting in more wildlife in native ducks, pelicans etc.

Fresh water supporting native ducks in a paddock

Example of a salt lake which has even had a pelican sighting this year on it.
CONCLUSION

Could you please take my local knowledge into consideration when making your assessment? I do not think a desktop study and five days in 2011 is sufficient to ascertain what an area is truly like and then to make an assessment as to how this proposed mine may impact on it. The area of the proposed mining lease is quite large and diverse.

I am forever amazed by the diverse ecological wonders that are contained here. There is nothing more wonderful than going for a walk in the scrub, hearing the birds sing and seeing the native wildflowers, like our White Everlastings and wildlife roam. It truly is a piece of paradise and to date I have been privileged to have it as part of my backyard! This area does deserve a more thorough evaluation before it is lost to future generations as it is truly irreplaceable.
Open File Envelope
No. 1663

SML 577
KYANCUTTA

PROGRESS REPORT TO LICENCE SURRENDER
FOR THE PERIOD 20/5/1971 TO 18/9/1971

Submitted by
Meekatharra Minerals (Australia) Pty Ltd
1971
CONTENT NEWS ENVELOPE 1663

TENEMENT: S.M.L. 577

TENEMENT HOLDER: MEEKATHARRA MINERALS (AUST) PTY. LTD

REPORTS:

GEOTECHNICS (AUST) PTY. LTD 1971
Quarterly report No. 1
For period ending 20th August 1971
S. M.L 577 Kimba, Eyre Peninsula,
South Australia
(No Plans) (pgs. 2A-6)
MEEKATHARRA MINERALS

QUARTERLY REPORT NO. 1

FOR PERIOD ENDING 20TH AUGUST, 1971

S.M.I. 577 KIMBA, EYRE PENINSULA

SOUTH AUSTRALIA.

Geotechnics (Aust.) Pty. Ltd.
68-70 Daly Street
BELMONT W.A.
# MEEKATHARRA MINERALS

## QUARTERLY REPORT NO. 1

**FOR PERIOD ENDING 20TH AUGUST, 1971**

*S.M.L. 577 KIMBA, EYRE PENINSULA, SOUTH AUSTRALIA*

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INTRODUCTION

During the period under review a brief geological reconnaissance was made of the concession area the bores and wells recorded in Mines Department’s plans were visited and where possible samples of water were taken for analysis.

WORK DONE

Three days were spent on examination of Department of Mines records and literature search. Between May 10th and May 16th one geologist and two field assistants were engaged in regional geological reconnaissance and bore and well location and water sampling. The main purpose of the geological reconnaissance was to locate basement outcrops in the concession area, and to examine bore cuttings.

RESULTS

The search for wells and bores suitable for sampling failed to show any that could usefully be tested. Only three wells contained water and these were suspect and were not submitted for analyses.

Geological reconnaissance showed that basement is represented by massive unstressed coarse grained biotite granite which forms several small hills between four miles and six miles northwest of the town of Wudinna and a few miles north of the northwest corner of the lease.

Exploration work including geophysical surveys and drilling by the S.A. Department of Mines (Whitten and Risely 1968) located biotite-feldspar-quartz gneiss and low grade iron ore covered by sand, clay and kumkar, about two miles east of Warramboo.

/2...
Sediments of possible Tertiary age have been recorded in the Warramboo district in bores constructed to test magnetic anomalies.

The deepest bore recorded in the Warramboo district passed through 346 feet of sediments before entering basement. This hole was sited eight miles south of Warramboo on the Port Lincoln railway.

A bore in the town of Pygery passed through 216 feet of sediments.

Drillers' logs reveal that the sedimentary section is generally made up of clayey, fine grained sand with more porous coarse quartz sand and gravel, generally overlain by up to 15 feet of soil and sandy clay with nodules of limestone.

A well about four miles southeast of Kyancutta, outside the lease boundary, appears to cut about 30 feet of firm limestone.

Lignite and lignitic sand are recorded in bores sunk in Kyancutta and on the highway five miles northwest and two miles south of the town. A sample of lignite from the Kyancutta silo foundations is made up of about 70 percent friable, flakey, black carbonaceous material and about 30 percent coarse quartz sand. The lignitic sediments range in thickness from 11 feet, five miles northwest of Kyancutta through 48 feet, in a bore at Kyancutta oval to 60 feet, two miles south of the town. At the last locality the lignitic sand contains pyrite nodules.

The presence of unoxidized sediments in a southward-thickening section in the middle of the lease indicates that an environment suitable for the accumulation of sedimentary uranium probably exists within the lease, and future exploration can be directed to locating the boundary between the unoxidized and oxidized sediments which almost certainly occurs in the vicinity of the exposed or shallow basement rocks near Wudinna and Warramboo.
The bulk of the sediments overlying the basement are almost certainly of Cainozoic age, Ludbrook (in Parkin, 1969) refers to Eocene lignitic sediments in the Polda Basin, about 15 miles southwest of Warramboo, and the lignitic sediments at Kyancutta, probably have a similar age. However, Harris (in Parkin, 1969) has identified Jurassic microfossils in lignitic clay from a bore at Lock, about 25 miles south of Warramboo, and it is possible that some of the sediments may be of Mesozoic age.
CEIP ONLINE SUBMISSION

Mrs Jade Klante
SA 5652
wudcomclub@gmail.com
31/01/2016

5th Australian Mining Application (MP)

0 - I understand that my submission, including my personal contact details, will be published on the
government website and provided to the applicant; OR

Hi, please note the attached submission letter was posted to you last week, but it did not include the
cover note, so I have submitted it again to make sure it will be received properly. Thanks

CEIP_Submission_Letter.pdf, type application/pdf, 183.2 KB
17th January 2016

CEIP Submissions
Mining Regulation
Attention: Business Support Officer
Department of State Development
GPO Box 320
ADELAIDE SA 5001

To Whom it may concern

We are writing in regards to the proposed Central Eyre Iron Project (CEIP) on the Eyre Peninsula in South Australia. "We" are the Executive Committee of the Wudinna Community Club.

The Wudinna Community Club was built in 1977 by local benefactors as a facility that would serve local residents, a place to enjoy sport and hospitality in a relaxing friendly environment and as an alternative to the local Hotel. We are a family friendly environment that welcomes not just members of the numerous sporting clubs - Football, Netball, Cricket, Basketball and Lawn Bowls - but also travellers, visiting families and locals alike. Our complex caters for functions for up to 300 people with full bar and kitchen facilities. We currently rely heavily on volunteers for a large portion of our labour requirements. We are a priority venue for small and large conferences and also for large inter-association sporting events due to the layout of our facility.

The CEIP is proposing a long term residential village in nearby proximity to the Wudinna Community Club. We recognise that the service we provide is for each and all that are working and residing in our community. Not all individuals prefer to frequent Hotels and many prefer the more relaxed environment to socialise in that the Community Club provides.

As stated in your Environmental Impact Statement, the population of Wudinna is set to increase if the Central Eyre Iron Project goes ahead. We as a Board see that this will provide new economic opportunities for the region and our community. The area of our complex, while more than sufficient at present, might struggle to cope with the larger numbers of patrons that choose to frequent our Club. The Community Club will need to partner with Iron Road to make sure that our facilities are adequate, as we may not have the capability to achieve such outcomes on our own.

We look forward to working with Iron Road in the future.

Yours sincerely

Ryan Du Bois
President

Id: #269715
17th January 2016

CEIP Submissions
Mining Regulation
Attention: Business Support Officer
Department of State Development
GPO Box 320
ADELAIDE SA 5001

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We are writing in regards to the proposed Central Eyre Iron Project (CEIP) on the Eyre Peninsula in South Australia. "We" are the Executive Committee of the Wudinna Community Club.

The Wudinna Community Club was built in 1977 by local benefactors as a facility that would serve local residents, a place to enjoy sport and hospitality in a relaxing friendly environment and as an alternative to the local Hotel. We are a friendly environment that welcomes not just members of the numerous sporting clubs - Football, Netball, Cricket, Basketball and Lawn Bowls - but also travellers, visiting families and locals alike. Our complex caters for functions for up to 300 people with full bar and kitchen facilities. We currently rely heavily on volunteers for a large portion of our labour requirements. We are a priority venue for small and large conferences and also for large inter-association sporting events due to the layout of our facility.

The CEIP is proposing a long term residential village in nearby proximity to the Wudinna Community Club. We recognise that the service we provide is for each and all that are working and residing in our community. Not all individuals prefer to frequent Hotels and many prefer the more relaxed environment to socialise in that the Community Club provides.

As stated in your Environmental Impact Statement, the population of Wudinna is set to increase if the Central Eyre Iron Project goes ahead. We as a Board see that this will provide new economic opportunities for the region and our community. The area of our complex, while more than sufficient at present, might struggle to cope with the larger numbers of patrons that choose to frequent our Club. The Community Club will need to partner with Iron Road to make sure that our facilities are adequate, as we may not have the capability to achieve such outcomes on our own.

We look forward to working with Iron Road in the future.

Yours sincerely

[Signature]

Ryan Du Bois
President
29 January 2016

CEIP Submissions
Mining Regulation
Attention: Business Support Officer
Department of State Development
GPO Box 320
ADELAIDE  SA  5001

By Email: dsd.ceipconsultation@sa.gov.au

Submission on Central Eyre Iron Project

This submission has been prepared by the District Council of Tumby Bay to provide input into the Environmental Impact Statement and the Mining Lease Proposal. The submission will be formally approved by Council at a meeting on 9th February 2016. Should there be any changes to the submission arising from that meeting we will formally notify the Department.

The Council has previously made a formal presentation to the Development Assessment Commission in October 2014 regarding matters to be considered in the EIS. This current submission references those items of concern from the presentation.

The submission primarily refers to the EIS rather than the Mining Lease Proposal. The issues relevant to both are those related to transport and this is noted in the submission.

Should further consultation with Council be required please contact the undersigned at the Council offices.

Kind Regards

Trevor Smith
Chief Executive Officer
District Council of Tumby Bay

smith@tumbybay.sa.gov.au

(encl).
District Council of Tumby Bay

Response to:

Central Eyre Iron Project
Environmental Impact Statement; and
Mining Lease Proposal

4 February 2016

Introduction

The District Council of Tumby Bay (the Council) has been actively involved with Iron Road throughout the development of the Central Eyre Iron Project and to date we have had a constructive relationship with the company.

