Government of South Australia
Department of Planning, Transport and Infrastructure

In reply please quote 2018/06886/01

[redacted]

PEOPLE AND BUSINESS DIVISION

77 Grenfell Street
Adelaide SA 5000

GPO Box 1533
Adelaide SA 5001

Telephone: 08 8343 2222
Facsimile: 08 8204 8740

ABN 92 366 288 135

[redacted]

Dear [redacted]

FREEDOM OF INFORMATION INTERNAL REVIEW

I refer to your application for internal review of 23 May 2018 under the *Freedom of Information Act 1991* (the Act)

The original application requested access to:

> *"Matters pertaining to the Iron Road (the Company) Central Eyre Iron Project.*
> *4. The haul road: - I seek the entirety of documents associated with the requirement of the Company to construct a haul road from the port to the mine site inclusive of, but not limited to:-*
> *a. its location*
> *b. it specifications*
> *c. any environmental impact assessment and approvals associated with the roadway (EPBC and or State requirements)*
> *d. details of the requirements that the Company is to meet the entire cost of such a roadway.*
> *e. details of intersection (or otherwise) of the haul road with the Lincoln Highway.*
> *5. The proposed grain port at Cape Hardy: - Accordingly I seek the entirety of documents associated with the Department's (Government's) assessment of the proposed grain handling /port proposal inclusive of, but not limited to*
> *a. expert advice received from the Environmental Protection Authority,*
> *b. PIRSA with respect to the impact of the fugitive ore dust upon grain handling (over the life of the project).*
> *c. an EPBC referral."*

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Determination

I have reviewed the original determination and wish to advise that the determination is varied. Please find a copy enclosed.

Documents, including the public submissions, within the scope of your request can be obtained from a joint State and Federal website on line at http://www.ceipconsultation.sa.gov.au/. More information is also available from the Iron Road Ltd website on line at http://www.ironroadlimited.com.au/central-eyre-iron-project/mining-lease-proposal-environmental-impact-statement.

Of the 25 documents within the scope of your request, sourced by the Department, I have determined to release in full documents 2, 11 and 15, to partially release documents 1, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14 and 16, and am refusing access to documents 17 to 25 as they are currently available on the internet. I have refused access to nine documents and partially refused access to thirteen documents in accordance with Section 20(1)(a)(b) and Clause 6(1) of the FOI Act which states;

20—Refusal of access

(1) An agency may refuse access to a document—

(a) if it is an exempt document; or

(b) if it is a document that is available for inspection at that or some other agency (whether as part of a public register or otherwise) in accordance with Part 2, or in accordance with a legislative instrument other than this Act, whether or not inspection of the document is subject to a fee or charge;

6—Documents affecting personal affairs

(1) A document is an exempt document if it contains matter the disclosure of which would involve the unreasonable disclosure of information concerning the personal affairs of any person (living or dead).

Please note the redacted sections within document six have been removed as they are out of scope.

Point 5 of your request cannot be answered at this stage as no paperwork has been received by this department.

Attached is an explanation of the provisions of the Act which details your rights to review and appeal this determination, and the process to be followed.

In accordance with Premier and Cabinet Circular PC045, if you are given access to documents as a result of this FOI application, details of your application, and the documents to which access is given, may be published in the agency's disclosure log. A copy of PC045 can be found at http://dpc.sa.gov.au/what-we-do/services-for-government/premier-and-cabinet-circulars.

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Should you have any enquiries concerning your application please contact [redacted] Freedom of Information Officer, on telephone [redacted]

Yours sincerely

Julienne TePohe
PRINCIPAL OFFICER

9 July 2018

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FREEDOM OF INFORMATION ACT 1991

YOUR RIGHTS TO REVIEW AND APPEAL

EXTERNAL REVIEW BY THE OMBUDSMAN

After an Internal Review has been completed, or where you have been unable to apply for an Internal Review, and you are still dissatisfied with the decision you can apply for an External Review by the Ombudsman.

You may also request an External Review by the Ombudsman if you have no right to an Internal Review.

The application for review by the Ombudsman should be lodged within 30 days after the date of a determination. The Ombudsman's Office, at their discretion, may extend this time limit.

Investigations by the Ombudsman are free. Further information is available from the Office of the Ombudsman by telephone on 8226 8699 or toll free 1800 182 150 (within SA).

APPEAL TO THE SOUTH AUSTRALIAN CIVIL AND ADMINISTRATIVE TRIBUNAL (SACAT)

If you are still dissatisfied with the decision made by the State Government Agency, Local Government Council or University after an Internal Review or after a review by the Ombudsman or, you can appeal to SACAT.

You must exercise your right of appeal to SACAT within 30 calendar days after being advised of the determination or the results of the review. Any costs will be determined by SACAT, where applicable. For more information, contact;

South Australian Civil and Administrative Tribunal (SACAT)
Phone: 1800 723 767
Email: sacat@sacat.sa.gov.au

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SCHEDULE OF DOCUMENTS - FREEDOM OF INFORMATION APPLICATION NUMBER				Determination	2018/06886/01	12567034
Document Number	Description of Document	Date of Document	Author	Release / Refuse Access	Schedule Clause Applied	Notes
1	Email 15:27	23-September-2016	Iron Road Ltd	Partial Release	6(1) personal affairs	N/A
2	attachment to doc 1 Iron Road Limited - CEIP EIS Response Document - 30 June 2016	30-June-2016	Iron Road Ltd	Release		October 2016 avail on Iron Road Ltd CEIP website - refer letter
3	Email 10:00	20-February-2017	DPTI	Partial Release	6(1) personal affairs	
4	Email 14:46	29-July-2016	DPTI	Partial Release	6(1) personal affairs	
5	Email16:54 attachment to doc 4 (CEIP EIS Response Document - 30 June 2016 attachment the same as doc 2)	22-February-2016	DPTI	Partial Release	6(1) personal affairs	
6	attachment to doc 5 Response Document Adequacy Check - consolidated Government comments on the EIS for Cape Hardy Sea Port - IRD July 2016	July 2016	DPTI, DEWNR, EPA, PIRSA, Renewal SA, CFS	Partial Release	out of scope material removed	17/03/2016 Final comment chart EIS CEIP IRD available on Government CEIP website - refer letter
7	Meeting Note Ref to EPBC Referral	10-December-2014	Iron Road Ltd	Partial Release	6(1) personal affairs	
8	Minute and Letter to Iron Rd re OSOM Loads on Local Roads	04-August-2015	DPTI	Partial Release	6(1) personal affairs	
9	Email 17:05 (CEIP EIS Response Document - 30 June 2016 attachment the same as doc 2)	30-June-2016	DPTI	Partial Release	6(1) personal affairs	
10	Email 08:53	23-November-2016	DPTI	Partial Release	6(1) personal affairs	
11	Attachment to document 10 High level commitments - EIS	2016	Iron Road Ltd	Release		
12	EPBC Referral	26-August-2014	Department of the Environment and Energy	Partial Release	6(1) personal affairs	
13	Email 15:39	12-September-2016	DPTI	Partial Release	6(1) personal affairs	
14	Email 09:56	19-December-2016	DPTI	Partial Release	6(1) personal affairs	

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SCHEDULE OF DOCUMENTS - FREEDOM OF INFORMATION APPLICATION NUMBER				Determination	2018/06886/01	12567034
Document Number	Description of Document	Date of Document	Author	Release / Refuse Access	Schedule Clause Applied	Notes
15	Draft Comment from DE on EPBC Matters	unknown	Department of the Environment and Energy	Release		
16	Bilateral Agreement on Assessment EPBC	03-October-2014	Department of the Environment and Energy	Partial Release	6(1) personal affairs	
17	DPTI Assessment Report - Major Development Application - Iron Road Limited	March 2017	DPTI	Refuse Access	20(1)(b) available for inspection	http://www.ceipconsultation.sa.gov.au/data/assets/pdf_file/0008/291788/Assessment_Report_-_Major_Development_Application_-_Iron_Road_Limited.pdf
18	CEIP Request for Response Document - Letter	18-March-2016	DPTI	Refuse Access	20(1)(b) available for inspection	http://www.ceipconsultation.sa.gov.au/data/assets/pdf_file/0003/272730/20160316_-_CEIP_Request_for_Response_Document_-_Letter.pdf
19	Mining tenement documents	unknown		Refuse Access	20(1)(b) available for inspection	http://www.ceipconsultation.sa.gov.au/view_the_documents#assessments
20	Development application approval document	unknown		Refuse Access	20(1)(b) available for inspection	http://www.ceipconsultation.sa.gov.au/view_the_documents#assessments
21	Assessment reports	unknown		Refuse Access	20(1)(b) available for inspection	http://www.ceipconsultation.sa.gov.au/view_the_documents#assessments
22	Response documents	unknown		Refuse Access	20(1)(b) available for inspection	http://www.ceipconsultation.sa.gov.au/view_the_documents#assessments

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SCHEDULE OF DOCUMENTS - FREEDOM OF INFORMATION APPLICATION NUMBER				2018/06886/01		12567034
Document Number	Description of Document	Date of Document	Author	Determination Release / Refuse Access	Schedule Clause Applied	Notes
23	Submissions	unknown		Refuse Access	20(1)(b) available for inspection	http://www.ceipconsultation.sa.gov.au/view_the_documents#assessments
24	Iron Road mining proposal application	unknown		Refuse Access	20(1)(b) available for inspection	http://www.ceipconsultation.sa.gov.au/view_the_documents#assessments
25	Environmental impact statement	unknown		Refuse Access	20(1)(b) available for inspection	http://www.ceipconsultation.sa.gov.au/view_the_documents#assessments

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From: 6(1) Personal affairs
To: Kleeman, Robert (DPTI)
Cc: 6(1) Personal affairs Querzoli, Andrew (DSD); Ferguson, Karen (DPTI); Wood, Jeremy (DPTI); Lock, Erik (DSD)
Subject: RE: Response Document
Date: Friday, 23 September 2016 3:27:51 PM
Attachments: image001.gif
image002.gif
image003.gif
image004.gif
IRONROADORANGE(2-9SSTACKEDSmallText)1NoDPIAdjust_181e25a4-9950-4956-a570-87f3794b6b02.jpg
Iron Road Limited - CEIP EIS Response Document - 30 June 2016.pdf

Hi Rob

Thanks for your email. Due to size limits on Government emails I have to send the Response Documents in two separate emails so please find attached the Response Document relating to the EIS/EPBC. Please note the following:

- The document has been subject to an internal edit process which has resulted in minor editorial changes only
- The Master Index has been updated due to the change in page numbers
- The wording agreed by DPTI and Iron Road in relation to the grade separation is included within Attachment B. We acknowledge that this matter is subject to further negotiation which will occur outside of the Response Document process.
- The document is still dated 30 June 2016

Printing hard copies and providing USBs is a simple exercise and will only take a day for Iron Road to complete.

If you have any queries or require anything further please let me know.

Kind regards
6(1) Personal affairs

6(1) Personal affairs

Project Approvals Manager

Iron Road House, Level 6, 30 Currie Street, Adelaide, South Australia 5000 * GPO Box 1164, Adelaide, South Australia 5001, Australia
ironroadlimited.com.au

From: Kleeman, Robert (DPTI) [mailto:Robert.Kleeman@sa.gov.au]
Sent: Friday, 23 September 2016 2:25 PM
To: 6(1) Personal affairs
Cc: Querzoli, Andrew (DSD); Ferguson, Karen (DPTI); Wood, Jeremy (DPTI); Lock, Erik (DSD)
Subject: Response Document

Hi6(1) Personal affairs

Further to your conversation with DPTI staff regarding the finalisation of the response to public submissions received, noting the work nearing completion on the response to the issues raised by DPTI regarding the issue of grade separation, and the work being undertaken to answer DEWNR's query regarding the water balance for the Mine (and that you are meeting with DSD on Monday to finalise), it now looks as if we are nearing the point where the Response Document can be formally submitted to Government and subsequently publically released.

To progress this matter it would be appreciated if you could update and finalise as per above and send to both DSD and DPTI a final soft copy of the Response Document. We will then send you a joint formal letter accepting the document as suitable for formal printing.

We will at that point commence the process of booking ads in the paper for its formal release, and commence arrangements for its circulation and availability (including in the Region), on a date to be confirmed with Iron Road – and subject to how long it will take you to print, and for us to get copies to the relevant Councils.

Trust this provides for an orderly process to have the document formally released.

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Happy to further discuss as required.

Robert Kleeman
Unit Manager Strategic Development Assessment
Investment Management, Development Division
Department of Planning, Transport and Infrastructure
6(1) Personal affairs
Level 1, 211 Victoria Square, Adelaide SA 5000
GPO Box 1815 Adelaide SA 5001 • DX 967 • www.dpti.sa.gov.au

collaboration . honesty . excellence . enjoyment . respect

We acknowledge and respect Aboriginal peoples as South Australia's first peoples and nations, we recognise Aboriginal peoples as traditional owners and occupants of land and waters in South Australia and that their spiritual, social, cultural and economic practices come from their traditional lands and waters; and they maintain their cultural and heritage beliefs, languages and laws which are of ongoing importance; We pay our respects to their ancestors and to their Elders.

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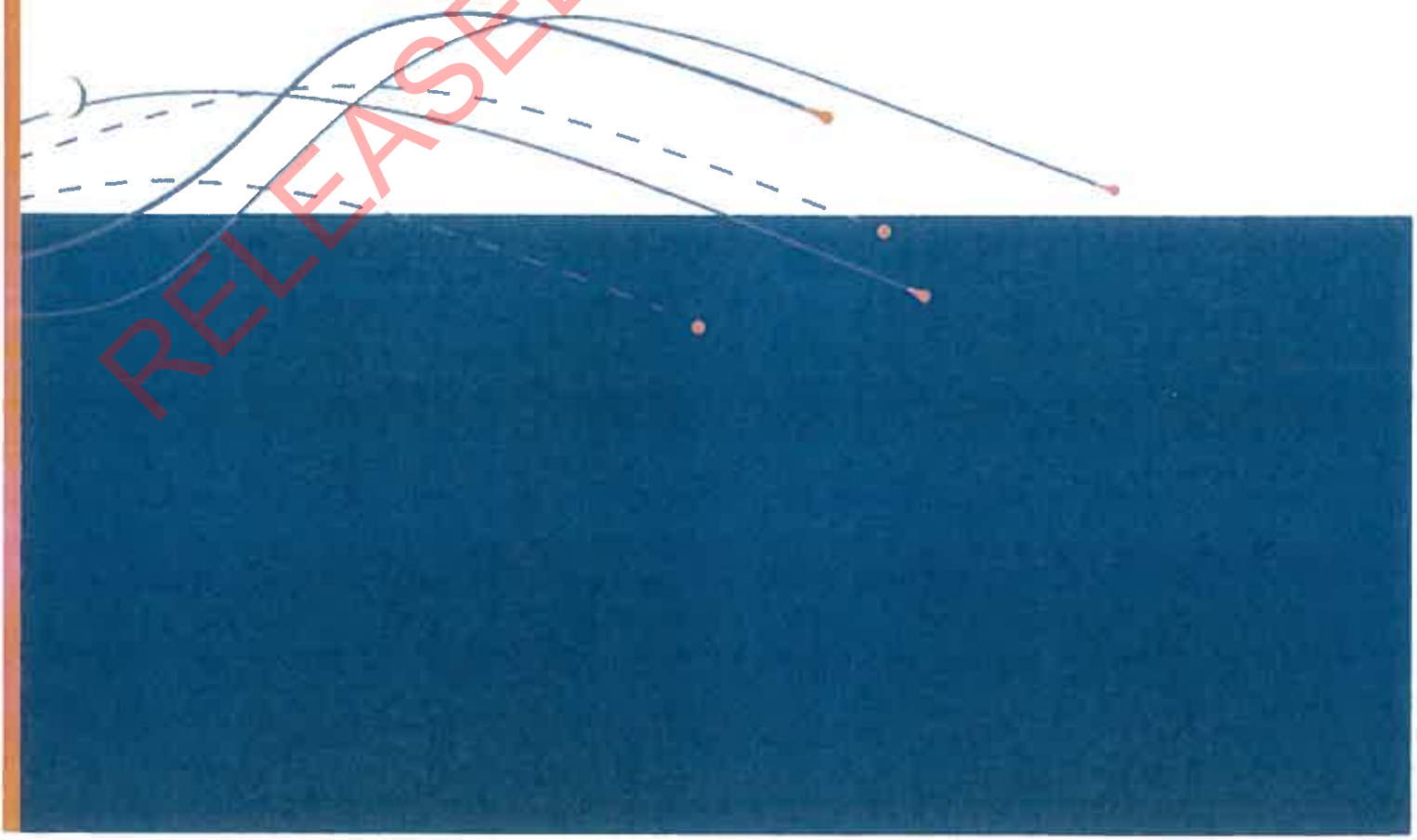
File 2018/06886/01 - Document 002

IRON ROAD

CENTRAL EYRE IRON PROJECT

Environmental Impact Statement
Response Document



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IRON ROAD

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Attachment B: CEIP EIS – Government Issues/Comments and Iron Road's Responses
Attachment C: CEIP EIS – Issues/Comments on EPBC Act and Iron Road's Responses

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1 Executive Summary

The Central Eyre Iron Project (CEIP) is located on the Eyre Peninsula in South Australia and comprises:

- A proposed magnetite mining and minerals processing operation (CEIP Mine) near Warramboo, approximately 28 km south east of Wudinna; and
- Significant infrastructure (CEIP Infrastructure) required to support the CEIP Mine and to provide the logistics chain to enable the export of magnetite concentrate to market (CEIP Infrastructure). This infrastructure comprises a long term employee village, water borefield, railway line, power line and deep sea port.

On 5 November 2015 Iron Road Limited (Iron Road) lodged an Environmental Impact Statement (EIS) with the Department of Planning, Transport and Infrastructure (DPTI) pursuant to section 46B of the *Development Act, 1993* (SA). The EIS covers all aspects of the CEIP Infrastructure and was prepared in accordance with the Guidelines issued to Iron Road by the SA Planning Minister in November 2014.

As Iron Road's proposed port at Cape Hardy is deemed to be a 'controlled action' under the Commonwealth Government's *Environment Protection and Biodiversity Conservation Act, 1999* (EPBC) the requirements under that Act have been incorporated into the EIS process and will be assessed in accordance with the Bilateral Agreement between the Commonwealth and South Australian Governments.

At the same time the EIS was lodged, IRD Mining Operations Pty Ltd, a wholly owned subsidiary of Iron Road, submitted an application for a Mineral Lease (ML) over the entire area of Mineral Claim (MC) 4383, together with a Mining Lease Proposal (MLP), to the Department of State Development (DSD) pursuant to section 35 of the Mining Act, 1971 (SA). The MLP covers all social, economic and environmental aspects of the proposed CEIP Mine.

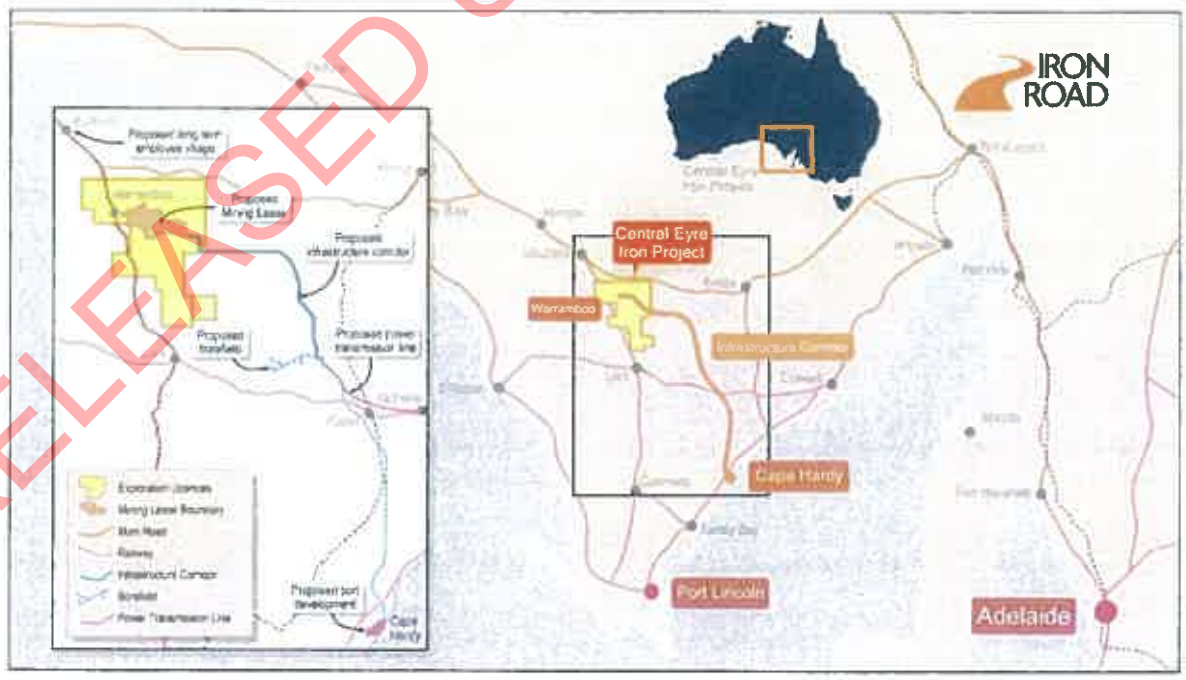

Figure 1: Overview of the CEIP components

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1.1 Joint Consultation Process

On 19 November 2015, DPTI and DSD commenced a joint consultation process in respect to both the EIS and MLP concluding on 2 February 2016, a period of almost 11 weeks.

The SA Government facilitated three public forums in the key towns of Port Neill, Cleve and Wudinna, all of which were attended by representatives from DPTI, DSD and Iron Road. The forums provided interested parties with an opportunity to hear directly from SA Government about the respective application and assessment processes and how they could make submissions relating to the EIS/EPBC or MLP (or both) during the public consultation period. Each forum took place over a five hour period (2pm – 7pm) and included presentations from DPTI, DSD and Iron Road.

Comprehensive guidelines for the application, public consultation and assessment processes relating to the CEIP were prepared by SA Government and made available to interested parties at the public forums and online.

In addition, and in accordance with legislation and / or Government policy, DPTI and DSD distributed hard copies of the EIS and MLP, together with USB memory sticks containing electronic copies, across the Eyre Peninsula to landowners, local DCSs and libraries. Hard copies were also available for viewing at both DPTI and DSD offices in Adelaide together with free electronic copies on USB memory sticks.

The EIS and MLP were also available for downloading from a dedicated Government website for the CEIP (www.ceipconsultation.sa.gov.au), Iron Road's website (www.ironroadlimited.com.au) and from the DSD and sa.gov.au websites.

1.2 Submissions

At the conclusion of the public consultation period, a total of 105 public submissions were received by SA Government, 53 of those being supportive in nature and setting out numerous reasons why the CEIP is an important development to South Australia's economic and social wellbeing. For example, submitters noted that the CEIP would:

- Improve employment and career opportunities;
- Provide a diversification of industries; and
- Increase economic benefits and contribute to a reverse in the population decline across the Eyre Peninsula, particularly within the Wudinna DC area.

Of those 105, 21 raised issues relating only to the EIS/EPBC while another 19 provided comment in relation to both the EIS/EPBC and the MLP. The remaining submissions either raised concerns purely in relation to the MLP or did not express any concerns or issues with the CEIP development and urged the Government to approve the project for the benefit of all South Australians.

1.3 Response Documents

On 18 March 2016, DPTI and DSD jointly forwarded a formal "*Request for Response*" letter to Iron Road together with copies of all public submissions and Government comments received in relation to both the EIS and MLP. Guidance on how Iron Road should respond to each was also provided.

All of the questions and areas of concern raised in the public submissions and by SA Government agencies that relate to the EIS/EPBC have been addressed in this Response Document (refer **Attachments A and B** respectively) and contributes directly to the assessment of the EIS by DPTI. In addition, comments received from the Commonwealth Department of the Environment (DotE) in relation to the EPBC have been addressed (refer **Attachment C**) and will also contribute to assessment of the EIS.

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This Response Document will also assist in setting appropriate conditions should the Governor of South Australia approve the CEIP Infrastructure and consent under the EPBC Act is also obtained from the Commonwealth Minister for the Environment.

Iron Road also commits to continue working with authorities and stakeholders to provide positive outcomes and looks forwarded to this opportunity should development approval for the CEIP Infrastructure be obtained.

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2 Introduction

2.1 Background

The CEIP is located on the Eyre Peninsula in South Australia and comprises:

- The proposed CEIP Mine near Warramboo, approximately 28 km south east of Wudinna; and
- Significant infrastructure required to support the CEIP Mine and to provide the logistics chain to enable the export of magnetite concentrate to market, comprising a long term employee village, water borefield, railway line, power line and deep sea port.

Iron Road's application for development approval for the CEIP Infrastructure through an EIS pursuant to section 46B of the *Development Act, 1993* was submitted to DPTI on 5 November 2015. The comprehensive EIS was prepared in accordance with the Guidelines issued to Iron Road by the Minister for Planning in November 2014 and sets out environmental, social and economic impacts and benefits of the proposed CEIP Infrastructure.

At the same time the EIS was lodged, IRD Mining Operations Pty Ltd, a wholly owned subsidiary of Iron Road, submitted a ML application over MC 4383 at Warramboo pursuant to section 35 of the *Mining Act, 1971*. The ML application was accompanied by a comprehensive MLP which set out all environmental, social and economic aspects of the proposed CEIP Mine.

The EIS and MLP were open for public consultation in a process undertaken jointly by DPTI and DSD, commencing on 19 November 2015 and concluding just short of 11 weeks later on 2 February 2016.

This Response Document provides further information and/or clarity on the questions and issues raised during the public consultation period that relate to the EIS/EPBC only. Questions and issues raised in relation to the MLP can be found in the separate MLP Response Document which has been forwarded to DSD for assessment of the CEIP Mine.

2.2 Multi-user Infrastructure

Iron Road's CEIP Infrastructure, in particular the port and rail, has been designed to allow for third party access. While the EIS sets out only Iron Road's intended use for the infrastructure, and seeks relevant approvals for that purpose, third parties could obtain their own approvals in order to develop further infrastructure for use at the facilities.

Earlier in 2016 Emerald Grain, a wholly owned subsidiary of Sumitomo Corporation, announced that an MOU had been in place with Iron Road since early 2014 (refer Emerald Grain's announcement dated 1 March 2016 and Iron Road's ASX announcement of the same date).

The companies are working closely together to explore opportunities to access the proposed rail and port facilities in order to facilitate a modern, efficient and internationally competitive grain export route.

The companies envisage that Emerald Grain will make application for all necessary approvals that it may require to enable it to use the proposed deep sea port at Cape Hardy in due course.

Iron Road has also signed a Strategic Cooperation Agreement with a wholly owned subsidiary of China Railway Group Limited, Asia's largest infrastructure construction contractor.

Together with another recent signing with Shandong Iron & Steel Group Co Limited in China, Iron Road is aligning itself with international companies who share the vision of broadening the economic base of the Eyre Peninsula and South Australia.

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3 Results of the Public Consultation Process

The results of the public consultation are encouraging, with 53 of the 105 submissions received by SA Government recognising that the CEIP will bring significant economic benefits to the Eyre Peninsula and the State, including employment opportunities, a diversification of industries and, by bringing workers and their families to the Eyre Peninsula, a reversing of the steady population decline (reference ABS Census data) witnessed by many Eyre Peninsula communities over the past 25 years.

Of those 105 public submissions (including the submissions received from all four impacted DCs – Wudinna, Cleve, Kimba and Tumby Bay) 21 raised issues to be addressed or asked for further information/clarification from Iron Road in relation only to the EIS/EPBC while another 19 related to both the EIS/EPBC and the MLP. The remaining submissions related purely to the MLP or did not have any concerns or issues with the CEIP and urged the Government to approve the project for the benefit of all South Australians.

In all, Iron Road has addressed 305 questions/issues (many duplicated) raised in the public submissions relating to the EIS/EPBC (refer to **Attachment A**), the responses to which will directly contribute to the assessment of the EIS by DPTI. Iron Road's Response Document will also assist in the setting of appropriate conditions should the Governor of South Australia approve the CEIP Infrastructure.

3.1 Out of Scope Comments

The purpose of the public consultation process was for interested parties to consider the detailed information contained in Iron Road's development and mining applications and to provide comment on the content of those documents. However, several of the submissions received during the public consultation process contain a variety of questions and/or concerns that are outside the scope of both the EIS and MLP.

The guidelines issued by SA Government for the CEIP public consultation process ("*Central Eyre Iron Project – Guideline for the application, public consultation and assessment processes*" – available from www.ceipconsultation.sa.gov.au) include various examples for consideration when preparing submissions, such as:

- Did Iron Road adequately describe any potential environmental, social or economic impacts?
- Did Iron Road overlook a key stakeholder in its community consultation process?
- Did Iron Road propose mine closure and completion outcomes that are both appropriate and achievable?

Iron Road has identified numerous questions and statements in the public submissions that it considers to be 'out of scope'. Nevertheless, these have been divided into 30 topics and are addressed in Section 7 of this Response Document. Some examples of 'out of scope' topics in the public submissions are:

- Suggestions for alternative infrastructure corridor routes, including transecting existing wilderness protections areas that do not currently permit development;
- Opposition to mining generally or mining on agricultural and/or arable land specifically;
- Questions relating to a perceived de-valuation of land;
- Timing of the Iron Road submissions and SA Government's public consultation process (e.g. during harvest activities, school holidays, Christmas and New Year); and
- Cost of obtaining hard copies of the EIS.

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Iron Road management and staff are committed to discussing and resolving, where possible, matters of concern raised by stakeholders, including those outside of the formal bounds of the assessment process.

3.2 Content of Submissions

The various questions raised in the public submissions received during the SA Government led consultation process, and which relate to the EIS/EPBC (including those from the four impacted DCs), may be found in **Attachment A** of this document. The majority of the positive and supportive public submissions do not generally require a response, except for a few cases where specific questions are asked.

Iron Road notes that the majority of negative submissions received are from directly impacted landowners, with multiple submissions received from the same small group of families.

Several submissions are lengthy and contain a mixture of repetitive questions, statements, commentary and accusations. Other submissions are difficult to address, particularly where no direct query is raised. In these cases, Iron Road has paraphrased or rephrased some of the content from the submissions in order to succinctly respond to what the Company believes is the underlying concern.

Iron Road recognises that some people are fundamentally opposed to mining and development, especially on agricultural land. The Company believes that different industries can co-exist, on a basis consistent with the SA Government's Multiple Land Use Framework, and build on the strength of each.

3.3 Notes to Consider

When reading this document please note the following:

- The author of the Tumby Bay Residents and Ratepayers Association (TBRARA) repeatedly makes reference to Iron Road's "DFS" as opposed to either the EIS or MLP. The DFS is a commercially confidential document outlining the results of Iron Road's 2.5 year feasibility study which has not been provided to TBRARA, or any other stakeholder, therefore in every case Iron Road has taken "DFS" to mean either the EIS or MLP.
- As there is much repetition and duplication of issues among the submissions received there may be some instances where specific questions have been answered in the Response Document by reference to a similar question and associated response.

Various submitters' posed the same or similar questions regarding the perceived financial liability of the impacted DCs due to the CEIP development. While a few of those questions have been addressed separately in **Attachment A**, Iron Road provides the following general response:

- None of the DCs will be financially liable for any component of the CEIP development (e.g. such as the long term employee village at Wudinna, or the closure/upgrade of local roads). Iron Road intends to enter into Management Agreements with each of the four DCs directly affected following completion of project funding and approvals processes, but prior to construction activities commencing. Those agreements will set out appropriate arrangements in relation to infrastructure, roads and other relevant matters.

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Some submissions allege that Iron Road will use only imported Chinese steel and labour and that all CEIP components will be manufactured offshore. Again, some questions have been separately addressed in **Attachment A** but Iron Road provides the following general response:

- These statements are incorrect. The Requests for Budget Quotations priced in Iron Road's studies were issued to, and received from, Australian based companies. However, it is also too early for Iron Road to provide guidance relating to aggregate Australian content as funding sources are likely to at least partly dictate where products and services are sourced. Regardless, Australian manufacturers and suppliers will be afforded opportunity to supply services to the CEIP. Iron Road will comply with relevant legislation in this regard, together with its Australian Industry Participation Plan which has been approved by the Australian Industry Participation Authority (established by the Commonwealth Government). In relation to the workforce, it has long been Iron Road's intent to source the future long term workforce locally and regionally, for example from the Eyre Peninsula and upper Spencer Gulf regions.

3.4 Summary of Issues Raised

A summary of the number of issues raised for each EIS Chapter is outlined in Table 1 overleaf and shows that the main areas of concern are *Traffic* and *Terrestrial Flora and Fauna*, followed by *Project Description* and *Social Environment*. No comments were made in relation to the *Introduction*, *Risk and Impact Definition*, *Aboriginal Heritage and Native Title* or *Non-Aboriginal Heritage* Chapters.

The major issues raised within each of these Chapters include:

- Traffic (e.g. delays due to CEIP construction activities; safety of school bus operations and school bus routes; local road changes)
- Rail crossings (e.g. quantity and type)
- Terrestrial Flora and Fauna (e.g. weeds in the corridor and who would manage them)
- Fire hazard management (e.g. operations on fire ban days; ease of access for emergency vehicles)
- Impacts to agricultural values (e.g. dust on crops; saline water for dust suppression; soil compaction; erosion)
- Impacts to farming operations (e.g. access, stock movements and fencing)
- Noise levels, baseline studies, sensitive receivers
- Social environment (e.g. safety and security; population; workforce, social infrastructure)
- Groundwater (e.g. impacts to aquifers; impacts to Polda Basin and Prescribed Wells Area)
- Stakeholder consultation (e.g. impacted landowners)
- Economic viability (e.g. iron ore pricing)

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Table 1: Summary of Issues Raised per Chapter

Chapter		Submission Number																																											
No.	Title	1	3	4	17	18	20	21	22	23	25	26	27	28	30	33	36	37	40	46	47	49	50	55	58	60	63	74	77	78	79	80	82	83	84	85	87	92	93	94	95	98	102	104	Tot.
1	Introduction																																													0
2	Project justification																																											✓	1
3	Project alternatives										✓		✓	✓		✓					✓		✓		✓						✓														8
4	Project description	✓			✓	✓	✓	✓		✓			✓		✓				✓	✓	✓		✓				✓			✓						✓		✓					✓	✓	18
5	Statutory framework																	✓																									✓	✓	3
6	Stakeholder engagement						✓							✓				✓				✓	✓							✓					✓			✓					✓		9
7	Physical environment				✓																																✓				✓	✓	✓	5
8	Land use and tenure																									✓												✓					✓		3
9	Risk and impact definition																																												0
10	Air quality				✓	✓									✓											✓				✓					✓			✓	✓				✓	✓	10
11	Climate change and greenhouse gas																																✓					✓							2
12	Noise and vibration						✓							✓												✓												✓				✓	✓	✓	7
13	Terrestrial flora and fauna			✓	✓	✓		✓	✓	✓	✓			✓	✓						✓	✓	✓		✓	✓	✓			✓						✓		✓	✓			✓	✓	21
14	Marine and coastal environment																									✓												✓					✓		3
15	Surface water				✓																							✓																2
16	Groundwater		✓		✓			✓	✓				✓		✓							✓						✓	✓										✓				✓	✓	12
17	Soil and land quality							✓	✓										✓			✓			✓	✓			✓						✓	✓		✓				✓	✓	12
18	Traffic and transport	✓	✓	✓	✓	✓		✓	✓	✓		✓		✓		✓		✓	✓			✓		✓		✓	✓		✓	✓	✓		✓			✓							✓	✓	24
19	Aboriginal heritage and Native Title																																											0
20	Non-Aboriginal heritage																																											0
21	Economic environment				✓	✓													✓									✓				✓							✓		✓	✓	8
22	Social environment		✓											✓			✓		✓	✓		✓						✓					✓	✓				✓		✓	✓		✓	✓	14
23	Landscape and visual amenity																									✓														✓					2
24	Environmental management																									✓																		✓		3

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4 Issues raised by SA Government Agencies

As part of its standard assessment process, DPTI forwarded copies of the EIS to various SA Government agencies for review and seeking comment regarding the adequacy of matters under their specific areas of responsibility. Agencies that provided comment to DPTI include the EPA, DEWNR, PIRSA and Renewal SA.