The Council provided input into the draft Assessment Guidelines produced by DPTI for consideration by the Development Assessment Commission at a meeting on 9 October 2014.

The Council is agnostic regarding mining and recognizes that there are members of the community being both pro-mining and anti-mining. The Council respects that the decisions on whether mining will or will not occur will be economic and regulatory decisions made by State and Federal Government.

It is the role of Council to ensure that if mining does proceed it occurs in a manner which provides the greatest possible level of benefit to the local community and addresses the concerns of those people directly affected.

Primary production remains a cornerstone of the local economy and support of primary production is critical.

The Council has already invested significantly in preparing for the resources industry by preparing Structure Plans for Tumby Bay and Port Neill which plan for growth over a 30+ year horizon.

While this growth can be accelerated it is imperative that should the State Government approve the Central Eyre Iron Project that it recognizes and commits to a financial responsibility to budget in a timely manner for the services and infrastructure that will be required under a faster growth scenario.

The Port Neill Sustainable Future Structure Plan identifies a number of growth scenarios that take into account a shift in the economy of the Eyre Peninsula. It is identified that
the rapid progress of mineral exploration projects would result in significant township growth in the short to medium term. The construction and operation of a port at Cape Hardy to service a mine elsewhere would fulfill this growth scenario for the township of Port Neill and would likely result in a transformation of the township from a quiet settlement with only a small number of permanently occupied dwellings to a substantial township. Such an outcome will have significant implications for the provision of physical and social infrastructure.

As the Structure Plan contains a land supply analysis it is important that the land identified for various uses is appropriately separated and buffered from the potential impacts of the proposed port facility and associated infrastructure corridor. It is the position of Council that the assessment of impacts in and around Port Neill should relate to the ultimate extent of the township as identified in the Structure Plan, rather than the current extent of the township or the current extent of zoning for urban uses.

In considering the proposal broadly, key issues of relevance to the local communities include the general workforce demand for support industries and local businesses, including impact on the demand for labour and the local labour cost implications of the proposal. Additionally, there is a need for continuing consultation with the local community that provides a clear and unambiguous understanding of both the proposal and the extent to which the local communities can actually influence outcomes.

The Mining Lease Proposal prepared by Iron Road focuses heavily on the mining operations proposed as part of the Central Eyre Iron Project. As such, much of the discussion on traffic impacts does not relate to the Tumby Bay Council area. Despite this, the proposed port construction and provision of the infrastructure corridor associated with the mine have the potential to impact on the Council and District road network. The Environmental Impact Statement (EIS) provides more detailed commentary on the impact of the port construction and operation on the local road network.

Finally, to the extent that it is possible, there must be clear reference to the scope and timing of meaningful and binding management agreements between the proponent and Local Government. The Council has so far declined to be a signatory to a proposed MOU with the Company on the basis that it is a broad and non-specific document that is not binding on either party.
Development Assessment Commission EIS Guidelines

The following guidelines were identified by Council as being of particular interest.

The comments in italics after each subject heading were those provided by Council previously to DAC in response to the draft guidelines.

Comments at the end of each section prefaced by an R, e.g. R1 indicate that Council is making a further request with regard to Iron Road's response.

Where guidelines have not been addressed it is recognized that other agencies are better placed with greater expertise and resources to comment on those matters.

4.1 Planning and Environmental Legislation and Policies

Council requested that local government development plans, policies and strategies were considered, including all legislative requirements and approvals from local government.

Council requested an explanation of how changes to the land zoning will impact on land valuations for the purpose of levying Council rates.

4.1.1 Describe the extent to which the expected effects of the development are consistent with the provisions of the relevant Development Plans and the relevant Planning strategy.

Satisfactory – the report references Council's 2012-2022 Strategic Plan

4.1.6 Identify the full scope of legislative requirements and the range of approvals needed to complete the proposed development.

Satisfactory – noting that one of the legislative requirements relates to Local Government's power over roads. This is addressed in more detail in the transport and access section.

4.1.7 Describe any changes that the proponent believes will need to be made to the zoning of the multiple sites to facilitate the ongoing use.

Chapter 5 identifies that the infrastructure corridor will traverse land in the District Council of Tumby Bay zoned General Farming. As this zone currently has similar infrastructure (e.g. railways, transmission lines and water pipelines) Council agrees with the report that no rezoning of the corridor land is necessary.

Chapter 5 identifies that the proposed port facility land is currently zoned Coastal Zone and General Farming Zone. As a port is not an envisaged land use within those zones the report recognizes that future rezoning of the port site may be appropriate to:

- Restrict the establishment of sensitive land use within the area surrounding the port site that may conflict with port activities;
• Recognise the use of land as a port and provide an appropriate planning framework for the assessment of any future development at the port site; and
• Facilitate opportunities for value adding activities at the port site (e.g. export of grain).

R1:  Council requests that all land in the ownership of Iron Road at the port site be rezoned at the time of the State Government granting approval to formally recognize the change in land use and to facilitate the use of the land by third party companies for other uses such as grain and other agricultural or mineral exports.

4.5 Transport and Access

Council requested that the traffic impact included the impact on all local, state and national roads; and that the impact assessment include the interface issues between the proposed transport routes and the Port Neill township including the impact on adjoining land uses.

Council requested that the assessment should recognize severance impacts on landholdings where the transport corridor splits existing farm operations; including in respect of the transportation on farm machinery.

Council requested that the assessment should recognize that the rail network will have a life span for exceeding that of the iron ore mine and, if linked to the national rail network, have a permanent life. Council maintained that this would alter the standard of grade separated crossings, especially where roads pass under the rail infrastructure and future needs should be considered at the construction stage.

Council also maintained that the assessment of rail network level crossings should recognize that the vehicle types travelling on local roads can change annually, especially with regard to school bus routes.

4.5.1 Identify the traffic impacts on the local and arterial road network, including the Port Neill Access/Lincoln Highway intersection and locations for rail crossings of the Lincoln and Birdseye Highways, during both construction and operation. A Traffic Impact Assessment should be undertaken, taking into consideration existing traffic data, accident statistics and predicted traffic volumes (including vehicle types, numbers/frequencies and traffic peaks).

4.5.2 Detail and infrastructure improvements that will be required to provide safe and efficient car parking and road access to the Port and/or Construction Village, along with the Long Term Employee Village adjacent to the Wudinna, including any potential junction/intersection treatments on the arterial road network.
4.5.3 Describe access and parking arrangements for all vehicles during construction, including any approvals and specific access requirements for over dimensional vehicles.

4.5.4 Describe the requirements and management aspects for the future rail operations including, impact on the existing rail network, fueling locations, maintenance facilities, noise management, access to/ across the corridor (particularly where land in contiguous ownership is bisected by the corridor), fencing of the corridor and speed of trains.

4.5.5 Assess all proposed level crossings along the route against Australian standard AS1742 Manual of uniform traffic control devices, Part 7 – 7.9 Railway Level Crossing Treatments for Restricted Access Vehicles, (paying particular attention to the safety implications and possible changes in transport routes with regards to school buses) of proposed treatments and identifying any design issues that need to be addressed.

**Module Haul Route**
The following roads within the District Council of Tumby Bay are identified within the scope of the Traffic Chapter (MLP-08) of the Mining Lease Proposal (MLP):
- Lincoln Highway
- Port Neill Access Road
- North Coast Road
- Balumbah – Kinnaird Road

North Coast Road, Port Neill Access Road and Balumbah-Kinnaird Road (in particular at intersections) are identified (MLP Section 8.6.1) to be upgraded as part of the module transport route to accommodate the turning path of the transporter for mining modules. The MLP also identifies:
- widening of culverts and road formations to a minimum of 12m along the module haul route
- grading of cuttings which have insufficient width for the module transporter

It is also expected that the upgrade requirements would also require realigning of sections of road to meet longitudinal standards for the module transporter, however the MLP appears to be silent on this issue.

Details of the expected movement of modules, including expected delays for commuters, is provided through Section 18 and Appendix W of the EIS.

**R2:** Council requests that iron Road be required to detail the requirements for the longitudinal requirements of all roads forming the module haul route.

**Port Access**
The EIS considers the anticipated Port impact on local roads, in particular:
- North Coast Road
- Kiandra Road
- Brayfield Road
- Port Neill Access Road
The proposed public port access via Port Neill Access Road and North Coast Road (EIS Section 18.3.2) is contrary to recent discussions between Council staff and Iron Road personnel. This road passes close to the existing township of Port Neill, and bisects land proposed within the township structure plan for future development.

A more suitable long term port access is required, particularly when considering the potential for heavy vehicle movements associated with materials in/out of the site or third party use of the port facilities (eg grain export). It is noted that the traffic assessments provided as part of the MLP and EIS ignore the potential impact of third party access to the port site.

EIS Section 4.3.3 states “The proposed main access gate to the port will likely be located at the intersection of Bayfield Road and North Coast Road. An upgrade of relevant roads is proposed to provide for increased traffic volumes including a higher proportion of heavy vehicles. The upgrades would include shoulder widening and increasing the extent of sealed pavement to allow for the required turning movements.”

Also, “A short section (approximately 350m) of North Coast Road is proposed to be realigned in the north of the port site to provide for the new bridge over rail.”

The EIS (section 18.3.2) identifies that Brayfield Road is proposed to provide access to the construction camp (up to 650 persons) at the port site during the construction phase. This is consistent with previous discussion with Council staff.

The EIS (Section 18.5) provides traffic capacity impact forecasts for both the construction and operations phases of the project, as summarised below:

<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>Lincoln Hwy/BK Road Int to Pt Neill turnoff</td>
<td>25</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>Port Neill turnoff to Port</td>
<td>25</td>
<td>51</td>
<td></td>
</tr>
<tr>
<td>Tumby Bay to Port Neill turnoff</td>
<td>1</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Balumbah – Kinnaird Road to Rudall</td>
<td>2</td>
<td>0</td>
<td></td>
</tr>
</tbody>
</table>

These forecasts are further expanded within Appendix W Traffic Impact Assessment. Traffic projections (App W Section 4) assume bus transfers for workers during both the construction and operational phases of the project, which keeps expected traffic volumes down. Appendix W acknowledges there will be a split of traffic between Brayfield Road and North Coast Road accessing the Port, but does not seek to quantify this. It is noted (EIS Section 18.4) that project traffic will use the rail maintenance corridor to minimise public road impacts – this is not quantified, but it appears that minimal construction traffic has been projected to use the public road network.

R3: Council requests that Iron Road be required to further investigate the use of the rail maintenance road for large vehicle movements between the port.
and the Lincoln Highway as detailed in previous discussion between Council staff and Iron Road.

Further clarity is required on the anticipated use of the rail maintenance track vs North Coast Road and Brayfield Road. Certainty around use of buses for personnel movement during construction and operation is needed, as a change to private vehicle use would impact significantly on traffic volumes. There may be justification for upgrades to include sealing of either or both of Brayfield Road and North Coast Road, especially if Brayfield Road is expected to form an access for third party use in the future.

R4: Council requests the Iron Road be required to provide further details around the use of buses due to the potential impact on traffic volumes.

### Rail Interfaces
The following treatments of road/rail interfaces are proposed.

<table>
<thead>
<tr>
<th>Crossing Location</th>
<th>EIS Comment</th>
<th>Staff Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Whariminda Boundary Road</td>
<td>Grade separated – bridge steel arch culvert. Rail over road. Clearance 5.9 m high and 5.0 m wide.</td>
<td>Ensure culvert width adequate for two way traffic passage, including agricultural machinery.</td>
</tr>
<tr>
<td>Mt Hill Coomaba Road</td>
<td>Passive at grade crossing. Sight distances and traffic volumes to be confirmed during detailed design. Sight clearance works or active crossing if AS1742 requirements cannot be met.</td>
<td>Minimum requirement of activated crossing. Grade separation preferred.</td>
</tr>
<tr>
<td>Wills Road</td>
<td>Passive at grade crossing. Sight distance to be confirmed during detailed design. Sight clearance, road realignment or active crossing if AS1742 requirements cannot be met.</td>
<td>Minimum requirement of activated crossing. Grade separation preferred.</td>
</tr>
<tr>
<td>Chilmans Road</td>
<td>Grade separated – bridge steel arch culvert. Road over rail.</td>
<td>Ensure adequate road width maintained for two way traffic including agricultural machinery.</td>
</tr>
<tr>
<td>Lincoln Highway</td>
<td>Grade separated – road over rail.</td>
<td></td>
</tr>
<tr>
<td>North Coast Road</td>
<td>Grade separated – steel girder and concrete deck. Road over rail.</td>
<td>Ensure adequate road width maintained for two way traffic including agricultural machinery.</td>
</tr>
</tbody>
</table>

The MLP proposes that:
During detailed design each of the proposed level crossings along the infrastructure corridor will be designed in accordance with AS1742.7 which
defines the sighting required for level crossings in order to provide clear visibility of warning signage for an approaching motorist as well as between a road vehicle and an oncoming train.

The clearance or rail over road grade separated crossings (e.g. Wharninda Boundary Road) has a proposed clearance of 5.9m high and 5.0m width. Clearances should allow for the passing of two way traffic in a safe manner.

**R5:** Council requests that Iron Road be required to increase the width of the road clearance envelope to 8 metres for all local, regional and state roads.

Further to this the EIS (Table 18-5) provides detailed design commitments relating to railway crossings, which are limited to providing active controls only if sight distances required by AS1742 cannot be achieved.

Council has previously advised Iron Road that road rail interfaces within the District Council are to be either grade separated (preferred) or provided with active warning systems (i.e. flashing lights and boom gates). The Council does not support the installation of passive control (i.e. stop or give-way signage) at level crossings.

At a public meeting in Port Neill Iron Road engineers stated that the company would be exceeding the minimum requirements for railway crossings because the safety of the community was of paramount importance. Additionally, traffic volumes will change over time and vehicle types, e.g. school buses, will change over time.

**R6:** Council requests that Iron Road be required to provide active controls at all level crossings.

**R7:** Council requests that Iron Road be required to realign roads to achieve a minimum of 50 metres of road on either side of the crossing is at 90 degrees to the rail.

**R8:** Council requests that Iron Road be required to seal 100 metres either side of rail crossings with the first 15 metres to be hot-mix asphalt and the remaining 85 metres to be two coat seal.

**R9:** Council requests that Iron Road be required to be responsible for maintenance of the 100 metre envelope either side of rail crossings, including vegetation clearances.

### 4.6 Economic Development

Council requested that this issue could be expanded to the flow-on effects for tradespersons, contractors and other local businesses (e.g. supply) opportunities. The matter of land ownership on local government rates could also be examined.

### 4.6.3 Outline the economic effect the construction and on-going workforce will have locally and regionally, including preparing a South Australian Industry Participation Plan (see [www.icn.org.au](http://www.icn.org.au)).
The economic effects in employment and gross regional product detailed in Chapter 21 is consistent with (existing) figures from the RDAWEP and were produced by the same analysts. Iron Road have committed to assisting local employment and business where possible however at this point in time it is too early to provide accurate figures.

Council will pursue this commitment by inclusion in an MOU with Iron Road.

The annual income (presumably land rates) to local government across the project is estimated at $300,000. Across three Councils this figure is considered to be low and further justification would useful on how it was calculated.

R10: Council requests that Iron Road be required to demonstrate how it has arrived at the figure of $300,000 per annum income for local government from the project.

4.6.4 Describe the land tenure arrangements during and after construction.

Chapter 8 discusses the land tenure arrangements around the port site and recognizes that Council own Allotment 10 DP60630. The LMA registered over the southern portion of the port site is also acknowledged as are easements for water supply purposes.

The comment is made and noted that Iron Road will need to enter into discussions with Council, the Minister for Sustainability, Environment and Conservation and other authorities over these matters respectively.

4.8 Effects on Communities

Council requested that his issue could be expanded to include the employment multiplier effect. This could include opportunities for local tradespersons, contractors and other local business. The report needed to differentiate between the construction phase and the operational phase.

The matter of infrastructure and services could be expanded to include local government and private infrastructure and include “soft” infrastructure, recreational facilities, and services such as child care. It could also include detail of how the social impacts of the construction and residential workforces will be managed.

The consultation strategy for the preparation of the EIS should be more than a description of the strategy and should provide detail of why the consultation techniques selected are appropriate in the circumstances, how they have been tailored to the local community and how information gained during the consultation process will influence outcomes.

4.8.1 Outline the likely size of the composition of the construction and operational workforce and other employees, how accommodation requirements will be met and detail employment opportunities for the local community, including the multiplier effect.

4.8.2 Describe the expected effects of the additional workforce on community infrastructure and services (including recreation, health, education,
childcare and other local human services) and how these are proposed to be managed.

4.8.3 Describe the potential positive and negative social impacts that could result from an increased population and how this is proposed to be managed.

Chapter 22 provides details of the current state of play in the affected areas and estimates to the best of their ability the effects on employment communities of the construction and operational workforce.

It is noted that some of the services (health, education, police) are provided by the State Government who need to make a financial commitment to increasing services if the project is approved.

4.8.5 Detail opportunities for local aboriginal vocational training and employment.

Iron Road have committed to vocational training and job placement in the ILUA.

4.8.6 Describe the impacts on the tourism and recreation values of the respective area due to increased human activity and disturbance.

The report identifies distances of activities from towns and concludes minimal interference.

4.8.7 Describe the impact on neighbouring land and water users, such as primary production, commercial fishing and aquaculture, including the need for adequate separation distances from adjoining uses, and the effects of access loss due to increased shipping traffic and anchorages.

The report identifies distances from activities and concludes minimal interference.

4.8.10 Describe the consultation strategy adopted in the preparation of the EIS.

Detailed comprehensively in Chapter 6

4.12 Effects on Infrastructure Requirements

Transport issues are raised elsewhere in the EIS however Council requested that the impact on waste management, waste water treatment and disposal, storm water management and roads infrastructure needed to be addressed to the satisfaction of local government.

4.12.1 Outline the requirements for an adequate supply and the location of distribution networks for gas, electricity, water, sewerage, storm water management, waste water treatment and disposal, communications systems and roads infrastructure, including any potential costs and/or savings to state and local government of infrastructure beyond the site boundaries.
Detailed in Chapters 4, 15, 16, 18.

4.13 Construction and Operational Effects

Council requested detail on items 4.13.5, 4.13.6, 4.13.9 and 4.13.10 which has been addressed in the EIS.

4.13.5 Where possible identify the source and origin or construction materials for buildings and infrastructure (such as road making) and the opportunity for use of recycled materials.

4.13.6 Provide information about the transport and storage or construction materials to minimize effects on the local environment.

Detailed in Chapter 4, 18

4.13.9 Describe the management agreements between the District Councils of Tumby Bay, Cleve and Wudinna and the proponent during and after construction.

Individual agreements will be developed with Councils following approvals.

4.13.10 Detail long-term management/maintenance arrangements for the operation and decommissioning of the facility, including the ownership of any land and infrastructure, sand management and any costal protection measures.

Long term decommissioning arrangements are not covered as the main assets are assumed to exist in perpetuity.
Recommendations Summary

R1: Council requests that all land in the ownership of Iron Road at the port site be rezoned at the time of the State Government granting approval to formally recognize the change in land use and to facilitate the use of the land by third party companies for other uses such as grain and other agricultural or mineral exports.

R2: Council requests that Iron Road be required to detail the requirements for the longitudinal requirements of all roads forming the module haul route.

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2/02/2016

5th Australian Mining Application (MP), 5th Australian Development Application (FIS)

1. I understand that my submission will be published on the government website and provided to the applicant, BUT I require that the government withholds my name and contact details. I understand that it is my responsibility to ensure personal information is not included in the body of my submission, any footers or headers or any attachments.

The Iron Road Project is an important development for the SA economy, local communities and the mining sector in general. It represents a major vote of confidence in the State of SA and must be a demonstration of the "can do" attitude that is required to attract additional investment. My reading of the project documents shows that there are a few HSEC impacts and those that exist can be managed. I also believe the local community is supportive of the project and wants the jobs, growth and investment in infrastructure required to sustain a vibrant and healthy community.