Iron Road's responses to the 95 requests for further information or suggested amendments to the EIS from SA Government agencies, are included in **Attachment B** of this document.

Note that in three instances the responses from Iron Road have required the inclusion of Figures or Tables that cannot be readily accommodated in a tabular format, therefore the information requested is set out below.

4.1 DEWNR Comment # 33 – Modelling Review, Appendix V

Provide information regarding the water budget used for the groundwater model.

Iron Road's Response:

The model water budget is summarised in Table 4-4 of EIS Appendix V, as a simple class 1 model, with constant head boundaries located distant from the pumping centre. All (>99.9%) of pumped groundwater is removed from storage for the base case (no recharge) model. The detailed water budget for the base case model is presented below in Table 2. There is no impact on achieving outcomes.

Table 2: Detailed Water Budget (Base Case Model)

	WELLS OUT	CONSTANT HEAD IN	STORAGE IN	Constant Head IN (% of total Flux)
Time [day]	Rates [m^3/day]	Rates [m^3/day]	Rates [m^3/day]	(%)
352	40,000	0.00060	39,999	0.0000015
773	40,000	0.014	40,000	0.0000362
1280	40,000	0.0053	40,002	0.0000132
1887	40,000	0.016	40,003	0.0000410
2616	40,000	0.039	39,997	0.00010
3491	40,000	0.053	39,998	0.00013
4540	40,000	0.10	40,001	0.00026
5800	40,000	0.21	40,001	0.00052
7311	40,000	0.43	40,000	0.0011
9125	40,000	0.88	39,999	0.0022
9477	0	0.97	19,237	0.0051
9898	0	1.1	16,368	0.0068
10405	0	1.3	14,689	0.0086
11012	0	1.5	13,249	0.011
11741	0	1.8	11,880	0.015
12616	0	2.2	10,588	0.021
13665	0	2.8	9,398	0.030
14925	0	3.6	8,323	0.043
16436	0	4.8	7,363	0.065
18250	0	6.5	6,516	0.099

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4.2 DEWNR Comment # 36 - Modelling Review, Appendix V

Further information regarding conceptualisation of groundwater conditions of the borefield area, in particular the existence of the tertiary clay confining layer, which is not evident in cross sections for Appendix V, to be provided. In addition, further information regarding the presence of a Quaternary aquifer is requested.

Iron Road's Response:

For comment on the tertiary confining layer, please see Iron Road's response to DEWNR Comment # 35 in **Attachment B**.

A quaternary aquifer has not been identified at the borefield site. Quaternary sediments are present and elevated above the water table. Inferred Quaternary sediments are saturated further west in the Musgrave PWA as discussed in **Attachment B**.

Table 3 below summarises the quaternary sediment intersection and standing water level (or water cut for aircore drilling) for investigation bores in proximity to the Kielpa Borefield.

Table 3: Quaternary Sediment Intersection

Bore ID	Easting	Northing	Collar Elevation (mAHD)	SWL (in depth)	Base of Quaternary sediment (in depth)	Comments
IC4	604910	6285181	130	49.8	22	
KPBp04	601414	6284357	125	35.4	22	
KPBi07	597907	6283718	117	27.4	14	
KPBi09	594439	6282471	109	39.5	12	
IC10 (AC)	610380	6279916	134	43.0	15	First aircore water cut at 68m depth

The model layer is used to simulate the water table which is inferred to sit near the top of the Tertiary unit, logged as weathered, oxidised clay with some sand, in all drillholes.

There is no impact on achieving outcomes.

4.3 DEWNR Comment # 37 - Appendix V

Provide additional information regarding the cone of depression and its possible extent following cessation of pumping.

Iron Road's Response:

Recovery of the groundwater system is simulated in the recovery models run as part of the sensitivity analysis. The results are summarised in Chapter 16.5.2 of the EIS with full details provided in the Groundwater Science Report *Kielpa Groundwater Supply Model Sensitivity Analysis E-F-66-RPT-2002*. Note that as this report contains information relating to costs it will be provided to SA Government on a commercial in confidence basis only, with no authorisation for it to be released or published as part of this Response Document.

Sensitivity analysis was undertaken for varying rates of recharge (1, 7, and 15 mm per year). Complete water level recovery is predicted between 350 years (1 mm recharge) and 75 years (15 mm recharge). Note that no recharge is applied in the pumping models presented in the EIS and GIA (for this reason these models are very conservative).

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For the conservative (1mm recharge) model, the 1 m drawdown contour reaches its maximum extent following approximately 65 years recovery (the cone of depression flattens and extends following cessation of pumping, and then diminishes to nothing as recharge replaces the water previously removed through pumping). At 65 years the calculated 1 m drawdown contour is located 35.7 km east of the MPWA boundary. See Figure 2 below for model output.

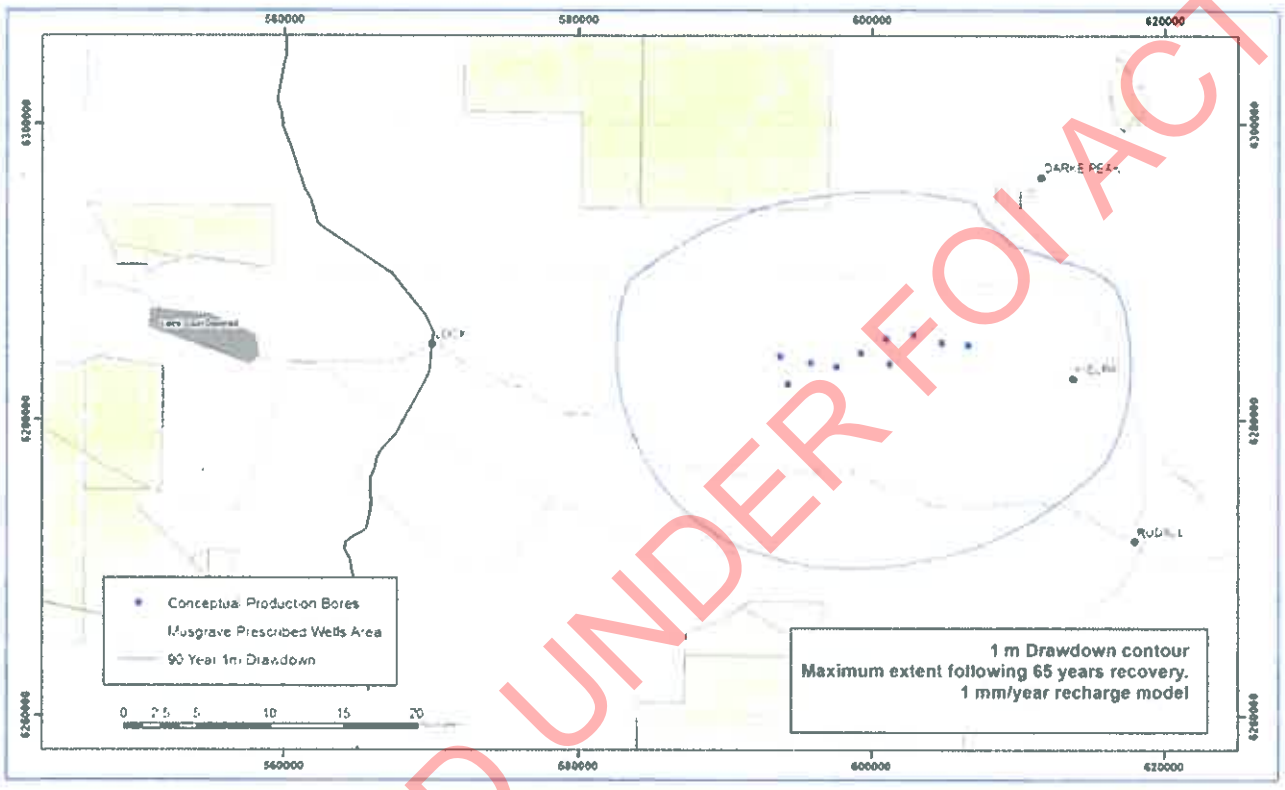

Figure 2: Model Output for Drawdown

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5 Issues Raised by the Commonwealth

As the Commonwealth DotE advised in 2014 that Iron Road's proposed port at Cape Hardy is a 'controlled action' due to potential impacts on the Southern Right Whale, that agency has provided comments on the EIS.

Iron Road's responses to those comments can be found in **Attachment C** of this document.

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6 Correction to Information

DEWNR Comment # 39 points out that Figure 1-1 within EIS Chapter 1 does not align with the information relating to the CEIP Mineral Resources provided elsewhere in that Chapter.

While Chapter 1.3 correctly advised that the Mineral Resources for the CEIP is 4.5 billion tonnes, up 819 million tonnes as a result of the Company's last drilling programme, completed in late 2014, Figure 1-1 showed only 3.7 Billion tonnes, the known Mineral Resources prior to that final drilling programme. Please refer to the updated Figure below which is consistent with the CEIP Mineral Resource of 4.5 billion tonnes.

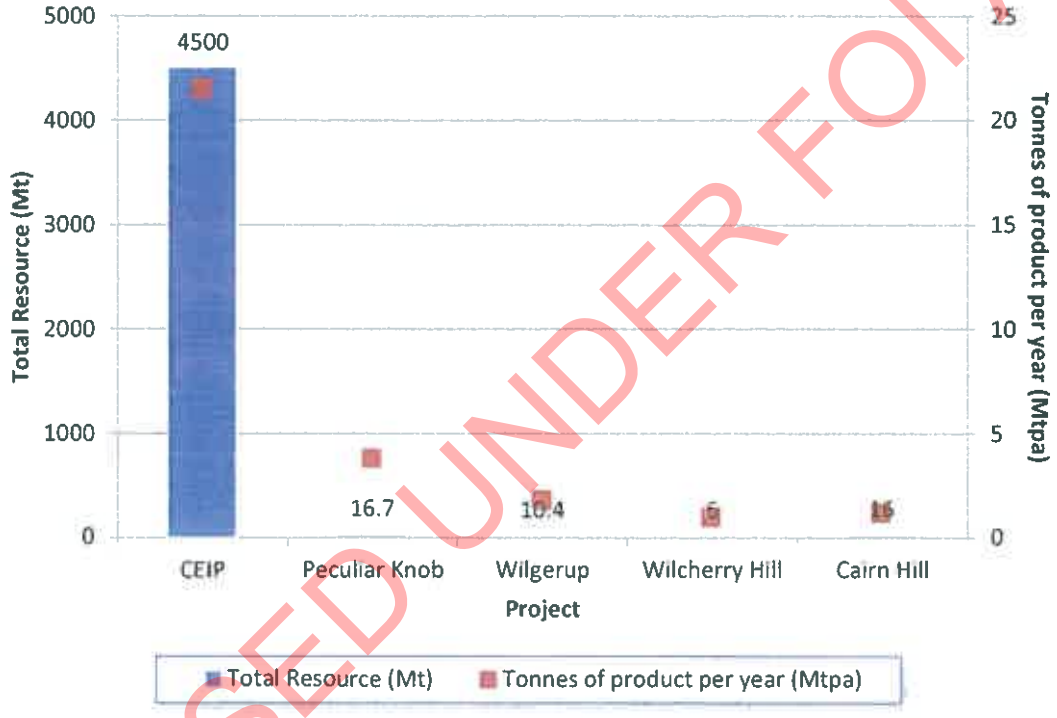

Figure 3: Updated Mineral Resources for the CEIP

CEIP Global Mineral Resource							
Location	Classification	Tonnes (Mt)	Fe (%)	SiO_2 (%)	Al_2O_3 (%)	P (%)	LOI (%)
Murphy South/Rob Roy	Measured	2,222	15.69	53.70	12.84	0.08	4.5
	Indicated	474	15.6	53.7	12.8	0.08	4.5
	Inferred	667	16	53	12	0.08	4.3
Boo-Loo/Dolphin	Indicated	796	16.0	53.3	12.2	0.07	0.6
	Inferred	351	17	53	12	0.09	0.7
Total		**4,510**	**16**	**53**	**13**	**0.08**	**3.5**

The Murphy South/Rob Roy Mineral Resource estimate was carried out following the guidelines of the JORC Code (2004) by Iron Road Limited and peer reviewed by Xstract Mining Consultants. The Murphy South - Boo-Loo/Dolphin oxide and transition Resource estimate was carried out following the guidelines of the JORC Code (2004) by Coffey Mining Limited. The Boo-Loo/Dolphin fresh Mineral Resource estimate was carried out following the guidelines of the JORC Code (2012) by Iron Road Limited and peer reviewed by AMC Consultants.

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7 Out of Scope Questions/Comments

As outlined in Section 3.1 above, there were numerous questions and/or comments received in the public submissions that are "Out of Scope" as they do not directly relate to the content of the EIS or the results of Iron Road's impact assessments. Regardless, Iron Road has endeavoured to provide responses for clarification as set out below.

7.1 Inflexibility in time is unjust over harvest period. Why weren't hard copies of the MLP and EIS made available for free?

Iron Road publicly advised stakeholders that both the EIS and MLP would be lodged during the latter part of 2015 (e.g. CEIP CCC communication of 28 September 2015; monthly updates in The Granite newsletter; project updates to various stakeholders from staff via meetings and telephone calls).

While much effort is made, it is not always practical to conduct events and consultation activities outside of peak farming periods. Moreover, due to the seasonal activities, Iron Road did not object to SA Government's decision to hold an extended public consultation period of almost 11 weeks. Iron Road notes that the average and statutorily required timeframes for public consultation on a proposed development is six weeks.

The EIS documents, including technical appendices, were several thousand pages long, demonstrating the extensive environmental, economic and social impact assessments undertaken, together with Iron Road's stakeholder engagement activities spanning several years. Although not required to do so, and in addition to the electronic copies already forwarded to landowners by DPTI, Iron Road provided hard copies of the EIS (excluding the appendices) to all infrastructure corridor landowners. SA Government also forwarded hard copies to various locations across the Eyre Peninsula and in Adelaide for other interested parties to view, and free USB memory sticks containing electronic copies were also made widely available.

7.2 "I am hearing that the compensation that we should be appreciative to take is only a few thousand dollars".

Iron Road will discuss compensation amounts with impacted landowners and their solicitors. Compensation amounts will always be dependent on a variety of factors including level of impact and independent market valuations for the portion of land in question. To date no compensation figures have been discussed with any party.

7.3 What will Iron Road do for the value of our farms? Will the value of the land be downgraded?

How will I be compensated for decreased land value and ability for future financial borrowings?

Will the government compensate us for the devaluation of our land once it is earmarked with potential rail corridor going through it?

Devaluation of Farm – currently property presents as 3 accessible blocks, an attractive farm package. We believe that with the rail line severance the property value will be impacted.

The effect of the proposed railway line on property prices is speculative and outside the scope of this assessment.

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7.4 Who conducted the EIS for Iron Road and are they independent?

The EIS project team is detailed in Appendix E of the EIS and included both Iron Road staff and independent consultants. The consultants engaged by Iron Road to undertake various technical, environmental, social and economic assessments are highly qualified and experienced in their fields and have prepared reports and other input based on their professional judgement. The EIS has been conducted in compliance with the Development Act, Development Regulations and the Guidelines issued by the Minister for Planning.

7.5 Some GPSA members have indicated that IRD is not trying to establish strong relationships with landowners.

Establishing relationships is a mutual process and not all families impacted by the proposed CEIP development have, despite offers from Iron Road to do so, been prepared to meet with the Company to talk in detail about concerns and potential impacts.

7.6 If CEIP is committed to provide adequate compensation for land acquisition then an open and transparent negotiation process should be developed. GPSA believes that an independent body representative of those landowners directly affected and their adjacent neighbours needs to be established to ensure consistency in the negotiations and determination of equitable compensation levels. The current process where CEIP negotiates one on one with landowners provides CEIP with an unfair advantage and may lead to inequities and inconsistencies between compensation levels paid to different landowners. This can lead to division within the community.

Iron Road has acknowledged some inconsistencies regarding communication with landowners to date, primarily due to some families not willing to talk with the Company about potential impacts. Other landowners along the proposed infrastructure corridor have spoken with Iron Road representatives and are comfortable with progress, while others have indicated that they would be willing to revisit discussions once Iron Road has secured project funding and approvals.

Iron Road believes that every landowner's situation is unique and does not agree with an independent body being formed to determine compensation levels, and is aware of many landowners (and their solicitors) who would object to a third party making recommendations on how they should deal with their land.

Land acquisition and compensation are commercial matters which will only be discussed with impacted landowners (and/or their solicitors) and subject to a consistent strategy and compensation regime on an individual and case-by-case basis.

7.7 What is the exact position of the proposed infrastructure corridor with respect to my land and my transport/cargo routes? How much of my land, and what land, is Iron Road proposing to acquire?

Iron Road would be happy to discuss these matters in detail with the submitter and develop an IMP for the relevant property.

7.8 The opportunity for us to try and sell our once pristine coastal block to anyone will now not be available. Only the mining company could use our block and they are not interested in it.

Potential sale negotiations for this block took place in late 2011 and early 2012 but amicably cased when the owners' sale price was far in excess of what Iron Road was willing to pay for land that is not required for the CEIP development.

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7.9 A lot of the information we have seen and read online about the project has our block within the boundary.

Iron Road confirms that the block owned by the submitters is not and never has been within the CEIP footprint. As the block is very small (3.5 hectares) it is possible that some maps of a certain scale may appear to include it.

7.10 Few visits from Iron Road, no paper trail, no talk about compensation, no-one told us about powerline crossing one of our properties.

The Company would welcome the opportunity to discuss the project and formulate an IMP for the land in question and encourages the submitter (or their lawyer) to make contact to organise a meeting.

7.11 Mining does not complement our farming sector and could damage our 'Clean Green' image forever. This rail line should not be near any agricultural land.

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/barley/meat in the world and mining should not occur anywhere near agriculture.

SA comprises 98.4 million hectares of land but only 4.2 million hectares is used for agriculture.

Legislation in South Australia (and all other Australian States and Territories) allows developments, including mines and infrastructure, on agricultural land. These are controlled by stringent regulation and allowed only after proponents have undertaken social, economic and environmental studies.

Iron Road maintains that both agriculture and mining are important industries that may not only co-exist, but together strengthen communities and regions. Both State and Commonwealth Governments have published Multiple Land Use Frameworks in this respect.

Indeed, rail lines crossing or in close proximity to agricultural land are common and provide transport routes for farmers to deliver product to market.

7.12 Iron Road has a disclaimer on every section of the documentation, why?

Why is there a disclaimer for accuracy and completeness in every section?

A disclaimer is standard for legal and commercial reasons as proponents such as Iron Road rely on data sources and statistics that are not of their own making (such as Census, ABS, BOM).

7.13 Iron Road is considered a foreign owned entity yet the company profile states that it is an Adelaide based resources company. Why has this information only been made available at the end of the submissions process?

We cannot recall this ever being declared by Iron Road.

The company is considered to be foreign owned purely due to the fact that its largest shareholder is registered overseas. This information has been public knowledge since Iron Road listed on the ASX in June 2008. Iron Road itself is an Adelaide based and registered resources company as stated in the EIS.

7.14 How many Impact Management Plans have been completed and for how many affected landowners?

The development of IMPs is a confidential matter between the company and individual landowners.

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7.15 (Reference to IMPs) What are the risks to the project if these issues are not developed to the satisfaction of the property owner?

IMPs are not a requirement of the EIS or any legislation; rather, they are a practical way for landowners to advise Iron Road of potential farming impacts so that these may be documented and, where practicable, solutions proposed to minimise those impacts. The IMPs may also form a basis for compensation discussions between Iron Road and the individual landowners.

7.16 We will only be compensated for the current value of the land, however we are losing all future income off that land as well, which will naturally affect our future earning potential.

No landowners have been advised by Iron Road that they will be compensated based only on market value of the land. The Company looks forward to further discussing compensation and other matters with this submitter (and/or lawyer) in due course.

7.17 Have Iron Road considered the feelings of those affected?

This is an important topic which is why Iron Road has provided a free, confidential counselling service since August 2013. Refer to www.ironroadlimited.com.au or Submission # 40, Issue # 9 in **Attachment A** for further details.

7.18 Process optimisation studies - Why are they still ongoing?

The process optimisation studies were completed in October 2015 and the results set out in Iron Road's ASX announcement dated 13 October 2015. The Company routinely and prudently undertakes reviews of the CEIP in order to optimise operations, particularly when economic or industry conditions change.

7.19 Given the quantities of fuel likely to be consumed, does the proposed port have the capacity to receive and store fuel?

Iron Road is not seeking approval to receive and store fuel at the proposed port site.

7.20 Where are the third party players in the project that might give credibility to the claims being made?

Iron Road has made several public announcements about potential third parties. Please refer to ASX releases dated 1 March 2016, 5 April 2016 and 6 April 2016.

7.21 What is the legislative authority underpinning the 'adoption' of what appears to be arbitrary data points? (refers to EPA particulate levels).

This is a matter for SA Government, not Iron Road.

7.22 Most data quoted by Iron Road is out of date.

The submitter has not substantiated this statement; however, all data quoted by Iron Road in its EIS was the latest available from all official Government sources such as Census and the ABS.

7.23 The grain industry, grain-growers would have the expense of establishing the export facility with no guarantee that grain will not be contaminated by iron ore dust and other heavy metals that could be in the dust. The perceived $10 saving would disappear in the costs of the facility. Will this lead to, in some cases, substandard uncontrolled Chinese imports on EP?

Iron Road and Emerald Grain are working together to ensure that Cape Hardy is capable of exporting grain in addition to the magnetite concentrate, including undertaking all relevant design works to ensure that contamination does not occur.

The submitter has not explained the relevance, or connection, between an export facility at Cape Hardy for grain and 'substandard uncontrolled Chinese imports on the EP'.

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7.24 How economical will it really be to grain producers? How is the alleged $6/tonne saving gained?

Emerald Grain is Iron Road's grain partner and will make contact with Eyre Peninsula grain producers and other stakeholders in the near future to discuss these and other matters.

7.25 As far as the farmers know no independent scientific data has been presented regarding the damage blasting will inflict on the Eyre Peninsula's very fragile water supply.

There are no fragile water supplies in the region of the corridor and no ongoing blasting activities will occur along the proposed corridor or at the port.

7.26 Centrex Metals has reduced its iron ore operations on the EP. Most of Centrex's properties are up for sale and some under contract or sold.

Centrex Metals and its activities are not relevant to Iron Road or its EIS. However, as Centrex's proposed Port Spencer is still listed under Major Developments in SA (a list maintained by DPTI), Iron Road is obliged to refer to it when discussing other proposed port facilities in South Australia.

7.27 We cannot recall the TBCCG ever holding a public meeting to convey the information they received to the ratepayers of the DC of Tumby Bay.

All of the TBDCCG meetings are open to the public and Iron Road is aware that the submitter attends those meetings on a regular basis.

7.28 Iron Road has entered into a joint MOU with several peak industry bodies on the Eyre Peninsula including RDAWEP. The "independent chairperson" of TBCCG is on this board. How can this be an independent committee?

Iron Road has provided a copy of the TBDCCG's Terms of Reference in the EIS (Appendix H) which sets out how members are elected. Any concerns of independence should be directed to the TBDCCG, not to Iron Road or SA Government.

7.29 How will removing sustainable farming affect global food markets?

The proposed CEIP footprint (mine and infrastructure) will result in the permanent loss of approximately 7,050 hectares of productive agricultural land. At a regional level, this equates to less than 0.2 per cent of productive land in the EPNRM region. Consequently, it is considered that this very limited "removing" of agricultural land will not have any effect on the global food market.

7.30 Why hasn't Iron Road realised that the mining boom is in decline?

Commodity prices are currently low; however, pricing is cyclical in nature so the decline will reverse in time.

7.31 Who audits the applicant with respect to compliance with the provisions of the approvals granted in this respect?

Any questions relating to Iron Road's compliance with legislation and approvals should be directed to the relevant Government authorities.

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8 Master Index of Responses

Sub. No.	Public Submission Name	EIS / MLP or Both	Iron Road Responses Page References
001	Nield, Heather Joan	EIS	EIS Attachment A, Page 1
002	City of Port Lincoln	Both	NIL response
003	Wetherby, Ken & Carole	Both	EIS Attachment A, Page 2 MLP Attachment A, Page 1
004	Nield, Malcolm	Both	EIS Attachment A, Page 3 MLP Attachment A, Page 2
005	BGC Contracting	Both	NIL response
006	Finlaysons	Both	NIL response
007	Sharp Airlines	Both	NIL response
008	SA Power Networks	Both	NIL response
009	Zonge Engineering	Both	NIL response
010	Sampson, Jennifer	MLP	MLP Attachment A, Page 3
011	Name & Address Withheld	MLP	MLP Attachment A, Page 24
012	Name & Address Withheld	Both	NIL response
013	Name & Address Withheld	Both	NIL response
014	Euro Exploration Services P/L	Both	NIL response
015	Port Lincoln Chamber Of Commerce & Tourism	Both	NIL response
016	Allan, Robert	Both	NIL response
017	Name & Address Withheld	EIS	EIS Attachment A, Page 4
018	Name & Address Withheld	Both	EIS Attachment A, Page 9 MLP Attachment A, Page 27
019	Warramboo Community Club	MLP	MLP Attachment A, Page 27
020	Sampson, Craig	Both	EIS Attachment A, Page 11 MLP Attachment A, Page 28
021	Name & Address Withheld	Both	EIS Attachment A, Page 12 MLP Attachment A, Page 31
022	Name & Address Withheld	EIS	EIS Attachment A, Page 13
023	Name & Address Withheld	EIS	EIS Attachment A, Page 14
024	O'Brien, Kaye	MLP	MLP Attachment A, Page 32
025	O'Brien, Peter	Both	EIS Attachment A, Page 15 MLP Attachment A, Page 34
026	Cleve Auto Repairs	EIS	EIS Attachment A, Page 16
027	Triple B Nominees	Both	EIS Attachment A, Page 16 MLP Attachment A, Page 38
028	Name & Address Withheld	EIS	EIS Attachment A, Page 17
029	Name & Address Withheld	Both	EIS Attachment A, Page 19 MLP Attachment A, Page 38

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Sub. No.	Public Submission Name	EIS / MLP or Both	Iron Road Responses Page References
030	Mallee Hill Farming	Both	EIS Attachment A, Page 19 MLP Attachment A, Page 39
031	Name & Address Withheld	MLP	MLP Attachment A, Page 39
032	Name & Address Withheld	MLP	MLP Attachment A, Page 40
033	District Council of Cleve	EIS	EIS Attachment A, Page 21
034	Global Maintenance Upper Spencer Gulf	Both	NIL response
035	Veitch, Georgina	MLP	MLP Attachment A, Page 42
036	Wudinna Community Club	EIS	EIS Attachment A, Page 22
037	District Council Of Tumby Bay	EIS	EIS Attachment A, Page 22
038	Name & Address Withheld	Both	NIL response
039	Name & Address Withheld	Both	NIL response
040	Grain Producers SA	Both	EIS Attachment A, Page 25 MLP Attachment A, Page 46
041	Name & Address Withheld	Both	NIL response
042	Alexander Symonds	Both	NIL response
043	Centre For Excellence In Rail Training	Both	NIL response
044	Ajilon Aust P/L	Both	NIL response
045	AMC Consultants	Both	NIL response
046	Wudinna Districts Tourism Assocation	Both	EIS Attachment A, Page 28 MLP Attachment A, Page 47
047	Hebberman, Kelvin & Melanie and Parks, Greg & Jasmine	EIS	EIS Attachment A, Page 29
048	Name & Address Withheld	Both	NIL response
049	Name & Address Withheld	EIS	EIS Attachment A, Page 30
050	Stringer Land P/L – Stringer Engineering	Both	EIS Attachment A, Page 31 MLP Attachment A, Page 48
051	Name & Address Withheld	Both	NIL response
052	Radcliffe, Barbara Dr	Both	NIL response
053	Rockwell Automation	Both	NIL response
054	Nagel, James	Both	NIL response
055	Wudinna District Council	Both	EIS Attachment A, Page 33 MLP Attachment A, Page 49
056	Murphy, Kane	MLP	MLP Attachment A, Page 49
057	Regional Development Australia WEP	Both	NIL response
058	Name & Address Withheld	EIS	EIS Attachment A, Page 33
059	Osmoflo	Both	NIL response
060	Peter & Pam Brougham	EIS	EIS Attachment A, Page 33
061	Hegarty, KM	MLP	MLP Attachment A, Page 50

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Sub. No.	Public Submission Name	EIS / MLP or Both	Iron Road Responses Page References
062	Name & Address Withheld	Both	NIL response
063	Edwards, Mark	EIS	EIS Attachment A, Page 34
064	EP Crushing	Both	NIL response
065	Skyden Farms	MLP	MLP Attachment A, Page 52
066	SMEC	Both	NIL response
067	Murphy, Wendy	MLP	MLP Attachment A, Page 53
068	Murphy, David	MLP	MLP Attachment A, Page 54
069	District Council of Kimba	EIS	NIL response
070	Adams, James	Both	NIL response
071	Name & Address Withheld	MLP	MLP Attachment A, Page 55
572	Name & Address Withheld	MLP	MLP Attachment A, Page 59
073	Kracman, Borvin	Both	NIL response
074	Dodd, Geoffrey	EIS	EIS Attachment A, Page 34
075	Challenger Geological Services	Both	NIL response
076	Smith, John Dr	Both	NIL response
077	Nield, Paul	EIS	EIS Attachment A, Page 37
078	Name & Address Withheld	EIS	EIS Attachment A, Page 37
079	Elleway, Ray	EIS	EIS Attachment A, Page 39
080	R Petty Electrical	Both	EIS Attachment A, Page 39 MLP Attachment A, Page 59
081	Wudinna Meat Store P/L	Both	NIL response
082	Fechner, Katy	Both	EIS Attachment A, Page 40 MLP Attachment A, Page 60
083	Name & Address Withheld	Both	EIS Attachment A, Page 41 MLP Attachment A, Page 60
084	Whillas, Stephen	EIS	EIS Attachment A, Page 41
085	Name & Address Withheld	EIS	EIS Attachment A, Page 42
086	Name & Address Withheld	Both	NIL response
087	Hill, Sallyann & Richard	EIS	EIS Attachment A, Page 44
088	Name & Address Withheld	Both	NIL response
089	Electranet	Both	NIL response
090	Clarke Energy (Australia) Ltd	Both	NIL response
091	Name & Address Withheld	Both	NIL response
092	Name & Address Withheld	Both	EIS Attachment A, Page 45 MLP Attachment A, Page 61
093	Name & Address Withheld	Both	EIS Attachment A, Page 53 MLP Attachment A, Page 66

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Sub. No.	Public Submission Name	EIS / MLP or Both	Iron Road Responses Page References
094	Name & Address Withheld	Both	EIS Attachment A, Page 53 MLP Attachment A, Page 66
095	Wudinna TAFE	Both	EIS Attachment A, Page 54 MLP Attachment A, Page66
096	Stop Invasive Mining Group	MLP	MLP Attachment A, Page 67
097	RESA – Resources & Engineering Alliance	Both	NIL response
098	Name & Address Withheld	Both	EIS Attachment A, Page 54 MLP Attachment A, Page 73
099	Name & Address Withheld	MLP	MLP Attachment A, Page 77
100	Joyglobal	Both	NIL response
101	Corporate Aircraft Charter	Both	NIL response
102	Tumby Bay Residents & Ratepayers Assoc. Inc	Both	EIS Attachment A, Page 55 MLP Attachment A, Page 79
103	SACOME	Both	NIL response
104	Stop Invasive Mining Group	EIS	EIS Attachment A, Page 71
105	Name & Address Withheld	Both	NIL response

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9 Glossary

Acronym/Term	Definition
ABS	Australian Bureau of Statistics
ASX	Australian Securities Exchange
Borefield	Proposed borefield including bores/wells and associated water pipelines
CAPEX	Capital Expenditure
CCC	Community Consultative Committee
CEIP	Central Eyre Iron Project
CEIP CCC	The CEIP Community Consultative Committee comprising members (Council, farmers, landowners, business owners) from the Warramboo and Wudinna district and headed up by an Independent Chairperson
CEIP Infrastructure	Port, rail line, pipeline, transmission line, borefield and long-term employee village associated with the proposed CEIP. Applied for via the EIS under the *Development Act, 1993* (SA).
CEIP Mine	A magnetite mining and minerals processing operation near Warramboo. Applied for via the MLP under the *Mining Act, 1971* (SA).
CEMP	Construction Environmental Management Plan
Commonwealth	Commonwealth Government of Australia
Development Act	Development Act, 1993 (SA)
DC/ DCs	District Council / District Councils
DCTB	District Council of Tumby Bay
DEWNR	Department of Environment, Water and Natural Resources (SA)
DFS	Definitive Feasibility Study
DIDO	Drive-in Drive-out
DoE	Department of the Environment (Commonwealth)
DPTI	Department of Planning, Transport & Infrastructure (SA)
DSD	Department of State Development (SA)
EIA	Economic Impact Assessment
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EPA	Environment Protection Authority (SA)
EPBC Act	Environment Protection and Biodiversity Conservation (EPBC) Act (Commonwealth)
FIFO	Fly-in Fly-out
GPSA	Grain Producers SA

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Acronym/Term	Definition
Guidelines	Guidelines issued to Iron Road and published by the Planning Minister (SA) for the preparation of an EIS
ha	hectares
IMP	Impact Management Plan
Iron Road	Iron Road Limited and/or IRD Mining Operations Pty Ltd
km	Kilometre
km^2	square kilometres
m	Metre
Mining Act	Mining Act, 1971 (SA)
ML	Mining Lease or Mineral Lease
MLP	Mining Lease Proposal
MLUF	Multiple Land Use Framework
MPWA	Musgrave Prescribed Well Area
Mt	Million tonnes
Mtpa	Million tonnes per annum
OEMP	Operation Environmental Management Plan
OPEX	Operating Expenditure
Proposed Infrastructure Corridor	Incorporates the proposed rail line and maintenance track between the mine site and the port site, the water pipeline and transmission line
SA	South Australia
SA Government	The Government of South Australia
SEB	Significant Environmental Benefit
SIA	Social Impact Assessment
State	The State of South Australia/Government of South Australia
USB	Universal Serial Bus (memory stick)
WPA	Wilderness Protection Area

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ATTACHMENT A – CEIP EIS - RESPONSES TO PUBLIC SUBMISSIONS

Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
Submission 1 – Heather Joan Nield. Relates to EIS only.					
1	EIS 4.2 & 4.6	Project Description – rail line	Risks during operation of rail line.	Management of the train line during an emergency, fire or accident.	Rail operators have strict legislative obligations in relation to safety under the *Railways (Operations and Access) Act, 1997* (SA) and the *Rail Safety National Law (South Australia) Act, 2012* (SA) and related Regulations. Train operations would be suspended if a hazard was detected on the line. The rail and train will both be designed to represent a low fire risk, for example, through continuous welded rail and good maintenance of diesel electric engines. It is intended that the train will continue to operate on total fire ban days, as happens with other diesel trains across Australia. Fire management measures are described in the draft Operation EMP in Appendix BB of the EIS and these will be further elaborated in the final EMP. On high fire risk days, the rail operator would undertake additional pre-departure checks focusing on areas such as exhausts and braking systems. With these measures, rail operations represent a very low risk.
2	EIS 18.5	Traffic & Transport	Risks during operation of rail line.	Closing down farm crossings will force big machinery onto roads. Less sheep crossings will cause more sheep to be on the roads. Sheep are in danger of the new train line.	The corridor has been designed to minimise disruption to farming operations and will be fenced to ensure sheep and other animals do not enter. Some impact will occur and this is acknowledged in Chapter 22.5.6 of the EIS and will be/is being managed through individual IMPs with directly affected landowners.