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Id: #269854
2/02/2016

5th Australian Mining Application (MP)

1. I understand that my submission will be published on the government website and provided to the applicant, BUT I require that the government withholds my name and contact details. I understand that it is my responsibility to ensure personal information is not included in the body of my submission, any footers or headers or any attachments.

In my limited discussions with Iron Road and understanding of the project I believe that the submission has a diligent social and environmental plan, they have developed an innovative approach to the plant and process design with robust economics to support the viability of a long life mine operation. The project will contribute to infrastructure needed on the Eyre Peninsula which may also help regional communities and other proposed mine operations. This project will be a valuable contributor to the economics of the State. In view of the decline in the local manufacturing industry. It is a high volume mine and will require long term resources and staff and suppliers. I would like to see conditions included in the mining approval that will support the creation of jobs in Australia and ongoing service businesses. This needs to be more than a % contribution of local content as we have seen on other projects. A percentage contribution of overall project value can easily be achieved through concrete supply and civil works while important manufacture and engineering go overseas. We need to ensure this work stays in SA to create jobs, develop new technologies and local skill base not only for this project but also to attract and support future projects and businesses to our state. I trust the State Government will approve this project, it has my endorsement as a resident of SA.

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Id: #269853
040 - GRAIN PRODUCERS SA

CEIP ONLINE SUBMISSION

Mr Darren Arney

SA 5018
darren@grainproducerssa.com.au

448186707

2-Feb

5th Australian Mining Application (MP), 5th Australian Development Application (EIS)

0 - I understand that my submission, including my personal contact details, will be published on the government website and provided to the applicant; OR

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160202_GPSA_Submission_on_the_CEIP_F.pdf, type application/pdf, 609.8 KB

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Id: #269845
**Cover Sheet**

**Section A: Contact Details**

Please complete the following information. Your contact details will be used by the South Australian Government to acknowledge your submission. Those marked with an asterisk (*) are mandatory. Anonymous submissions will not be accepted.

<table>
<thead>
<tr>
<th>Title</th>
<th>Mr</th>
</tr>
</thead>
<tbody>
<tr>
<td>*Name</td>
<td>Darren</td>
</tr>
<tr>
<td>*Surname</td>
<td>Amy</td>
</tr>
<tr>
<td>Organisation</td>
<td>Grain Producers SA</td>
</tr>
<tr>
<td>*Street / PO Box</td>
<td>26 Hack Street,</td>
</tr>
<tr>
<td>*Town / Suburb</td>
<td>Mount Barker</td>
</tr>
<tr>
<td>*State</td>
<td>SA</td>
</tr>
<tr>
<td>*Postcode</td>
<td>5251</td>
</tr>
<tr>
<td>*Email Address (Mandatory for electronic submissions)</td>
<td><a href="mailto:darren@grainproducerssa.com.au">darren@grainproducerssa.com.au</a></td>
</tr>
<tr>
<td>Telephone</td>
<td>0418 187 707</td>
</tr>
<tr>
<td>Submission Date</td>
<td></td>
</tr>
</tbody>
</table>

Please indicate below which of the applications your submission relates to:

<table>
<thead>
<tr>
<th>S.A. Mining Application (MP)</th>
<th>S.A. Development Application (EIS)</th>
<th>Commonwealth EPBC Act (EIS)</th>
</tr>
</thead>
<tbody>
<tr>
<td>[x]</td>
<td>[x]</td>
<td>[x]</td>
</tr>
</tbody>
</table>

Select those (one or more) which apply to your submission

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**Section B: Privacy**

Please select one of the following options:

- [x] I understand that my submission, **including my personal contact details**, will be published on the government website and provided to the applicant.

OR

- I understand that my submission will be published on the government website and provided to the applicant, **but I require that the government **withholds my name and contact details**. I understand that it is my responsibility to ensure personal information is not included in the body of my submission, any footers or headers or any attachments.

- [x] I have attached my written submission
Central Eyre Iron Project: Mining Proposal and EIS

Rationale for submission

Grain Producers SA (GPSA) represents South Australian grain grower interests and strives to achieve the best possible outcomes for the industry as a whole. GPSA takes the issue of protecting farmers' rights to farm very seriously and has established an Agricultural Security and Priority (ASAP) sub-committee reporting to the GPSA Board. The aim of this sub-committee is to advocate for the priority and security of viable agricultural production over any other proposed form of land use, and to advocate for protecting the value of farm assets and the health and wellbeing of farmers.

The grains industry has an export value of $2 to $2.5 billion annually. There are 98.4 million hectares of land within South Australia. Of this, 4.2 million hectares is used for grain production. The ability to be able to protect this land for future production is a priority for GPSA. This is evidenced by the release of the GPSA Draft Mining Policy in 2015 in which we emphasise our belief that mining and agriculture cannot co-exist and therefore we do not support mining on agricultural land.

Having said this, GPSA recognises that we must deal within the confines of the current Government policies and legislation, which promote and support mining endeavours. Therefore, GPSA will endeavour to drive the agenda for grain producers to ensure infrastructure investment delivers maximum benefit to growers and that the best possible outcome can be achieved for both the industry as a whole and those individual growers impacted first hand via adequate compensation packages.

Whilst GPSA acknowledges that the CEIP may potentially benefit the Eyre Peninsula via government/private investment in infrastructure, the scale of benefit to the grain industry is unknown and there are a number of grain growers who are severely disadvantaged and negatively impacted. GPSA would be supportive of a competing grain terminal being built on the Eyre Peninsula separate from the monopoly grain terminal ownership that currently exists on the EP. Given the current limited information though, it is difficult to support a project where we don't know who the potential partner in the grain terminal is going to be. The MLP does not give any clear information on how the shared port would work and to whom would be given priority and how.
Key points that still need addressing are:

- How would cross contamination between food grains and iron ore be dealt with?
- Would the same rail trucks carry both grain and iron ore?
- Would a second materials handling system need to be built and by who?
- Is the site suitable for bulk grains and the required segregations?
- Would it take into consideration the amount of road freight required?
- Is the current road network capable of the traffic required to supply a port?
- How economical will it really be to grain producers?
- How is the alleged $6/tonne saving gained?

The GPSA position is that, along with an independent review of the pricing and access arrangements of the incumbent grain handling monopoly, upgrading the Thajerd port in the Western Zone should provide the greatest boost to the entire EP grain producing fraternity. Given current iron ore prices and the recent write-downs in mining assets across the globe, we consider the project unlikely to proceed to an actual mine within the medium term, or at least not within the next 10 years. Therefore we can give little weight in this submission to the promise of a new independent port and grain terminal, and therefore GPSA cannot support the CEIP project in its current form.

It is worth noting that less than 5% of the state is suitable for cropping. Iron Ore is not a scarce commodity. The current Ore price clearly shows that the world has ample long-term supplies and the ability to cost effectively supply the market. In the longer term, food and its primary base product, grain, will need the maximum amount of land available to meet the needs of the hungry and ever expanding world. We are experiencing the decline of the mining boom and are now beginning the dining boom, and grain is important at many levels, from a livestock feed to direct food ingredient.

GPSA would seek open and transparent communication with affected landowners and adjoining properties, consistency in the treatment between landowners, and adequate financial compensation agreed to before exploration commences. Compensation for this extremely difficult pre-mining period needs to be addressed immediately, and certainty provided as to timing of the mining operation from start up to closure.

With the current information, GPSA has concerns that grain producers would be disadvantaged both individually and as an industry by the proposed mine and as such does not support the approval of the mine at this point.

<table>
<thead>
<tr>
<th>Issue</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reduced area of productive land available for agriculture</td>
<td>On the Eyre Peninsula, there are exploration leases on greater than 90% of the arable land and the impact to the affected landholders is extreme. There are 98.4 million hectares of land within South Australia, of this only 4.2 million hectares is used for agriculture. We have no issue with exploration occurring on the other 94.2 million hectares.</td>
</tr>
</tbody>
</table>
The landowners affected by the proposed mine face immediate stress and anxiety once served with their notice of entry. Uncertainty about their future is paramount – will the mine go ahead, what will that mean to their farming operations and family, when will they know, etc. are all valid questions which seem to be lacking in answers. The future of children’s education, plans for home renovation or renewal, farm improvement, soil amelioration work, infrastructure such as sheds, yards, roadways, water points, are all thrown into limbo because the landowner has no idea as to how long before he can no longer farm, or whether he will ever be compensated for improvements he wishes to invest in.

Current farm management and profitability is compromised.

<table>
<thead>
<tr>
<th>2. Permanent displacement of some farming families and loss of productive agricultural land as a result of the mine.</th>
</tr>
</thead>
<tbody>
<tr>
<td>There is very little support on offer during the exploration, consultation and planning phases of the project.</td>
</tr>
<tr>
<td>The impact the CEIP has already had on individual farming operations needs to be acknowledged. Farm businesses are unable to make strategic decisions to progress and conduct their business effectively as outlined in Point 1 above. More needs to be done in the early stages of the pre mining period. Consistency in the treatment between landowners, open communication and negotiations are all things that need to be considered. Farmers need a degree of certainty in the process, their role and rights and the timing of the operations i.e. a start and finish date for the proposed mining activities would provide some real certainty and enable farmers to either plan for a future on their farm or plan to leave.</td>
</tr>
<tr>
<td>It is stated in the MLP document that IRD has provided access to counselling; the experience of affected GPSA members is that this has not been forth coming and financial support to a local counselling service was declined even though that councillor was serving the members of the local community in the area affected by the proposed mine. How many people were directly contacted by the IRD provided counselling service?</td>
</tr>
<tr>
<td>Compensation for this extremely difficult pre mining period needs to be addressed immediately.</td>
</tr>
</tbody>
</table>

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<tr>
<th>3. Section 5.5.2 Page 5-10 state. Establishing strong relationships with landowners whose properties lie within, or are adjacent to, the proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Some of our members directly and indirectly affected by the mine and the transport corridor have found this not to be the case. Landowners directly and indirectly affected by the proposed mine face immediate stress and anxiety once served with their notice of entry. Again as in Point 1 and 2 above, uncertainty about their future is paramount. The adverse consequences on mental health and wellbeing and on the family whose properties are directly affected are well known.</td>
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<tr>
<td>mining lease, together with directly affected community members, has been a priority for Iron Road. Further, whilst mining companies may well pay above market rates for those properties it wants to acquire, those farming families who neighbour the affected farms believe their properties to be devalued because of the unknown undesirable outcomes of dust, noise, toxic wastes, contaminated water, road traffic, and so on. GPSA believes that any landowner who believe their property to be devalued by mining and exploration activities, either directly or indirectly, must be adequately compensated. GPSA holds the view that landowners whose properties are surveyed for a mining lease must have immediate access to financial compensation once a notice of exploration is given. Due consideration must be paid to the emotional and financial costs incurred by farming families, and this compensation must be agreed to before exploration commence.</td>
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<td>4.</td>
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<tr>
<td>5.</td>
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</table>
The agriculture industry is at risk of losing workers due to the financial discrepancies and the upward pressure on employment costs in an environment of skill shortages. The transferrable nature of agriculture skills to the mining industry such as heavy vehicle operation, diesel mechanic and welding skills will make it increasingly hard for family-run farms to keep their employees.

There are also the impacts of short term population boosts causing pressure on housing affordability and rents, the FIFO impact on towns and, and the pressure on local towns/councils and communities to provide social and community infrastructure.

Additionally operating labour units are likely to be overstated as mining process seek to reduce operating costs through the transition to driverless trucks and or conveyor systems to replace labour units.

| 6. Rehabilitation/Remediation costs | We also have considerable concern about the transparency on expenditure allocated to these activities as there is no budget allocated to rehabilitation. The PEPR will provide a program for rehabilitation and a bond recommendation, but with a mine proposing an annual revenue of $2.6 billion/annum for the next 25 plus years, we are concerned about the long term rehabilitation/remediation costs. The recent example of Queensland Nickel being placed in administration with estimated costs to the Queensland taxpayers in the order of $1.4 billion in clean up and rehabilitation, as quoted in the Australian 30/1/2016. The rehabilitation of the Brukunga mine in the Adelaide Hills has an annual operating cost estimated at $750,000 per year with projected treatment required for the next 1,000 years as quoted from the DMITRE publication “Notes for Visitors to the Brukunga Mine 2012”, and that doesn't include the amounts spent to date in rehabilitation/remediation or “clean-up” works such as the $26 million 10 year program of clean up initiatives that the State Government approved in 2001. |
2/02/2016

5th Australian Mining Application (MP), 5th Australian Development Application (FIS), Commonwealth EPBC Act (FIS)

1. I understand that my submission will be published on the government website and provided to the applicant, BUT I require that the government withholds my name and contact details. I understand that it is my responsibility to ensure personal information is not included in the body of my submission, any footers or headers or any attachments.

As a [NAME] privately-owned South Australian family business, [NAME] has seen a vast amount of changes to the economic landscape in rural and regional SA. Our company has long been an active supplier to the agricultural industry, with long associations with a number of rural businesses throughout the Eyre Peninsula and other agricultural districts. We are also a supplier to the mining industry, having been a member of the South Australian Chamber Of Mines & Energy (SACOME) for over 10 years. Through this affiliation, we have attended briefings on the CEIP by key members of Iron Road Limited’s Executive Team. Having heard these briefings, and through our awareness of the challenges faced by our regional communities, we support the proposal and the significant economic and infrastructure benefits it will bring to the region, its residents and local businesses, even in the current environment of depressed iron ore prices. We believe the flow-on benefits from the associated infrastructure investments, such as the upgraded power supply, upgrades to the Whyalla airport, and the construction of a rail link and handling terminal at Cape Hardy, will also offer significant lifestyle improvements to local residents, and an additional source of employment in this region during the construction and operation of the mine itself, and for the associated infrastructure, which has the potential to provide benefits for a much longer period. We also acknowledge the wider economic advantages to grain and livestock farmers in the region through the potential opening of a more direct linkage to export markets.

[No file uploaded]
Submission for CEIP Mining Lease Proposal, 2015

Alexander Symonds would like to offer general support to the Central Eyre Iron Project as outlined in the Mining Lease Proposal.

Whilst there are both benefits and challenges of such a project, we believe South Australia is well positioned to undertake such a project, and would be a huge beneficiary of the economic activity created.

In particular, the construction phase of the project will generate a large demand for local and state-wide employment. Our company has serviced the Whyalla and Eyre Peninsula region of the State for many decades and the current economic conditions in the Eyre Peninsula region are in need of improvement. The timing of the CEIP from the point of view of business opportunities and job creation would be very beneficial should significant construction activity commence in the next year or two.

This project will no doubt provide many benefits for the local area in many ways and is an opportunity not to be missed by our State.

1 February 2016
CEIP ONLINE SUBMISSION

Mr Peter Williamsen

SA 5067

peter.williamsen@certrail.com

407150144

2/02/2016

5th Australian Development Application (EIS)

0 - I understand that my submission, including my personal contact details, will be published on the government website and provided to the applicant; OR

Infrastructure example EIS 17, 20, 23 and 24

Please see attached file, unable to input all content.

Please see attached document

Iron_Road_-_Mining_Submission_CERT_V2.docx, type application/vnd.openxmlformats-officedocument.wordprocessingml.document, 19.9 KB

Submission for CEIP Iron Road Project – Centre for Excellence in Rail Training (CERT)

Reference:

- CEIP and the Community Fact Sheet (Attached)
- CEIP Infrastructure Corridor page 17 – Executive Summary
- CEIP Impact on Communities page 20 – Executive Summary
- CEIP Economic Benefit’s page 23 and 24 – Executive Summary

It is with great pride that the Centre for Excellence in Rail Training Pty Ltd is writing and submitting this public consultation paper today in support of the Iron Road Project. Our organisation often known as CERT is a publicly listed organisation owned by Engenco and is a Registered Training Organisation that specialises in the training and assessment of rail competency workers. Today we wish discuss the benefits of this project in relation to the competency of workers and increase in employment outcomes for communities impacted by this opportunity.
CERT has engaged and worked closely with Iron Road and Regional Development Australia (Port Lincoln) over the past year in regards to the opportunities that the Iron Road project which has focuses on numerous considerations ranging from socio-economic development within the region. Having extensive experience in workforce development both domestically across Australia and internationally within the rail/logistics industry, CERT experts believe that the claims made in relation to required size of the workforce is sound and indicative of our experience in both the construction and maintenance phases of their rail components. As outlined within the Iron Road CEIP and Community Fact Document the required recruitment of 2500 jobs during construction and 750 jobs required during the maintenance phases are realistic. This reflects previous such projects such as the Roy Hill Mine in the Pilbara, Western Australia.

It has been made clear through our interactions with Iron Road to date and within all of their available information the clear intent of the project to recruit its workforce or a large proportion of its workforce from within the Eyre Peninsula region. This will prove to increase the economic earning of households, increased spending by each household and reduction of reliance on social welfare. This logical conclusion shouldn’t require evidence to demonstrate as it has been the foundation of the Australian social welfare system. As outlined in the below table 1 (ABS Census of Housing and Population, 2011) as of 2011 there are 9006 reported to not be currently employed. This is a significantly high percentage of 34.82%.

Table 1 - Eyre Peninsula Employment Statistics

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<thead>
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</thead>
<tbody>
<tr>
<td>South Australian Population</td>
<td>738,358</td>
<td>44,972</td>
<td>784,330</td>
<td>496,429</td>
<td>1,250,759</td>
</tr>
<tr>
<td>Eyre</td>
<td>18,098</td>
<td>761</td>
<td>16,857</td>
<td>9,006</td>
<td>25,863</td>
</tr>
<tr>
<td>430 – Eyre</td>
<td>18,098</td>
<td>761</td>
<td>16,857</td>
<td>9,006</td>
<td>25,863</td>
</tr>
</tbody>
</table>

The introduction of both phases and available vacancies will undoubtedly reduce the percentage of unemployment for the region. However CERT recommends that several key recruitment and training activities are undertaken to ensure that the appropriate individuals are sourced, meet the requirements
of the rail safety act and additionally are provided with the correct training to ensure their effective contribution to the project.

The current Rail Safety Legislation (National Rail Safety Law, 2012, Subdivision 4- Provisions relating to rail safety workers, Part 117) states that a “rail transport operator must ensure that each rail safety worker who is to carry out rail safety work in relation to railway operations in respect of which the operator is required to be accredited has the competence to carry out that work.” This protects the operator through the reduction of liability in terms of accidents, injuries and fatalities, protects the worker and the general public. This legal requirement has been interpreted albeit differently across the county of Australia however consistently this has involved reliance of the Australian Qualification Framework (AQF). This has been inclusive of qualifications from the Transport and Logistics Training Package (TLT). To effectively determine the training and assessment requirements for the region, it must be ascertained what current rail industry experience is available from the population. As outlined below in table 2 for the local region (ABS Census of Housing and Population, 2011), as of 2011 only 822 workers have reportable been employed within the transport, postal and warehousing industry classification. This information is not inclusive of appropriate classifications of industry subsectors such as rail, road transport, marine and postal services.

<table>
<thead>
<tr>
<th>South Australia</th>
<th>Construction 2011</th>
<th>Mining 2011</th>
<th>Transport, Postal and Warehousing 2011</th>
<th>Total 2011</th>
</tr>
</thead>
<tbody>
<tr>
<td>Eyrie Peninsula</td>
<td>367</td>
<td>9,647</td>
<td>30,701</td>
<td>739,360</td>
</tr>
<tr>
<td></td>
<td>1,236</td>
<td></td>
<td>822</td>
<td>16,106</td>
</tr>
</tbody>
</table>

Given the relatively low percentage of workers with current industry experience and are already gainfully employed by other employers it is assumed that in order to achieve the appropriate employment objectives for the project that recruitment will have to be undertaken followed by an appropriate training calendar to ensure compliance to the Rail Safety Act’s requirement for competent
workers. It is recommended that this process occurs prior to the commencement of work. CERT additionally recommends that a risk based approach to determining the competency requirements of its intended workforce is undertaken initially and published to the standards of the Australian National Rail Regulator. CERT has made these recommendations in our discussions with stakeholders within the organisation and we believe that the project does have the intent to ensure that this process will be followed to comply with these requirements which is used for both direct recruitment and contracting.