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
Submission 2 – City of Port Lincoln – Supportive submission; no issues raised.					
Submission 3 – Ken and Carole Wetherby. Refer to MLP Response Document for Q&A relating to MLP.					
1	EIS	Out of Scope	Use of explosives along transport corridor - impact to water supply	As far as the farmers know no independent scientific data has been presented regarding the damage blasting will inflict on the Eyre Peninsula's very fragile water supply.	Refer to Question 7.25 in the Out of Scope section of the EIS Response Document.
2	EIS 16.5	Groundwater	Potentially impacting events	No mention is made of the effect the proposed rail-line will have on salinisation of land adjoining the two rivers or the paleochannels the rail-line will cross.	Salinisation could only occur if the rail line caused water (saline) to pool on the upstream side or if excessive ground compression interrupted underground (saline) flows. Iron Road has listened to the information provided by members of the public with regard to this issue. The design of the rail line complies with modern engineering standards and will include adequate culverts to ensure overland flows are maintained and compression loads are low. The experiences of past rail constructions suggests insensitive design for waterways, however the CEIP Infrastructure has been designed in accordance with water sensitive principles as per DPTI guidelines.
3	EIS 18	Traffic & Transport	Rail crossings and traffic interruptions	The thought of 20 or 30 open crossings is frightening. Also traffic interruptions on the Lincoln Highway, Cleve/Lock portion of the Birdseye highway and the Kimba/Darke Peak/Rudall/Kinnard Hill road would have a major effect on tourism and fertiliser/grain transport.	An extensive traffic impact assessment has been completed, taking these and other issues into account. Please refer to EIS Chapter 18 for the findings of this assessment and Appendix W for the full study. Control and management strategies are outlined in Table 18-12 on page 18-33. Iron Road continues to work with DPTI and DCs in relation to rail crossings and other traffic related impacts in order to deliver a safe and efficient network that complies or exceeds Australian Standards.

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
4	EIS 22	Social Environment	Loss of farmers & businesses	If only half of the approximately 46 farmers involved in the rail route are forced off their land all communities will suffer. Businesses will suffer badly. We have been told there is to be a 'village' built for the workers in the mine. This means there will not be families brought to the district so our schools, etc, will not benefit in any way if this project goes ahead.	The camp at the proposed mine site will only provide for the construction and contract mine workforce. A long-term employee village at Wudinna will accommodate up to 300 other employees who will contribute financially and socially to the town and the local area. Other employees, particularly those with children, will likely move into town. Both groups will contribute to the community and schools. The goal is that a large portion of the workforce will be existing residents from local towns and the broader region. This is discussed in Chapter 22 of the EIS.
Submission 4 – Malcolm Nield. Refer to MLP Response Document for Q&A relating to MLP.					
1	EIS 13	Terrestrial Flora & Fauna	Weeds in corridor	Noxious weeds will definitely spread the entire corridor length a permanent cost to land owners.	Iron Road will be responsible for weed control within the corridor in a similar way that farmers are responsible for weed management on their properties. Refer to Table 13-23 of the EIS for best practice weed management strategies. This will also be outlined in the CEMP.
2	EIS 18.5	Traffic & Transport	Ongoing costs to landowners	It is not possible to cut across farmer's paddocks, stock crossings, machinery driveways, daily school bus routes etc, without causing astronomical danger, delays and permanent ongoing costs to landowners.	Consultations are continuing with affected landowners in relation to minimising impacts to their farming operations and identifying potential benefits and opportunities. Changes to school bus routes are not anticipated as appropriate level crossings will continue to provide access across the railway line.
Submission 5 – BGC Contracting. Supportive submission; no issues raised.					
Submission 6 – Finlaysons. Supportive submission; no issues raised.					
Submission 7 – Sharp Airlines. Supportive submission; no issues raised.					
Submission 8 – SA Power Networks. Neutral submission; no issues raised.					
Submission 9 – Zonge Engineering. Supportive submission; no issues raised.					

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
Submission 10 – Jennifer Sampson. Relates to MLP only. Refer to MLP Response Document.					
Submission 11 – Name and Address withheld. Relates to MLP only. Refer to MLP Response Document.					
Submission 12 – Name and Address Withheld. Supportive submission; no issues raised.					
Submission 13 – Name and Address Withheld. Supportive submission; no issues raised.					
Submission 14 – Euro Exploration Services P/L. Supportive submission; no issues raised.					
Submission 15 – Port Lincoln Chamber of Commerce & Tourism. Supportive submission; no issues raised.					
Submission 16 – Robert Allan. Supportive submission; no issues raised.					
Submission 17 – Name and Address withheld. Relates to EIS only.					
1	EIS 4.2.2	Project Description	Fire Hazards (pipeline)	The proposed railway line and above ground pipeline is an impassable structure for a fire truck/people will not know where crossings are. How can farmers move stock in the case of fire through narrow gates that may be on the other side of the paddock and in line with the approaching fire?	There will be regular crossing points of the rail line/water pipeline as there are for the existing rail network and water pipelines on the Eyre Peninsula and across Australia. These crossings will be documented and sign posted and provided to all DCs and emergency service authorities. The rail corridor will in fact behave as an effective fire break, with a train driver every two hours being an effective monitor of fires that are more likely to come from neighbouring lands. Individual IMPs have been/are being developed and agreed upon with affected landowners which will provide for appropriate fencing, gates and access ways that, in some cases, will be under the rail line.
2	EIS 4.2.1	Project Description	Rail Route	The line will be fenced with few crossing areas and how do you cross an above the ground pipeline? We may have water pipes and telephone cables crossing the areas where the railway line is supposedly planned.	Utilities will be buried under the roadways as is normal practice. All services crossed by the rail line will be relocated and reinstated at Iron Road's expense.

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
3	EIS 7.3.3	Physical Environment	Operational Traffic & Transport Risks – fire	Sparks from a train would be a catastrophe. Fire risk is greater for farmland due to the higher potential for loss of lives, dwellings, firefighters and crops.	Refer to Submission #1, Issue #1.
4	EIS 10	Air Quality	Use of water sprays/chemical wetting agents	Will this happen for 25 years? When Iron Road ceases to exist who picks up on the cleaning up this mess? We hear of mining companies becoming insolvent or selling onto another company. Is the next company bound to keep any of these clean up commitments? The use of water trucks wetting down the area and the use of salt water may cause contamination to farm land after a rain event.	Refer to the MLP for details on mine closure. Iron Road has designed infrastructure to prevent the release of saline water onto neighbouring farms.
5	EIS 10	Air Quality	Impacts	The amount of NO_2 to spread from the rail line for a distance of 140km is predicted to be below the acceptable criteria. Is this a carcinogenic substance that will keep building up in the soil over the predicted 25 years. The dust will be treated with chemicals & water or covered. Is this dust non-toxic or toxic?	NO_2 is a gas and thus it will not build up in soil, but will dissipate quickly in the atmosphere. It is also not carcinogenic. The dust is non-toxic and inert. A biodegradable dust suppressant used extensively across the world is proposed to be used to ensure dust levels are below health limits.
6	EIS 13.5.7	Terrestrial Flora & Fauna	Impact Assessment	Road side vegetation is used by many native animals. I cannot see that a fenced rail line and above ground pipeline can assist in restoring linkages of vegetation because it will make fewer pathways for animals to cross. Pederson Road – diverse population of wild life and the noise of a train rattling past will move them on.	As set out in Chapter 13.5.7 of the EIS, during the operation of the rail impacts to fauna within the project area are considered to be Low/Negligible, particularly given the limited habitat within the project footprint and the frequency of rail operations (12 passes per day). In addition, the trains will not 'rattle' as the rail will be continuously welded. For fauna within the Hambidge WPA some species that are less mobile and more sensitive to noise are likely to exhibit short term negative changes whilst other

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
					species may become accustomed to changes in noise or retreat deeper into the WPA if impacted by noise. Hence, impacts are considered to be Medium.
7	EIS 15.5.4	Surface Water	Sheet flow	The EIS states that the railway line will form a barrier to sheet flow and that sheet flows will only be able to cross the railway line at point locations. Again, the water and salt spreads out over agricultural land because there are times almost every year that the creek runs high and fast and often the main Port Lincoln highway is blocked to traffic by the passage of water.	Immediately after the highlighted section (in Chapter 15.5.4 of the EIS) Iron Road states: "*Locations immediately downstream of overland flows blocked by the railway line between the culverts will receive less runoff following construction of the railway line. This effect will be isolated to small areas adjacent to the railway line as all locations with significant catchments (i.e. identifiable drainage lines) will have flows retained by culverts. As previously outlined, overland sheet flows are uncommon due to low levels of rainfall, permeable soils and the storage capacity of natural swales. It is expected that detectable changes to the surface water regime and surface water quality will be limited to the CEIP Infrastructure study area and within regulatory limits. As such, surface water impacts associated with the impeding of overland sheet flow is considered to be low.*"
8	EIS 15.5.5	Surface Water	Driver River	We cannot allow the Driver River to be challenged in any way it may have a devastating impact on the EP. The water has to go somewhere and if the culverts block the water it will spread out over agricultural land also spreading the salt.	The impacts of the proposed rail on the Driver River have been assessed and found to be low. Refer to Chapter 15.5.5 of the EIS for full details.
9	EIS 16.3.3	Groundwater	Polda Trough & Basin	The interaction of the aquifers is apparently not understood (by Iron Road) and no one really knows the result of taking such a massive amount of water from a well in the Polda Trough and putting the Polda Basin at risk is irresponsible it is a major freshwater source.	Refer to Chapter 16 and Appendix U of the EIS for the findings of expert hydrogeologists. Independent findings clearly describe why there will be no impact to the Polda Basin. These findings are subject to the review of expert government hydrogeologists as part of the EIS assessment process.

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
10	EIS 16.4	Groundwater	Geotechnical investigations	Surely these geotechnical investigations should have already been done at the beginning of such a project and not left to this stage?	The areas requiring additional investigations are known and the work will be undertaken should the project be approved. The additional work is a refinement and not required at this stage of any project.
11	EIS 16.5	Groundwater	Predicted Effects	If the ground has been compacted when the water level has dropped permanent damage may occur to the passage of saltwater and then when the water level again rises this will cause salty patches to occur elsewhere because channels have been blocked and the water will have to find other pathways.	Iron Road has heard and listened to the information provided by members of the public with regard to soil compaction. The design of the rail line will comply with modern engineering standards and will include adequate culverts to ensure overland flows are maintained and compression loads are low. Past engineering deficiencies will not be repeated.
12	EIS 16.5	Groundwater	Draw down	Iron Road cannot be certain of the draw down effects and this is totally irresponsible.	The uncertainty in drawdown as a result of the infrastructure development is whether or not the drawdown will have a positive effect on the Driver River. The current saline inflows are reported by the EPA to be having a detrimental effect. This is described in EIS Chapter 16.5.3 and shown in Figure 16-6. To suggest material uncertainty that could cause harm is incorrect.
13	EIS 16.7.1 & 16.7.2	Groundwater	Residual risk assessment	The freshwater (within the Musgrave Prescribed Wells Area) is of critical community value and even a low risk is too high because once damaged or salt water enters the fresh system it cannot be returned to its pristine condition. Page 16.24 it is considered possible that a leak or spill could occur during construction or operation of the CEIP Infrastructure. How can this be considered minor or low risk to groundwater? Chemical or salt water contamination into groundwater surely cannot be undone.	The reference is discussing an identified risk of spills in the operating area of the infrastructure which is over 30 km away from the Musgrave Prescribed Wells Area (MPWA). The potential impacts are related to the local groundwater which is hypersaline and of no use for domestic, agricultural or other purposes. There are no potential spill impacts or drawdown impacts to the MPWA from the CEIP. Any localised spill can be remediated if required.

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14	EIS 18	Traffic & Transport	Heavy vehicles	The figure of 13 heavy vehicles travelling from Rudall to Lock can be misleading because during harvest numbers could be in the hundreds on any day..... School bus crossing the rail line twice every day - they do not all have active crossing flashing lights planned. How much value does Iron Road put on the lives of our biggest asset, our children? Farmers need to move very wide machinery across these intersections and they must be made wide enough to accommodate future changes to the agricultural industry.	The potential for 'above average' daily heavy vehicle use at times has been considered and Iron Road will continue to work with impacted local DCs and farmers, together with SA government agencies such as DPTI, to ensure that safety is paramount and impacts to farming activities are minimised. As these discussions continue, it may be necessary to implement management plans to include additional safety measures. For example, intersections will be widened where this has been identified as an issue.
15	EIS 21.3	Economic Environment	FIFO	(Reference is made to a TV program on Mt Newman): FIFO no benefit to towns, they do not bring in families and there is no benefit to businesses and schools.	The FIFO component of the CEIP will relate to the specialised construction workforce that will be required for a term of approximately 3 years, whereas normal mine site and other CEIP workers will be part of the local communities and contributing to the local economy for at least 25 years. Table 22-23 of the EIS (refer specifically to page 22-54 onwards) sets out Iron Road's commitment to providing benefits to communities. These include: • Developing policies and/or offering incentives to encourage the workforce to reside locally; • Providing family friendly work environments and developing flexible work practices; • Working with relevant authorities to train and upskill local and regional people to enhance business capacity; • Working with local businesses to identify tendering and procurement opportunities

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					• Developing corporate volunteering programmes; • Participating in planning by Government in relation to future social services; • Continuing to provide support to local community groups; and • Developing induction procedures CEIP operations will also facilitate the re-instatement of a commercial air service to the central Eyre Peninsula, bringing further opportunities and attraction for existing local communities.
Submission 18 – Name and Address withheld. Refer to MLP Response Document for Q&A relating to MLP.					
1	EIS	Out of Scope	Communication	Few visits from Iron Road, no paper trail, no talk about compensation; no-one told us about powerline crossing one of our properties?	Refer to Question 7.10 in the Out of Scope section of the EIS Response Document.
2	EIS 4.2.1 & 4.5.4	Project Description	Earthworks	Iron Road say they will get filling for the corridor it needs from along the route. Ask the DC Cleve, they cannot find good rubble in this area to form or fill sand holes on roads in our district. How are Iron Road going to and they will have to destroy more agricultural land trying to get it?	The work outlined under Chapter 4 of the EIS relating to cut and fill requirements and earthworks has been scoped by experienced civil engineers. No additional land will be required for sourcing construction material. Note that the material suitable for road repairs is very different to the general fill required for embankment construction, etc.
3	EIS 10	Air Quality	Impacts on Agricultural Values	Will the company have enough public liability insurance to cover the loss of income for all farmers if this contamination (dust) does occur? If this does happen and the company goes into receivership, what then?	The company regularly reviews its public liability insurance to ensure that it is appropriate and will continue to do so through all phases of the CEIP. In the unlikely event that Iron Road goes into receivership, the issue of compensation (if any) will become the concern of the Administrators.

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					It should be noted that contamination to the extent that would require compensation is not predicted by the impact assessment and continuous dust monitoring will be in place in 'real time' to monitor and confirm this.
4	EIS 13.5.1	Terrestrial Flora & Fauna	Sources of impacts	Salt water pumped across agricultural land is a disaster waiting to happen	As outlined in Chapter 4.2.2 of the EIS, the water from the borefield will be transported to the mine site via pipelines that will be located within either public road reserves or the proposed infrastructure corridor, not agricultural land. The pumping of saline water is common practice in many industries, including mining, oil and gas. Construction quality assurance standards and pressure sensors and real-time monitoring also reduce the risk of spills from pipelines and these controls will be implemented at the CEIP.
5	EIS 18	Traffic & Transport	Risks (fire)	If the train drags its brakes, which will happen and it sparks a fire along the track for several kilometres, on a dry very windy day it will lead to a catastrophic fire and with the fuel load it will burn to the gulf. If there is a fire and it jumps the corridor, how do we get to the other side quickly without doing long detours to get there?	The rail and train will both be designed to ensure a low fire risk, for example, through continuous welded rail, good maintenance of diesel engines and brakes and regular weed and vegetation removal. The rail corridor will in fact behave as an effective fire break, with a train driver every two hours being an effective monitor of fires that are more likely to come from neighbouring lands. There will be regular crossing points of the rail line as there are for the existing rail network on the Eyre Peninsula. Also refer to Submission #17, Issue #1.
6	EIS 18.7.2	Traffic & Transport	Risks	We run 2 heavy vehicles on roads impacted by the proposed line; that means for 4 months of the year there is more traffic on roads, plus 2	Trains are scheduled every two hours and thus will be very predictable. Should any changes to this schedule be required, they would be made widely known using

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
				sprayers using the roads most times of the year. How do we know when a train is coming as they (our heavy vehicles) will only be travelling really slowly and take a reasonable time to cross?	the normal communication channels (radio, websites, print media if time permits). Iron Road would also liaise with local schools so that suitable alternative routes for the school buses could be organised if required. Procedures will be communicated widely prior to rail operations with as much notice given as possible. In addition, as set out on page 22-56 of the EIS within Table 22-23, Iron Road will provide regular and timely information on planned CEIP works to assist in reducing disruptions to road users.
7	EIS 21	Economic Environment	FIFO	(Reference is made to a TV program on Mt Newman): FIFO no benefit to towns, they do not bring in families and there is no benefit to businesses and schools.	Refer to Submission #17, Issue #15.
Submission 19 – Warramboo Community Club. Relates to MLP only. Refer to MLP Response Document.					
Submission 20 – Craig Sampson. Refer to MLP Response Document for Q&A relating to MLP.					
1	EIS	Out of Scope	Impact Management Plans	How many IMPs have been completed and for how many affected landowners?	Refer to Question 7.14 in the Out of Scope section of the EIS Response Document.
2	EIS	General	Financial liability of Wudinna DC	What financial liability will the Wudinna DC have in the meeting of council controlled infrastructure (roads, waste, water etc,) to service both the accommodation village and construction camp, or will Iron Road finance this aspect of the development?	Costs for the establishment and/or upgrading of infrastructure required for the accommodation village at Wudinna and the construction camp within the ML boundary at Warramboo will be borne by Iron Road and will be set out in due course in a commercial agreement between the company and Wudinna DC.
3	EIS 4	Project Description	Rails crossings & road diversions	Have Iron Road considered more road overpasses than crossings over local roads?	The requirement for rail/road crossings has been established after consideration of the following: 1. Rail vertical geometry 2. Roadway design alignment and traffic assessment

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
					3. Road/rail crossing safety assessment and review completed by independent consultants 4. Land impacts from design construction footprints. The design review considered all of these factors and has resulted in design features that are optimal and provide safe solutions incorporating best practice.
4	EIS 6	Stakeholder consultation & engagement	Information sessions- infrastructure corridor	Iron Road hosted information sessions specifically for affected landowners along the proposed infrastructure corridor. When were they held, where were they held, how were they advertised and how many actually attended?	There were two sessions held specifically for corridor landowners, both on 2 March 2015. The first was held in Port Neill and the second in Rudall with a total of 28 landowners attending. Each of the corridor landowners was forwarded a personal letter of invitation on 10 February 2015. A further 20 people attended the public meeting organised by Iron Road at Rudall the following day, 3 March 2015.
5	EIS 12	Noise & Vibration	Railway operation noise	Lives 10km away from current rail but can hear it. Iron Road says noise will be within guidelines but will impact hugely. Iron Road going on modelling.	The noise impact assessment (refer to Chapter 12 and Appendix N of the EIS) demonstrates that the noise will be under regulatory noise limits. The discussion acknowledges that train noise will be able to be heard and lists the levels of noise that will be experienced at each sensitive receptor. Note that the existing railway referred to by the submitter is not welded.
Submission 21 – Name & Address withheld. Refer to MLP Response Document for Q&A relating to MLP.					
1	EIS	Out of Scope	Compensation	"I am hearing that the compensation that we should be appreciative to take is only a few thousand dollars"	Refer to Question 7.2 in the Out of Scope section of the EIS Response Document.
2	EIS 4.5	Project Description	Construction phase	How will erosion of sandy soils be managed during construction of the corridor?	Refer to Table 17-5 within Chapter 17 of the EIS which sets out control and management strategies for erosion.
3	EIS 13	Terrestrial Flora and Fauna	Weeds in Corridor	How will pests and weeds be monitored and managed along the corridor?	Refer to Submission #4, Issue #1.

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4	EIS 16.5	Groundwater	Predicted Effects to Groundwater as a result of infrastructure	Will the corridor create compaction resulting in a rise in the saline water table?	Any compaction will be negligible (in the order of a few centimetres at most) and will not cause a rise in the saline water table. It is important that the rail design ensures minimal settlement, or this will adversely affect the efficiency of the rail.
5	EIS 17.3.3	Soil & Land Quality	Site contamination	How will potential contamination of crops/livestock with ore dust along the corridor be monitored / managed?	Rail wagons will be covered (refer Figure 4-41 of the EIS). Consequently, there is no potential for contamination and/or cross contamination of crops or livestock.
6	EIS 18.5	Traffic & Transport	Impacts to school bus operations	How will the addition of several rail crossings impact the safety of school children?	There will be no impact to the safety of school children. School buses operate across Australia as do extensive rail networks. The systems often interact and have been designed to protect road users, including school buses. Safety is paramount for the CEIP and is embodied in the aspects of the current design.
Submission 22 – Name and Address withheld. Relates to EIS only.					
1	EIS 13.5.1	Terrestrial Flora & Fauna	Sources of Impacts	How will the integrity of the corridor pipeline be monitored?	The integrity of the pipeline will be monitored via routine maintenance inspections and pressure sensors, both of which are standard industry practice.
2	EIS 13	Terrestrial Flora & Fauna	Ants	There are three sites of rare ants, right near the rail line on section 38 Hundred of Rudall.	There is no legislation (either Commonwealth or South Australian) that requires developments to consider ants in the process of an impact assessment. The submitter may, however, like to supply details regarding the ants to DEWNR as this could be of future scientific interest.
3	EIS 13	Terrestrial Flora & Fauna	Lizards	Thorny devils are found along the corridor.	Noted. The protection of any fauna will be considered further in the CEMP.

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4	EIS 16.5	Groundwater	Predicted Effects to Groundwater	Will the rail corridor create compaction resulting in a rising of the saline water table?	Refer to Submission #21, Issue #4.
5	EIS 17.3.3	Soil & Land Quality	Site contamination	How will cross contamination of commodities be prevented? (i.e. iron ore in grain)	Refer to Submission #21, Issue #5.
6	EIS 18	Traffic & Transport	Rail crossings	How will the introduction of rail crossings impact emergency services?	Refer to Submission #17, Issue #1. The intent of the design is to minimise the impact to road users, including emergency services. Emergency services operate effectively across Australia in many areas where rail crossings exist. The development of the CEIP is seen as a benefit to the emergency services capabilities as many new employees will come to the Eyre Peninsula with skills and experience in this field and the mine will have extensive management capabilities including equipment which may be made available in the event of an emergency beyond the mine gate.
Submission 23 – Name and Address withheld. Relates to EIS only.					
1	EIS 4.5	Project Description	Construction phase	How will disruptions to realignment / reinstatement of local services (electricity/phones/water) due to corridor construction be managed?	Iron Road acknowledges that there may be temporary disruptions to services during the construction phase of the project. The Company will provide its development plans to service providers such as SA Water, SA Power Networks and Telstra, well in advance of construction activities and at the earliest time practicable in order to minimise any disruptions to landowners and communities. All services (including water, power, telephone and internet) that need to be relocated will be redirected and reinstated as efficiently as practicable at Iron Road's expense.

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					As set out in Table 22-23 of the EIS (refer page 22-56), Iron Road is committed to providing regular and timely information to local residents and communities about the CEIP and planned works which in turn will assist in reducing disruptions and the number of complaints. Iron Road will also continue to operate a toll free phone hotline and a complaints register. Communities will benefit from any upgraded services required to support the CEIP operations (such as internet and telephone) and Iron Road will liaise with stakeholders in this regard as the project develops.
2	EIS 4.5	Project Description	Construction phase	How will erosion be managed during corridor construction?	Control and management strategies for each stage of the project relating to soil and land quality (e.g. erosion) are set out in Chapter 17, Table 17-5.
3	EIS 13	Terrestrial Flora and Fauna	Weeds in corridor	How will pests and weeds be managed along the corridor? Who will be responsible for this?	Refer to Submission #4, Issue #1.
4	EIS 18	Traffic & Transport	Operational impacts on farms	How will the corridor impact grain and stock movements?	Iron Road has spoken with, and continues to speak with, landowners along the corridor about any impacts to grain and stock movements and these discussions will form part of the individual IMPs.
5	EIS 18.5	Traffic & Transport	Impacts to school bus operations	How will road realignments and the new rail crossings impact the school bus routes?	Changes to school bus routes or timetables are not anticipated as appropriate level crossings will continue to provide access across the railway line.
Submission 24 – Kaye O'Brien. Relates to MLP only. Refer to MLP Response Document.					
Submission 25 – Peter O'Brien. Refer to MLP Response Document for Q&A relating to MLP.					
1	EIS 3.2.5	Project Alternatives	Selected Option – Railway Line	Could the proposal of the corridor be shifted to Hambidge Park or on its boundary?	As set out in Chapter 3.2.5 of the EIS, the corridor cannot traverse the Hambidge WPA.

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					Relocating the corridor adjacent to the WPA boundary was also assessed in earlier studies but is not practical due to topographical and engineering reasons. Refer to DEWNR's comments on this matter under Issue #7 on page 13 of Attachment B in the EIS Response Document.
2	EIS 13	Terrestrial Flora and Fauna	Weeds in corridor	How and by whom will weeds be controlled on site and along the corridor?	Refer to Submission #4, Issue #1.
Submission 26 – Cleve Auto Repairs. Refers to EIS only.					
1	EIS 18.5	Traffic & Transport	Impacts to school bus operations	Bus route will have to change timing. Danger for school children crossing railway line.	Refer to Submission #23, Issue #5.
Submission 27 – Triple B Nominees Pty Ltd. Refer to MLP Response Document for Q&A relating to MLP.					
1	EIS	Out of Scope	Preparation of EIS	Who conducted the EIS for Iron Road and are they independent?	Refer to Question 7.4 in the Out of Scope section of the EIS Response Document.
2	EIS 3.2.3	Project Alternatives	Corridor route	Why can't the corridor follow the existing grain train line?	As discussed in Chapter 3.2.3 of the EIS, this route was eliminated early on in the process by Iron Road for social, environmental and engineering reasons.
3	EIS 3.2.5	Project Alternatives	Corridor route	Wouldn't the straightest track go through Hambidge and Hincks Reserve down to the Port?	As discussed in Chapter 3.2.5 of the EIS, Hambidge WPA is protected under the *Wilderness Protection Act 1992* which does not allow for the construction of any infrastructure within the WPA. Iron Road first investigated the possibility of routing the railway line through Hambidge WPA several years ago and discussions with SA Government confirmed legal advice that amendments to the Act would be required. However, the amendments would likely be unsuccessful due to the inconsistency of the proposed land use with the established wilderness values. This also applies to the Hincks WPA.

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4	EIS 4.2	Project Description	Corridor design description	Where does the corridor run?	The corridor is shown in Figures 4-6, 4-7 and 4-8 of the EIS.
5	EIS 16.3.3	Groundwater	Polda Basin	Will the CEIP impact the Polda Basin?	Groundwater extraction for the mine will come from the Polda Trough. This is saline and a separate and distinct geological unit from the Polda Lens, which is used as a fresh water supply for the Eyre Peninsula. The Polda Lens is 45 km from the proposed borefield. There is no potential for the borefield, or any other components of the CEIP, to affect the Polda Lens.
6	EIS 16.5	Groundwater	Predicted impacts	Will the corridor create compaction resulting in a rise of the saline water table? If so, will landowners be compensated for land damaged?	Any compaction will be negligible, in the order of a few centimetres at most. It is important for Iron Road that the rail design results in minimal settlement, or this will affect the efficiency of the rail operations.
Submission 28 – Name and Address withheld. Refers to EIS only.					
1	EIS	Out of Scope	No mining or development on agricultural land.	Mining does not complement our farming sector and could damage our 'Clean Green' image forever. This rail line should not be near any agricultural land.	Refer to Question 7.11 in the Out of Scope section of the EIS Response Document.
2	EIS	Out of Scope	Mental health	Have Iron Road considered the feelings of those affected?	Refer to Question 7.17 in the Out of Scope section of the EIS Response Document.
3	EIS 3.2.5	Project Alternatives	Selection option for rail	What about the bits of land left where they have cut paddocks off? These become unusable as we will not be able to access them. Who is going to pay for lack of productive land?	Any parts of land that could no longer be utilised by the landowner could potentially be bought by Iron Road and used for SEB purposes, or may even be sold or leased to another party so that farming may continue. It is important to note that IMPs deal with these types of issues and access to the 'bits' of land may still be possible by the inclusion of culverts or something similar to assist with access. Iron Road would welcome

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					the opportunity to discuss and implement a well thought-through agreement for the submitter's property which could then be used as the basis for further discussions.
4	EIS 6	Stakeholder consultation and engagement	Impacted landowners	Will the powerline go through our property? Our last 'On Farm' consultation was back on 3/10/13. There has been no discussion 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. How much land will we lose for the corridor? Will we be compensated for this?	See response to Issue #3 above.
5	EIS 6	Stakeholder consultation and engagement	Impacted landowners	How will we pay our bills if during construction the majority of land in the CEIP will be unavailable to farming and 'where practical' reverted to agriculture use?	See response to Issue #3 above.
6	EIS 6	Stakeholder consultation and engagement	Impacted landowners	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 not correct. A form 21 is a Notice of Entry under the *Mining Act, 1971* and the corridor is not subject to that Act.
7	EIS 12	Noise	Impacts to housing	Train goes through Section 37 which has a house that is occupied. Vibration and noise from train will be quite evident.	Refer to Submission #20, Issue #5.
8	EIS 13	Terrestrial Flora & Fauna	Birds	Residents have photos of a diverse population of bird life on Pederson Road which is considered vulnerable. Will the rail corridor affect these populations?	The impact assessment of native fauna, in particular impacts on listed and protected fauna including bird species, is described in Table 13-20 of the EIS. The impacts from the infrastructure corridor range from Negligible to Low due to the predominantly farming land use (minimal native vegetation clearance required by Iron Road) and the high mobility of the species present.

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9	EIS 18.5.5	Traffic & Transport	School bus operations	"Active Crossings"-Shouldn't Iron Road be made to place these on all School Bus runs where they cross the line to keep our children safe?	Expert road and rail safety consultants have assessed all potential road/rail crossings in accordance with Australian standards. The conclusions of that work are detailed in the EIS and are subject to review by SA Government experts as part of their assessment of the CEIP Infrastructure.
10	EIS 22.4	Social Environment	Safety & Security	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.	Safety and security were issues raised during Iron Road's extensive consultation with stakeholders and are covered in Chapter 22.4 of the EIS, together with a set of design modification to protect social values. It is unjust to assume that construction workers or new members to the communities are criminals and will trespass on land and steal equipment and produce.
Submission 29 – Name and Address withheld. Refer to MLP Response Document for Q&A relating to MLP.					
1	EIS	Out of Scope	Mining and development on agricultural land.	I am horrified that the Government is considering passing an iron ore mine and rail corridor through agricultural land.	Refer to Question 7.11 in the Out of Scope section of the EIS Response Document.
Submission 30 – Mallee Hill Farming. Refer to MLP Response Document for Q&A relating to MLP.					
1	EIS	Out of Scope	Devaluation of land/compensation	Will the government compensate us for the devaluation of our land once it is earmarked with potential rail corridor going through it?	Refer to Question 7.3 in the Out of Scope section of the EIS Response Document.
2	EIS 4.5.4	Project Description	Construction phase	Iron Road will require massive amounts of rubble to build this rail corridor. Where are they getting this from?	Refer to Submission #18, Issue #2.
3	EIS 4.6.2	Project Description	Rail wagons	Will rail wagons be covered?	Yes. Refer to Figure 4-41 of the EIS.

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4	EIS 10	Air quality	Dust impacts	How will potential crop and livestock impacts from dust be monitored /managed along the corridor?	As stated in Issue #3 above, wagons containing magnetite concentrate will be covered. There is no potential for contamination of grain or livestock along the corridor.
5	EIS 13	Terrestrial Flora & Fauna	Weeds in corridor	Who will control the weeds along the corridor?	Refer Submission #4, Issue #1.
6	EIS 13	Terrestrial Flora & Fauna	Fencing	What sort of fencing will the corridor be fenced with? How will the corridor fences, gates, etc, be maintained?	It will be a standard stock fence. Iron Road is responsible for maintaining the fence and gates for the repair of any damage it may cause. If other parties, such as adjoining landowners cause damage, they will be financially responsible for repairs.
7	EIS 13	Terrestrial For a & Fauna	Fencing	What if the gates are left open and stock wander onto the railway?	Iron Road will develop a policy with the rail operator in due course to deal with a variety of factors including protocols around reporting of incidents (such as stock on the track) and compensation (where it can be shown that an Iron Road employee or contractor left a gate open). Advice would be taken from both existing landowners and rail operators on how this situation is currently managed, given trains operate across the EP, SA and Australia every day. It should be noted that the proposed rail corridor will be fully fenced, which is an improvement when compared to many existing rail corridors currently operating.
8	EIS 16.5	Groundwater	Predicted effects as a result of infrastructure	If salt compacts and spreads into surrounding paddocks will we be compensated?	Saline water will only be used for dust suppression on the corridor during construction and will be collected in swales and sediment ponds and will not leave the corridor.
Submission 31 – Name and Address withheld. Refers to MLP only. Refer to MLP Response Document.					
Submission 32 – Name and Address withheld. Refers to MLP only. Refer to MLP Response Document.					

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Submission 33 – District Council of Cleve. Relates to EIS only.					
1	EIS 3.2.5	Project Alternatives	Selection option – rail	Why can't the corridor go through existing national parks?	Refer to Submission #27, Issue #3.
2	EIS 3.2.5	Project Alternatives	Selection option – rail	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.	Iron Road is continuing discussions with DPTI about the Birdseye Highway – refer to Attachment B of this Response Document, DPTI Issue #2.
3	EIS 18	Traffic & Transport	Rail crossings	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 upgraded to Active Level Crossings.	Refer to Issue #2 above. Iron Road will continue discussions with DC Cleve and DPTI in relation to all rail crossings.
4	EIS 18	Traffic & Transport	Delays for commuters	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 be considered for implementation subject to Iron Road securing funding and approvals for the CEIP.
5	EIS 18	Traffic & Transport		Regardless of the type of crossing, Council requests that the following be included in the crossing detailed design: • Road realignments so that at least 50 m of road on either side of the crossing is at 90° to the rail • 100 m either side of the crossing to be sealed with the first 15m to be hot mix asphalt and the remaining 85 m to be 2 coat seal	The next phase of detailed design will include liaison with all relevant authorities, in particular the relevant DCs, whereby design details may be presented and considered for implementation in appropriate management agreements. Note that all items proposed here by DC Cleve are considered to be good design practice.