The provision of training and assessment after the finalisation of required competency matrices is often difficult as prospective employees are often unsure of where to secure such training and if the sample population are listed as being on welfare benefits how will it be paid for? Traineeships and apprenticeships are not applicable at present as the prospective workforce will not be gainfully employed into their roles at that point in time. CERT has held several discussions with key stakeholders within both the rail and training industries and through this process has identified a current opportunity funded through the South Australian Department of State Development called Work Ready.

The purpose of the Work Ready program is to purposely provide vocational education and training to South Australian residents to both increase their skills and knowledge, allowing for the transition into meaningful employment outcomes. CERT will be submitting a Heads of Agreement to the government in the month of February for the purpose of assisting the Iron Road project in achieving its up skilling of the local community after our organisation's experience with the former Skills for All program. To ensure the highest potential of the project CERT will be required to once again work directly with the local community in terms of employment service providers and other agencies to ensure that all identified barriers to employment are effectively addressed.

Through this application it is CERT's intention to assist the Iron Road Project through the provision of the correct training required by a local workforce. However, it must be noted that the qualifications initially identified as being required are currently not on the list of funded training. Based on this it is recommended that our organisation in partnership with Iron Road and other local community leaders within the first quarter of 2016 initiate discussion with the South Australian Government with the intent of securing funded places for the local residents of the region for the purpose of gainful employment.

The qualifications that will be of support are inclusive of, but not limited to:

- Certificate II in Rail Infrastructure
• Certificate III in Rail Infrastructure
• Certificate II in Track Protection
• Certificate IV in Train Driving
• Certificate IV in Network Control
• Certificate II and III in Warehousing

Although the construction phase of the project will require a greater amount of workers than the maintenance phase, it would be CERT’s intent to deliver training that will allow for workers to transfer their skills and knowledge to other rail operators in South Australia or within Australia overall.

Depending on the candidates and the employment possibilities CERT will train eligible candidates for the following job roles.

• Rail Labourers (Certificate II and III in Rail Infrastructure) for the construction and ongoing maintenance of the proposed infrastructure Corridor (Rail)
• Rail Safety Workers (Certificate II in Track Protection) who will coordinate work safely within the rail corridor
• Train Drivers (Certificate IV in Tran Driving) can be used to up skill current train drivers to the required national units of competence to operate on the Rail Network
• Network Controllers (Certificate IV in Network Control) to be used to qualify suitable candidates to become network controllers, or qualify current network controllers to the unit of competence that will be relocation to the Eyre Peninsula
• Warehousing (Certificate II and III in Warehousing) this qualification can be used for the warehousing operations of the Iron Road mine, due to its multi-faceted use it can be used in a diverse range of industries.
• Machinery Specific Qualifications in this instance CERT will be able to qualify workers in individual and specific skills for – Fork Lift licenses, Order Picker, Elevated Work Platform (EWP), Reach Stacker, Big Fork, Electric Walkie stacker, Electric reach truck, Electric end rider, Working at heights, Enter and Work in confined Spaces (Mining) and White card.

Although still in the consultative phase, CERT would like to finalise this submission by reiterating it’s commitment to the Iron Road Project, its principals and the overall opportunity that it presents to the locals of the Eyre Peninsula region. We believe that the short and long term benefits for the local
residents is worth supporting the project overall and should be supported by all stakeholders. CERT will continue its discussion with all stakeholders and work to the best our organisation’s ability to support the needs of Iron Road.

Id: #269842
044 - AJILON AUST P/L

CEIP ONLINE SUBMISSION

Mr Matthew Chapman
SA 5000

matthew.chapman@ajilon.com.au
430411793

2/02/2016

Sth Australian Mining Application (MP), Sth Australian Development Application (EIS), Commonwealth EPBC Act (EIS)

0 - I understand that my submission, including my personal contact details, will be published on the government website and provided to the applicant; OR

RO_CEIP_Public_Submission_form_-_FINAL.docx, type application/vnd.openxmlformats-officedocument.wordprocessingml.document, 85.2 KB

Public Submission

Section A: Contact Details

Please complete the following information. Your contact details will be used by the South Australian Government to acknowledge your submission. Those marked with an asterix * are mandatory. Anonymous submissions will not be accepted.

<table>
<thead>
<tr>
<th>Title</th>
<th>Mr.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
<td>Anthony</td>
</tr>
<tr>
<td>*Surname</td>
<td>Williams</td>
</tr>
</tbody>
</table>

| Organisation | Ajilon Australis Pty Ltd |

| *Street / PO Box | Ground Floor 165 Granfell Street |

<table>
<thead>
<tr>
<th>Town / Suburb</th>
<th>SA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adelaide</td>
<td>5000</td>
</tr>
</tbody>
</table>

| *Email Address | Anthony.williams@ajilon.com.au |
| *Mandatory for electronic submissions |

| Telephone | (08) 8336 8262 |

| Submission Date | 02/02/16 |

Please indicate below which of the applications your submission relates to:

<table>
<thead>
<tr>
<th>S.A. Mining Application (MF)</th>
<th>S.A. Development Application (EIS)</th>
<th>Commonwealth EPBC Act (EIS)</th>
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<td>☑️</td>
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</tbody>
</table>
Section B: Privacy

Please select one of the following options:

☑️ I understand that my submission, including my personal contact details, will be published on the government website and provided to the applicant.

OR

☒ I understand that my submission will be published on the government website and provided to the applicant, but I require that the government withholds my name and contact details. I understand that it is my responsibility to ensure personal information is not included in the body of my submission, any footers or headers or any attachments.
## Section C: Your Submission

Points to consider when making your submission:

- Provide information on any aspect of the existing environment that either has not been included in the MP and/or EIS; or that you consider has been inadequately described.
- Are there any environmental, social or economic impacts or benefits associated with the MP and/or EIS that have not been identified?
- If applicable, are the proposed environmental, social or economic outcomes acceptable? If not, try and describe what outcome you would find acceptable?

<table>
<thead>
<tr>
<th>Issue</th>
<th>Reference and Page No (if applicable)</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Groundwater and hydrology</td>
<td>MP 71.3 p53</td>
<td>Example</td>
</tr>
<tr>
<td>Infrastructure example</td>
<td>ES 63.2 p104</td>
<td>Example</td>
</tr>
<tr>
<td>Local business opportunities</td>
<td></td>
<td>Increased regional employment will reverse population decline and result in several benefits including increased sport participation and volunteering.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Employ local first policy with encouragement for full-time employees to reside locally.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Increased jobs, skills diversification and business opportunities.</td>
</tr>
<tr>
<td>Increase tax revenue opportunities</td>
<td></td>
<td>More families equal more children, thus more opportunity for increased educational funding and improved educational options.</td>
</tr>
<tr>
<td>Noise reduction</td>
<td></td>
<td>The innovative use of In Pit Crushing and Conveying (IPC) will reduce dust and noise impacts and require lower use of diesel.</td>
</tr>
<tr>
<td>Dewatering requirements</td>
<td></td>
<td>IPCC combined with tailings dewatering will eliminate the need for a dewatering dam.</td>
</tr>
<tr>
<td>Integrated Waste Landform design</td>
<td></td>
<td>The integrated Waste Landform design will allow for immediate and progressive rehabilitation and provide another opportunity for local businesses in the area of soil collection, plant propagation and vegetation monitoring.</td>
</tr>
<tr>
<td>Third party water supply quantities</td>
<td></td>
<td>the mine is developing a major un-tapped water supply system that could be piggy backed off for community or business use.</td>
</tr>
<tr>
<td>Electrical Network</td>
<td></td>
<td>The upgrade of the electrical network/grid will provide a more stable electricity supply network for the general public and businesses across the region.</td>
</tr>
<tr>
<td>Community Emergency Assistance</td>
<td></td>
<td>CERP infrastructure can be utilised for community emergency assistance - at the mine, the mine fire trucks, equipment and staff could be used in a farming/rice-vegetation fire situation, rescue or major road accidents, whilst the tug at the port could be used in marine emergencies.</td>
</tr>
<tr>
<td>Rail and port infrastructure</td>
<td></td>
<td>The rail and port infrastructure has been designed for ease of use by third parties, in particular bulk grain export and containerised imports and exports.</td>
</tr>
<tr>
<td>Wudlina Airport</td>
<td></td>
<td>The proposal upgrade of the Wudlina airport by the Wudlina District Council will increase tourism as it will make it easier for visitors to access the region and will provide a regular commercial passenger service.</td>
</tr>
<tr>
<td>Road upgrades</td>
<td></td>
<td>Road upgrades will be at the cost of Iron Road and represent a significant local government, localised business and contractor opportunity.</td>
</tr>
<tr>
<td>Commercial opportunities</td>
<td></td>
<td>Commercial opportunities for District Councils in relation to waste/recyclables management, construction, operational camp management, etc.</td>
</tr>
<tr>
<td>Issue</td>
<td>Reference and Page No. (If known)</td>
<td>Comment</td>
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</tr>
<tr>
<td>Flow on opportunities</td>
<td>Overall a project of this scale and status of the CEIP will add to the recognition of the Eyre Peninsula and will assist directly and indirectly in a myriad of potential federal and state government funding opportunities</td>
<td></td>
</tr>
</tbody>
</table>
Section D: Any other comments

Aflion supports the CLIP proposal due to the economic benefits it will bring to South Australia and the flow on benefits to individuals and local businesses.

If approved, the CLIP will bring significant economic benefit to the local communities across the Eyre Peninsula and more broadly across South Australia and Australia. Benefits would include an increase in economic activity resulting in economic growth, an increase in employment and training opportunities, an increase in business development opportunities for suppliers and an increase in government revenue.

It is anticipated the CLIP will employ 1,950 construction workers and 750 operational workers (including 300 contractors) and indirectly create a number of other jobs in support industries, adding approximately 0.3% to the State’s employed labour force.

Diverse environmental impact assessments have been conducted over several years and consultations with stakeholders have identified that the biggest environmental concerns for the community, beyond mine closure and how that will be achieved, are dust (air quality), water, noise and visual amenity. Mitigation plans have been developed to minimise the impact of all of these.

Iron Road is continually engaging with the various stakeholder groups to manage the social and environmental impacts and Iron Road’s responsibilities as well as the potential economic impacts.
CEIP ONLINE SUBMISSION

Mr Johann van Wijk

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82011800

2-Feb-16

5th Australian Mining Application (MLP)

0 - I understand that my submission, including my personal contact details, will be published on the government website and provided to the applicant; OR

Support in favour of Central Eyre Iron Project MLP

Please see attached letter.

Iron_Road_Limited_CEIP_Submission.pdf, type application/pdf, 131.4 KB
Central Eyre Iron Project Mining Lease Application

Iron Road Limited (ASX:IRD) has submitted a Mining Lease Application (MLA) and a Mining Lease Proposal (MLP) to the Department of State Development (DSD) of South Australia (the State) and an Environmental Impact Statement (EIS) to the Department of Planning, Transport and Infrastructure (DPTI) in relation to the Central Eyre Iron Project (CEIP).

Australia, and South Australia in particular, has a mature legislative framework governing the mining industry. For many decades, mining companies have demonstrated that they bring significant benefits to the jurisdictions in which they operate. Mining companies have demonstrated that they are responsible corporate citizens, taking responsibility for their actions and ensuring sustainability of their operations and the communities in which they operate. They achieve this through applying state-of-the-art methods and technologies to evaluating, developing, and operating their mines.

IRD has been studying the CEIP for over seven years. The company has maintained a transparent approach and has consulted widely with stakeholders. Having considered important factors, including sustainable development, environmental responsibility, cultural and social preservation, and economic viability, the company determined that the project is viable and it wishes to apply to the State Government for approval to develop a mine at the CEIP.

In the supporting documentation to the application, IRD has articulated its commitment to managing the environmental and social aspects of the mine and the health and safety of its employees in an industry-leading manner. It has further given its commitment to providing a net benefit to the environment and communities in which it operates.

The proposed mine will be the second largest resources project in South Australian history. The scale of the proposed development is significant and the benefits that it could bring to the State and the communities in which it operates are substantial.

Despite experiencing the most challenging economic and political climate in the minerals industry, IRD has had the courage to persist with development of the CEIP and has demonstrated that, even in these challenging times, it is able to develop a project with substantial capital investment in South Australia. This decision demonstrates the commitment of the company and its shareholders to development of the project.
The proposed infrastructure development will not only benefit the company, but is likely to significantly benefit the Eyre Peninsula communities, and the State. This proposed infrastructure development includes a deep-water port facility, railway infrastructure, power transmission facilities, borefields, a water pipeline, and long-term accommodation facilities that complement the existing town of Wudinna.

As an ASX-listed company, IRD is subject to the same strict trading rules as other blue chip companies such as the Commonwealth Bank, Wespac, NAB, ANZ, Telstra, CSL, BHP Billiton, OZ Minerals, and Wesfarmers - all good corporate citizens in South Australia. In relation to commodity-specific requirements for public reporting by ASX listed companies, IRD is further subjected to the same reporting codes as other leading minerals companies, including BHP Billiton, Rio Tinto, Alcoa, Fortescue Metals, Newcrest Mining, OZ Minerals, and many more. These reporting codes include the Joint Ore Reserves Committee Code for Reporting Exploration Results, Mineral Resources and Ore Reserves (the JORC Code) and the Code for Technical Assessment and Valuation of Mineral and Petroleum Assets and Securities for Independent Expert Reports (VALMIN Code).

The South Australian Government is committed to developing the State’s minerals industry. Examples of how the Government has demonstrated this commitment include initiatives under the Programme for Accelerated Development (e.g. PACE Frontiers and PACE Supply Chain Development Programme), the Nuclear Fuel Cycle Royal Commission, the Resources Infrastructure Taskforce, and more recently the South Australian Copper Strategy.

Considering the importance of mining to the economy of Australia, and particularly to South Australia, AMC considers approval of a Mining Lease Application for the CEIP as potentially beneficial to the region.

Yours Sincerely

Johann van Wijk
General Manager, Adelaide
CEIP ONLINE SUBMISSION

Mr Andrew Buckham
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2/02/2016

5th Australian Mining Application (MP), 5th Australian Development Application (EIS)

0 - I understand that my submission, including my personal contact details, will be published on the government website and provided to the applicant; OR

General Commentary on CEIP Proposal MPL R, MLP 02, EIS 22

Please refer to uploaded document attached

WBTA_CEIP_Submission_31_Jan_2016.pdf, type application/pdf, 208.1 KB
Wudinna and Districts Business and Tourism Association (WDBTA)

Response/Submission for the Public Consultation call by the Department of State Development (DSD) in respect to the Central Eyre Iron Project (CEIP)

30 January 2016

Forward

Iron Road Ltd has been developing the Mining Lease proposal along with related infrastructure (rail, seaport, airport etc.) for many years. The mineral resource is understood to have been known for at least 70 years, but this Iron Road proposal is the first known attempt to escalate the deposit to an operable mining project.

In considering the development of a mine, early mining proposals by Iron Road were lower tonnages, slurry pipe transport of ore to Port and various Port locations. As mine planning and business planning progressed, ore reserves become proven, the project evolved to the substantial development that is presented in the current application to the Department of State Development.

This changing project has been canvassed with the community along the way, various focus groups, community presentations and information sessions, a more formal Community Consultative Committee, a column in the local paper and availability of staff.

For the average citizen, the scale and complexity of a development such as the CEIP is difficult to contemplate and understand. The Environmental Impact Study, Mining Lease documentation and studies are in most cases undertaken by experts in their fields, and as such many interpretations and statements are subject to trust that they are undertaken at an “arms length” providing subjective assessments of their subject area. The community therefore also needs to rely on the assessors of the project (DSD), that statements made and conclusions reached are satisfactory.

It follows that comments made here are from a community level perspective, not from qualified expertise in any particular area.

Wudinna and Districts Business and Tourism Association – General Position Statement

This committee comprises of membership of local business, tourism and local government, representing the economic interests of the Central Eyre Peninsula district. The WDBTA has been presented with various information over recent years; including delegations from Iron Road representatives, involvement on committees and focus groups, receipt of information and media.

The Central Eyre Peninsula area is experiencing an ongoing general decline of population, as is reflected in so many rural areas nationwide. This is evidenced in the Census data, also anecdotally as businesses close and the community struggles to hold key commercial and governmental services within the area.

A development such as the CEIP has the potential to reverse this trend.

The WDBTA is generally supportive of the development of the CEIP, subject to Iron Road or any subsequent owner operator supporting the local communities and that appropriate level of compensation is provided to anyone disadvantaged by the development.
Key Areas for Consideration

Rail and Port (MLP and EIS General Commentary)
- The rail and port facilities should be available for joint use, not single commodity infrastructure. This releases opportunities for agricultural use and increases the Eyre Peninsula’s ability to grow economically and socially.
- Whilst not considered a priority of this particular development, ultimately the rail and port should be designed to allow an easy linkage to the national rail network, thus linking the rail to a southern cape size port.
- Port should have import and export facilities, which is particularly important with future linkage to the national rail network.

Mine (MLP R)
- When mine is developed, a provision is made for visitation/tourism. Perhaps a vehicle/visitor lookout similar to the Kalgoorlie Super Pit given that the proposed pit here is large scale and will attract interest.
- Appropriate measures for environmental nuisance control (dust, noise, storm water, salt, seepage/seepage) are implemented and monitored. Notation here that all of these aspects are commented on in the MLP and EIS, in many cases on a scientific level.

Community Infrastructure (MLP 02) (EIS 22)
- Mine owners, operators and contractors be obliged to source products and services locally where this is possible.
- Employees and contractors are sought to live locally as far as possible rather than a fly in fly out basis.
- Assistance is provided to local government to ensure that local community infrastructure is developed at an appropriate level. This includes roadways, storm and waste water, hard waste facilities, sport and recreation infrastructure.
- Liaison and assistance with key service suppliers such as education, health, emergency services to ensure that appropriate levels of service are in place.
- Assistance is provided to Wudina District Council to upgrade airport infrastructure to host the increased air traffic proposed. In addition, provision is made for a regular face passenger service component for access by the general community.
- Permanent resident village is constructed to best fit with the existing community and be of a quality that does not detract from the amenity of township. Where ever possible, duplication of sporting and recreational facilities should be avoided to best utilise and upgrade the existing community facilities. The village should also be linked to existing township services via road, foot path/cycle path to allow ease of travel within township.
- Miners employees and contractors are encouraged to participate in community level clubs and organisations. This will assist integration into the community and attempt to avoid the “them and us” scenario often witnessed in one employer communities.
CEIP ONLINE SUBMISSION

Mr Kelvin Hebberman
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2/02/2016

5th Australian Mining Application (MP), 5th Australian Development Application (EIS), Commonwealth EPBC Act (EIS)

0 - I understand that my submission, including my personal contact details, will be published on the government website and provided to the applicant; OR

Hebberman_Submission.doc, type application/msword, 27.5 KB

We (Kelvin and Melanie Hebberman with our daughter and son-in-law Jasmine and Greg Parks) do not agree with the proposed Iron Road Train Corridor and the Central Eyre Iron Project and will not support such a venture through our prime producing agricultural land.

Iron Road should be meeting all our financial costs in all lawyer fees and reimbursing us for the time we have spent over the past 3 years and onwards throughout the consulting period; taking us away from our primary business, family’s lives and causing much anxiety and stress.

HISTORY

We are a third generation farming family and are farming the land that my Father cleared and established in the late 1950's. Together with my son-in-law and daughter we continue to farm the blocks he cleared in Section 53 and 54 Hundred of Darke.

Consultation Period

We believe Iron Road consultation period has been stressful and unsatisfactory. For many of us we have been left in the dark. Questions that have been asked and raised have been often ignored and our concerns raised never addressed.

Iron Roads claim that the train corridor will be running down boundary fence lines is false and many farms are being split in half.

When Iron Road approached us with a map they said the train line could never be moved; “this was where it was going”.


On their first visit they took photos of where the train corridor would be going now their current plan is nowhere near where it was. In fact, we are worse of now that ever. We have had the plan changed twice with no consultation with us the landowner.

Will they continue to change the route or is this the final plan?

**Overtaking Lanes – Rail Corridor**

We only found out through the proposal books that the proposed over taking lanes will be going through my property. Iron Road has yet to inform me of this decision. There has been no consultation with me.