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				• Iron Road to remain responsible for road reserve maintenance 5 m either side of the crossing • Iron Road to remain responsible for vegetation clearances to maintain at least minimum required site distances at crossings.	
Submission 34 – Global Maintenance Upper Spencer Gulf. Supportive submission; no issues raised.					
Submission 35 – Georgina Veitch. Relates to MLP only. Refer to MLP Response Document.					
Submission 36 – Wudinna Community Club. Supportive submission. Relates to EIS only; one issue raised.					
1	EIS 22	Social Environment	Population and Social Services	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.	Iron Road looks forward to working with the Wudinna Community Club to ensure that the facilities are adequate for the increased population expected in the region as a result of the CEIP.
Submission 37 – District Council of Tumby Bay. Relates to EIS only.					
1	EIS 5.4.1	Statutory Framework	Port Neill Structure Plan	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.	Noted and agreed in principle. This can be discussed in detail with DCTB and agreed outcomes set out in a management agreement in due course. Note that this does not change the outcome of the impact assessment.
2	EIS 5.4.1	Statutory Framework	Management agreements	There must be clear reference to the scope and timing of meaningful and binding management	Iron Road anticipates entering into a detailed management agreement with DCTB prior to the

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				agreements between the proponent and Local Government. The Council has so far declined to be a signatory to a proposed MOU with the Company.	commencement of any construction activities within that DC area and after Iron Road has secured all necessary funding. A MOU was proposed (and entered into by the other three impacted DCs) as it is considered too early to determine what specific matters need to be included.
3	EIS 5.4.3	Statutory Framework	Rezoning of port land	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.	Iron Road appreciates DCTB's request but disagrees that rezoning should occur upon development approval being given. It is more appropriate that rezoning occur, in consultation with Iron Road, only after funding and all approvals (including a CEMP) have been secured, as it is only then that a change in land use will occur. Until then the land will continue to be leased to local farmers for agricultural use which is consistent with current zoning. The Company will continue to liaise with DCTB on this matter.
4	EIS 6	Stakeholder consultation and engagement	Ongoing community consultation	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.	Agreed. Iron Road is committed to continuing its dialogue with the local community and interested stakeholders throughout all stages of the project, and building on its extensive network of relationships gained over many years of consultation.
5	EIS 18	Traffic & Transport	Road descriptions	Council requests that Iron Road be required to detail the requirements for the longitudinal requirements of all roads forming the module haul route.	The modules are now proposed to travel along the infrastructure corridor due to a request from DPTI and subject to further detailed engineering/impact assessment by Iron Road.
6	EIS 18.3.2	Traffic & Transport	Port access roads	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.	Acknowledged. The EIS presents all designs, data and scientific and engineering reports that were correct at the time of writing that report (before those recent discussions).

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				This road passes close to the existing township of Port Neill, and bisects land proposed within the township structure plan for future development.	The findings of the recently completed Optimisation Study will be presented to DCTB in the near future and is expected to address any concerns.
7	EIS 18	Traffic & Transport	Third party access	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.	Iron Road is only required to assess the impacts of its own project. Traffic impacts from the use of the port by other parties are speculative at this stage. Third parties will be responsible for undertaking impact assessments and obtaining their own approvals.
8	EIS 18	Traffic & Transport	Rail maintenance track	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.	This is now the preferred option and Iron Road thanks DCTB for its valued input on this issue.
9	EIS 18	Traffic & Transport	Bus use to reduce traffic impacts	Council requests that Iron Road be required to provide further details around the use of buses due to the potential impact on traffic volumes.	No further details have been developed at this stage. Should approvals and funding be secured, Iron Road would be happy to work with DCTB on ensuring sensible future bus management.
10	EIS 18	Traffic & Transport	Road width	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.	Iron Road has provided for a minimum 8 m wide road pavement in all of its designs. The clearance envelopes for vehicles are regulated by both State and Australian Standards and will be complied with throughout the project.
11	EIS 18	Traffic & Transport	Rail crossings	Council requests that Iron Road be required to provide active controls at all level crossings.	Refer to Submission #33, Issue #2.
12	EIS 18	Traffic & Transport	Road realignments	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.	Refer to Submission #33, Issue #5.

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13	EIS 18	Traffic & Transport	Sealing of roads	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.	Refer to Submission #33, Issue #5.
14	EIS 18	Traffic & Transport	Road maintenance	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.	Refer to Submission #33, Issue #5.
15	EIS 18	Traffic & Transport	Local government income	Iron Road to demonstrate how it has arrived at the figure of $300,000 pa income for local govt from the project.	This was a proposed area rate estimate used by the expert economic consultant but the exact amount will be set by the Valuer General (based on land valuation) at the appropriate time. This is not the total contribution to all DCs as documented in detail in Chapter 21 and Appendix X of the EIS. The contribution to DCs will be far greater than just this estimated rates figure e.g. due to jobs, businesses, increased population rates etc.
Submission 38 – Name and Address withheld. Supportive submission; no issues raised.					
Submission 39 – Name and Address withheld. Supportive submission; no issues raised.					
Submission 40 – Grain Producers SA. Refer to MLP Response Document for Q&A relating to MLP.					
1	EIS	Out of Scope	Mining vs agriculture	SA comprises 98.4 million hectares of land but only 4.2 million hectares is used for agriculture.	Refer to Question 7.11 in the Out of Scope section of the EIS Response Document.
2	EIS	Out of Scope	Relationships / compensation / loss of land values	Some GPSA members have indicated that IRD is not trying to establish strong relationships with landowners.	Refer to Question 7.5 in the Out of Scope section of the EIS Response Document.
3	EIS	Out of Scope	Dealings with landowners/ negotiations/ compensation	If CEIP is committed to provide adequate compensation for land acquisition then an open and transparent negotiation process should be developed.	Refer to Question 7.6 in the Out of Scope section of the EIS Response Document.

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				GPSA believes that an independent body representative of those landowners directly affected and their adjacent neighbours needs to be established to ensure consistency in the negotiations and determination of equitable compensation levels.	
4	EIS	Out of Scope	Potential benefits to farmers	How economical will it really be to grain producers? How is the alleged $6/tonne saving gained?	Refer to Question 7.24 in the Out of Scope section of the EIS Response Document.
5	EIS 4	Project Description	Port site	Is the site suitable for bulk grains and the required segregations?	Yes. Refer to recent Iron Road and Emerald Grain media announcements, both dated 1 March 2016.
6	EIS 4.3.1	Project Description	Materials handling	Would a second materials handling system need to be built and by who?	Yes. Iron Road and Emerald Grain will work together to design the relevant infrastructure at the port site. Refer to announcements by both companies dated 1 March 2016.
7	EIS 17.3.3	Soil & Land Quality	Site contamination	How would cross contamination between food grains and iron ore be dealt with?	Refer to Submission #21, Issue #5.
8	EIS 18	Traffic & Transport	Local road networks	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?	A grain terminal will be the subject of a separate impact assessment and is not part of this approval process. Having said that, the existing road network is expected to be adequate with some minor upgrades. Both DPTI and DCTB will be consulted at the appropriate time.
9	EIS 22	Social Environment	Counselling services	There is very little support on offer during the exploration, consultation and planning phases of the project. Experience of affected GPSA members is that IRD has not provided access to counselling, and that financial support to local counselling services was declined. How many people were directly contacted by the IRD-provided counselling service?	In line with industry best practice, Iron Road has provided a confidential, independent counselling service for all directly and indirectly impacted landowners of the CEIP since August 2013. This service is offered through Davidson Trahair Corpshych (DTC) and was put in place in response to feedback received from the communities Iron Road is involved in. While this service is the same as offered to Iron Road

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					employees through its Employee Assistance Program, it is completely independent from the Company and 100% guaranteed confidential. The service is accessible by phone, internet, and video conference or in person and includes a variety of counselling and financial services. Information on this service has been on Iron Road's website since 2013 (www.ironroadlimited.com.au/stakeholders/stakeholder-engagement-contacts) and has also been advertised in other ways (e.g. The Granite newsletter).
10	EIS 21 & 22	Social Environment and Economic	Workforce/skills shortage/housing affordability	(summarised) The agriculture industry is at risk of losing workers; upward pressure on employment costs; skill shortages; housing affordability.	Iron Road has undertaken extensive economic and social impact assessments, the results of which are set out in Chapters 21 and 22 of the EIS respectively. Specifically, Table 22-22 (page 22-52 of the EIS) sets out all social impacts, including concerns around housing affordability. Table 22-23 sets out control and management strategies for numerous matters, including incentives to increase labour force participation. Iron Road recognises that its operations may detrimentally impact the agricultural workforce so has committed to: • Providing flexible work practices to accommodate farm work as best as practicable, including peak agricultural periods such as harvesting and other seasonal business activities; and • Providing family friendly work environment. Iron Road is committed to continuing discussions with stakeholders and DCs as the CEIP progresses.
Submission 41 – Name & Address withheld. Supportive submission; no issues raised.					

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
Submission 42 – Alexander Symonds. Supportive submission; no issues raised.					
Submission 43 – Centre for Excellence in Rail Training P/L. Supportive submission; no issues raised.					
Submission 44 – Ajilon Aust P/L. Supportive submission; no issues raised.					
Submission 45 – AMC Consultants. Supportive submission; no issues raised.					
Submission 46 – Wudinna Districts Tourism Association. Supportive submission. Refer to MLP Response Document for Q&A relating to MLP.					
1	EIS 4	Project Description	Third party use of infrastructure	Rail and Port should be available for joint use. Port should have import and export facilities.	The rail and port have been designed to enable third party use (subject to finalising commercial arrangements and those third parties obtaining any additional approvals that may be required). The port is designed as a multi-user facility and can provide for both exports and imports. Iron Road intends to seek Expressions of Interest from potential users of the port later in 2016.
2	EIS 4	Project Description	Link to the national rail network	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.	Iron Road has designed a standard gauge rail that is compatible for this to occur in the future although this is a matter outside the current scope.
3	EIS 22	Social Environment	Workforce to live locally where possible	Employees and contractors are sought to live locally as far as possible rather than FIFO.	Iron Road has consistently acknowledged and advised its stakeholders that there will be a FIFO element during the construction phase of the CEIP as a specialised and experienced workforce will be required for that initial three year period. In relation to other potential employees and contractors, particularly during the operations phase, Iron Road has committed to providing as many opportunities as possible to encourage locals to seek work at the CEIP. As set out in Table 22-23 of the EIS (refer page 22-54 onwards), these include: • Developing policies and/or offering incentives to encourage the workforce to reside locally;

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					• Working with relevant authorities to train and upskill local and regional people to enhance business capacity; • Providing family friendly work environments and developing flexible work practices; • Working with local businesses to identify tendering and procurement opportunities; • Having flexible work practices to accommodate farm work as best as practicable; and • Providing family friendly work environments
4	EIS 22	Social Environment	Long term employee village	Permanent resident village is constructed to best fit with existing community and be of a quality that does not detract from the amenity of township.	This is the intent behind the design of the village and we will continue discussions with Wudinna DC and other stakeholders in this regard.
5	EIS 22.5	Social environment	Changes to tourism	Provision should be made for visitation/tourism e.g., a lookout similar to the Kalgoorlie Super Pit.	Iron Road is planning to build a viewing platform at an appropriate location so that visitors/tourists/locals will be able to see the mining operations.
Submission 47 – Kelvin & Melanie Hebberman and Greg & Jasmine Parks. Relates to EIS only.					
1	EIS 3.2.5	Project Alternatives	Selection option – railway line	How was the rail corridor location determined? Will it still change?	As set out in Chapter 3 of the EIS, numerous infrastructure alternatives were investigated during the feasibility studies of the CEIP and each were evaluated against environment, social, engineering design and economic criteria to identify the preferred options. With respect to the proposed railway line, the route was selected as it best satisfies all of the selection criteria noted above. It is unlikely the route will change substantially, if at all.

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2	EIS 4.2.1	Project Description	Railway Line	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?	Iron Road will go through all impacts with landowners along the corridor and discuss all issues of concern. These will form part of the IMPs and lead the way for subsequent compensation discussions.
3	EIS 4.2.1	Project Description	Railway Line	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?	There will not be a third party interest in the land as Iron Road's intention is to purchase that part of the land required for the infrastructure corridor. Iron Road is committed to open and active dialogue with all impacted landowners and would welcome the opportunity to meet with the submitters to discuss and develop an IMP for their property and to discuss any concerns they may have.
4	EIS 4.5.4	Project Description	Construction Phase	Where will excess sand/fill from corridor construction be placed?	Cut and fill during construction is discussed in Chapter 4.5.4 and Table 4-7 of the EIS. To the extent practicable, cut and fill will be balanced in the project design stage.
5	EIS 13	Terrestrial Flora & Fauna	Echidnas	We have had sightings of echidnas along Wickstein Road by many locals. The train corridor will interfere with their natural habit.	Measures to minimise impacts on fauna are described in Table 13-23 of the EIS. While some impacts on habitat will occur, these will be offset by measures to provide a SEB.
6	EIS 13.5.1	Terrestrial Flora & Fauna	Sources of Impacts	How will the integrity of the pipeline be checked? What if it leaks? If the pipeline leaks product onto farming land will farmers be compensated?	Refer to Submission #18, Issue #4.
Submission 48 – Name and Address withheld. Supportive submission; no issues raised.					
Submission 49 – Name and Address withheld. Relates to EIS only.					
1	EIS 6	Stakeholder consultation & engagement	Counselling services	There is currently no counselling (by an independent source) offered to affect landholders by Iron Road to help combat the	Refer to Submission #40, Issue #9.

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				stress that is being felt by landholders, and this stress will increase the longer this proposal and approval process takes.	
2	EIS 13	Terrestrial Flora & Fauna	Weeds in corridor	What is Iron Road proposing to do about the control of noxious weed control along the railway corridor?	Refer to Submission #4, Issue #1.
3	EIS 13	Terrestrial Flora & Fauna	Fencing	What type of fencing will be used to ensure livestock are contained and the spread of noxious weeds is reduced? Who is responsible for maintaining this fencing?	Refer to Submission #30, Issue #6.
4	EIS 16.5	Groundwater	Predicted effects	Will the rail corridor causes compaction resulting in a rise of the saline water table?	Refer to Submission #17, Issue #11.
5	EIS 17	Soil & Land Quality	Erosion	How will soil erosion and sand drift be managed/prevented?	Erosion prevention and management measures are described in Table 17-5 within Chapter 17 and include dune management procedures.
6	EIS 18	Traffic & Transport	Risks (Fire)	Will trains be included in harvest ban restrictions faced during times of high fire risk?	Refer to Submission #1, Issue #1.
7	EIS 18	Traffic & Transport	Risks	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.	A full risk assessment of every crossing has been included in EIS Chapter 18 and Appendix W which sets out that the required approach sight distance is 257 m, which is less than the 300 m available. In addition, it is proposed that this crossing be signalised with Active Flashing Lights with an advance active warning system installed on approaches.
Submission 50 – Stringer Land P/L and Stringer Engineering P/L. Refer to MLP Response Document for Q&A relating to MLP.					
1	EIS	Out of Scope	Location of corridor	What is the exact position of the proposed infrastructure corridor with respect to my land and my transport/cargo routes?	Refer to Question 7.7 in the Out of Scope section of the EIS Response Document.

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				How much of my land, and what land, is Iron Road proposing to acquire?	
2	EIS 3.2.5	Project Alternatives	Corridor route	Why can't the infrastructure corridor be routed through the Hambidge and Hincks Conservation Parks (to preserve agricultural land)?	Refer to Submission #27, Issue #3.
3	EIS 4.5	Project Description	Construction phase	Who is responsible for re-directing current services (e.g. water, power, telephone) that will be disrupted by the mine?	Refer to Submission #23, Issue #1.
4	EIS 6.6	Stakeholder consultation and engagement	Third party use of corridor and port	Will Iron Road provide guarantee of grain being allowed to travel down the proposed infrastructure corridor and be loaded onto ships at the proposed new wharf? (This has huge economic importance for the farming community).	There is capacity in the rail for grain movement and Iron Road is proactively working with third parties to ensure that both the rail and port will be used for the transport and export of grain. Refer to the recent announcements by Iron Road and Emerald Grain (both on 1 March 2016) and by Iron Road in relation to China Rail (5 April 2016).
5	EIS 13	Terrestrial Flora & Fauna	Maintenance of corridor land	Who is responsible for maintenance of the proposed infrastructure corridor land and associated boundaries during construction, operation and after closure?	Iron Road will be responsible for the maintenance of the corridor and its boundaries during construction and operation. It is likely that the rail will continue to exist long after the CEIP Mine has closed as third parties will still use both the rail and the port. Responsibility for maintenance of the corridor would therefore rest with whatever party is operating the railway line at that time.
Submission 51 – Name and Address withheld. Supportive submission; no issues raised.					
Submission 52 – Dr Barbara Radcliffe. Supportive submission; no issues raised.					
Submission 53 – Rockwell Automation. Supportive submission; no issues raised.					
Submission 54 – James Nagel. Supportive submission; no issues raised.					

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Submission 55 – Wudinna District Council. Refer to MLP Response Document for Q&A relating to MLP.					
1	EIS 18	Traffic & Transport	Rail crossing design for local roads.	The Wudinna DC has concurred with the District Council of Cleve's position with respect to a 'crossing detail design' for local roads.	Refer to Submission #33, Issue #5.
Submission 56 – Kane Murphy. Relates to MLP only. Refer to MLP Response Document.					
Submission 57 – Regional Development Australia Whyalla & Eyre Peninsula. Supportive submission; no issues raised.					
Submission 58 – Name and Address withheld. Relates to EIS only.					
1	EIS 3.2.5	Project Alternatives	Selected Option – Proposed Railway Line	Alternative routes need to be considered including negotiating with the government to realign the corridor through existing national parks.	Refer to Submission #27, Issue #3. Also refer to SA Government (DEWNR) comments in Attachment B of the EIS Response Document which relate to the location of the infrastructure corridor as proposed by Iron Road and its proximity to the Hambidge WPA.
2	EIS 17.3.3	Soil & Land Quality	Site Contamination	How will the impacts or perceived impacts of contamination of grain or livestock along the corridor be managed?	Refer to Submission #21, Issue #5.
3	EIS 17.7.4	Soil & Land Quality	Elevated Soil Salinity	How will salt water used in construction not leach into the ground causing the land and any vegetation to be barren and landowners having to battle with salt issues on their property? Will saline water used during construction impact surrounding soil and vegetation?	The effect of saline water used for dust suppression activities during construction is discussed in Chapter 17.7.4 of the EIS with control and management strategies set out in Table 17-5.
Submission 59 – Osmoflo. Supportive submission; no issues raised.					
Submission 60 – Peter & Pam Brougham. Relates to EIS only.					
1	EIS 8.2.7	Land Use & Tenure	Land Management Agreement	(rephrased) Iron Road's EIS is contrary to the features enshrined in the LMA; the submitter has the ability to apply for a development authorisation for a dwelling; major development status shouldn't haven't been	Iron Road acknowledges the existence of the Land Management Agreement (refer to Chapter 8.2.7 of the EIS, specifically page 8-18). That agreement currently exists over two parcels of land owned by Iron Road at the port site and the

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				given as legal entitlements are over all of the land necessary for the CEIP; unresolved land conflict issues.	Company will liaise with all relevant parties necessary to remove it from those land parcels without adversely impacting the submitters' rights under the agreement on their own land.
2	EIS 10, 12, 13, 14, 18, 23 & 24	Various	Environmental impacts	(rephrased) It is likely that pollution, noise and light spill will seriously impact on the coastal and marine environment disrupting feeding and breeding habits of local and migratory birds, mammals and marine life; dust and ore spillage, plus oils, fuel and litter from ships is likely to pollute our beaches and marine environmental; visual amenity.	The EIS clearly sets out all of the environmental impact assessments undertaken in relation to the CEIP over several years together with all management and mitigations measures proposed by Iron Road. EIS Chapters 10, 12, 13, 14, 18, 23 & 24 cover the issues raised by the submitters.
Submission 61 – K M Hegarty. Relates to MLP only. Refer to MLP Response Document.					
Submission 62 – Name and address withheld. Supportive submission; no issues raised.					
Submission 63 – Mark Edwards. Relates to EIS only.					
1	EIS 4.5 & 17	Project Description	Construction phase	How will soil erosion and drift be managed during corridor construction?	Refer to Table 17-5 of the EIS which sets out control and management strategies for soil and land quality during construction and operation of the CEIP Infrastructure.
2	EIS 13	Terrestrial Flora & Fauna	Weeds in corridor	Who will control weeds along the corridor?	Refer to Submission #23, Issue #3.
3	EIS 13	Terrestrial Flora & Fauna	Fencing	What material will fences be made from?	It will be a standard stock fence.
4	EIS 18	Traffic & Transport	Access point	Where will there be access points along the rail corridor?	Yes. These will be discussed with landowners on a case by case basis.
5	EIS 18	Traffic & Transport	Travel times	Will there be increased travel time and disruptions during seeding and harvest period? Will there be compensation for lost time?	The traffic and transport impact assessment is set out in Chapter 18 of the EIS and discusses impacts during both construction and operation. The intent is to

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					minimise all impacts as set out in Iron Road's proposed control and management strategies in Table 18-12. Compensation would not be appropriate as any delays will be minor in nature.
6	EIS 18	Traffic & Transport	Road upgrades	Who will pay for upgrades of council roads?	Iron Road will be responsible for financial implications relating to any upgrade of DC roads and will enter into appropriate management agreements with each impacted DC in due course.
7	EIS 18.5	Traffic & Transport	School bus operations	How will Iron Road ensure the railway does not impact on school bus routes and increase travel time?	Refer to Submission #23, Issue #5.
Submission 64 – EP Crushing. Supportive submission; no issues raised.					
Submission 65 – Skyden Farms. Relates to MLP only. Refer to MLP Response Document.					
Submission 66 – SMEC. Supportive submission; no issues raised.					
Submission 67 – Wendy Murphy. Relates to MLP only. Refer to MLP Response Document.					
Submission 68 – David Murphy. Relates to MLP only. Refer to MLP Response Document.					
Submission 69 – District Council of Kimba. Supportive submission; no issues raised.					
Submission 70 – James Adams. Supportive submission; no issues raised.					
Submission 71 – Name and Address withheld. Relates to MLP only. Refer to MLP Response Document.					
Submission 72 – Name and Address withheld. Relates to MLP only. Refer to MLP Response Document.					
Submission 73 – Borvin Kracman. Supportive submission; no issues raised.					
Submission 74 – Geoffrey Dodd. Supportive submission; several comments made in relation to EIS.					
1	EIS 15.4	Surface Water	Urban design principles at the port site	It is suggested that in addition to the above proposed containment measures that water sensitive urban design principles be employed to further enhance the quality of water runoff from the site and subsequently into the ocean.	Water sensitive urban design principles will be employed at the port as described in Chapter 15.4 of the EIS.

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2	EIS 21	Economic Environment	Local Procurement	Green House Gas will be generated from both the embodied emissions present in the steel and concrete and the manufacturing and transport of the steel and concrete from China to the project site. This raises two issues: 1. The necessity to purchase steel and concrete from overseas when local manufacturing of both products is available regionally. 2. The creation of over 53,000 tonnes of GHG from overseas transportation from China. Although it will be a commercial decision of Iron Road as to where they purchase materials for the CEIP from, it is suggested that serious consideration be given to the support of the local and state economy by purchasing locally, creating additional local employment and reducing GHG Scope 3 emissions.	The modular design of the project components has a number of advantages: it greatly reduces road transport; has a shorter construction time; minimises the disturbance footprint; has safety benefits; and provides a more energy efficient design. The main Scope 3 emissions are from embodied energy and these would apply regardless of construction method. A non-modular design would result in greater emissions during construction. On balance, Iron Road considers there are significant environmental and economic advantages in using a modular design. Refer to Section 3.3 of the EIS Response Document for information concerning supply options.
3	EIS 22	Social Environment	Employment	It is suggested that the State Government be consulted by Iron Road, if not already underway, to introduce employment transition and relocation incentives to metropolitan residents to relocate to the Eyre Peninsula region to take up both direct and indirect employment opportunities created by the CEIP.	Refer to Chapter 22, Table 22-23 of the EIS for the management strategies suggested by Iron Road in relation to employment.
4	EIS 22	Social Environment	Housing	It is suggested that contingencies for increasing the regional township housing supply (in addition to the worker's village) be formulated by local and state authorities in advance of townships experiencing future housing and rental price pressure from increased demand.	Iron Road has put forward management strategies in relation to housing in Chapter 22, Table 22-23 (page 22-35 of the EIS). These include: • Collaborating with Wudinna DC and SA Government in planning for new residential development, including the provision of strategic infrastructure;

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					• Collaborating with key agencies, including local government, to support the provision of appropriate and sustainable services and amenities that benefit existing and incoming residents and workers in Wudinna; and • Participating in planning initiated by SA Government, local Councils and other service providers.
Submission 75 – Challenger Geological Services. Supportive submission; no issues raised.					
Submission 76 – Dr John Smith. Supportive submission; no issues raised.					
Submission 77 – Paul Nield. Relates to EIS only.					
1	EIS	Out of Scope	Land acquisition	We will only be compensated for the current value of the land, however we are losing all future income off that land as well, which will naturally affect our future earning potential.	Refer to Question 7.16 in the Out of Scope section of the EIS Response Document.
2	EIS 16.5	Groundwater	Predicted effects	Will the rail corridor cause ground compaction and the saline water table to rise?	Refer to Submission #21, Issue #4.
3	EIS 18	Traffic & Transport	Local roads	We have had no indication what will happen to Phelps Road.	A civil engineering 'base case' has been developed for Phelps Road which will be discussed further with DC Cleve and the landowner in due course.
Submission 78 – Name and Address withheld. Relates to EIS only.					
1	EIS 4.2.1	Project Description	Infrastructure corridor design	Who will have access to the corridor access road?	Iron Road staff and select contractors (including construction workers) will have full access to the corridor maintenance track. Adjoining landowners may have limited access in order to conduct routine farming operations. Protocols will be put in place and discussed with stakeholders prior to construction of the corridor.

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2	EIS 4.2.1	Project Description	Infrastructure corridor	What will be the process if stock gets onto the corridor access track?	As stated in Chapter 4.2.1 and shown in Figure 4-4 of the EIS, the railway line will be fenced on both sides to prevent livestock from crossing the line. The rail maintenance track will be located outside of the fenced area.
3	EIS 6	Stakeholder consultation & engagement	Impacted landowners	How will farm water pipe networks be accommodated now and in to the future when changes may need to be made to the layout?	All services, including water, that need to be relocated will be redirected and reinstated as efficiently as practicable at Iron Road's expense and in consultation with relevant landowners.
4	EIS 10.4.1	Air Quality	Impacts on Agricultural Values	How will potential dust impacts to crops and livestock along the corridor be monitored/ managed? Will landowners be compensated if impacts occur?	Refer to Submission #30, Issue #4. If impacts occur that are directly attributed to CEIP activities then Iron Road will discuss potential compensation with impacted landowners.
5	EIS 13	Terrestrial Flora & Fauna	Weeds in corridor	Who will control these (weeds and) pests within the corridor and to what standard?	Refer to Submission #4, Issue #2.
6	EIS 13	Terrestrial Flora & Fauna	Fencing of corridor	To what standard will the corridor fence be built? Who will supply and erect the fence? How will the fence be maintained to an acceptable standard? Who will be responsible for wandering stock due to sub-standard fencing?	Refer to Submission #30, Issue #6.
7	EIS 16.5	Groundwater	Predicted effects	Will the corridor create compaction causing the saline water table to rise? If farming land is impacted, will landowners be compensated?	Refer to Submission #21, Issue #4.
8	EIS 17	Soil & Land Quality	Erosion	How will erosion be prevented during corridor construction?	Refer to Submission #49, Issue #5.
9	EIS 17	Soil & Land Quality	Construction material	Where will fill/rubble/ballast be sourced from?	Refer to Submission #18, Issue #2.

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10	EIS 18	Traffic & Transport	Risks (Fire)	Will the ore train be required to comply with fire bans / harvest restrictions?	Refer to Submission #1, Issue #1.
Submission 79 – Ray Elleway. Supportive submission; two matters raised in relation to EIS only.					
1	EIS 3.2.5	Project Alternatives	Proposed alternative route	It is my belief that the rail corridor should be routed from behind (approx. 400 metres) the Darke Peak silos and then adjacent to current rail corridor to Verran where it would branch off to the current Iron Road Proposal. It would need to skirt the Rudall township in the southern side to reduce noise impact, which could be achieved by purchasing the required land adjacent to the current rail line from Darke Peak to Rudall (approx. 100 metres out from the current railway corridor fence line. From Rudall to Taragoro I propose the rail corridor to traverse the western side of the road to Taragoro and then the proposed route to Verran and onto Cape Hardy.	Iron Road appreciates the time and effort spent by this submitter in proposing an alternative route for the rail corridor. Iron Road considered multiple options in the early phases of the project which were also reviewed during ongoing consultation with stakeholders. Modifications have been undertaken as a result of these discussions. The proposed route as presented in the EIS has been fully impact assessed and as such is the route for which Iron Road is seeking government approval.
2	EIS 18	Traffic & Transport	Road network	A vehicle overpass on the Rudall – Lock Road is also a must when looking at traffic densities during the months of harvest.	Refer to Submission #33, Issue #2 for information as to the traffic and transport impact assessment work undertaken.
Submission 80 – R Petty Electrical. Supportive submission; one comment raised.					
1	EIS 21	Economic Environment	Local Procurement	If the Central Eyre Iron Project goes ahead I would like to see local businesses & services utilised wherever possible to ensure the local economy & community benefits from this project.	Iron Road has a stated preference to source local services and to support local businesses. Measures are outlined in Table 21-14 of the EIS and include: • Working with business groups to identify local business opportunities; • Providing information on CEIP business opportunities, tendering and procurement processes and standards to facilitate the pre-qualification of local and regional businesses;

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					• Maintaining a register of businesses with an interest in supplying goods and services to the CEIP; • Identifying contract packages that could potentially be awarded locally or regionally; • Actively working with local and regional employment services and businesses to enhance opportunities and give preference to suitable qualified local and regional workers; and • Working with the Industry Capability Network SA and regional organisations to promote the participation of local, regional and South Australian businesses in the project.
Submission 81 – Wudinna Meat Store. Supportive submission; no issues raised.					
Submission 82 – Katy Fechner. Supportive submission. Refer to MLP Response Document for Q&A relating to MLP.					
1	EIS 11.4.2	Climate Change & Greenhouse Gas	Clean energy initiatives	What clean energy initiatives are proposed? What initiatives are in place to reduce greenhouse gas emissions?	Small scale renewable energy options will be considered. A range of measures have been adopted to reduce greenhouse emissions and have been set out in EIS Chapter 11.4.2.
2	EIS 18.5.6	Traffic & Transport	Maintenance of highways	Who is responsible for maintaining local highways that degrade due to increased mine-related traffic?	Responsibility for road maintenance is shared by DPTI (for main highways) and DCs (for other public roads). As described in Chapter 18.5.6 of the EIS, Iron Road will implement a pavement monitoring, management and rehabilitation plan in consultation with DPTI. Iron Road will be responsible for the cost of accelerated pavement wear. This is standard practice for projects with substantial heavy vehicle trips. Iron Road's impact assessment, however, concludes CEIP traffic will not significantly affect the condition and remaining life of pavement in the study area.

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3	EIS 22.6	Social Environment	Community friendly rosters	Consideration must be given to shift work on weekends and how it may impact player availability for the local sporting clubs, as these sporting clubs often form the backbone of regional communities.	Please refer to EIS Table 22-23 which sets out various control and management strategies to encourage integration of workers with the community and family friendly rosters.
Submission 83 – Name and Address withheld. Supportive submission; one issue raised.					
1	EIS 22.6	Social Environment	Employment & Local Procurement	There should be a local/non local employment ratio or percentage for both full time employees and local businesses. Local farmers which have their livelihood affected by the proposal should have first preference.	Refer to Submission #80, Issue #1 for strategies to support local businesses and give preference to local workers. In addition, Iron Road will provide family friendly work environments and develop flexible work practices to assist local farmers as set out in Table 22-23 of the EIS (page 22-54).
Submission 84 – Stephen Whillas. Relates to EIS only.					
1	EIS 6	Stakeholder consultation and engagement	No knowledge of CEIP	Hasn't been consulted/engaged by Iron Road; owns a home in Port Neill and owns 50% of an agriculture-reliant business in Kimba.	Iron Road has held numerous engagement opportunities across the Eyre Peninsula since 2011, all of which are detailed in Chapter 6 of the EIS. These activities have occurred in Port Neill, Tumby Bay, Cleve, Rudall, Warramboo, Wudinna and Lock and have been widely advertised in local newspapers with invitations for any interested parties to attend / participate. Letter box drops to homes (including Port Neill) advising of upcoming events/activities have also occurred. The results of a Community Perception Survey undertaken in June 2015 show that 92% of the people surveyed across the Eyre Peninsula have a high awareness of the CEIP.

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2	EIS 10.3.2	Air Quality	Impacts on Agricultural values	Concerns about sensitive receivers – they (IRD) refer to houses and other buildings as opposed to crops and livestock.	Agreed. The proposed management criteria set out in Table 10-15 of the EIS will ensure no impacts to either crops or livestock. An extensive impact assessment was undertaken but specific regard to crops and livestock was not discussed in the air quality chapter of the EIS. It is important to understand that this would not change the outcomes i.e. the mitigation strategies would remain the same and the monitoring will be required to validate and continue to check on the performance of the CEIP operations.
3	EIS 17.3.3	Soil & Land Quality	Site contamination	How will the contamination and co-mingling of grain be prevented? Will growers be compensated for any impact?	Refer to Submission #21, Issue #5.
Submission 85 – Name and address withheld. Refers to EIS only.					
1	EIS	Out of Scope	Devaluation of land	Devaluation of Farm – currently property presents as 3 accessible blocks, an attractive farm package.	Refer to Question 7.3 in the Out of Scope section of the EIS Response Document.
2	EIS 4.2.1	Project Description	Infrastructure corridor	Who is responsible for providing/constructing raceways for stock movements?	Iron Road recognises that the infrastructure corridor will impact some farm operations and will continue to work with affected landowners to develop appropriate stock management solutions via IMPs. Where agreed, measures to provide ongoing access will be constructed by Iron Road at its expense.
3	EIS 4.2.1	Project Description	Infrastructure corridor	Machinery and stock movement and property access during all seasonal operations challenged by rail line division.	This is acknowledged. Refer response to Issue #2 above.

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ATTACHMENT C – CEIP EIS - ISSUES/COMMENTS ON EPBC ACT AND IRON ROAD'S RESPONSES

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Work Required (with reference to MNES)	Addressed in EIS?	Department of the Environment's Comments	Iron Road's Response
Avoidance, Mitigation, Offset Management and Control of Adverse Effects The EIS should demonstrate that the proposed avoidance, mitigation, offset, management and control measures are consistent with the EPBC Act offsets policy and relevant recovery plans, conservation advice and threat abatement plans.	Design measures to avoid and mitigate impacts described in each of Chapters 10 to 23.	The Department considers that the EIS adequately demonstrates that the proposed action avoids or is likely to have a negligible impact on terrestrial EPBC Act listed threatened species and communities.	Noted. No further action required.
	Environmental management framework outlined in Chapter 24, Appendix AA – Construction Environment Management Plan & Appendix BB – Operation Environment Management Plan.	The Department notes that whale management procedures have been developed and incorporated into the draft Construction Environmental Management Plan (CEMP) and draft Operation Environmental Plan (OEMP) for the proposed action. These measures may require the DoE Minister's approval before proceeding with the action. Commitments made in the EIS, to avoid blasting in the marine environment, and to only conduct piling in daylight hours (draft CEMP, p. 14), should be formalised with conditions.	Noted.
		The Department notes that aspects of the approval conditions for Port Spencer Stages 1 and 2, Eyre Peninsula, South Australia (EPBC 2012/6590) have been included in the draft CEMP. Other aspects, such as components (iv) and (vii) of the pile driving operating procedures included for EPBC 2012/6590, should be considered for this project. The Department notes the mitigation measures recommended within Attachment S to the EIS.	Noted.
		The Department considers that the CEMP and OEMP should be improved by detailing which audits will be conducted by an independent reviewer.	Noted. The CEMP and OEMP will be amended as suggested.
		The Department considers that the CEMP and OEMP should include details addressing the name of every	Noted.

Work Required (with reference to MNES)	Addressed in EIS?	Department of the Environment's Comments	Iron Road's Response
		agency responsible for endorsing or approving each mitigation measure or monitoring program (and addressed within proposed approval conditions).	
Planning and Environmental Legislation and Policies Describe the proposal's consistency with other State and Commonwealth legislation; including provisions of the EPBC Act 1999 (include consideration of principles of sustainable development and relevant bioregional plans).	Chapter 5	The EPBC Act component of this requirement has been adequately addressed.	Noted. No further action required.
Environmental Issues Quantify and detail the extent, condition and significance of potential native fauna habitat loss or disturbance during construction and operation and the ability of communities and individual species to recover, especially for resident and migratory shore birds, and Threatened, Endangered and Protected Species (TEPS) under the EPBC Act and the South Australian National Parks and Wildlife Act 1972 (NP&W).	Chapters 13 & 14 Appendix O – Infrastructure Corridor Ecological Assessment. Appendix P – Port Terrestrial Ecology Baseline Survey. Appendix Q – Marine Environment Technical Report	The Department considers that the EIS adequately quantifies and details the extent, condition and significance of potential native fauna habitat loss or disturbance during construction and operation, and the ability of EPBC Act listed species and communities to recover.	Noted. No further action required.
Detail appropriate buffer distances that will be required between the proposed	Chapter 13	The Department considers that the EIS adequately addresses buffer distances between TEPS and native vegetation within conservation areas within Chapter	Noted. No further action required.

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Work Required (with reference to MNES)	Addressed in EIS?	Department of the Environment's Comments	Iron Road's Response
development and TEPS, including feeding areas, nesting sites and roosting sites.		13 (Specifically Table 13-6, Table 13-7 and Table 13-2). The Department considers that buffer distances should be a component of the conditions (as detailed within the EIS), should the project be approved.	Noted.
Outline the effect of light pollution, noise emissions and vibrations on TEPS (including those listed under the EPBC and NPW Act's) and how these will be managed.	Chapter 13, Chapter 14, Chapter 24 Appendix Q – Marine Environment Technical Report Appendix S – Marine Environmental Noise Assessment Report Appendix AA – Construction Environment Management Plan Appendix BB – Operation Environment Management Plan.	The Department considers that the effects of light pollution, noise emissions and vibrations on EPBC Act listed species, and subsequent management has, for the most part, been adequately addressed. The Department considers that mitigation measures for light pollution, noise emissions and vibrations on EPBC Act listed species, and subsequent mitigation measures should be a component of proposed approval conditions. The approval conditions for Port Spencer Stages 1 and 2, Eyre Peninsula, South Australia: EPBC 2012/6590, is relevant and is discussed above. Its operating procedures should be considered for this project, to mitigate impacts of pile driving on the EPBC Act listed Southern Right Whale.	Noted. No further action required. Noted. This can be discussed further at the approval stage. Noted. This can be discussed further at the approval stage.
Describe how the proposal is not inconsistent with any relevant EPBC Act guidelines, conservation advice and/or recovery plans. For instance, the recovery plan for the endangered Southern Right Whale.	Chapter 13, Chapter 14.	The Department considers that the EIS explicitly states how the proposal is not inconsistent with the *Conservation Management Plan for the Southern Right Whale 2011-2021* in Section 14.8.1: Findings and Conclusions on EPBC Matters and Table 14-10 Summary of Impacts on Southern Right Whale. The Department considers that the EIS proposal is consistent with the *Marine bioregional plan for the South-west marine Region.*	Noted. No further action required. Noted. No further action required.

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From: Kleeman, Robert (DPTI)
To: Lawes, Phil (DPTI); Ferguson, Karen (DPTI)
Cc: Whitford, Michael (DPTI); Wood, Jeremy (DPTI); Wyatt, Sharon (DPTI); Webb, Lee (DPTI); Liu, Peter (DPTI); Smith, Sally (DPTI); Kwong, Chris (DPTI)
Subject: RE: Iron Road Major Development - draft Assessment Report (for information) and draft conditions (for comment)
Date: Monday, 20 February 2017 10:00:15 AM

Hi Phil,

Support the amendment of item 12 and addition of third item regarding funding the upgrade of any road and rail upgrades.

Consistent with prior discussions between Paul G and Sally it is proposed not to include the middle condition outlined below as this mandates an outcome now when further review is required, the outcome of which will inform the necessary interventions and which will need to be undertaken prior to construction and to the satisfaction of the Minister for Transport and Infrastructure. Works will also need to be undertaken in accordance with relevant Deeds of Agreement.

Am available to talk further as required, inc further discussion between Sally and Paul as required.

Could you come back to me directly if this remains a threshold issue noting we are finalising material including sending to Iron Road for final fact checking.

Regards

Robert Kleeman
Unit Manager Strategic Development Assessment

Investment Management, Development Division
Department of Planning, Transport and Infrastructure
6(1) Personal affairs
Level 1, 211 Victoria Square, Adelaide SA 5000

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We acknowledge and respect Aboriginal peoples as South Australia's first peoples and nations, we recognise Aboriginal peoples as traditional owners and occupants of land and waters in South Australia and that their spiritual, social, cultural and economic practices come from their traditional lands and waters; and they maintain their cultural and heritage beliefs, languages and laws which are of ongoing importance; We pay our respects to their ancestors and to their Elders.

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From: Lawes, Phil (DPTI)

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Sent: Friday, 17 February 2017 11:16 AM
To: Ferguson, Karen (DPTI) 6(1) Personal affairs
Cc: Whitford, Michael (DPTI) 6(1) Personal affairs Kleeman, Robert (DPTI) 6(1) Personal affairs Wood, Jeremy (DPTI) 6(1) Personal affairs Wyatt, Sharon (DPTI) 6(1) Personal affairs Webb, Lee (DPTI) 6(1) Personal affairs Liu, Peter (DPTI) 6(1) Personal affairs
Subject: FW: Iron Road Major Development - draft Assessment Report (for information) and draft conditions (for comment)

Hi Karen

We have reviewed the draft conditions, and provide the following recommended amendments:

CONDITIONS OF DEVELOPMENT AUTHORISATION

- Amend item 12 as it closes a perceived loop hole:

  In respect of rail crossings, a review of rail crossings to determine the appropriate treatment for each and every crossing to be impacted **or created** by the CEIP, acknowledging the principles and intent of the South Australian Government Railway Crossing Policy 2015 to minimise risk to all road (including stacking distances) and rail users, and formalise Interface Agreements required with all relevant parties.

- Add item regarding the grade separation of the Lincoln and Birdseye Hwys:

  Road grade separations for the intersection of the rail line with the Lincoln Highway and the Birdseye Highway, including a Deed of Agreement with the Department of Planning, Transport & Infrastructure incorporating finalised plans and relevant specifications.

- Add item as the funding of upgrades is not explicit:

  Fund the upgrade of any road and rail upgrades, including railway crossings, which are required as a direct result of Iron Road's activities.

NOTES TO PROPONENT

- Amend item 12:

  Appropriate navigational aids shall be erected in **appropriate** locations, or existing navigation marks may need to be re-located, in consultation with the Department of Planning, Transport &

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Infrastructure, prior to use of the facility for shipping purposes

- Update Item 19:

  As foreign vessels are allowed into port the proponent would need to consult with **DPTI (Marine Operations)** to address any requirements of the **Department of Agriculture and Water Resources** and **Department of Immigration and Border Protection**.

Thanks

Phil Lawes
Manager, Infrastructure and Services Planning
Planning and Transport Policy
Department of Planning, Transport and Infrastructure
6(1) Personal affairs

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www.dpti.sa.gov.au

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From: Ferguson, Karen (DPTI)
Sent: Tuesday, 7 February 2017 8:41 AM
To: Lawes, Phil (DPTI) 6(1) Personal affairs
Cc: Kleeman, Robert (DPTI) 6(1) Personal affairs Wood, Jeremy (DPTI) 6(1) Personal affairs Wyatt, Sharon (DPTI) 6(1) Personal affairs Webb, Lee (DPTI) 6(1) Personal affairs
Subject: FW: Iron Road Major Development - draft Assessment Report (for information) and draft conditions (for comment)

Sorry Phil, I left you off the list for comment!

Could you please review the attached conditions for the Iron Road development and provide comment on whether these reflect any transport requirements?

Thanks

Karen

From: Ferguson, Karen (DPTI)

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Sent: Monday, 6 February 2017 12:02 PM
To: Pryde, Kym (EPA) 6(1) Personal affairs Reachill, Sarah (DEWNR) 6(1) Personal affairs Houston, Peter (PIRSA) 6(1) Personal affairs 6(1) Personal affairs
Cc: Kleeman, Robert (DPTI) 6(1) Personal affairs Wood, Jeremy (DPTI) 6(1) Personal affairs Webb, Lee (DPTI) 6(1) Personal affairs Wyatt, Sharon (DPTI) 6(1) Personal affairs
Subject: Iron Road Major Development - draft Assessment Report (for information) and draft conditions (for comment)

Hi all,

Please find attached the draft conditions proposed for the Iron Road Major Development (Infrastructure corridors/ port/workers long-term accommodation at Wudinna for consideration. Could you please provide comment on the draft conditions by 10 February 2017. The draft assessment report is attached for information and should match the outcomes in the draft conditions. The next step is to put this up for a decision via a Cabinet Submission and DPTI would like to be made aware of any 'sticking points' before putting it to Cabinet.

If you have any further queries please let me know.

Regards

Karen Ferguson

Senior Specialist Environmental Officer

Strategic Development Assessment

Planning and Development

Department of Planning, Transport and Infrastructure

P/T Mon/Wed/Thurs

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8 Recommendations and Conclusions

RECOMMENDATIONS

Should the Governor grant a provisional development authorisation, the approval should be based on the following requirements:

CONDITIONS OF DEVELOPMENT AUTHORISATION

General

1. The proponent shall carry out the development generally in accordance with:

Plan Description	ID	Date	Author
CEIP Environmental Impact Statement 2015 (Main Report Volumes 1 and 2 and Appendices)		5 November 2015	Iron Road Limited
CEIP EIS Response Document (Supplementary EIS)		October 2016	Iron Road Limited

If there is any inconsistency between the documents referred to above, the most recent document shall prevail to the extent of the inconsistency. However, conditions of this approval prevail to the extent of any inconsistency.

2. For the purposes of Section 48 (11)(b) of the *Development Act 1993*, the proponent shall commence the development by substantial work on the site of the development within 2 years of the date of this authorisation, failing which the authorisation may be cancelled.

3. The proponent shall have materially completed the development within 5 years of the date of this authorisation, failing which an extension might be sought from the Minister or the authorisation may be cancelled.

4. That except where minor amendments may be required by other relevant Acts, or by conditions imposed by this authorisation, the proposed Major Development for the Central Eyre Iron Project (CEIP) must be carried out in accordance with the plans and details submitted as part of the Major Development Application, and where provided,

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in accordance with the conditions imposed by this authorisation and the details and plans submitted in accordance with those conditions.

The following conditions apply prior to the Commencement of Construction Works

The following information shall be provided to the Minister for Planning, in relation to each component, prior to the commencement of construction works for that component:

5. A Social Management Plan (SMP) prepared in consultation with relevant Councils and Government agencies. The SMP shall outline proposed measures in relation to (at a minimum) the following matters:

   (a) monitoring or rentals rates, rental availability and housing stress in Wudinna and Port Neil/Tumby Bay
   (b) opportunities for local industry participation and employment
   (c) opportunities for indigenous employment and involvement
   (d) incorporation of all strategies, initiatives and commitments described in Chapter 22 of the Environmental Impact Statement.
   (e) means by which ongoing feedback to and from the community is to be maintained and enhanced.
   (f) a process for reviewing and updating the SMP on a regular basis.

   The SMP shall remain in operation throughout all stages of the project, including construction and operation.

   A suitably qualified independent expert shall undertake an improvement review of the SMP annually and make their findings publically available

The following information shall be submitted for further assessment and approval by the Minister for Planning, in relation to each component, prior to the commencement of construction works for that component:

6. Compliance with the Building Rules in relation to all aspects of the proposed Major Development relating to building works. A decision on Building Rules compliance in relation to each component of the development will only be made after a Building Rules assessment and certification has been undertaken in relation to that component and issued by the relevant Council or a private certifier, in accordance with the provisions of the Development Act 1993, and after the Minister for Planning receives a copy of the relevant certification documentation, as outlined in Regulation 64 of the Development Regulations 2008 (refer to 'Notes to proponent' below for further information).

7 Preliminary site investigation (PSI), in accordance with the *National Environment Protection (Assessment of Site Contamination) Measure 1999* for the sites of the short term workers accommodation at Cape Hardy and long term employee village at Wudinna to identify potential sources of contamination within these sites. The PSI is to be completed prior to the CEMP and the PSI results used to inform the CEMP development.

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8. Final design details (including site plans, floor plans, elevations, cross-sections, perspectives, details of cut and fill, finishes and colours, any on–site landscaping and car parking configuration) for the following items:
   (a) Railway line;
   (b) The jetty structure and associated loading facilities;
   (c) Permanent warehouse facility;
   (d) Permanent fuel and chemical storage tanks;
   (e) Long-term employee village at Wudinna and construction camp at Cape Hardy(refer Notes to Proponent);
   (f) All administrative and other buildings.

9. Detailed engineering designs for the jetty, associated structures and all other structures sought to be constructed on or over land owned by the Crown shall be prepared and independently certified by a registered engineer, to the satisfaction of the Department for Planning, Transport & Infrastructure (DPTI). A certificate as to the structural soundness of each proposed structure shall be submitted to DPTI prior to the commencement of construction of the relevant structure.

10. A Southern Right Whale Management and Monitoring Plan, prepared in consultation with the Spencer Gulf Ecosystem and Development Initiative (SGEDI). The Plan should outline appropriate methodology to monitor both whale habitat use and behaviour using appropriate survey techniques during construction, operation and decommissioning of the Port (refer to Notes to Proponent below).

11. A Construction Environmental Management Plan (CEMP), prepared in consultation with the Environment Protection Authority, the Country Fire Service, Department of Environment, Water and Natural Resources (as required) and relevant Councils, and in accordance with the EPA guideline 'Construction environmental management plans' 2016 (see http://www.epa.sa.gov.au/business_and_industry/environmental_planning/position-statements-and-guidelines).

    The CEMP shall cover the pre-construction and construction phases of the proposed Major Development and incorporate measures to manage and monitor (at a minimum) the following matters:

    a. traffic management, (including for construction materials), road maintenance and rail crossing management strategies
    b. in respect of the rail corridor, a plan which identifies the proposed impact on school bus routes including a demonstration of consultation with the appropriate schools and relevant councils
    c. air quality, dust and sediment control
    d. surface and groundwater management
    e. stormwater management strategy
    f. the assessment and remediation of known or suspected site contamination – in accordance with the National Environment Protection Measure
    g. waste management (for all waste streams) and overall site clean-up (including litter)
    h. use of and storage of chemicals, oil, construction-related hazardous substances and other materials that have the potential to contaminate

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stormwater, groundwater or the marine environment (including emergency responses).

i. vibration management and noise emissions (including ongoing noise monitoring to ascertain the effectiveness of noise control measures) and periods and hours of construction and operation which demonstrates compliance with the requirements of the *Environment Protection (Noise) Policy 2007*

j. Aboriginal heritage requirements in accordance with the *Aboriginal Heritage Act 1988*

k. vegetation clearance (including SEB offset and a Native Vegetation Management Plan developed in consultation with the Native Vegetation Council)

l. introduced plants and animals (including weeds and pests) management and control strategies

m. impacts on the marine environment (especially noise and turbidity)

n. climate change impacts

o. visual impacts (including lighting)

p. effect on existing infrastructure

q. emergency management, including fire

r. impacts on marine mammals, in particular the Southern Right Whale.

s. community complaints regarding the above matters by way of a community complaints register (refer to Notes to Proponent below).

The CEMP shall be actively monitored to ensure compliance with predicted impacts and will be formally reviewed annually until the construction phase is complete.

12. In respect of the infrastructure corridors, a Plan which:
    a. Identifies the final surveyed alignment for the infrastructure corridor(s).
    b. Ensures legal access is provided to all land parcels (as required under the Real Property Act 1886).

The following information shall be submitted for further assessment and approval by the Minister for Transport and Infrastructure, prior to the commencement of construction works for each relevant component:

13. In respect of rail crossings, a review of rail crossings to determine the appropriate treatment for each and every crossing to be impacted or created by the Central Eyre Iron Project, acknowledging the principles and intent of the South Australian Government Railway Crossing Policy 2015 to minimise risk to all road (including stacking distances) and rail users, and formalise Interface Agreements required with all relevant parties.

14. Fund the upgrade of any road and rail upgrades, including railway crossings, which are required as a direct result of Iron Road's activities.

15 In respect of road and rail upgrades, Infrastructure Agreements, including Deeds of Agreement, regarding the provision of road and rail upgrades between the relevant authority and the proponent. This should include the required improvement, timing, and delivery requirements.

The following conditions apply during Construction Works and Prior to Operation of the Development

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16. All works shall be undertaken at the proponent's cost in accordance with the approved plans, drawings, specifications and other documentation provided in accordance with conditions 1-15 listed above.

17. All landscaping shown on the approved plans in respect of each component shall be substantially established prior to the operation of that component of the development and shall be maintained in good health and condition at all times.

18. Vegetation screening and landscaping of the long-term employee village and the Cape Hardy port facilities, where appropriate, shall be planted and established prior to operation commencing at each of those sites respectively and, when established, must be maintained in good health and condition at all times.

19. The entire length of the infrastructure corridor is to be fenced as per the Environmental Impact Statement (refer to Note to Proponent)

20. All external lighting, including car parking areas and buildings, shall be designed and constructed to conform with Australian Standards and must be located, directed and shielded and of such limited intensity that no unreasonable nuisance or loss of amenity is caused to any person beyond the boundary of the site.

21. Council, utility or state-agency maintained infrastructure (i.e. roads, kerbs, drains, crossovers, footpaths etc.) that is demolished, altered, removed or damaged during the construction of the development shall be reinstated to Council, utility or state agency specifications as applicable. All costs associated with these works shall be met by the proponent.

22. All vehicle car parks, driveways and vehicle entry and manoeuvring areas shall be designed and constructed in accordance with the relevant Australian Standards and be constructed, drained and paved with bitumen, concrete or paving bricks (or other such material as agreed to by the Minister for Planning), in accordance with sound engineering practice and appropriately line marked.

23. All loading and unloading, parking and manoeuvring areas shall be designed and constructed to ensure that all vehicles can safely traffic the site and enter and exit the subject land in a forward direction.

24. All stormwater design and construction shall be in accordance with Australian Standards and recognised engineering best practice to ensure that stormwater does not adversely affect any adjoining property or public road.

25. All liquids or chemical substances that have the ability to cause environmental harm if discharged into the environment shall be stored within a bunded compound that has a

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capacity of at least 120% of the volume of the largest container, in accordance with the EPA 'Bunding and Spill Management Guidelines' (2007).

26. The proponent shall provide satisfactory oil spill and firefighting facilities and ensure that contingencies are in place prior to operation of the port, having regard to the South Australian Marine spill contingency action Plan and the *Pollution of Waters by Oil and Noxious Substances Act 1987*.

27. In consultation with and to the satisfaction of the Environment Protection Authority, the Country Fire Service and relevant Councils an Operational Environmental Management and Plan (OEMP) shall be prepared by the proponent. The OEMP must incorporate measures to manage and monitor (at a minimum) the following matters:
    a. vibration and operational noise management (such as from machinery noise), to ensure compliance with the Environment Protection (Noise) Policy 2007
    b. air quality management dust and sediment control
    c. site contamination
    d. surface, stormwater and groundwater management, including ongoing validation of model predictions and Water Sensitive Urban Design (where appropriate).
    e. waste management (for all waste streams) and overall site clean-up (including litter)
    f. fire and emergency management
    g. Aboriginal Heritage requirements in accordance with the *Aboriginal Heritage Act 1988*
    h. chemical, oil, hazardous substances and fuel use and storage (including management/emergency response plans)
    i. safe shipping activities and navigation
    j. impacts on the terrestrial, coastal and marine environment, including sand accretion and deposition, coastal hazards, pest plants and animal species, impacts on sea grass and marine flora
    k. climate change impacts
    l. Southern Right Whale and other marine mammal management and monitoring (including monitoring of whale strike).
    m. visual impacts (including lighting)
    n. revegetation and landscaping (including environmental rehabilitation)
    o. traffic management/road maintenance and rail operations, including access (by way of traffic management/road maintenance and rail operations strategies)
    p. In respect of the rail corridor a plan which identifies the proposed impact on school bus routes including a demonstration of consultation with the appropriate schools and relevant councils
    q. public safety
    r. impacts on adjacent land users
    s. community complaints regarding the above matters by way of a community complaints register (refer to Notes to Proponent below)

    The OEMP shall be actively monitored to ensure compliance with predicted impacts and be reviewed at regular intervals, and updated as necessary, in particular when a significant change in project scope or performance is detected.

28. Each of the relevant councils shall be given seven days' notice, prior to the commencement of works within their council area, and be provided with the name and contact details for the person responsible for coordinating site works within their council area that are covered by this approval.

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29. Unless otherwise permitted, all over-dimensional vehicles operating between Cape Hardy and the mine site shall utilise the haul road contained within the infrastructure corridor, not public roads.

The following conditions apply during Operation of the Development

30. Operations on the sites shall be undertaken in accordance with all plans and details submitted as part of the Major Development Application, and where provided (and endorsed by the Minister for Planning where required) in accordance with conditions 16 – 29 as listed above.

31. The development and the sites shall be maintained in a serviceable condition and operated in an orderly and tidy manner at all times.

32. The proponent will be responsible for the maintenance and repair of the fence along the infrastructure corridor, unless otherwise agreed to in Individual Management Plans as negotiated with individual landowners.

33. A rehabilitation or decommissioning plan shall be developed to the satisfaction of the Minister for Planning, in consultation with the relevant councils, stakeholders and Government Agencies. The Plan should be prepared at, or before, the 20 year anniversary of operation, and include information related to:

    a. identifying assets to be rehabilitated, remediated, decommissioned and/or removed, along with those that are proposed to be retained and the proposed tenure and management arrangements;
    b. confirming responsibility for costs associated with rehabilitating, remediating, decommissioning and/or removing and retaining assets;
    c. handover arrangements for useable assets;
    d. responsibility for future management and maintenance of useable assets.

    The plan must outline measures, if required, to remove fuel and chemical storage and wastewater treatment facilities in accordance with relevant legislation and standards.

    Unless otherwise specifically provided for all costs shall be the responsibility of the proponent.

NOTES TO PROPONENT

1. Pursuant to Development Regulation 64, the proponent is advised that the Wudinna DC or the DC of Tumby Bay or private certifier conducting a Building Rules assessment must-

    (a) provide to the Minister a certification in the form set out in Schedule 12A of the Development Regulations 2008 in relation to the building works in question; and

    (b) to the extent that may be relevant and appropriate-

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(i) issue a Schedule of Essential Safety Provisions under Division 4 of Part 12; and

(ii) assign a classification of the building under these regulations; and

(iii) ensure that the appropriate levy has been paid under the *Construction Industry Training Fund 1993*.

Regulation 64 of the Development Regulations 2008 provides further information about the type and quantity of all Building Rules certification documentation for Major Developments required for referral to the Minister for Planning.

2. The DC of Wudinna/DC Tumby Bay or private certifier undertaking Building Rules assessments must ensure that the assessment and certification are consistent with this development authorisation (including any Conditions or Notes that apply in relation to this development authorisation).

3. The final design and layout of the long-term employee village, including the provision for all required infrastructure, shall be to the satisfaction of the Wudinna DC.

4. The following dot points shall be considered in the selection of the design/colour/materials/landscaping and open space provision in the long-term employee village at Wudinna.

- Incorporate landscaping at all road frontages and amongst the various structures within the village to soften the overall visual impact
- Develop the village as a logical extension to the Wudinna Township utilising consistent colours, materials, landscaping and street layout within a compact urban form.
- Undertake the establishment of the village in accordance with the objectives and principles of development control for temporary/transient populations (e.g. tourist accommodation) as outlined in the Wudinna DC Development Plan.

5. The Southern Right Whale Management and Monitoring Plan shall include the following:

a) A description of all threats to the Southern Right Whale arising from port construction, operation and decommissioning activities (including appropriate mapping).

b) A plan to monitor whale habitat use and behaviour, using appropriate survey techniques for mapping potential threats to whales arising from Port construction and operation activities.

c) Mitigation measures to manage the impact of Port construction and operation (including shipping), especially underwater noise caused by the Port and vessels and the risk of vessel strike.

d) Consideration and management of cumulative impacts arising from Port construction and operational activities.

e) Management of noise impacts, such that underwater noise does not exceed 183 dB re 1µPa2.s. The Plan should identify all sources of underwater noise that would be produced and measures to minimise these.

f) During construction, marine piling and blasting activities should minimise the risk of physical impacts, including temporary threshold shift to whales (i.e. reversible hearing loss). These must include:

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Pre-start up visual observations

- Visual observations for whales undertaken to the extent of the marine piling/blasting observation zone (i.e. up to 1,500 metres) by a suitably trained crew member for at least 30 minutes before the commencement of marine piling/blasting.

Operating procedures

- Visual observations of the observation zone.
- Exclusion zones must be implemented so as to ensure that whales are not exposed to Sound Exposure Levels (SEL) of greater than or equal to 183 dB re 1µPa2.s and be no less than a 1250 metre horizontal radius for whales, unless a lesser exclusion zone has been determined from noise monitoring of piling or blasting and has a SEL equal to or below 183 dB re 1µPa2.s.
- If whales are sighted within the relevant exclusion zone, action to cease all piling/blasting within the relevant exclusion zone should be taken within two minutes of the sighting or as soon as possible if it is unsafe to cease piling/blasting within two minutes. If piling/blasting does not cease within two minutes the person undertaking the action must report the incident to the Commonwealth Minister for the Environment and Energy in writing within one business day.
- Piling/blasting activities must not recommence until any whales that were observed in the exclusion zone are observed to move outside the exclusion zone or 30 minutes have passed since the last sighting.
- Soft start procedures: Piling activities must be initiated at the soft start level and then build up to full operating impact force. The soft start procedures should only commence if no whales have been sighted in the exclusion zone during pre-start-up visual observations.
- No marine piling operations should occur between the hours of sunset and sunrise during the peak southern migration of mother and calf whale pods (defined as April to November in any year).
- Marine piling commenced prior to sunset or prior to a period of low visibility (i.e. inability to see for a distance of 500 metres or more due to fog, rain, sea spray or smoke) can continue between the hours of sunset and sunrise, unless marine pile driving is suspended for more than 15 minutes.
- Post blast inspection procedures for any injured whales, including management of injured whales.
- Reporting within one business day to the Federal Minister for the Environment and Energy when injury, or mortality of, a whale occurs.
- Contingency measures should blasting result in injury to, or mortality of, fauna.
- Measures that prohibit night time blasting during the peak migration of Southern Right Whales.

Monitoring shall be undertaken by a suitably qualified Marine Fauna Observer who is trained in the identification of key marine species/fauna behaviour and communication procedures.

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To complement the Plan, an Oil Spill Contingency Plan shall also be prepared and implemented that addresses strategies to address any potential impacts on whales.

6. The proponent's CEMP and OEMP should be prepared taking into consideration, and with explicit reference to, relevant EPA policies and guideline documents, including, but not limited to: the *Environment Protection (Air Quality) Policy 2016*, the *Environment Protection (Noise) Policy 2007*, the *Environment Protection (Water Quality) Policy 2015*, the *National Environment Protection Measures (Assessment of Site Contamination)1999*, the EPA Code of Practice for Materials Handling on Wharves 2007, EPA *Bunding and Spill Management Guidelines 2012*, EPA Handbooks for Pollution Avoidance and the EPA Stormwater Pollution Prevention Codes of Practice, in addition to other legislative requirements and Guidelines/Australian Standards requiring compliance.

   The CEMP and OEMP shall address the impacts of Southern Right Whales through the implementation of a Southern Right Whale Management and Monitoring Plan, prepared in consultation with the Australian Government Department of the Environment and Energy.

   The CEMP and OEMP shall include a Fire & Emergency Management Strategy that outlines the proposed fire and emergency management procedures, prepared in consultation with the Country Fire Service.

7. The following activities in relation to the components of the development hereby approved and/or requiring future approval will require licenses under the *Environment Protection Act 1993* (EP Act).

   - Bulk Shipping Facility: the conduct of facilities for bulk handling of agricultural crop products, rock, ores, minerals, petroleum products or chemicals to and from any wharf or wharf side facility (including sea-port grain terminals), being facilities handling or capable of handling these materials into or from vessels at a rate exceeding 100 tonnes per day. (triggers 7(1) Schedule 1, EP Act)

   - Petroleum Production, Storage or Processing Works or Facilities: The conduct of works or facilities at which petroleum products are stored in tanks with a total storage capacity exceeding 2,000 cubic metres. (Triggers 1(5)(a) Petroleum Storage Schedule 1 EP Act)

   - Concrete batching exceeding .5 cubic metres per production cycle (triggers 2(5) of Schedule 1 EP Act)

   - Railway construction activity (triggers 7(2) Schedule 1 EP Act)

   - Fuel Burning (if power generation triggers 5MW) (triggers 8(2)(a) Schedule 1 EP Act)

   - Chemical storage and warehousing facilities (triggers 1(1) Schedule 1 EP Act)

8. All works and activities must be undertaken in accordance with the General Environmental Duty as defined in Part 4, section 25(1) of the *Environment Protection Act 1993* (which requires that a person must not undertake any activity, which pollutes, or may pollute the environment; without taking all reasonable and practical measures to prevent or minimise harm to the environment), relevant Environment Protection Policies made under Part 5 of the Environment Protection Act 1993, the

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Australian and New Zealand Environment Conservation Council (ANZECC) Best Practice Guidelines for Waste Reception Facilities at Ports, Marinas and Boat Harbours in Australia and New Zealand and other relevant publications and guidelines.

9. Well construction permits (*Natural Resources Management Act 2004*) will be required for all wells installed as a part of the project.

10. Pursuant to the *Harbors and Navigation Act 1993*, the proponent will need to enter into a licence agreement with the Minister for Transport over adjacent and subjacent land on terms acceptable to the Minister prior to the commencement of construction. Such agreement will require completion of the works to the satisfaction of the Minister, at which time the responsibility and control of the area will be transferred so as to minimise the Minister's ongoing responsibilities. Under the *Harbors and Navigation Act 1993*, the proponent would also need to apply to the Minister for Transport to have the harbor defined (and gazetted) as a 'Port', including a Port Operating Agreement being negotiated between the port operator and the Minister. It is likely that Iron Road will be subject to the *Maritime Services (Access) Act 2000* allowing for third party access.

11. Prior to the use of the facility for shipping purposes, the Port will be required to be defined under the *Harbors and Navigation Act 1993* as a harbor and a port, and that the proponent (or port operator) will be required to enter into a port operating agreement with the Minister for Transport. The port may be a compulsory pilotage area. Pilotage of loaded Cape size vessels drafts greater than 16m) on outward journey will be compulsory.

12. Appropriate navigational aids shall be erected in appropriate locations, or existing navigation marks may need to be re-located, in consultation with DPTI, prior to commencement of operations at the new terminal.

13. To ensure safe navigation and efficient traffic management between ships calling at the port of Cape Hardy and the new bulk terminal, an approved Vessel Tracking System (VTS) system shall be put in place prior to commencement of operations at the new terminal.

14. In accordance with the National Heavy Vehicle Law (South Australia) Act 2013, the proponent will need to apply to the National Heavy Vehicle regulator for the use of Restricted Access Vehicles on public roads, where access for such vehicles is currently not available. This might include such things as construction equipment and vehicles carrying large indivisible construction materials. This might also include access for vehicles such as Road Trains or Performance Based Standards (PBS) vehicles to transport commodities to and from the Port as part of regular operations.

15. An important initial step, as outlined in the Heavy Vehicle Access Framework, is to have an assessment of the route undertaken by an Authorised Route Assessor, at the proponent's cost. This process will identify any upgrades required to make the route safe and suitable for the type of vehicle access requested. As part of the approval/s, the proponent will be required to prepare a list of final transport infrastructure improvement needs upon completion of a full route assessment. If this

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is necessary, the list should identify the scope, timing and estimated cost of the required improvements.

16. The proponent is reminded of its obligations under the *Aboriginal Heritage Act 1988* whereby any "clearance" work, which may require permission to disturb damage or destroy Aboriginal Sites, must be undertaken with the full authorisation of the Minister for Aboriginal Affairs and Reconciliation, according to Section 23 of the *Aboriginal Heritage Act 1988*.

17. The proponent, and all agents, employees and contractors, such as construction crews, must be conversant with the provisions of the *Aboriginal Heritage Act 1988*, particularly the requirement to immediately contact the Department of Aboriginal Affairs and Reconciliation in the event that archaeological items (especially skeletal material) are uncovered during earthmoving.

18. The proponent is reminded of its obligations under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999,* not to undertake any activity that could have a significant effect on any matter of National Environmental Significance, without the approval of the Federal Minister for the Environment and Energy.

19. As foreign vessels are allowed into port the proponent would need to consult with DPTI (Marine Operations) to address any requirements of the Department of Agriculture and Water Resources and Department of Immigration and Border Protection.

20. The wastewater treatment system shall be designed to ensure that the general obligations of the *Environment Protection (Water Quality) Policy 2016* are met, and to ensure that effluent does not overflow or escape from drains, pipes, sumps, tanks, storage/treatment basins into any watercourse, or into stormwater drains which do not drain into the effluent collection, treatment and disposal system, except where the effluent complies with criteria in the above Policy.

21. Approval for upgrading the electricity network capacity will be undertaken separately by ElectraNet. This is expected to include liaison with land holders to gain access to land for construction, operation and maintenance of the Yadnarie to Rail corridor.

22. The proponent shall establish a Community complaints register which includes appropriate contacts for Iron Road Limited and from which a record of complaints can be kept and audited, this may be in conjunction with the requirements of the Mining Lease.

23 The rail line shall be subject to the *Railways (Operations and Access) Act 1997*.

24. Should the proponent wish to vary the Major Development or any of the components of the Major Development, an application must be submitted, provided that the development application variation remains within the ambit of the Environmental Impact Statement and Assessment Report referred to in this development authorisation. If an application variation involves substantial changes to the proposal,

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pursuant to Section 47 of the *Development Act 1993*, the proponent may be required to prepare an amended Environmental Impact Statement for public inspection and purchase. An amended Assessment Report may also be required to assess any new issues not covered by the original Assessment Report and a decision made by the Governor pursuant to Section 48 of the *Development Act 1993*.

25. The Minister has a specific power to require testing, monitoring and auditing under Section 48C of the *Development Act 1993*.

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From: Wyatt, Sharon (DPTI)
To: Kleeman, Robert (DPTI)
Cc: Wood, Jeremy (DPTI); Ferguson, Karen (DPTI)
Subject: RE: Agency Response to IRD Response Document - IRD CEIP Mining Proposal Response Document
Date: Friday, 29 July 2016 2:46:12 PM
Attachments: FW Agency Response to IRD Response Document - IRD CEIP Mining Proposal Response Document.msg
image001.gif
image002.gif
image003.gif
image004.gif

Hi Rob

This is the only response I have received (via Jeremy) from DPTI transport.
I have added the comments, where I think they best fit, into the EIS agency comments table. As you can see, DPTI Transport did not provide any comment in relation the railway crossing at the proposed lease boundary (south east corner) as mentioned by DSD today & covered in issue 29 of the DSD table.