Where they have shown these overtaking lanes is also the best productive land on my property that will be removed from my farming business. Will we be duly compensated?

**Environmental Impact**

We have had sightings of echidnas along Wickstein Road by many locals. The train corridor will interfere with their natural habit.

**Pipe Line**

We have concerns of the removal of water from the water table. If you start messing around with nature and it gets out of balance there will always be a negative impact. We also have concerns about pumping saline water through the pipe line. What happens if and when the pipe line leaks on my property and makes the farming land unproductive? Will I be compensated for that?

**Construction Period**

We have concerns during the construction period of the following:

- Where are they going to put the excess sand from going through sand hills? Will this be put on our better land as land fill; again making our land less productive.

- We strongly suggest Iron Road needs to put up a fence line before commencement and they need to work within this designated space.

**Further comments**

- How long will this third party interest in our land be held? In future, if I wish to sell my land having this third party interest will clearly devalue my property? If the Iron Road project doesn’t get up and running how long will we have this third party interest on our land?
- Our preferred option of the current proposed train line would be Option A on page 3-9 to go down the already established train corridor. Leaving our farming land alone. Another option we would be happy with is to go through the middle of the Hambridge Conversation Park.

- We strongly believe that Iron Road should leave our prime farming land alone and not to take over our food producing area.

Signed:

Kelvin and Melanie Hebbeman

Greg and Jasmine Parks

Id: #269825
To whom it may concern

I wish to make a brief general submission in regards to Iron Road’s proposed mining proposal & associated infrastructure which is to be located at Warrambool on upper Central Eyre Peninsula.

As a small business owner we see this proposed development as being very positive for the immediate upper central Eyre Peninsula, broader Eyre Peninsula region & the state of South Australia. I am writing in support of the overall proposal to establish the CEIP mine. As indicated in the executive summary the investment provided by the developer will see significant & much needed economic & employment benefits flow on to our communities throughout this region. It is good to see that the company is committed to utilising local business & sub-contractors as much as possible both during construction phase & for its ongoing mining operations. I have seen & been involved first hand with the establishment of Iluka’s Jacinth Mining operation in the far west of Eyre Peninsula. I can attest to the positive community, economic & social outcomes that mineral operations bring to a community.

We also support the establishment of a strategic rail corridor & deep sea port facility at Cape Hardy. I understand this infrastructure will be used initially by the mine operator, however we can see that in the long term there is potential for the operator to provide access to other paying users. We would stress the importance of having the belt on & around the wharf fully enclosed. We are sure that PIRSA will be stipulating this as a part of the development approval process.

I understand this submission is brief & I’m happy to expand on any of the above comments should it be required.
2/02/2016

5th Australian Development Application (EIS)

1 - I understand that my submission will be published on the government website and provided to the applicant, BUT I require that the government withholds my name and contact details. I understand that it is my responsibility to ensure personal information is not included in the body of my submission, any footers or headers or any attachments.

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We would like to clearly state that we are strongly opposed to the approval of the railway corridor and mine site proposed by Iron road at Warramboo. We believe that the entire CEIP will have a detrimental effect on large proportions of valuable agriculture land and will make the day to day operation of farming life such as stock management and cropping difficult and add unnecessary extra cost to landholders especially if landholders are left with small parcels of what will become unworkable land. The proposal is also leaving many landholders and future landholders that they are unable to future plan as they are unsure what will happen and how bigger affect this will have on their land. Iron road to date have not been transparent and forthcoming with accurate information and they would need to develop greater business ethics, as currently their business ethics when dealing with landholders is less than desirable. This proposal for affected landholders is not just about a 100m wide piece of land (this will be greater if small parcels of land are cut off due to the corridor), but their lifestyle, livelihood and the lifestyle and livelihood for the next generation, and the emotional affect needs to be taken into account, and Iron road need to develop an empathy with these landholders.

Fencing and maintenance --

That the erection of adequate fencing to prevent the risk of harm to livestock and crop be done prior to the commencement of construction of the railway corridor. This would be necessary to reduce the risk of trespasses and the risk of opportunistic theft on private property, the containment of livestock and to reduce the risk of the spread of noxious weeds.

Type of fencing would have to meet the landholders' specifications to ensure that it is stock proof.
A clearly outlined maintenance plan and who is responsible for maintaining the fencing, for the life time of the mining lease.

Access across rail corridor and of maintenance track –

In section 6.5.1 of the environmental impact statement volume 1 states that an impact management plan will be developed in conjunction with landholders but that this may continue to be developed after the commencement of construction. This plan needs to be completed and finalised prior to construction been commenced as the design of the access points is crucial to the daily operation for the landholder and the management of stock movement, machinery and road train access and other operations such as shearing and cropping.

To ensure viable access for all farming operations, the access points would need to be planned taking into consideration the natural terrain, soil types and existing services such as farm tracks, fencing and water reticulation.

Consideration needs to be given to who can access the maintenance tracks, as this will increase the access to farming properties and allow for increase opportunistic theft for livestock and equipment. This will then lead to an increased cost to the landholder due to replacement and increased insurance premiums.

Communication –

In numerous section for the environmental impact statement, Iron road that they are establishing strong relationship with landowners and have been committed to negotiating consistently and sensitively with directly affected landholders. To date this has not been the experience of the landholders; any consultations with Iron road have been inconsistent and unproductive with no firm information regarding access over the railway corridor, definitive location of the corridor, compensation. Discussion or meetings with other landholders has made it clear that information being given is inconsistent, with directly affected landholders being given opposing answers on various issues, leading to a grave distrust of any information being given by iron road. The major concern is that if this proposal was approved that the currently level of communication and would need to greatly improve when dealing with directly affected landholders to re-establish trust and be open to negotiation to allow landholders the ability to continue their farming practises.

Compaction of Soil, and rising salinity –
Compaction under the railway line can result in salt coming to the surface and this would affect good fertile farming land. The Drive river catchment covers a large area of the proposed railway corridor; this will present problems where there is already salt on the surface or close to the surface. Hence the railway line would need to be built on poles across this affected area to ensure there is no compaction of soil under the railway line.

**Soil erosion**

In section 17.7.6 of the environmental impact statement regarding dune instability, it is concerning that when clearing sand ridges along the railway corridor that a large amount of top soil will be removed, leaving large amounts of raw gultess (infertile) sand that will not be viable to be regenerated, and due to the prevailing wind blowing from a south easterly direction will lead to the corridor becoming a wind tunnel and therefore causing issues with infrastructure eg railway line, pipeline, maintenance track and fencing for stock (sand against fencing cause it to become unstable).

**Increased fire risk**

There will be a substantial increase in the risk of fire, with 12 trains passing a day as outlined in section 4.6.2 with a future possibility of more. There is proven history that trains have started fires in the past. Landholders currently have harvest ban restrictions placed on them at times a high fire risk, will this apply to the trains, and will they cease to run during this allocated ban. If they continue to operate and cause fire at this time what form of compensation and responsibility will Iron road take for this, as it would cause significant risk to the community and potential loss of livestock and crop.

**Crossing at Birdseye Highway**

I have lived on the Birdseye highway all my life and in the last few years the traffic has increased substantially along the Birdseye highway and I cannot see by the figures Table 18-3 that there will be no increase from 2013-2017. There is a lot more tourists travelling this road today and overflow off the Eyre highway. This vision along the Birdseye Highway travelling in an easterly direction has a significant bend and the proposed railway crossing site is not visible until 300 metres away, this is surely a significant risk due to the amount of road trains that travel with heavy loads and need a large distance to come to a complete stop. It is felt by many that an overpass should constructed to reduce the risk of accident.
Weed control –

What is iron road proposing to do about the control of noxious weed control along the railway corridor? As the spread of noxious weed would see a significant increase to the cost to landholders due to increase need to purchase chemical. The establishment of uncontrolled weeds along the railway corridor poses an increased risk of disease hosts and therefore increase the risk of disease such as rust in the crops.

Increased Crop Contamination risk–

After recently visiting the surrounding area around Iron Baron, there was visibly a large amount of red iron ore dust that coated the roads, flora and railway line. In section 4.6.4 it is stated that the covers remain on the carriages for the entire unloading process, this will surely mean that
iron dust will settle on the carriages and have the potential risk of then fall over and being blown over crops as the trains proceed along the corridor and this risk will surely increase closer to the mire site as wind has the potential to carry dust particles for a great distance. This may seem an insignificant risk but due to the strict nature of the grain industry any contamination risk could see the rejection and large loss of income for affected landholders and their families, and any loss of income then also has a flow on effect on local communities and business. There needs to be some plan for compensation on Iron roads behalf for landholders if it was proven that the contamination of grain and therefore loss of income was due to iron ore dust.

Loss of productive farming land –

Section 22.4 of the environmental impact statement Vol 2 states that the location of the railway corridor will be designed to minimise the division of land and separation of farming activities. Throughout consultation the current plans and maps of the railway corridor show numerous occasions where landholders are being left with numerous small parcels of land that will become unviable farming land due to lack of access and land size that is too small to maintain stock or be workable for cropping. Several landholders have stated that they have tried consulting with iron road to have boundaries changed to follow existing paddock boundaries without success or negotiation on iron road part.

Section 22.5.8 of the environmental impact statement Vol 2 states that the CEIP as a whole will result in the loss of 7050ha, Is this taking into account the small parcels of land remaining that will no longer be workable for cropping and be a loss that is far from negligible to the individual landholders and local communities and businesses.

Stress on community –

This proposal is causing undue stress on farming families, due to them being unsure of the future of their farming land that has been built and worked for generations. Many landholders feel that they are currently in a very unstable predicament, with the inability to succession plan as the future of their land is unknown and there is currently no definitive end to the approval process. This leads to an instability for families as future generations may be feeling unstable and therefore look to a career outside of the farming industry. There is currently no counselling (by an independent source) offered to affect landholders by iron road to help combat the stress that is being felt by landholders, and this stress will increase the longer this proposal and approval process takes.

There is also great concern that if this proposal was to be approved that there may be bullying tactics and unnecessary pressure put onto landholders around the acquisition of their parts of their land. How is this going to be monitored and clear information needs to be provided to landholders on their rights if they do not wish to sell.