> Issue raised re MLP:
> The Impact/Risk Assessment Register (Appendix C MLP) does not include potential impact events that involve a train interaction with the public either on the proposed lease or adjacent to the proposed lease.
> Requirement: Provide a new impact event(s) analysis and propose any new outcomes and draft measurement criteria

Regards
Sharon

From: Kleeman, Robert (DPTI)
Sent: Friday, 29 July 2016 2:24 PM
To: Wyatt, Sharon (DPTI) 6(1) Personal affairs
Subject: FW: Agency Response to IRD Response Document - IRD CEIP Mining Proposal Response Document
Importance: High

Sharon,

Following the discussion with Andrew Q today can you pls send me the query which DPTI have raised with the MLP that we should also be checking in terms of the EIS component.

Regards
Robert

From: Wood, Jeremy (DPTI)
Sent: Friday, 22 July 2016 4:54 PM
To: Kleeman, Robert (DPTI) 6(1) Personal affairs ; Ferguson, Karen (DPTI) 6(1) Personal affairs Wyatt, Sharon (DPTI) 6(1) Personal affairs
Subject: FW: Agency Response to IRD Response Document - IRD CEIP Mining Proposal Response Document
Importance: High

For discussion

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Kind regards

Jeremy Wood
Team Leader - Major Development & Crown

From: Rozaklis, Lillia (DPTI)
Sent: Tuesday, 19 July 2016 12:38 PM
To: Wood, Jeremy (DPTI) 6(1) Personal affairs
Cc: Wilde, Mike (DPTI) 6(1) Personal affairs Hogben, Don (DPTI) 6(1) Personal affairs
Lawes, Phil (DPTI) 6(1) Personal affairs Loughron, Reece (DPTI) 6(1) Personal affairs
Subject: FW: Agency Response to IRD Response Document - IRD CEIP Mining Proposal Response Document
Importance: High

Hi Jeremy,

Please find attached comments from Planning and Transport Policy (P&TP) re the - : Agency Response to IRD Response Document - IRD CEIP Mining Proposal Response Document

The Agency Response to IRD Response Document was circulated to areas within "*Infrastructure and Services Planning*" and *"Programs and Concept Planning"* and comments received have been summarised below:

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The Proponent's draft of response to DPTI's key comments / requirements of the CAPE HARDY DEEP SEA PORT, INFRASTRUCTURE CORRIDOR AND EMPLOYEE VILLAGE have been received for comments. (Refer to Page 23 – 29).

From a road network planning and efficiency perspective, P&TP submit the following comments to the draft response by the Proponent:

- DPTI reiterates that the crossing of the Birdseye Highway should be grade separated, which is consistent with the recently formalised Railway Crossing Policy (refer https://www.adelaidemetro.com.au/content/download/391045/2084685/version/1/file/Railway-Crossing-Policy.pdf).

- The EIS report identifies that intersection upgrades are required for North Coast road / Port Neill access road, Port Neill Access Road / Lincoln Highway, Lincoln Highway / Balumbah-Kinnard Road, Birdseye Highway / Tod Highway and Tod Highway / Kimba Road intersections to allow for the required turning circle of module (transfer towers, sample station, dust extraction buildings, conveyors, shiploader etc) transportation of the oversize modules during the construction phase.

- In accordance with the current response document, it is now proposed that the OSOM & RAVs carrying process plant and building modules, including mining and materials handling equipment and infrastructure components and buildings, may be delivered to the mine site from the port, away from public roads and along the optimised MAR. It is noted that the intersection upgrades identified above are therefore no longer being pursued by the Proponent. The new details of the equipment transportation procedure should be discussed

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with DPTI prior to approval of the development in ensuring that the safety and efficiencies of the arterial network are not jeopardized.

- Prior to approval for the development, the infrastructure agreement regarding the provision of road and rail upgrades must be established between the Proponent and DPTI. The road infrastructure agreement will need to include identified road upgrades specifically:
    - Grade separation of Lincoln Highway;
    - Grade separation of Birdseye Highway.

Additional comments should be included under section 5. Transport (page 33) regarding the airports mentioned. There should be some further investigations completed in this area to ascertain the viability of undertaking FIFO operations for Iron Road:

- The viability of utilising the non-commercial airports listed for FIFO operations needs further investigation. Aerodrome requirements will need to meet the proposed aircraft specifications and upgrades may be required to existing aerodrome infrastructure.

Kind regards,

Lillia Rozaklis
Senior Advisor, Heavy Vehicle Access
Planning and Transport Policy
Department of Planning, Transport and Infrastructure
6(1) Personal affairs
Level 7, 77 Grenfell Street Adelaide SA 5000 • GPO Box 1533 Adelaide SA 5001 • DX 171 •
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Sent: Thursday, 7 July 2016 3:29 PM
To: Pryde, Kym (EPA) 6(1) Personal affairs Hazell, Phil (EPA) 6(1) Personal affairs Loughron, Reece (DPTI) 6(1) Personal affairs Schutz, Adam (DEWNR) 6(1) Personal affairs Huppatz, Tony (DEWNR) 6(1) Personal affairs Hancock, Dale (DSD-AAR) 6(1) Personal affairs Lewis, Dave (PIRSA) 6(1) Personal affairs Russo, Anna (DSD-AAR) 6(1) Personal affairs Houston, Peter (PIRSA) 6(1) Personal affairs Crimes, Angela (DEWNR) 6(1) Personal affairs Morias, George (DPTI) 6(1) Personal affairs Rozaklis, Lillia (DPTI) 6(1) Personal affairs Davy, Jodi (Renewal SA) 6(1) Personal affairs
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Subject: Agency Response to IRD Response Document - IRD CEIP Mining Proposal Response Document
Importance: High

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To: Major Development Co-ordinators,

Please find attached a copy of the proponent's draft Response Document for comment on the Major Development components of the project.

A Government Referral Template (Word format) is also attached to assist you with your comments. The template builds on the comments provided by each agency and for ease is populated with the proponent's response rec 30/6/16.

If there are any critical issues that have not been adequately addressed, please notify us asap.

Summary of Central Eyre Iron Project

-

The CEIP is a mining project centred on a large magnetite deposit at Warramboo, 25 km south of Wudinna on central Eyre Peninsula.

Iron Road has made applications to government for:

A mining lease under the Mining Act 1971 for

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-

Scope of this Referral

- This referral relates to the Response Document for the **Major Development Proposal only** (A referral for the MPL Response document has been sent separately by DSD to relevant agencies)
- The referral seeks agency input into the assessment of the Government Issues Table (IRD Response Document Attachment B)

-

Out of Scope

- Response document – Attachment A – Public Submission responses.
- DPTI and DSD will first assess IRD's response to the Public submissions. If required, we will seek technical/expert assistance from relevant agencies in relation to Public submissions at a later date through a separate referral.

-

The closing date for comments is (2 Weeks) 19th July 2016. As discussed at the meeting on 5/7/2016, if this due date is not able to be met, please contact DPTI to arrange an alternative due date.

For any enquiries, please contact Robert Kleeman or Jeremy Wood.

Your assistance in this matter is much appreciated.

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Kind regards

Jeremy Wood
Team Leader - Major Development & Crown
Investment Management | Development Division
Department of Planning, Transport and Infrastructure
6(1) Personal affairs
Roma Mitchell House 136 North Terrace Adelaide SA 5000 • GPO Box 1815 Adelaide SA 5001 • DX 171
• www.dpti.sa.gov.au

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To: Kleeman, Robert (DPTI); Ferguson, Karen (DPTI); Wyatt, Sharon (DPTI)
Subject: FW: Agency Response to IRD Response Document - IRD CEIP Mining Proposal Response Document
Date: Friday, 22 July 2016 4:53:40 PM
Attachments: Iron Road Limited - CEIP EIS Response Document - 30 June 2016.pdf
DOCS_AND_FILES-#10602931-v2-Response_Document_Adequacy_Check_-_consolidated_Government_comments_on_the_EIS_for_Cape_Hardy_Sea_Port_-_IRD_July_2016.doc
image001.gif
image002.gif
image003.gif
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Importance: High

For discussion

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Team Leader - Major Development & Crown

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Jeremy Wood
Team Leader - Major Development & Crown
Investment Management | Development Division
Department of Planning, Transport and Infrastructure
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COMBINED SA GOVT COMMENTS – IRD Cape Hardy EIS

CAPE HARDY DEEP SEA PORT, INFRASTRUCTURE CORRIDOR AND EMPLOYEE VILLAGE – AGENCY REVIEW OF IRON ROAD LTD'S RESPONSE DOCUMENT RELEASED 30/6/16

EPA Comments

EPA comment #	Guideline reference	Chapter of EIS	Issue	Specialist	Key Comments and suggested response/solution	Category	Iron Road's Response (30/6/16)	Agency comment on adequacy of Response Document. If not adequate, state why and specify what is required for an adequate response from IRD or can the issue be dealt with as a condition
4.1 Planning and environmental legislation and policies								
1	4.1.4	24.2.3	General	All	The EPA notes that noise has been considered in the draft Construction Environmental Management Plan (CEMP) but air quality and noise are not referenced in Section 24.2.3 of the EIS. The EPA considers that an air quality and a noise management strategy should be included in the CEMP and Operational Environmental Management Plan (OEMP). Such a requirement could form part of a condition of approval.	A	Noted. Iron Road will ensure that it provides air quality and noise management strategies in both the CEMP and the OEMP.	
4.3 Environmental Issues								
Coastal and Marine								
2.1	4.3.1	Section 14	Marine	SG	While Iron Road Ltd (IR) has undertaken a multi criteria analysis to choose the site with the most appropriate combination of factors, the proposed site will still result in a significant amount of benthic habitat loss. The EIS states that there will be a potential loss of 17 ha of seagrass. IR have not shown on a map the areas considered to be potentially impacted but state that the seagrass density is sparse (<5 % density). The EPA has interrogated the map provided and suggests that this is actually 5-15% in density while there is also an area of medium cover that is likely to be impacted (Fig 14-3). The same section suggests that almost 250 ha of macroalgal rocky reef will be potentially impacted. This is a significant area of habitat loss which will only be off-set to some extent by creation of new habitat with the dumping of rock for the Module Off-loading Facility (MOF).	A	The assessment undertaken has been conservative as detailed in Chapter 14.5 and summarised in Table 14-5. Examples of conservatism in the assessment include: • An entire calculation of 'Potential Disturbance' where clearance is not anticipated but minor and/or temporary impacts may be experienced • Total clearance areas assumed in areas where it is known that this will not be the case e.g. under the jetty • Areas are independent of seagrass density i.e. a <5% coverage is given equal weighting to >50% coverage in terms of SEB	
2.2					IR has undertaken adequate surveys but does not propose to quantify the amount of habitat lost or impacted due to the development. IR have proposed Native Vegetation Clearance for this loss and have mentioned significant environmental benefit (SEB) offsets for the loss. Refer to EPA comment 12.1 for more comments about this issue.	B	An area of 241.2 ha of rocky reef has been quantified as potentially disturbed in a total of 246.79 ha. A total of 2.66 ha is proposed to be directly cleared which is 5.4% of the rocky reef in the study area and a tiny fraction of the rocky reef in the local or regional area and this does not qualify as "a significant area" in this context.	
2.3					The EIS is vague in relation to the method of construction for the MOF. This is not covered in the Construction Environmental Management Plan (CEMP) but the construction method will need to minimise impacts on benthic habitats. It should also be noted that running heavy machinery through the intertidal and subtidal habitats is not seen as best practice.	A	The next phase will require an SEB and Iron Road will work with the appropriate government agencies and other key stakeholders to propose a fair and reasonable off-set.	
2.4					The EIS states that there will be permanent changes to the	A	Please refer to EIS Appendix R: Cape Hardy Coastal Modelling, which includes a total of 85	

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2.5					sedimentation and hydrodynamics of the marine environment due to the construction of the MOF and jetty. These changes include a change of "less than 1% around the MOF". However, it is unclear where the boundaries to this statement have been considered and whether they include the bay directly to the west of the MOF as the changes to the sedimentation in this region appear more significant than 1% based on the two figures supplied. More detail is needed explaining these changes, particularly to the sedimentation of the bay located directly west of the MOF and an assessment of the annual changes to the sedimentation. The EIS states that the seagrasses in this area should be able to naturally accrete this increase in sediment but has not outlined the location of the habitats impacted. There has also been no consideration given to impacts on the macroalgal reef habitats, particularly as they are far more susceptible to sedimentation. The EPA considers the permanent changes to adjacent habitats warrants a low to medium risk rating and monitoring to assess changes. These issues should be addressed in the Response document. EIS still mistakenly states that common dolphins have higher metal levels probably due to their coastal habitat and prey. However, this should be 'bottlenose dolphins', not 'common dolphins'.	C	figures, including five figures on sedimentation and 16 figures on bed shear stress, demonstrating the very low impacts that would occur. It is incorrect to state that "There has also been no consideration given to impacts on the macroalgal reef habitats" as an SEB has been proposed for this potential impact on a conservative basis. A change to the risk rating in this case would not alter the proposed management actions given the conclusions of the comprehensive impact assessment. The comment in relation to dolphins has been noted.	
3	4.3.6	Section 14	Marine Air Quality	SG	There is very little likelihood of marine ecological impact from iron dust but there may be aesthetic impacts, however there are very few human 'sensitive receivers' nearby. The EPA considers that the dust mitigation from the overall proposal is of a high standard and therefore acceptable.	A	Noted.	
4	4.3.7	Section 14	Marine	SG, TI	Although there are currently no active aquaculture licences in the Port Neill Aquaculture Zone, the proposed development must not inhibit future potential development of aquaculture in this area from an access or environmental perspective. There does not appear to be any significant issues that may impact aquaculture development in the Port Neill aquaculture zone. However, the EIS only addresses impacts to aquaculture associated with access and not water pollution. The latter issue should be addressed in the Response document.	A	There is no scenario envisaged whereby there would be impacts to potential future aquaculture developments, be it air or water quality. The development of Cape hardy opens up future opportunities for the aquaculture industry given the land and waterside infrastructure that will be available for potential third party use	
5	4.3.8	Section 14	Marine	SG	The invasive marine species (IMS) monitoring proposed should be consistent with BiosecuritySA or federal monitoring programs so that it dove tails into existing programs and the information is publicly available.	A	Agreed. Iron will ensure that monitoring of IMS is consistent with both SA and Commonwealth biosecurity programs.	
6	4.3.9	Appendix Q	Marine	SG	Appendix Q states that in areas of deeper water the sediment becomes increasingly fine, and is expected to be more easily suspended in the water column. Propeller wash and vessel scour from tug movements during operation are expected to have medium impacts on the nearshore. This increases the	A	As discussed in the EIS and in previous responses, the next phase of work will require a detailed SEB requiring additional government approval. Iron road will propose a fair and reasonable off-set that will, as a minimum,	

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					likelihood of impacts to the additional 14 ha of seagrass and 240 ha of macroalgal reef that was highlighted as potentially impacted due to operation of the facility. Given IR are not proposing to monitor the loss of habitats in the region, the significant environment benefit (SEB) of the full extent of potentially impacted habitats (including reef – Table 14-5) should be committed proportional to the 'ecosystem services' to be lost, rather than default value of rehabilitation based on terrestrial vegetation. This should be defined in consultation with DEWNR and EPA (refer EPA comment 12.1 also).		comply with the intent of the Native Vegetation Act and associated Guidelines.	
7	4.3.10	14, App Q	Marine	SG	Section 4.1 in Appendix Q describes the "< 1% change in sedimentation" and suggests that the seagrass community can naturally accrete this extra sediment. There has been no discussion with respect to impacts on macroalgal rocky reefs which are known to be more vulnerable to sedimentation. This should be an issue dealt with by DEWNR but could be addressed through monitoring the impact before and after construction. However, due to the location and design of the Module Off-loading Facility it will be very difficult to mitigate impacts.	B		
Geology and Soils								
Water Supply								
8.1	4.3.33	Section 15, 16	Stormwater Groundwater	TC	Groundwater is considered suitable for stock up to salinity of 13,000 mg/L, not 5,000mg/L as stated in page 3-13. This requires a minor edit.	C	ANZECC Guidelines state that for sheep (most salt tolerant livestock listed0 the following salinity limits apply to drinking water: <5,000 mg/L TEDS: No adverse effects on animals are expected. 5,000 – 10,000 mg/L TDS: Animals may have initial reluctance to drink or there may be some scouring, but stock should adapt without loss of production. 10,000 – 13,000 mg/L TDS: loss or production and a decline in animal condition and health would be expected. On the Eyre Peninsula where alternative stock water sources (SA – Water reticulated supply) is available, 5,000 mg/L is a realistic limit for water 'generally considered unsuitable for stock' as stated in the introductory paragraph of the EIS. The technical Appendix U applies the most conservative limit on water suitable for livestock use of <13,000 mg/L TDS. Nonetheless, the quality of groundwater impacted by mining	

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							exceeds both limits and does not change the outcome of the assessment.	
8.2					A spring fed creek is briefly discussed on page 19-12 and is identified as a key environmental value. Despite this being a 'key environmental value' this spring fed creek is not discussed in the groundwater chapter (Chapter 16), nor is it considered in the risk assessments (if appropriate). This should be rectified.	B	The reference to the spring fed creek being a key environmental value is incorrect as the saline groundwater discharge (baseflow) to drainage lines in this landscape is typical. No significant impacts on this regime are expected therefore a formal risk assessment is not appropriate.	
8.3					Section 16.3.3 on page 16-7 discusses the Quaternary Aquifers. The EIS states the tertiary clay provides a 'barrier'. This is incorrect. The correct statement should include words to the effect that the tertiary clay ensures a low degree of connectivity between the two aquifers.	C	Noted. This does not alter the proposed management actions.	
8.4					Section 16.3.4 on page 16-11 discusses 'ecosystems dependent on the subsurface presence of groundwater' however it is unclear if the area around the rail unloading facility has been considered in the assessment. This should be made clear.	B	The rail unloading facility at the proposed port site has been considered in the assessment outlined in Chapter 16.3.4 of the EIS. No significant impacts on this regime are expected therefore a formal risk assessment is not appropriate.	
8.5					Monitoring for groundwater quality is not detailed in the Construction Environmental Management Plan (Table 3-6) or Operational Environmental Management Plan (Table 2-6). Further detail on this is required, ideally in IR's Response document. However, this could form part of a condition of approval.	A	Details around the monitoring for groundwater quality will be included in the CEMP and OEMP in due course. It is too early in the design process for Iron Road to commit to firm details in this Response Document. This level of detail is not required at this stage in any primary regulatory approval process.	
8.7					Groundwater dependent ecosystems (e.g. springs/soaks and downstream watercourses) should be listed as an environmental value in the OEMP (App BB, s.2.3.2, page 9).	A	Agreed. Section 2.3.3 of the OEMP may now be read to include 'groundwater dependent ecosystems' as an environmental value.	
Air Quality and Noise								
9	4.3.39	Section 12	Noise	MB, JS	The EIS shows that Scenario 2 (Table 12-12, p.p.12-20 & 12-21) would comply with the Environment Protection (Noise) Policy 2007 in relation to construction noise and that, with the right management of construction activities, compliance is possible.	A	Noted.	
10	4.3.40	Section 12	Noise	JS	The rail noise section in the EIS are comprehensive. The predicted noise levels used within the model have been confirmed and found to be reasonable. As long as suitable regular maintenance is undertaken to ensure that the rail activity does not produce annoying noise characteristics, rail noise levels should be able to meet the noise criteria contained	A	Noted. Rail maintenance will form a significant component of future contractual obligations of any rail operator.	

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					in the EPA's Rail Noise Guidelines.			
11.1	4. 3.41	Section 10	Air Quality	DL, PS,	The EPA notes that there is a commitment by IR to undertake moisture monitoring, the application of water through spray systems and the use of veneering agents if required. However, when such measures would be undertaken is not detailed. The EPA considers this should form part of the CEMP and OEMP and should be addressed in the Response document.	A	Moisture monitoring, the application of water through spray systems and the use of veneering agents will all be included in the CEMP and OEMP in due course and it is too early in the design process for Iron Road to commit to such details in the EIS Response Document. This level of detail is not required at this stage of the regulatory approval process.	
11.2					Table 10-8 and 10-9 (page 10-14) present a series of emission rate numbers without any detail on how they were derived or a reference. The EPA asks for this to be clarified in the Response document.	B	The reference is Appendix J of the EIS "CEIP Air Quality Impact Assessment – infrastructure" by Jacobs, Section 3.2.2, Tables 3-8, in particular the footnotes. The National Pollutant Inventory (NPI) Emissions Estimation Technique Manual (EETM) is a government produced document and one of the primary references used by governments and industry experts.	
11.3					There has been no decision in South Australia regarding sulphur levels in shipping fuel. Despite this, the EPA still questions what fuel quality is being considered in the Table 10-11 that derives an SO_2 level of 0.0111kg/kWhr, and whether it is likely to be a realistic emission rate. The EPA notes this factor is taken from the NPI Emission Estimation Technique Manual, but that appears to be based on US EPA data. The EPA would like IR to confirm what sulphur in fuel level is this based on, and is that realistic for this project?	B	It is not possible to ascertain the sulphur levels in shipping fuels at this stage of the project given this contract will be tendered following project approvals and funding. The sulphur levels in fuel of any future shipping contractor will also change over time as fuels globally improve, thus an estimate has been calculated based on the only reference available i.e. the NPI EETM. Iron Road and its expert air quality consultants requested other known data sources of references from the SA Government and the broader industry but no alternatives were forthcoming. The outcomes of the emission estimation assessment based on the best data available demonstrate that the emissions will be very low (almost 20 times lower than similar projects in Sydney) and are thus predicted to cause no impacts (Appendix J: CEIP Air Quality Impact Assessment – Infrastructure, Section 3.3.5.1)	
11.4					The EPA has concerns about off-site monitoring and that without someone with the authority on-site at all times, there may be times when a serious dust event is occurring and no-one can call for a cessation to the cause. The EPA would like	A		

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					to see a commitment by IR to having someone with the authority on-site (or otherwise available on-call) at all times.			
11.5					The monitoring section in Table 10-15 states that the purpose of the monitoring program is to confirm compliance with air quality criteria, and that it is proposed that monitoring be undertaken to allow for the implementation and/or application of reactive mitigation if leading indicators are exceeded. The EPA considers that a period of monitoring 'beyond compliance' checking should be confirmed by IR. Any amendments or updates to the proposed monitoring program should be undertaken in consultation with the EPA. This could form a condition of approval (refer to EPA comment 13 also).	A	Iron road will continue to liaise with the EPA in relation to its dust monitoring program of air quality criteria, including consultation in relation to any amendments or updates, as part of the CEMP and OEMP implementation phases.	
Management and Monitoring								
12.1	4.3.42	Section 14; Appendix AA	Marine	SG	The native vegetation clearance offset Significant Environmental Benefit (SEB) through the Native Vegetation Council is typically inadequate for marine rehabilitation (see EPA comment 6), however this is an issue with the Significant Environmental Benefit, not IR's application of it. The EIS does state that proposals are being considered with Eyre Peninsula Natural Resources Management Board and Nature Foundation but there is no commitment and no statements about whether they will cover the extent of the direct clearance or the potential disturbance. As outlined in EPA comment 6, in lieu of habitat monitoring to assess area impacted, the full disturbance area should be used for both seagrass and reef.	B	Please to EPA comment 36 above.	
12.2					The Construction Environmental Management Plan (CEMP) does have various strategies for minimisation of impacts. However, some aspects do not have detail on methods for monitoring or frequency, hold and alarm criteria etc., particularly for turbidity monitoring.	A	This level of detail will be included in the CEMP where appropriate.	
12.3					Piling marine animal observer monitoring needs to be consistent between table 14-8 and page 14-41, particularly as there are differences between noise monitoring protocols between piling and Module Off-loading Facility (MOF) within table 14-8.		Noted. This will be addressed in the finalf CEMP.	
12.4					The final CEMP should have a high level of detail (hold and alarm criteria, frequency and location of sampling) and should be prepared to the reasonable satisfaction of the Minister for Planning in consultation with the EPA (and BiosecuritySA for invasive marine species) prior to construction commencing. This could form a condition of approval (refer to EPA comment 19.2 also).		Noted.	

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13	4.3.45	Section 10	Air Quality	DL, PS	The monitoring section in Table 10-15 states that the purpose of the monitoring program is to confirm compliance with air quality criteria for the project, and that monitoring would be undertaken to allow for the implementation and/or application of reactive mitigation if leading indicators are exceeded. The EPA considers that a period of monitoring beyond compliance checking should be confirmed by IR. Any amendments or updates to the proposed monitoring program should be undertaken in consultation with the EPA. This could form a condition of approval.	A	Iron Road will continue to liaise with the EPA in relation to its dust monitoring program for air quality criteria, including consultation in relation to any amendments or updates, as part of the CEMP and OEMP implementation phases.	
4.5 Transport and Access								
Risk/Hazard Management								
14	4.7.2	Section 17	Site contamination	Tn Coll	The EIS provides a basic site history to identify potential sources of site contamination within the areas of the proposed Central Eyre Iron Project (CEIP) infrastructure. Whilst the presence of existing site contamination has not been confirmed anywhere within the areas of the proposed CEIP infrastructure (as no intrusive investigations have been undertaken), a number of potential sources (not exclusively associated with agricultural practices) have been identified within the port site and the long-term employee village. The likelihood of disturbing existing site contamination was assessed as rare, however there is no associated assessment of the most likely locations of potential site contamination with regards to areas of the port site and long-term employee village subject to soil disturbance and stripping. The EIS also indicates that the consequences of encountering site contamination will be moderate and able to be remediated in the long-term. However, no information is provided to indicate how site contamination would be identified for subsequent remediation (given that most site contamination will not have any visual or olfactory impacts), or the risk to on-site workers from encountering site contamination during construction and operations. The EPA considers that further information/assessment is required to justify the conclusion that no control measures are required for the management of any existing site contamination.	A	Control and management strategies for potential contaminated land are listed in Table 17-5 of the EIS. As with any construction project of this nature, more detailed geotechnical site investigations would be required prior to any construction taking place on either site. As part of this future data gathering, an expert contamination consultant will be engaged to ensure appropriate ASS data is gathered, however the results of the site history investigation and many hours of walking the site and talking to stakeholders have concluded the risk is low. Should data indicate otherwise, a Preliminary Site Investigation may be initiated followed by a Detailed Site Investigation and a Remediation Action Plan as per standard industry practice.	
15.1 15.2	4.7.3	Section 17, Appendix AA	Site contamination	Tn Coll	The EPA considers that management measures for site contamination should be reviewed once further information/assessment has been documented to justify/re-assess the associated risks (see EPA comment 14). A reference to the need for notification under S83A of the *Environment Protection Act 1993* should be specifically included as part of the reporting requirements for accidental releases from chemical/hydrocarbon storage (where appropriate).	A	Noted. Please see response to comment #14 above. Noted.	

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16	4.7.4	Appendix AA	Marine	GH	MD-C8 & SL_011 refers to "National Maritime Oil Spill Contingency Management Plan 2011". This should be the "National Plan for Maritime Environmental Emergencies".	C	Noted.	
17	4.7.7		Marine Stormwater	TC	There is no detail in the EIS about the location and size of the stormwater sedimentation basins. Sedimentation basins need to be sized appropriately to ensure they have the capacity to capture all runoff from the Cape Hardy site. In addition, they should not be constructed within 500m of the high water mark. The Response document should confirm the size and location of stormwater sedimentation basins.	A	Details of the stormwater sedimentation basin, including the broader principles of management, are contained in Section 4.3.3 with the location and dimensions shown on Figure 4-19. The basin is designed to capture run-off from stormwater that has come in to contact with laydown areas and stockpiles, not the entire, mostly undisturbed site. The proposal is for a sedimentation basin, not a waste water treatment pond. Waste water treatment ponds are subject to draft guidelines recommending that these facilities are not constructed within 500 m of the high water mark, not sedimentation basins.	
4.12 Effects on Infrastructure Requirements								
18	4.12.1	15.4.3	Wastewater	KP	Section 15.4.3 of the EIS refers to wastewater being directed to the DC Wudinna Community Wastewater Management Scheme. However, there is no detail on the existing capacity of the scheme to take this wastewater or if an upgrade is required. This should be clearly addressed in the Response document.	A	All details relating to the proposed long term employee village at Wudinna, including wastewater, will be discussed in detail with Wudinna DC in due course. As noted in the EIS, Iron Road will support the preparation of a Structure Plan by Wudinna DC and will collaborate with both the DC and SA Government to facilitate planning for the new residential development. Any upgrades to infrastructure required as a result of the CEIP will be documented in a Management Agreement with Wudinna DC in due course.	
4.13 Construction and Operational Impacts								
19 19.1	4.13.1	Appendix AA	Air Quality Marine Noise Stormwater	All	The draft Construction Environmental Management Plan (CEMP) provides information regarding erosion and drainage management. However, it should be made clear if this information is applicable to both the Cape Hardy and Wudinna. Sedimentation basins are not mentioned in the CEMP and it is therefore assumed they will be constructed to only capture runoff post-construction. This is suitable provided sediment erosion is managed sufficiently in other ways. Sediment-laden runoff produced during the construction should not be allowed to reach the marine environment. The final CEMP should	A A	Information regarding erosion and drainage management will apply to both Cape Hardy and Wudinna and the CEMP will be amended to clearly reflect this. The final CEMP will address sediment erosion and provide management measures to ensure that any sediment-laden runoff that may be produced during construction will not reach the marine environment.	

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					address such requirements.			
19.2					With regards to addressing potential marine environmental impacts the proposed CEMP has very little technical information regarding locations, frequency and criteria to be tested against. The final CEMP should have a high level of detail (hold and alarm criteria, frequency and location of sampling) and should be prepared to the reasonable satisfaction of the Minister for Planning in consultation with EPA (and Biosecurity SA for Invasive Marine Species) prior to construction.	A	Noted.	
19.3					There are inconsistencies between the noise mitigation and control measures in 14: 40-41 and the statements in the CEMP (table 2-7). The CEMP should reflect the procedures on page 14-41. These procedures should also be consistent for the jetty piling and the construction of the tug berth/Module Offloading Facility or any significant marine noise generating activity. This inconsistency should be rectified.	A	Noted. The final CEMP will reflect the procedures set out on page 14-41 of the EIS and will be considered for the jetty piling and construction of the both the tug berth and MOF (or any other significant marine noise generating activity).	
20	4.13.6	5.3.2		GH	The EPA notes that section 5.3.2 of the EIS refers to the 'Environment Protection (Water Quality) Policy 1993'. This is a mistake which should have been the *Environment Protection (Water Quality) Policy 2003*. The proponent should also be aware that on 1 January 2016 the *Environment Protection (Water Quality) Policy 2015* will come in affect. Whilst the appropriate assessment tool for the IR EIS is *the Environment Protection (Water Quality) Policy 2003*, IR should be mindful that they will be required to ensure compliance with the *Environment Protection (Water Quality) Policy 2015* for construction and ongoing operations after 1 January 2016.	C	Changes to the relevant policies are noted and Iron Road will comply with the *Environment Protection (Water Quality) Policy 2015* for construction and ongoing operations.	

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DEWNR Comments

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Coast and Marine								
1	4.3.1 4.3.2 4.3.4	Section 4.3.2	Marine infrastructure design specs are inconsistent throughout document		Chapter 4.3.2 states the proposed causeway/land reclamation is to be 200m in length. However, Appendix R, the Jacobs 'Cape Hardy Coastal Modelling Report' bases their hydrodynamic modelling on a 350m long causeway. Chapter 4, Fig 4-26, also indicates that it is 350m long. Presumably earthworks quantities, intertidal habitat clearance considerations etc are based on Jacob's figure of 350m long causeway and that 350m if the final design proposal? Response/solution: Iron Road to confirm design specification inputs.	B	The confusion arises from the use of terms. The reference to 'causeway' in the Jacobs report includes the causeway and the MOF shown in Figure 4-26. Together, these add up to 350 m. It is more appropriate to refer to the whole reclaimed areas as the 'causeway' as used in the Jacobs report.	
2	4.3.1 4.3.2 4.3.4	Section 4.3.2	Marine Infrastructure design specifications are inconsistent throughout the document		The jetty and wharf length varies throughout the document. Chapter 4 describes them to be 900m and 400m long respectively. Whereas the Jacob's report (App R, 1.2) bases hydrodynamic modelling on a 600m jetty and 400m wharf. Response/solution: confirm design specifications align with modelling inputs.	B	This is a terminology issue. The Jacobs report is referring to the structure shown in pink in Figure 4-26 of the EIS. However the jetty length of 900 m, shown in this figure, also includes the causeway (and MOF).	
3	4.3.1 4.3.2 4.3.4	Section 14.5.5	Coastal access is not described in detail DEWNR is unable to assess as insufficient information has been provided		Chapter14.5.5 States that the impacts of restricting public access to the coastal reserve are discussed in Chapter 22. No information detailing the impacts of restricting public access are located in Chapter 22 Response/solution: Iron Road to address impacts of restricting public access.	B	Chapter 22.5.5 of the EIS discusses public access to Cowley's Beach which is located near the south eastern boundary of the proposed port site. Cowley's Beach may be accessed via Kiandra Road and will not be affected by the port development as recreational vehicles and campers would still be able to access the beach and informal camping grounds. The impacts to the public accessing the beach have been assessed as being negligible.	
Ecology								
4	4.3.19	Appendix P Table 5.5	Changes to species listings since first publication of report		Several of the threatened species listed in the report have changed conservation status over the course of the project. Hooded Plover are) under the EPBC Act. White –bellied Sea Eagle are no longer listed as Migratory Terrestrial (MT) under the EPBC Act. There are also references to these species and their rating in other locations of the documents Response Solution: Update documents to reflect current status of species.	A	Iron Road is aware of this and acknowledges that these changes have occurred. This is not unusual with the passage of time. The removal of the WBSE does not have any material impact to the outcomes of the project. The upgrading of the threatened status of the Hooded Plover is noted. Iron Road is aware of the EPBC status of the Hooded Plover and has acknowledged stakeholder interest in this species.	

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							Iron Road is aware of this and acknowledges that these changes have occurred. This is not unusual with the passage of time. The removal of the WBSE does not have any material impact to the outcomes of the project. The upgrading of the threatened status of the Hooded Plover is noted. Iron Road is aware of the EPBC status of the Hooded Plover and has acknowledged stakeholder interest in this species. It is noted that while some aspects of the EIS have not been updated (e.g. technical Appendices that were finalised earlier in the document preparation process), Hooded Plover records along the coast obtained from Birdlife Australia (following a census in 2015) are shown on Figure 13-10 and Figure 13-11 in the EIS (and are listed as EPBC rated). In addition Chapter 13 discusses the Hooded Plover (as EPBC Vulnerable) in the Port Fauna Section (13.3.3 page 13-52, Table 13-13), impacts to the Hooded Plover are addressed in Table 13-20, and this species is specifically addressed in control and management strategy F1_C7 (Table 13-23 of Section 13.6) due to its status. Changes to species listing were therefore included, and do not alter the outcomes of the risk/impact assessment undertaken for the project.	
5	4.3.19	Appendix Q	Changes to species listings since first publication of report		White – bellied Sea Eagle are classed as migratory in Appendix Q, they have since had this classification removed and are no longer considered migratory in Australia. Response/ Solution: Iron road to update documents to reflect current status of species.	A		
6	4.3.30	Through-out EIS	Scientific evidence of anthropogenic disturbance to Dutton River and Byres Bay Creek		There is a statement on p15.10 of the EIS that the 'Driver River is considered to be in poor ecological condition due to human disturbance resulting in increased salinity and acidity' which is based on an EPA report from field studies completed in 2010. The author then goes on the state that 'these conditions are echoed for Dutton River and Byres Bay Creek. It is acknowledged that these systems are likely degraded however there is no evidence provided to confirm that this is the case.	B	The comments about the Dutton River and Byres Bay Creek are anecdotal, based on site inspections, technical knowledge gained about the region (farming practices, groundwater depth) and the similarity between the creeks and rivers of the area. The developers and reviewers of the EIS have visited the region on numerous occasions and are familiar with the degraded condition of the local creeks within the study area (e.g. Plate 15-3). It is not unreasonable to assume that the same pressures which have degraded the Driver River are applicable to the Dutton River and Byres Bay Creek.	

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					Response/Solution: Iron Road to clarify source of information			
7		Section13.4.1	Hambidge Wilderness Protection Area infrastructure corridor buffer		DEWNR supports the 35m buffer and inclusion of a 10m wide maintenance track; acknowledging that DEWNR's preferred option of a 500m buffer is difficult to implement. It is understood that final confirmation of the location of the railway centreline and power transmission line will not be available until the design phase of the project. Response/solution:DEWNR requests the opportunity to review the location of infrastructure directly adjacent to Hambidge WPA.	B	Noted.	
8	4.13	Section 5.6.3	Objectives do not identify environment as something that should not be adversely impacted.		Objective 5.6.3 currently reads *"Ensure that human health and safety is not adversely affected"*. DEWNR strongly agrees with the objective and suggests that a complimentary objective be added to ensure that environment is not adversely affected. Response/ solution: DEWNR requests the opportunity to review the location of infrastructure in the corridor directly adjacent to Hambidge WPA	B	Iron Road acknowledges this omission. This comment refers to the Fire Risk section of the draft OEMP. Ecological values are noted in Chapter 5.6.2. It is therefore appropriate to amend the current objective to include ecological values. This will be done in the final OEMP.	
9	4.13	Appendix BB and Appendix AA	Further detail into activities that will support OEMP objective 5.6.4		DEWNR notes the inclusion of several management measures for example 5.6.4 BF_02 in the OEMP. Response/Solution: DEWNR requests the opportunity to review the final CEMP and OEMP	B		
10	4.7.8	Chapter 13	There is a risk of fire within Hambidge WPA as a result of operational rail activities.		The majority of Hambidge WPA burnt in the year 2000 resulting in the majority of the reserves Major Vegetation Sub-groups (MVS) being below the Threshold of Potential Concern 1 (TPC1) as described in DEWNR Fire Management Guidelines for Native Vegetation in SA. In the event of another fire occurring, long term negative impacts on the MVS are considered highly likely by DEWNR. Recent documented events have shown the impact a bushfire can have when a whole reserve is burnt in a single event, including the occurrence of local and State wide extinctions. Response/Solution: That the risk of fire and	A	Iron Road acknowledges that railway operations can, and have, started bushfires. Consequently, rail operations present a threat to the Hambidge WPA, however, with appropriate modern construction techniques and equipment, along with ongoing preventative measures, this threat is expected to be minimal. Ongoing preventative measures include removal of vegetation on or adjoining the track, monitoring of rail wheel condition, regular maintenance of locomotives and rolling stock, including exhausts and brakes and avoidance of 'hot works' (e.g. welding) on days of high fire danger. These measures will be described in more detail in the OEMP.	

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					the potential impacts on Hambidge WPA are acknowledged in the document.		A benefit of the infrastructure corridor is that it will act as a fire break between agricultural land and the Hambidge WPA. Furthermore, the train drivers will become valuable early spotters of fires as they travel the length of the corridor every two hours.	
11	4.3.12-4.3.17	Section 4.2.3 (Page 4-27)	Clearance in relation to the transmission line		This section states that in relation to transmission lines, only vegetation that infringes on the safety clearance areas under the transmission lines will be pruned or cleared. If trees will be subject to repeat and serve trimming or complete clearance, and this is likely to compromise their long term health, habitat value or viability, then such vegetation should be considered as part of the calculations for the SEB offset requirements. Response/solution: Further consideration of the impacts of pruning of vegetation under the transmission line. If it is assessed as potentially impacting the long term health of vegetation then it should be included in the determination of the SEB.	A	Chapter 13.6.1 of the EIS notes that clearance of vegetation requires approval from the Native Vegetation Council and an SEB offset. Iron Road acknowledges that pruning of vegetation may require an SEB in some circumstances and this will be taken into account when the SEB offset is fully developed.	
12	4.3.12-4.3.17	Section 13.2.1 (page 13-4)	Assessment of vegetation within the Infrastructure Corridor		This section states that not all patches of vegetation that will be impacted within the infrastructure corridor have been assessed on the ground. Rather, condition of the vegetation has been inferred from aerial imagery, associated records and the condition of nearby patches of vegetation. Assessments generally have not occurred due to lack of access to the sites. Once access has been obtained, will there be any on ground verification of the condition ratings that have been applied to the sites? Particularly in relation to the SEB offset ratios that have been applied? Equally, will there be any further surveys to identify any rare or threatened species that may be present in these sites? Response/solution: Once access is obtained to all areas requiring clearance, that verification of the condition of vegetation and the presence of rare or threatened species is undertaken. This will ensure the SEB requirements are determined to be accurate and appropriate for the scale of the proposal.	A	The methodology used by the expert ecologists to verify the condition of vegetation is set out on page 14 of Appendix O of the EIS "Infrastructure Corridor Ecology Assessment" by Jacobs. This included using the Native Vegetation Council's "Guidelines for a Native Vegetation Significant Environmental Benefit (SEB) Policy" developed for the clearance of native vegetation associated with the minerals and petroleum industry (DWLBC 2005). Patches of vegetation were given initial SEB ratings from 10:1 through to 2:1 based on the following principles: 10:1 Intact vegetation 8:1 Native vegetation with little disturbance 6:1 Native vegetation with some disturbance 4:1 Native vegetation with considerable disturbance 2:1 Weed-dominated with only scattered areas or patches of native vegetation. The methodology used to determine the presence of rare of threatened species is also outlined in Appendix O – see pages 10-12.	

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13	4.3.12-4.3.17	Section 13.6.1 (page 13-83)	SEB Offset options		This section outlines the options being considered for SEB offsetting. Whilst the options identified within this section is largely supported as a means of providing an SEB offset, the following options are not supported; Contributing to local weed and pest control activities, Monitoring, research, weed and pest management inputs to regions. An SEB should generally be an area of land that is protected and managed for the establishment and growth of native vegetation. Activities such as monitoring, research and weed and pest control by themselves, will not ensure an improvement in vegetation condition and/or extent and therefore will not offset the loss of vegetation from the clearance activities. Additionally, weed and pest control activities are generally a legislative requirement under the NRM Act and therefore this is unlikely to meet the requirements of additionality. It should also be noted, that regardless of the option chosen to provide the SEB offset, it must be located within the same region as the impact. The region is taken as being the NRM Region. Response/solution: SEB offset options are further developed to ensure they will effectively offset the impacts on native vegetation and ensure the offset will be delivered in the Eyre Peninsula NRM Region.	A	It is noted that DEWNR do not support some of the potential options suggested. Iron Road will develop SEB offset options via the standard process and submit a Native Vegetation Management Plan for approval. Iron Road has commenced preliminary discussions with the Native Vegetation Biodiversity Unit (DEWNR) and the NRM Region and will submit a Native Vegetation Clearance Application to the Native Vegetation Council when all the information is available (e.g. regarding final clearance areas and condition of clearance areas). Iron Road has a number of options for such SEB offset. There is great potential for a combination of options to be utilised that will benefit the Eyre Peninsula NRM region and offset impacts that will occur as part of the project. It is incorrect, however, to say that weed and pest control cannot result in an improvement in vegetation condition and/or extent. DEWNR spends a considerable, although arguably inadequate, sum of money on weed control in its parks every year for conservation purposes. Furthermore, the requirement under the NRM Act to control pest plants and animals, beyond a general duty of care, only extends to declared plants and animals. Consequently, additionality may still be achieved through a more comprehensive weed control program. As noted above, Iron Road will continue to discuss the SEB with DEWNR.	
14	4.3.4-4.3.7	Section 11.1.2	Inclusion of South Australia's Climate Change Strategy		The EIS was published prior to release of South Australia's Climate Change Strategy; however it would be of benefit to include a reference to it in documents that are still in draft format such as CEMP and OEMP. Response/solution: Iron Road to acknowledge the Climate Change Strategy in the CEMP and OEMP, and consider implementing actions that align with the strategy.	B	This will be noted in both the CEMP and OEMP as they are further developed.	
15	16.3.1	Chapter 15	Byrnes Bay Creek is not mentioned in the hydrology description in the		Hydrology resources in surface water and ground water chapters should be consistent. Response/solution: Include Byrnes Bay Creek in the hydrology description in the groundwater chapter.	C	Noted that Chapter 16.3.1 of the EIS should have also referred to Byrnes Bay Creek. This is contextual information and does not affect the groundwater assessment. As noted by DEWNR, the information is available in the Surface Water chapter.	

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			groundwater chapter but is mentioned in the surface water chapter					
16	4.3.30	Chapter 15	Description of hydrological systems along the infrastructure corridor north of Cleve is required		Figure 15-2 shows the proposed transmission line crossing at least two creek catchments and drainage lines for example Yadnarie Creek and Sheoak Creek. These hydrological systems are not considered in terms of the infrastructure corridor north of Cleve and potential impacts associated with construction and operation. Baseline hydrology should be established for all areas within the infrastructure corridor. Response/Solution: Describe hydrological systems in the infrastructure corridor to the north of Cleve. As with other hydrological systems described in the EIS potential impacts as a result of construction should be addressed. It is recommended that site scale maps showing surface water features and the location of infrastructure are incorporated into the document.	B	Surface water along the power transmission spur was not described in any detail as the surface water values are low and the potential for impact is negligible. The power transmission line is described in Chapter 4.2.3 of the EIS. Poles will be approximately 350 m apart and each pole will have a concrete foundation pad of approximately 2 m^2. A disturbance footprint during construction is conservatively noted in Chapter 13.5.2 of the EIS as 30 m x 30 m. In most cases, minimal disturbance will be required as the site will already be cleared. As Iron Road will not be erecting poles within ephemeral watercourses the risk to surface water values is negligible. It is also noted that the EPA Aquatic Ecosystem Conditions Reports show aquatic ecosystems in the general vicinity of the transmission line spur are in poor to fair condition.	
17	4.3.30	Chapter 15 Section 15.3.2	Terminology used to describe regional hydrology requires clarification.		The EIS states that *"Rainfall predominantly occurs in the winter months…however major rainfall events can also occur in December, January and February during summer storms when in rare circumstances intense daily rainfall can occur."* Implying that while there can sometimes be large rainfall events in these months, it does not happen often and when rainfall does occur it is rarely intense. The RPS report states that *"Although rainfall predominantly occurs in the winter months, major rainfall events statistically occur in the months of December, January and February, when local summer storms are common, causing intense daily rainfalls."* This implies that, while winter months have the greater total volume of rainfall, large intense rainfall events mainly occur in summer months and that such events are common. Response/solution: Further information as to why the EIS does not align with the RPS report is to be provided.	B		

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18	4.3.32 4.3.33	Chapter 16 App U App V App AA	Chapter 16 Appendix U Appendix V Appendix AA		Details of the numerical modelling have been provided in Appendix V. However elements of the previously outlined issue was confirmed, as the model's boundary conditions are constrained by data availability (p 41 Appendix V). This situation has required assumptions to be made about aquifer boundaries, and assign arbitrary constant head boundaries (p 35). These assumptions may not reflect the aquifer's response to long-term pumping. If this is the case, drawdown curves would differ to what has been presented in Figure 16-5. Response/Solution: For noting no action	C		
19	4.3.30 4.3.33	Chapter 16 App U	Not all relevant groundwater supporting documents have been provided in the EIS		In section 1.1 of Appendix U, it has been stated that Appendix U should be read in conjunction with 3 other documents. Only one of the documents has been provided in the EIS submission (Appendix V). References GWS 2014b and GWS 2013 were not included in the final documentation. Response/solution: All groundwater reports specific to the project are provided to assist with determining impacts.	B	The following reports will be provided to DPTI on a strictly commercial in confidence basis. These reports are not authorised for publication or release outside of SA Government and do not form part of Iron Road's Response Document: E-F-66-RPT-0039 Construction Water Supply Field Investigation E-F-66-RPT-2002: Kielpa Groundwater Supply Model Sensitivity Analysis	
20	4.3.32	Chapter 16	The distance between the predicted drawdown impacts and Musgrave PWA is greater than 40 km.		DEWNR provided comment on this previously and requests further information. The drawdown contours presented in figure 16-6 is approximately 30 km from the PWA boundary, not 40 as stated in the text. Even considering the base case modelling scenario as per figure 9 of Appendix U, the 1m drawdown contour is within 40 km of the PWA boundary. Response/solution: Further clarification on this matter is requested.	B	Noted. Chapter 16, page 16-18 of the EIS, last sentence of paragraph 4 is corrected to read 30 km, not 40 km as currently stated. This error has no impact on achieving outcomes.	
21	4.3.30- 4.3.33	Chapter 16 Section 16.3.3	Referencing incorrect		GWS2014a is referenced for the description of Jurassic sediments in the Polda Trough; however no description is provided in GWS2014a. Response/ solution: Update referencing.	C	The correct reference for Jurassic Sediments is (DMITRE, Undated, *Polda Basin Petroleum and Geothermal Prospectivity Notes*). Downloaded 4/2/2014 from: http://petroleum.statedevelopment.sa.gov.au/prospectivity/polda_basin	
22	4.3.30- 4.3.33	Chapter 26 Section 16.3.3	No regional description provided for Tertiary sediments		No regional description was provided for the Tertiary sediments that extend regionally from the mine site to the Kielpa Borefield and to the Musgrave PWA. Response/solution: Provide regional	B	The western Eyre Peninsula is draped with Tertiary Sediments; the lower part of the Tertiary sediment, the Poelpena Formation is typically sandy and comprises a variably productive aquifer. These sediments thicken across the northern, fault bounded part of the Polda Trough, and the thick sandy facies form the target aquifer	

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					description, including a comment on the risk to connectivity between the borefield and the Musgrave PWA.		for the Kielpa groundwater supply. The Tertiary Sediment and the aquifer extend regionally from basement outcrop in the central Eyre Peninsula west, across the Polda Trough and across to the coast on the western Eyre Peninsula. Within the Musgrave PWA, the Tertiary aquifer is overlain by the fresh groundwater lenses utilised for agricultural and domestic supply. Tertiary clays separate the Tertiary aquifer from the overlying freshwater lenses. Groundwater flow in the Tertiary aquifer is interpreted to be in a westerly direction. Isolated areas exist where no Tertiary sediments have been mapped and these coincide with basement and topographic highs. Measured salinity in the Tertiary aquifer at the Kielpa borefield ranged from 24,600 mg/L TDS to 41,300 mg/L TDS. Regionally the Tertiary aquifer exhibits salinity generally exceeding 10,000 mg/L TDS east of the Musgrave PWA. A bore audit failed to identify any bores accessing the Tertiary aquifer within 10 km of the borefield and its radius of impact yielding non-saline water. Only one saline bore (18,000 mg/L TDS) was identified; however the bore is not in use. The salinity of the Tertiary aquifer within the Musgrave Prescribed Wells area is reported to range from 500 to 5,500 mg/L TDS (DFW, 2010 Musgrave PWA Groundwater Level and Salinity Status Report 2011-2012).	
23	4.4.30-4.3.33	Chapter 16 Section 16.3.3	Further information regarding hydrogeology of the Port.		No comment has been provided on the hydrogeology of the fractured rock aquifers at the port facility. Response/solution: To be addressed.	B	The following information is providing on the fractured rock aquifer at the port site: Basement Rock comprises Gneiss and Granitoids of the Lincoln Complex and there is little evidence of faulting to provide secondary permeability and hence aquifer transmissivity. Existing bores report yields less than 80 m^3/day (<1 L/s). The regional groundwater salinity is around that of seawater (35,000 mg/L TDS). One shallow "beach well" at the outlet of a minor creek 3 km south of the project yields water with reported salinity <5000 mg/L TDS. The Aboriginal Heritage Survey describes a "spring Fed Creek" to the south of the port site. Saline groundwater discharge (baseflow) to drainage lines in this landscape on the Eastern Eyre Peninsula is typical (refer Dutton, Driver,	

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							and other minor drainage lines). The above information does not change the outcomes of the impact assessment.	
24	4.3.30-4.3.33	Chapter 16 Section 16.5.2	Referencing not provided		Information regarding numerical modelling of the groundwater recovery is not in the reference cited. Response/ solution: Correct reference to be provided.	C	Noted. The correct reference is: Groundwater Science 2014c Kielpa Groundwater Supply Model Sensitivity Analysis (E-F-66-RPT-2002).	
25	4.3.30-4.3.33	Chapter 16 Section 16.5.3	Potential impact to Groundwater Dependent Ecosystem's (GDE's)		Potential impact to GDE's has not been addressed for the operation of the wells along the infrastructure corridor, during the construction phase. Response solution: A process is established to GDE's during operation	B	GDE's identified near construction water supply wells are limited to the Driver River near well IC5. Impacts on this river have been considered and presented in Chapter 16.5.3 of the EIS.	
26	4.4.30-4.3.33	Chapter 16 Section 16.5.4	Potential impacts to subsurface GDE's		Subsurface GDE's have been identified in the Cape Hardy region, within the port facility parcel which should be addressed within the EIS. A spring fed creek is discussed in Chapter 19 but is not further described in the groundwater section of the EIS. Response/solution: Further information regarding subsurface GDE's and the spring fed creek is requested.	B	The Aboriginal Heritage Survey report describes a "spring fed reek" to the south of the port site. Saline groundwater discharge (baseflow) to drainage lines in this landscape is typical. No significant impacts on this regime are expected.	
27	4.3.30-4.3.33	Appendix U Section 16.5.4	Reliability of information regarding a groundwater divide.		The occurrence of a groundwater divide is referred to only in the groundwater summary. The reference cited is 35 years old with no up to date information provided. Response/solution: Further information regarding which aquifer the groundwater divide occurs and whether it is still present today to be provided.	B	The groundwater divide described in the GIA and referenced to *Eberhard and Waterhouse 1979* is still observed in the shallow water table data synthesised by DEWNR and reported by that agency as: *"Eyre Peninsula NRM Region simplified Hydrostratigraphic 3D Model, 2013"* which was accessed by Iron Road on 29 May 2014.	
28	4.3.30-4.3.33	Appendix U Section 3.3.1 Figure 7 Chapter 16 Section 16.3.4	Consistency in groundwater user data		The number of existing groundwater users presented in Figure 7 Appendix appears less than the number of water wells in the CEIP study area. Response/solution: Clarification is sought as to whether all existing users have been accounted for in the assessment. In addition further information is requested as to the risk to changes in water quality for those users (with recorded fresher quality groundwater)	B	Figure 7 presents recorded water bores (WaterConnect Database) after removal of the following: • Bores recorded as abandoned or backfilled; or • Bores confirmed as no longer existent during bore audit and landowner consultation conducted by Iron Road. The Iron Road bore audit specifically queried the presence of bores reporting fresher quality groundwater (bore number 6130-115).	

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					who fall within the predicted drawdown impact area of the Kielpa Borefield		The landowners reported that the bore does not exist and that they were not aware of any neighbours having bores yielding useable quality groundwater. The landowners have been on the property since 1987.	
29	4.3.30-4.3.33	Appendix U Table 7	Consistency in operational life of Kielpa Borefield		There are variations to the duration of drawdown data for the Kielpa Borefield. Table 7 in Appendix U notes a period of 25 years while Table E1 in Appendix V notes a life of 20 years. After 20 years of operation the total drawdown ranges from 78% to 92% (average 87.5%) of available drawdown. Accounting for an extra 5 years may exceed the available drawdown. Response/solution: Iron Road to clarify what the likely drawdown figures, drawdown extent and the post operation recovery time after 25 years of operation? This factors should also be considered during sensitivity analysis of the groundwater model	B	Drawdown at the pumped bores is reported for a pumping duration of 20 years. The reference to 25 years in Appendix U is an error. Additional drawdown at the pumped bores may be managed if required by optimisation of the borefield (modifying flow rates at individual bores to match bore efficiency) or by the addition of bores. Note that radius of drawdown impacts are correctly reported for 25 year model simulation. The above information does not change the outcomes of the impact assessment.	
30	4.3.30-4.3.33	Appendix U Figure 9	No fig 9 provided		Figure 9 is referenced to Appendix V, however figure is not present in appendix Response/solution: Figure 9 to be provided	C	The reference to Appendix V in Figure 9 is incorrect. The correct reference is: Groundwater Science 2014c Kielpa Groundwater Supply Model Sensitivity Analysis (E-F-66-RPT-2002).	
31	4.3.30-4.3.33	Appendix V	Modelling review		DEWNR completed a review of the groundwater monitoring conducted for the EIS. Response/solution: Recovery modelling to be extended to provide an indication of how long it will take for groundwater resources to recover.	A	Recovery Modelling was extended to 350 years and the results are summarised in Chapter 16.5.2 of the EIS. Full details are provided in: Groundwater Science 2014c Kielpa Groundwater Supply Model Sensitivity Analysis (E-F-66-RPT-2002).	
32	4.3.30-4.3.33	Appendix V	Modelling review		DEWNR completed a review of the ground water modelling conducted for the EIS Response/solution: Further information is requested regarding potential impacts to Hambidge and Hincks WPA. Sensitivity analysis as presented in Appendix U shows the 1m drawdown contour near the boundary or extending into the park areas	A	Both the Hambidge and Hincks Wilderness Protection Areas comprise mallee scrub on a dunal topology overlying saline groundwater. A slight reduction in the saline water table cannot and will not have a credible impact on this system due to the vegetation not relying on this saline water to survive or grow.	
33	4.3.30-4.3.33	Appendix V	Modelling review		DEWNR completed a review of groundwater modelling conducted for the EIS Response/solution: Information regarding the water budget used for the groundwater model to be provided.	B	Both the Hambidge and Hincks Wilderness Protection Areas comprise mallee scrub on a dunal topology overlying saline groundwater. A slight reduction in the saline water table cannot and will not have a credible impact on this system due to the vegetation not relying on this saline water to survive or grow.	

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34	4.3.30-4.3.33	Appendix V	Modelling review		DEWNR completed a review of groundwater modelling conducted for the EIS Response/solution: Modelling has been completed for a 20 year period however the mine will be operational for 25 years, DEWNR requests clarification as to why modelling was completed for a 20 year period. This also has implications in terms of drawdown averages, if modelled for 25 year is it possible that total drawdown will exceed the available drawdown?	A		
35	4.3.30-4.3.33	Appendix V	Modelling review		DEWNR completed a review of groundwater modelling conducted for the EIS Response/Solution: Figures provided in Table E1 indicate the aquifer will be in unconfined conditions. Further information is required as to why this has not been documented or accounted for in the model.	B	The Tertiary aquifer is variably confined. Refer cross sections Pages 13 to 20 of Appendix V and the description in Section 4.2.1 (Page 33). The upper Tertiary clay confining layer is not continuous and the Tertiary aquifer is naturally unconfined in some locations. To simulate this the flow model was set up with all Layers specified as "Type 3" layers which allow confined (Fixed Transmissivity and Storativity) and unconfined (Variable Transmissivity and Specific Yield) simulation depending on the calculated water level. A relatively low vertical conductivity is applied to Layer three in the model to simulate the leakage that is expected through this unit on a regional scale. The above information does not change the outcomes of the impact assessment.	
36	4.3.30-4.3.33	Appendix V	Modelling review		DEWNR completed a review of groundwater modelling conducted for the EIS Response/solution: Further information regarding conceptualisation of groundwater conditions of the borefield area, in particular; the existence of the tertiary clay confining layer, which is not evident in cross sections for Appendix V, to be provided. In addition further information regarding the presence of a quaternary aquifer is requested.	B	For comment on Tertiary confining layer, please see response to comment # 35 above. Please refer to Section 4.2 of the EIS Response Document for information on the other matters raised.	
37	4.4.30-4.3.33	Appendix V	Modelling review		DEWNR completed a review of groundwater modelling conducted for the EIS. Response/solution: Additional information regarding the cone of depression and its	B	Please refer to Section 4.3 of the EIS Response Document for information on the cone of depression.	

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					possible extent following cessation of pumping to be provided.			
38	4.3.32	Section 2.6.6 Appendix Q	Incorrect guideline reference		The text in section 2.6.6 references 'State Environment Protection Policy Groundwater of Victoria' Response/solution: Water quality and beneficial use of groundwater is presented as per guidelines relevant to South Australia.	B	Noted. The water quality and beneficial use assessment should reference the ANZECC/ARMCANZ 2000 Australian and New Zealand Guidelines for Fresh and Marine Water Quality. Reference to these guidelines does not change the outcome of the water quality assessment.	
39	Chapter 1	4.3.30-4.3.33	Figure 1-1 does not align with information provided		Information presented in this figure does not align with the latest information stated in Section 1.2. Response/solution: Update Fig 1-1 to align with current information	B	Noted. A new Figure 1-1 is located within Section 6 of the EIS response document.	
40		Section 3.3,Page 3-13	Consistency of information		Section 3.3 notes that salinity greater then 5000mg/L is unsuitable for stock which does not support the information provided in Table 4, Appendix U. Response/solution: further clarification to be provided	C	Also raised by the EPA – refer to Comment # 8.1 above for clarification.	
41	4.3.30-4.3.33	Table 4-3	Class of PVC to be used for construction of Kielpa wellfield		The EIS notes that construction wells will be constructed with Class 12 PVC. Response/Solution: It is recommended that Iron Road note the following; due to the depth of the wells it is recommended a higher class of PVC is used. In addition all wells are to be constructed in accordance with minimum construction requirements for water bores in Australia.	B	The recommendation to use suitable bore casing and to construct bores in accordance with industry guidelines is noted.	
42	4.3.30-4.3.33	Chapter 7	Further information required on groundwater at the Port facility and infrastructure corridor		Chapter 7 describes the physical environment however no information is provided in relation to the occurrence of groundwater at the Port facility or within the proposed infrastructure corridor. Response/solution: Further information to be provided on the occurrence of groundwater at the Port facility and within the proposed infrastructure corridor.	B	Groundwater at the port site is described in response to Comment # 23 above. The occurrence of groundwater along the infrastructure corridor is summarised in EIS Appendix U, Sections 2.6.1 and 2.6.5. Further detail is provided below: The infrastructure corridor extends from the mine site boundary some 130 km to the east and south to the port site boundary on the eastern coast of the Eyre Peninsula. The corridor traverses several geological domains (Figure 5 and Figure 6). Initially Tertiary sediments up to around 60	

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							m thick cover basement rock comprising Sleaford Complex Gneiss. The corridor then crosses the Polda Basin, an east-west intracratonic graben infilled with Permian and Jurassic sediments. This structure exhibits a significant fault throw at the northern margin with basement shallowing towards the south. Overlying Tertiary sediments also thicken across this structure. The route then crosses outcropping, to thinly covered Gawler Craton rocks of the Cleve subdomain. The Blue Range Beds, which infill the Itiledoo Basin, outcrop and sub-crop beneath thin recent cover. The route then crosses schists of the Hutchinson Group and then, approaching the coast, gneiss and granitoids of the Lincoln Complex. In this area thin Tertiary cover infills valleys associated with drainage lines. Groundwater is hosted within Tertiary sediments where these are sufficiently low in elevation to be below the regional water table. In elevated terrain the only groundwater is held within the basement fractured rock aquifers. Reported bore yields are consistently low (with the exception of IRD test bores in the Polda Trough Tertiary aquifer). Groundwater salinity consistently exceeds 10,000mg/L (typically >20,000 mg/L TDS). Some lower salinity groundwater is reported at the base of Darke Peak. These bores are located more than 4 km up-gradient of the infrastructure corridor in surface drainage lines and will not be impacted by the operation of the corridor. A detailed review of the non-prescribed groundwater resources traversed by the corridor is provided in "Department for Water (2011) Non-prescribed groundwater resources assessment - Eyre Peninsula Natural Resources Management Region – Phase 1 Literature and data review Report 2011/16)". The above information does not change the outcomes of the impact assessment.		

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DPTI comments

DPTI comment #	EIS ref	Guideline Ref	Summary issue		Key comments and suggested response/solution	Category	Iron Road's Response 30/6/16	Agency comment on adequacy of Response Document. If not adequate, state why and specify what is required for an adequate response from IRD or can the issue be dealt with as a condition
1	Chapter 4 Project descriptio n Section 4.3 Page 4-29 and Page 4-38		Port Design Description and Marine description		In general, DPTI is supportive of the marine infrastructure identified in the report. Meetings have been held with Iron Road, and DPTI understands that the applicant is fully aware of its obligations to obtain agreement from the Minister for Transport and Infrastructure before occupying his land Response/solution: The proponent should note that there will is a requirement to enter into a Ports Operating Agreement with the Minister for Transport under the *Harbors and Navigation Act 1993*. It is likely that Iron Road will be subject to the *Maritime Services (Access) Act 2000* allowing for third party access. With respect to navigational safety, the applicant is encouraged to consult with DPTI, Principal Navigation Specialist , Mr Gordon Panton (Ph 8360 0027/mob 0488 105 230) to discuss and develop appropriate strategies for navigational safety, notice to mariners, etc.	A	Noted. Chapter 5, Table 5-3 of the EIS states a range of other State approvals that may need to be obtained, including a Port Operating Agreement with the Minister for Transport under the *Harbors and Navigation Act 1993.* Iron road acknowledges that it will likely be subject to the *Maritime Services (Access) Act 2000i* in order to allow for third party access.	
2	Chapter 4 Project descriptio n Section 4.2.1 Page 4-16		Railway line		In September 2015 DPTI released a *Railway Crossing Policy* (refer https://www.adelaidemetro.com.au/content/download/39104 5/2084685/version/1/file/Railway-Crossing-Policy.pdf) identifying the following principle: *Principle 2 – New railway crossings on roads classified as Rural Arterial, or on roads with a designated function of Major Traffic Route or Freight Route shall be grade separated.* On this basis, DPTI does not support the proposed activation of the level crossing of the Birdseye Highway. This is provided in the context that the Birdseye Highway is classified as a Rural Arterial road, and a designated Freight Route. For noting - The policy also identifies the need for written consent to be obtained from road and rail infrastructure managers, and that an Interface Agreement be prepared. Response/solution: DPTI considers that the crossing of the Birdseye Highway should be grade separated. This would accord with policy, recently formalised as *Railway Crossing Policy* (refer https://www.adelaidemetro.com.au/content/download/39104 5/2084685/version/1/file/Railway-Crossing-Policy.pdf).	B	Iron Road acknowledges that this is a new DPTI policy introduced immediately prior to the submission of the Company's EIS to that agency. Iron Road will work with DPTI to seek the required variation by the Rail Commissioner or the Commissioner of Highways (whichever is applicable) through the provision of information relating to economic justification, safety and traffic management assessments. In addition, Iron Road will work with road and rail infrastructure managers during the CEIP's design stage to develop Interface Agreements.	

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					Variation to the policy can be considered by the Rail Commissioner or the Commissioner of Highways through the provision of information such as economic justification, assessment of safety, implications of traffic management, and other key assessments. With regards to the other level crossings identified in *Table 4-1- Proposed Railway Line Road Crossings and Road Diversions* (Chapter 4, page 4-19), DPTI's considers that active control should be utilised as a minimum treatment where an at-grade crossing is unavoidable to provide an acceptable level of safety for the travelling public. For noting - Written consent should be obtained from the relevant road manager for all new railway crossings. Interface Agreements between the relevant road and rail infrastructure managers must also be prepared in accordance with the *Rail Safety National Law (South Australia) Act 2012.*			
3	Chapter 5 Statutory Framework Section 5.3.4 Other State Legislation and Table 5-3 Other Relevant State Legislation		Railways (Operations and Access) Act 1997 Rail Network subject to third party access.		The Objective given for "Railways (Operations and Access) Act 1997 is: "*To provide for the operation of railways and access to railway services on fair commercial terms.*" Response/solution: This Statement should be amended as follows: "*The rail network is subject to third party access in accordance with (the Act) to provide access to railway services on fair commercial terms.*"	C	Noted.	
4	Chapter 18 Section 18.4 Page 18-13 to Page 18-15 and Table 18-5 Level Crossing		Design Modifications to Protect the Transport Network		The proponent proposes to install passive level crossings at 17 locations, with activation only if sight distance requirements described in AS1742.7 cannot be met. The proponent also refers to traffic volumes exceeding the "trigger threshold" as a warrant for activation (pg 18-14). DPTI does not consider a trigger exists. DPTI considers that active controls be utilised as a minimum treatment where an at-grade crossing is unavoidable.	B	Across the Australian rail industry best practice is adopted for assessment of risk associated with rail level crossings. A good industry reference and documented procedure for these assessments is provided in: Railway Crossing Protection in Western Australia - Policy & Guidelines, first issued in May 2004 and revised in June 2015. https://www.mainroads.wa.gov.au/OurRoads/RoadSafety/PolicyGuidelines/Pages/policy_guidelines.aspx	

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	Detailed Design Commitment				DPTI also considers that stacking distance must be considered as part of the design considerations as this is a critical consideration in crossing location. Response/solution: DPTI's considers that active control should be utilised as a minimum treatment where an at-grade crossing is unavoidable to provide an acceptable level of safety for the travelling public. DPTI also considers that stacking distance must be considered as part of the design considerations as this is a critical consideration in crossing location.		In the context of the proposed passive level crossing design considerations, the "trigger" equates to the considerations that warrant a higher level of safety signalling treatment from Passive to Active and ultimately "Boom Gated" crossings, via the derivation of the likelihood of the potential hazard at the road /rail crossing. This likelihood of conflict is normally expressed as the product of the number of road vehicles and trains that use the crossing. Speeds of approaching vehicles are also a factor and therefore it is appropriate to 'weight' the level of conflict based on the speed of approaching vehicles/trains. The various procedures for assessment are contained within the above reference document. Iron Road maintains its intention to design and implement appropriate levels of both Passive and Active level crossing controls, in accordance with National Rail Industry practices as outlined and, where appropriate, will provide additional levels of safety with the adoption of AAWD or Low-cost level crossing warning devices (LCLCWDs) as reviewed by the Cooperative Research Centre (CRC) for Rail Innovation for improving safety across the various types of level crossings with passive controls in the report; R3.111 - New Affordable Level Crossing Control Systems (17 Dec 2010).	
5	Chapter 18 Section 18.5.9 Page 18-31		Rail Movements and Traffic Delays at Level Crossings		EIS Section 18.5.9: Table 5.9 of the accompanying Transport Impact Assessment states that maximum delay for road traffic on the Birdseye Highway will be 100 seconds, however this doesn't seem to include the delay caused by the active crossing being activated "when an approaching train is 4km away, based on the requirements of AS1742.7" as stated in Section 4.6.2 in the EIS (page 4-60, last paragraph). At a train speed of 80 km/hr the active crossing will be activated three minutes before the train crosses Birdseye Highway and a 1.3km long train will complete the crossing in about 61 seconds, for a total delay of over four minutes. The comment on activation would also be better reflected as a time rather than distance.	B	In relation to a grade separation to be provided on the Birdseye Highway, Iron Road reiterates its position that it will work with DPTI to seek the required variation by the Rail Commissioner or the Commissioner of Highways (whichever is applicable) through the provision of information relating to economic justification, safety and traffic management assessments. In relation to DPTI's concern that the Traffic Impact Assessment underestimates the maximum day for road traffic on the Birdseye Highway, Iron Road advises that this matter has been reviewed extensively and a report prepared by SKM/Jacobs for the Company's DFS.	

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DPTI Comment #	EIS ref	Guideline Ref	Summary issue		Key comments and suggested response/solution	Category	Iron Road's Response 30/6/16	Agency comment on adequacy of Response Document. If not adequate, state why and specify what is required for an adequate response from IRD or can the issue be dealt with as a condition
					Response/solution: DPTI's position is that a grade separation should be provided on the Birdseye Highway. DPTI considers that Section 18.5.9 Table 5.9 of the accompanying Transport Impact Assessment underestimates the maximum delay for road traffic on the Birdseye Highway, stated to be 100 seconds. This doesn't appear to include the delay caused by the active crossing being activated "when an approaching train is 4km away, based on the requirements of AS1742.7" as stated in Section 4.6.2 in the EIS (page 4-60, last paragraph). At a train speed of 80 km/hr the active crossing will be activated three minutes before the train crosses Birdseye Highway, and a 1.3km long train will complete the crossing in about 61 seconds, for a total delay of over four minutes.		That report states: "The active level crossing shall be protected by flashing light controls in accordance with AS 1742.07. A track circuiting system shall be used to predict the approach of the train at a distance of 4 km from each approach, which allows the flashing lights to be activated with the required time for the control of the road traffic." This means that after the train triggers the "Track Circuit Controls" at the 4 km mark, train control does a calculation and then automatically turns on the Active Level Crossing Signals at the required interval from the crossing, based on the trains real-time approach speed. Accordingly, the delay is not four minutes. Any delay to vehicles on the road will only occur when it has to slow down and/or stop at the Active Rail Crossing.	
6.	Chapter 18 Section 18.7.3 Page 18-36 And Table 18-13		Summary of risks		The following statement is made in the Summary of Risks: "*Additionally, it is noted that the risk of catastrophic consequences are present at railway and road crossings and along roads across Australia, and the risk assessment of a vehicle accident applied here is not sensitive to the additional traffic generated by the project (i.e. the same risk rating would still apply to public safety if the project did not occur).*" The above paragraph doesn't acknowledge that without the new CEIP railway there isn't a residual risk of a road vehicle colliding with a CEIP train, therefore it isn't legitimate to claim that the same risk rating would still apply at proposed level crossing locations if the CEIP project did not occur. Response/solution: The following statement is made in the Summary of Risks: "*Additionally, it is noted that the risk of catastrophic consequences are present at railway and road crossings and along roads across Australia and the risk assessment of a vehicle accident applied here is not sensitive to the additional traffic generated by the project (i.e. the same risk rating would still apply to public safety if the project did not occur).*" DPTI considers that this statement does not acknowledge that there is no risk at the proposed level crossing locations at this time, and hence the proposed level crossings will result in a risk of crashes occurring. DPTI considers that the above statement should be removed.	C	Noted and acknowledged.	

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DPTI comment #	EIS ref	Guideline Ref	Summary issue		Key comments and suggested response/solution	Category	Iron Road's Response 30/6/16	Agency comment on adequacy of Response Document. If not adequate, state why and specify what is required for an adequate response from IRD or can the issue be dealt with as a condition
7	Appendix M and N		Environmental Noise and Vibration Assessment – Infrastructure and Long Term Employee Village and Predicted Railway Noise Figures		Section 3.2 (page 9) refers to the *Environment Protection (Noise) Policy 2007 (SA)*, however there is no reference to the Guidelines for the Assessment of Noise from Rail infrastructure and the need to apply the Noise and Air Emissions – Overlay 3 from the Planning Policy Library in accordance with the Minister Specifications SA 78B. Response/solution: Section 3.2 (page 9) refers to the *Environment Protection (Noise) Policy 2007 (SA)*. The proponent should demonstrate that it is able to meet the *Environment Protection (Noise) Policy 2007)* requirements.	A	The long term employee village is approximately 35 km from the proposed rail infrastructure and thus will be compliant with the Environment Protection (Noise) Policy 2007 (SA). This is demonstrated by the noise assessment that has been undertaken on the many closer receptors (less than 1 km) which are also compliant. The 'Noise and Air Emissions – Overlay 3 from the Planning Policy Library in accordance with the Minister Specifications SA 78B' has not been mentioned previously, or provided, to Iron Road. It has been reviewed and as described above, has no relevance given the fact that the long term employee village at Wudinna will be approximately 35 km away from the proposed rail infrastructure.	
8	Appendix W TIA Section 1 Page 1		Introduction – Project Overview		The report presents findings from the transport impact assessment undertaken for the Central Eyre Iron Project (CEIP) and identifies the following: • Scale and location of transport activities required to and from the proposed mine site and CEIP Infrastructure during the construction and operational phases of the mine • Impacts on public roads and infrastructure within the study area (Eyre Peninsula south of Whyalla) from transport activities resulting from CEIP • Any public infrastructure works or upgrades required to accommodate transport impacts resulting from the CEIP Prior to approval of the development, DPTI will be seeking to enter into an infrastructure agreement regarding the provision of upgrades required to State Government transport infrastructure. All infrastructure upgrade requirements will be at the proponents cost. Response/solution:	C	Noted. Iron Road will continue to liaise with DPTI in this regard, noting the Company's responses to that agency's comments set out in # 2, # 4 and # 5 above.	

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DPTI comment #	EIS ref	Guideline Ref	Summary issue		Key comments and suggested response/solution	Category	Iron Road's Response 30/6/16	Agency comment on adequacy of Response Document. If not adequate, state why and specify what is required for an adequate response from IRD or can the issue be dealt with as a condition
9	Appendix W TIA Section 3.2.4 Figure 3.7 Page 26 and Appendix W TIA Section 4.1.8 Page 42		Module Route Local Road Network		Figure 3.7 – Plan of module delivery route, depicts the proposed haul route for the transportation of Oversize Overmass (OSOM)modules and plant from the Port to the Proposed mine site. This is entirely on the existing public road network. A total of 144 Oversize/Overmass modules (the largest being up to 53m long, x 13m wide x 45m tall) will be moved at speeds varying between 1km/h and 40km/h and take between 1 and fourteen days to reach the mine site – requiring pullover sites at 12km intervals. This will impact on traffic management. The dimensions and mass proposed for the modules (up to 53m long x 13m wide x 45m tall, with a mass of up to 3000 tonnes) are well beyond any conventional OSOM loads. While some public roads are capable of catering for more conventional OSOM vehicles, vehicles of this scale would potentially have a significant impact upon the existing road asset, and require removal and replacement of roadside furniture. DPTI is also concerned that a 'rolling road closure' would be required to allow full use of the available road corridor, which would likely be unacceptable to the local community and industry given the very slow speed of these vehicles. A rolling closure could result in the effective closure of the road to the public for up to 12 hours, for an Oversize/Overmass modules travelling at 1 km/h. A rolling closure would have particularly severe implications during the grain carting season. Pullover bays will be required at 12km intervals to allow for the largest modules (53m -long x 13m wide x 45m tall) Response/solution: DPTI considers that the provision of a dedicated infrastructure corridor for the movement of oversize loads is required, and the Response Document must address this.	A	Both Iron Road's DFS and TIA were completed using the existing public road network which depicted the DFS base case of a Modular Access Route (MAR) utilising this network to transport pre-fabricated modules between the proposed port and mine sites. At the same time as the Traffic Impact Assessment (TIA) was being conducted by Jacobs in 2015, a parallel study team within Iron Road were reviewing alternative MAR options. The parallel study identified an alternative MAR that could provide for OSOM modules to be transported off public roads and along a dedicated and engineered route within the proposed infrastructure corridor. With an awareness of the staged construction requirements along the rail formation and provision of temporary heavy earthworks plant haul roads and ultimately the formation of a permanent rail maintenance/access track, it is considered that planned works could also provide a suitable MAR alignment. DPTI should note that Iron Road has not conducted any stakeholder engagement or landowner discussions concerning the possibility of using the proposed infrastructure corridor as a MAR.	
10	Appendix W TIA Section 4.1.3 Page 32		Vehicle types		Access for A-Triple Road Trains (which can carry up to 136t) is currently not available on the Eyre Peninsula. The EIS proposes to use vehicles approved under Performance Based Standards (PBS) to transport the same amount of load as the A-triple road trains. The highest PBS level of access available on the Eyre Peninsula is for PBS Level 3A vehicles which can only carry loads to a maximum of 110t. Response/solution: DPTI supports in principle the use of Performance Based Standards (PBS) vehicles, as indicated in Appendix W, Section 4.1.3. It should however be noted	C	Iron Road acknowledges that relevant approvals will be required from the National Heavy Vehicle Regulator.	

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					that the highest PBS level of access available on the Eyre Peninsula is for PBS Level 3A vehicles which can only carry loads to a maximum of 110t. Relevant approvals for the use of PBS vehicles will need to be sought through the National Heavy Vehicle Regulator. The proposed use of roads by Restricted Access Vehicles exceeding limitations under current gazetted routes during both the construction and operating stages will need to be considered as part of normal application processes through the National Heavy Vehicle Regulator.			
11	Appendix W TIA Section 5.1.3 Page 60		Module Delivery Route Safety		The following intersection upgrades will be required to accommodate turning circle room for a 12m by 52m long module transporter as shown in Figure 5-5 (page 61) • North Coast Road/Port Neill Access Road • Port Neill Access Road/Lincoln Highway • Lincoln Highway/Balumbah-Kinnard Road • Birdseye Highway/Tod Highway • Tod Highway/Kimba Road Response/solution: DPTI seeks advice as to the upgrading needs for the road network in the event that the transportation of OSOM modules/vehicles during the construction phase utilise the infrastructure corridor.	B	It is now proposed that the OSOM & RAVs carrying process plant and building modules, including mining and materials handling equipment and infrastructure components and buildings, may be delivered to the mine site from the port, away from public roads and along the optimised MAR. This will alleviate upgrades to the intersections listed. Details of the potential use of the infrastructure corridor for the MAR have been developed within Iron Road and will be discussed with DPTI in due course.	

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PIRSA Comments

PIRSA comment #	EIS ref	Guideline Ref	Summary issue		Key comments and suggested response/solution	Category	Iron Road's Response 30/6/16	Agency comment on adequacy of Response Document. If not adequate, state why and specify what is required for an adequate response from IRD or can the issue be dealt with as a condition
1			Broad acre agriculture		Issues relating to broad acre agriculture near the mine site, along the transport corridor to the port at Cape Hardy and at the port have been adequately addressed.	B	Noted.	
2			Fisheries and Aquaculture		From the EIS it would appear that consultation with the relevant fishing sectors (commercial and recreational) impacted by the port and shipping lanes activity, has not occurred. This was recommended by PIRSA in its comments on the draft EIS. PIRSA was of the understanding that the CEIP EIS would examine not only 'the potential impacts and benefits of the ongoing use of that infrastructure including, for example, increased shipping activity in Spencer Gulf. Impact for the fishing industry should differentiate between the recreational and commercial sectors and all commercial associations whose waters may be affected by the CEIP, including its shipping lanes (for example Blue crab fishery, Spencer Gulf prawn fishery, marine scalefish fishery etc should be listed	B	Iron Road has presented at many forums and to several government agencies with fishing industry and PIRSA representatives being present. Specifically, a representative from the Tuna Boat Owners Association has been present at a few presentations and a Fisheries executive attended the last meeting Iron Road had with PIRSA. No major concerns have been raised, presumably because the commercial fishing industry recognises the negligible impact that the proposed shipping from the CEIP would cause. It is also noted that no submissions from relevant fishing sectors were received on this issue. Regardless, Iron Road would welcome further opportunity to discuss any areas of concern with the fishing sectors should there be any interest. In addition, should the CEIP be approved and funded, the CEMP will include commitments for ongoing stakeholder engagement and members of the fishing industry are noted as stakeholders.	
3			Biosecurity		The marine biosecurity issues in relation to risks associated with bio fouling and ballast water exchange appear to be understood by the developer and a risk assessment has been conducted. Agree with the assessment of a 'high' residual risk in terms of potential to spread any introduced marine species from the port to elsewhere in the gulf. Agree with the recommendation that national guidelines for bio fouling management are allowed and guidelines/regulatory requirements for ballast water also be followed. Management of bio fouling and ballast water is being considered in a national review of marine pest biosecurity. Agree with the recommendation that national guidelines for bio fouling management are followed and guidelines/regulatory requirements for ballast water also be followed. Management of bio fouling and ballast water is being considered in a national review of marine pest biosecurity currently being	B	It is incorrect to state that there is a "…lack of any specific mention/plans to undertake monitoring in relation to marine pests." The EIS includes a clear commitment to undertake this monitoring in the Draft CEMP and OEMP, Sections 2.4.4 Control and Management Actions, Tables 2.7 Management Measures. Further details will be included in the final CEMP and OEMP following CEIP approval and funding.	

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					undertaken by the regulatory requirements relation to vessel hygiene and movements, but nonetheless current best practice should be followed, as detailed on www.marinepests.gov.au. A key issue of concern in relation to the document is the lack of any specific mention/plans to undertake monitoring in relation to marine pests. The EIS guidelines specifically request the need to monitor for marine pests. The EIS guidelines specifically request the need to monitor for marine pests and it seems there is no mention in the developer's EIS of how and when they will undertake monitoring. This needs to be addressed. This would be a concern given the area would be quite heavily used. The developer would have had initial surveys undertaken in the area for species present and this would allow the detection of new marine species (including pests) and would allow for a quicker response where appropriate. This would be integrated with ongoing requirements to monitor native marine species health/diversity.			
4			Regions		Regions SA has reviewed the MLP and EIS and believes that matters relevant to regional development are discussed in Chapter 22 of both documents headed 'social environment' Therefore, Regions SA's comments are limited to comments on this chapter in both documents. Chapter 22 covers information regarding the existing environment in the region, control measures (ie actions Iron road will take) to protect environmental values and an impact and risk assessment. RegionsSA notes that much of the content of Ch22 is the same for both documents. <u>Residential workforce VLDC workforce</u> The messaging throughout the Chapter is based on the premise that a residential workforce is preferable to a Long Distance Commute (LDC) workforce for many reasons which are well documented and, for this reason, Iron Road will do what it can to encourage development of a residential workforce. RegionsSA's primary comment about the chapter is that, while the messaging of the Chapter revolves around this premise, many of the actions that are proposed to be taken by Iron Road do not appear in their current form to accord with this messaging and will in fact facilitate the establishment, and long –term encroachment, of an LDC workforce.	B	Noted. Chapter 4.4 of the EIS provides some further information about the long term employee village with the key message being that "Iron Road is flexible around the final layout and design of the village and is working collaboratively with Wudinna DC to ensure an optimal outcome for the Wudinna community". While an indicative table of components plus an example layout are also included within Chapter 4.4, Iron Road will explore the possibility of providing some short term, family-friendly accommodation in the proposed village in consultation with the Wudinna DC.	

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					The CEIP includes a proposed long-term accommodation village located near Wudinna. The EIS states that the accommodation village will consist of single persons' accommodation (single rooms with en suite bathroom), share living and dining facilities). Naturally this accommodation will only suit a residential workforce (if it is even available to the residential workforce) if they are young, single men. Otherwise, this accommodation is designed to suit an LDC workforce. The Chapter makes the point that there are only 24 dwellings in Wudinna unoccupied and that it will be important to make land available for residential development. However, residential development is a long term proposition. The Chapter does not indicated if Iron Road itself will undertake this type of development. RegionsSA's view is that if Iron Road is to encourage development of a residential workforce that will integrate with, and contribute to the well-being of, the existing community (including paying council rates for services) then it could consider providing some (at least short term) family-friendly accommodation in the accommodation village. This would allow time for families to relocate, purchase land and build a home in the area. Further, the Chapter lists three working rosters that will be in place for the operational workforce at the mine. These three rosters are 5 days on and 2 days off (said to encourage a residential workforce), 2 weeks on and 1 week off and 7 days on and 7 days off followed by 7 nights on and 7 nights off. RegionsSA view is that the chapter could include further discussions of how these rosters will impact place of residence and whether employees on all rosters would have the option of residing at the accommodation village.			
5			Transport		RegionsSA's view is that the chapter could better address the issue of transport options for workers. Page 28 of the MLP includes a table of services and facilities in the relevant townships but does not include transport options. It would be useful if this table showed whether the townships have an airport, bus station/services or taxi service. It must be remembered that a significant proportion of the workforce may ultimately be Fly –In Fly –out workers. The Chapter does refer to a proposed bus service to transport workers from the accommodation village to the mine. However, it makes no reference to how these workers are expected to travel elsewhere in the region and, if the issue is not addressed, this could restrict worker's ability to interact with, and participate in, the community.		Noted. Information on regional transport is set out below. Premier Stateliner has regular bus services to Whyalla, Port Lincoln and Ceduna and these buses stop at many regional towns in and around the proposed CEIP such as Wudinna, Kyancutta, Yaninee, Minnipa, Cleve, Arno Bay, Port Neill and Tumby Bay. Bus terminals (for the buses that service these towns) only exist in Port Lincoln and Whyalla. These may conceivable be improved with increased demand.	

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							There are two commercial airports in the area of the CEIP being Whyalla and Port Lincoln but there are numerous non-commercial airports in Wudinna, Kimba, Cowell, Lock, Tumby Bay, Cummins and Elliston. To Iron Road's knowledge, taxi services on the Eyre Peninsula are only available in Port Lincoln, Whyalla and Ceduna.	
6			Draw down of workers		Separately to the above issue, Regions SA also notes that the risk of increased competition for workers as a result of the mine (ie draw down of workers from other industries thereby resulting in labour shortages in other industries) is high. Regions SA notes that Iron Road is proposing a number of actions and strategies to seek to address or manage this risk. Regions SA notes that liaison with the South Australian Government's Resources Infrastructure Taskforce and Eyre Peninsula Mining, Oil and Gas community Development Taskforce is one of these actions. Regions SA suggests that the SA Government's Alinta Taskforce could also be included in this list.		Noted.	

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Renewal SA

Out of scope

RELEASED UNDER FOI ACT

Out of scope

RELEASED UNDER FOI ACT

Out of scope

RELEASED UNDER FOI ACT

Country Fire Service

CFS comment #	EIS ref	Guideline Ref	Summary issue		Key comments and suggested response/solution	Category	Iron Road's Response 30/6/16	Agency comment on adequacy of Response Document. If not adequate, state why and specify what is required for an adequate response from IRD or can the issue be dealt with as a condition
Bushfire Management Plan								
1			Bushfire Management Plan		As the project develops further it is likely CFS, through the relevant Bushfire Management Committee, would require a Bushfire Management Plan for the mining tenement.		Noted.	

Agency	
DPC – AAR	No additional comments
DECD	No additional comments
SA Health	No additional comments
Department of Treasury and Finance	No additional comments

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MEETING NOTE

Company Name: Iron Road Limited (IRD) File No: 2013/00478/2

DMITRE Contact: 6(1) Personal affairs Date: 10/12/2014
Telephone No:

Company Contact:
Telephone No:

Iron Road Limited – proposed CEIP (Monthly meeting project status)

Iron Road House
Level 6, 30 Currie Street
Conference Room
Wednesday 10 December 2014
9:30am – 11:30am

Attendees
Robert Demarco RD (DSD)
Peter Boulton PB (DSD)
Karen Ferguson KF (DPTI)
Ian Llewellyn IL (DPTI)
Erik Lock EL (DSD)
6(1) Personal affairs

Apologies
Robert Kleeman RK (DPTI)
6(1) Personal affairs
Michael Smith MS (DSD)
Peter Short PS (DPTI)
Martin Reid MR (DSD)
6(1) Personal affairs
Diona Ashendon DA (DSD)
Andrew Querzoli AQ (DSD)

Discussion:

General project update

- 25 November 2014 Minister for Investment and Trade, Hon. Martin Hamilton-Smith met with IRD 6(1) Personal affairs at Wudinna and meeting included a visit to the proposed mine site location near Warramboo.
- IRD continuing with both community and South Australian Government stakeholder consultation.
- 28 October 2014 a delegate of the Minister for the Environment advised Iron Road Limited that its proposed open cut iron ore mine near Warramboo is not a controlled action.
- 9 October 2014 IRD presented its proposed CEIP to the Development Assessment Commission (DAC) prior to DAC finalising the EIS guidelines for the Minister for Planning consideration and subsequent public release.
- 1 October 2014 IRD lodged its EPBC referral for the mine site near Warramboo with the Commonwealth Department of the Environment.
- 26 August 2014 the delegate of the Commonwealth Minister for Environment declared the proposed action by Iron Road Limited to develop an infrastructure corridor, borefield and port facility a 'controlled action' and as such, requires assessment and approval under the *EPBC Act 1999* before it can proceed.
- 29 July 2014 IRD formally lodged its EPBC referral for the infrastructure corridor and port with the Commonwealth Department of the Environment.
- 10 July 2014 IRD presentation to South Australian Government agencies in relation to preparation of likely EIS guidelines under the *Development Act 1993*.

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Iron Road Limited – proposed CEIP (Monthly meeting project status)

Iron Road House
Level 6, 30 Currie Street
Conference Room
Wednesday 10 December 2014
9:30am – 11:30am

General project update

- 16 June 2014 IRD formally lodged its CEIP Development Application (DA) with the South Australian Government.
- 29 May 2014 IRD variation to s46 gazetted.
  - Original request for s46 – gazetted 22 August 2013.
- 9 May 2014 IRD project site tour (Port, modular route and proposed mining lease) by *former* DMITRE, DPTI, EPA and DEWNR – previous tours conducted 13 September, 3 & 10 December 2013.
- 6 May 2014 South Australian Government representatives met with several Eyre Peninsula Council Chief Executives and Works Managers (Wudinna, Cleve & Tumby Bay) including the RDA Chief Executive and Executive Officer EPLGA to advise them of the government's role in relation to the proposed IRD CEIP development, specifically rail, road and planning (s46 process). All matters raised by the Councils were addressed and the Councils look forward to future engagement with IRD and the South Australian Government.
- 30 April 2014 – Major Project Facilitation (MPF) presentation and roundtable discussion in Canberra.
- 17 March 2014 CEIP Definitive Feasibility Study (DFS) presentation released to market.
- 12 February 2014 IRD advised significant scope change to proposed CEIP.
- 6 September 2013 IRD (with SA Government) presentation to SEWPAC in Canberra.

Action Items:
Current issues – considerations

Action	Responsibility	Timing
• IRD requested copy of DSD and DPTI organisation charts. Note: *DPTI currently still to be finalised.*	PB / IL	When available
• IRD requested to understand Martin Reid, DSD position/role within the CEIP i.e. is he or not a case manager?	MS / PB	23 Dec 2014
• DSD mining to provide feedback on the line-by-line integrated project schedule (*per previous meeting action*) i.e. any amendments, timeframe considerations etc.	MS / EL	9 Jan 2015
• DSD Mining to provide feedback on the IRD Community Engagement Plan (*from 27 Nov 2014 meeting*).	MS / EL	As soon as practical
• *Previous action:* Follow up with DPTI in relation to 'roads' to understand further 'technical aspects / considerations'. Contact is 6(1) Personal affairs	PB / IL / SG	End Jan 2015
• *Previous action*: DSD Mining to respond to IRD re: implications for production of Proppant sand.	MS / EL	**23 Dec 2014**

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MINUTE

Government of South Australia
Department of Planning, Transport and Infrastructure

MINUTES forming ENCLOSURE to: 2013/08893/05

TO: CHIEF EXECUTIVE

RE: IRON ROAD - DRAFT ENVIRONMENTAL IMPACT STATEMENT: DPTI ADEQUACY CHECK RESPONSE

BACKGROUND

The Investment Management Division is managing the assessment process for the proposed multi-billion dollar Iron Road Major Development proposal.

The proposal, which was initially declared a Major Development by the Minister for Planning in August 2013, comprises three interrelated components:

- a deep sea water port, located about seven kilometres south of Port Neill, which would be capable of loading various bulk size carriers, including Capesize vessels, and exporting 30 million tonnes of iron ore and other products per year;
- a 150 kilometre infrastructure corridor, comprising a power transmission line, sea water supply pipeline and standard gauge rail line, to enable the transfer of products from the mine site to the port;
- a village to accommodate the longer term operational workforce for the mine – some 550 personnel and related infrastructure, to be constructed in the township of Wudinna.

The proponent, Iron Road Pty Ltd, have prepared a draft Environmental Impact Statement (EIS) based on the Guidelines set by the Development Assessment Commission.

Agencies, including DPTI, have been reviewing the draft EIS and providing comment on its adequacy against the Guidelines. The purpose of the adequacy check is to identify any threshold and other issues / gaps, prior to the EIS being formally released for consultation, based on the following criteria:

- Category A – Does the EIS adequately meet a mandated Government or Departmental policy (through a public (Cabinet endorsed) policy or legislative requirement);
- Category B – Does the EIS adequately meet best practice;
- Category C – Would the EIS benefit from a further review to meet other desirable outcomes.

From a DPTI perspective through this process there are two substantive issues identified which required resolution. These issues, along with the proposed outcome, as captured in the attached draft letter for your signature, are outlined overleaf:

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Issue 1:

The need for over dimension vehicles to travel along a private infrastructure corridor linking the mine and the port, as opposed to travelling on the standard road network as proposed in the draft EIS.

This matter is considered a Category A issue.

Outcome:

Iron Road Pty Ltd have agreed to include this as an option in the draft EIS, and have also signalled that this is the option they will move forward with. Greater detail will be provided in the Response Document (Supplementary EIS) following consultation.

Issue 2:

Whether to 'grade separate' the rail line servicing the mine with the Birdseye Highway, as opposed to Iron Road's proposal for an 'at grade' (traffic signals) intervention.

This matter is considered a Category B issue.

Outcome:

Iron Road Pty Ltd does not agree that this is required and have provided vehicle movement data to support the fact that the 'at grade' approach with traffic signals meets relevant Australian standards.

The number and nature of vehicle movements is not in dispute. The level of intervention – from avoidance ('grade separate') to management ('at grade') - is the point of discussion.

In discussions with Safety and Services Division and the Chief Executive, it has been resolved to request that Iron Road Pty Ltd continue to explore the 'grade separation', along with an enhanced 'at grade' option, as part of the Response Document, following consultation on the draft EIS.

RECOMMENDATION

That you sign the attached letter to 6(1) Personal affairs Environmental Manager, Iron Road Limited.

Sally Smith
GENERAL MANAGER, INVESTMENT MANAGEMENT

4 August 2015

SIGNED / NOT SIGNED

Andrew McKeegan
ACTING CHIEF EXECUTIVE

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COPY

Government of South Australia
Department of Planning, Transport and Infrastructure

In reply please quote 2004/07104/02
Enquiries to Phil Lawes
Telephone 6(1) Personal affairs

DEVELOPMENT DIVISION

Roma Mitchell House
136 North Terrace
Adelaide SA 5000

GPO Box 1533

Telephone: 08 83432222
Facsimile: 08 8204 8740

ABN 92 366 288 135

6(1) Personal affairs
Environmental Manager
Iron Road Limited
Iron Road House
Level 6, 30 Currie Street
Adelaide
South Australia 5000

Dear 6(1) Personal affairs

RE: DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS) - CAPE HARDY SEA PORT, INFRASTRUCTURE CORRIDOR AND LONG TERM EMPLOYEE VILLAGE - MAJOR DEVELOPMENT

I refer to the meeting with Iron Road on 15 May 2015 regarding the proposed Environmental Impact Statement (EIS) for the Central Eyre Iron Project.

I thank you for the opportunity to provide comments relating to the transport aspects of the pre-submission draft EIS. As discussed, there are two primary matters that the Department would like considered in the EIS, namely:

- The proposed use of public roads for transportation of oversize/overmass (OSOM) loads and equipment; and
- The proposed active level crossing on Birdseye Highway.

1. Oversize/Overmass (OSOM) Loads and Equipment

The dimensions and mass proposed for the modules (up to 53m long x 13m wide x 45m tall, with a mass of up to 3000 tonnes) are well beyond any conventional OSOM loads. While some public roads are capable of catering for more conventional OSOM vehicles, vehicles of this scale would potentially have a significant impact upon the existing road asset, and require removal and replacement of roadside furniture. DPTI is also concerned that a 'rolling road closure' would be required to allow full use of

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the available road corridor, which would likely be unacceptable to the local community and industry given the very slow speed of these vehicles.

It has been the Department's understanding that the movement of OSOM loads was to occur along a dedicated infrastructure corridor. DPTI requests that the EIS be amended to depict the dedicated corridor as an option for the movement of modules and expects that an impact assessment would be provided in the Supplementary EIS for this option.

2. Proposed active level crossing on Birdseye Highway

It is noted that four grade separations are proposed for the rail line where it is to cross public roads, namely:

- North Coast Road (a local road located just prior to the port balloon loop and the proposed heavy vehicle access road to the port);
- Lincoln Highway (an arterial road);
- Chilmans Road (a local road); and
- Wharminda Boundary Road (a local road).

The primary reason for the provision of a grade separation of rail lines is to remove the potential for high severity, and often fatal, crashes between road and rail vehicles. It is noted that the risk assessment for a collision between and transom and a member of the public at rail crossings is rated as 'High' in the EIS (refer Table 18-13).

The State and Australian Governments have progressively invested significant funding over time to remove existing at-grade rail crossings on arterial roads across South Australia. The provision of an at-grade crossing on the Birdseye Highway (the only arterial road not proposed for grade separation) would present a future challenge to the State Government to address safety issues at railway crossings.

The State Level Crossing Strategy Advisory Committee, comprised of representatives from the Department of Planning, Transport and Infrastructure, SA Police, rail authorities, RAA and the Local Government Association, has previously recommended that no new or additional at-grade level crossing be implemented on any roadway in South Australia.

This recommendation is reflective of work undertaken by the Australasian Railways Association, which developed an action plan that focuses on education, engineering and enforcement or the '3E's strategy', with the aim of eliminating level crossing collisions. The Association indicates that "regardless of the controls in place, every level crossing is a potential collision site so in addition to the 3E's the rail industry advocates for no new level crossings unless they are grade separated with a tunnel or bridge".

It is noted that you have provided information related to the volume and nature of vehicles which traffic the Birdseye Highway, and that you remain of the view, based on Australian Standards, that the volumes do not necessitate a grade separation at this location.

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DPTI requests that the option of a grade separated solution, as well an alternate option which optimises the at grade solution, continue to be explored and that an impact assessment be provided in the Supplementary EIS.

Further more detailed comments on the draft EIS are provided in Attachments 1 and 2 for your consideration.

Thank you again for the opportunity to provide input into the draft EIS.

Yours sincerely,

Andrew McKeegan
A/ Chief Executive Officer

7August 2015

Attachments:
1 – Additional Comments on the draft EIS
2 – Recommended Amendments to the draft EIS

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Additional Comments on the draft EIS

- The proponent proposes to install passive level crossings at 17 locations, with activation only if sight distance requirements described in AS1742.7 cannot be met. DPTI's considers that active control be utilised as a minimum treatment where an at-grade crossing is unavoidable.

- The proponent also refers to traffic volumes exceeding the "trigger threshold" as a warrant for activation (pg 18-14). DPTI does not consider a trigger exists. DPTI also considers that stacking distance should be considered as part of the design considerations.

- The EIS report identifies that intersection upgrades are required for North Coast road / Port Neill access road, Port Neill Access Road / Lincoln Highway, Lincoln Highway / Balumbah-Kinnard Road, Birdseye Highway / Tod Highway and Tod Highway / Kimba Road intersections to allow for the required turning circle of module (transfer towers, sample station, dust extraction buildings, conveyors, shiploader etc) transportation. The intersection upgrades that are identified in the EIS as being required for the transport of the oversize modules during the construction phase. DPTI seeks advice as to the upgrading needs in the event that OSOM vehicles utilise the infrastructure corridor.

- Prior to approval of the development, DPTI will be seeking to enter into an infrastructure agreement regarding the provision of upgrades required to State Government transport infrastructure.

- The proposed use of roads by RAVs exceeding limitations under current gazetted routes during both the construction and operating stages will need to be considered as part of normal application processes through the National Heavy Vehicle Regulator.

- Arterial road improvements are to be designed, engineered and constructed in accordance with DPTI standards that maintain the safety and efficiency of the arterial road network. These improvements also need to cater for any Restricted Access Vehicle (RAV) for which the road is gazetted.

- DPTI has also identified a number of potential issues associated with port and marine operations. I understand discussions are occurring regarding these matters.

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Recommended Amendments to the draft EIS

- The report refers to "CEIP Infrastructure" however the Glossary only defines this as "...associated with the Central Eyre Iron Project".

- The following comment is not applicable, given it is understood that the two rail lines are not going to be integrated. "*The line is proposed to be Standard Gauge, while the existing line on Eyre Peninsula (Cummins – Buckleboo) is narrow gauge. The proponent should identify how the new line will be able to be integrated with the existing narrow gauge network*".

- The document proposes that "*the proponent needs to address where potential locomotive fuelling locations or rolling stock maintenance facilities would be. Both these activities have potential environmental impacts which need to be considered at least conceptually, if not in fine detail at this stage*". It is understood that locomotive fuelling locations and rolling stock maintenance facilities will be on the port site, which is the subject of a separate EIS.

- The comment "*Suggest that rail noise commentary should include reference to the Guidelines for the Assessment of Noise from Rail Infrastructure*"... should be expanded to read as follows: "*Suggest that rail noise commentary should include reference to the Guidelines for the Assessment of Noise from Rail Infrastructure and there is a need to apply Noise and Air Emissions – Overlay 3 from the Planning Policy Library in accordance with SA Ministers Specification SA 78B if there are relevant developments within the nominated separation from the proposed rail line*".

- The comment "*There should be a comment to acknowledge that the rail network is subject to third party access in accordance with the Railways (Operations and Access) Act 1997*"...should be expanded to read as follows "*There should be a comment to acknowledge that the rail network is subject to third party access in accordance with the Railways (Operations and Access) Act 1997 to provide access to railway services on fair commercial terms*".

- Table 5.9 of the accompanying Transport Impact Assessment states that maximum delay for road traffic on the Birdseye Highway will be 100 seconds, however this doesn't seem to include the delay caused by the active crossing being activated "when an approaching train is 4km away, based on the requirements of AS1742.7" as stated in Section 4.6.2 in the EIS (page 4-60, last paragraph). At a train speed of 80 km/hr the active crossing will be activated three minutes before the train crosses Birdseye Highway and a 1.3km long train will complete the crossing in about 61 seconds, for a total delay of over four minutes. The comment on activation would also be better reflected as a time rather than distance.

- Figure 4-6 in Chapter 4 "Project Description" of the EIS is of the wrong section of the proposed CEIP railway line. It shows the central section instead of the northern section.

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From: Laura Johnston
To: Kleeman, Robert (DPTI)
Cc: Webb, Lee (DPTI); Ferguson, Karen (DPTI); Wood, Jeremy (DPTI) 6(1) Personal affairs Boulton, Peter (IASA); Smith, Michael (DSD)
Subject: Iron Road"s EIS Response Document
Date: Thursday, 30 June 2016 5:08:18 PM
Attachments: IRONROADORANGE62-95STACKEDSmallTest11NoDPIAdjust_182e25a4-9960-4956-a57b-87f3794b8b02.jpg
Iron Road Limited - CEIP EIS Response Document - 30 June 2016.pdf
Importance: High

Hi Rob

Further to a joint DSD/DPTI letter dated 18 March 2016, please find attached Iron Road Limited's EIS Response Document in relation to its proposed CEIP Infrastructure. I will contact you tomorrow about providing you with the additional technical reports that have been requested by another agency.

Please note that our MLP Response Document has been submitted directly to DSD.

I would appreciate an acknowledge of receipt of the attached EIS Response Document via email at your earliest opportunity.

Many thanks
6(1) Personal affairs

6(1) Personal affairs

6(1) Personal affairs
Project Approvals Manager

Iron Road House, Level 6, 30 Currie Street, Adelaide, South Australia 5000 * GPO Box 1164, Adelaide, South Australia 5001, Australia
ironroadlimited.com.au

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From: Ferguson, Karen (DPTI)
To: Kleeman, Robert (DPTI); Wood, Jeremy (DPTI); Luck, Erik (DSD); Quezoli, Andrew (DSD)
Subject: FW: EIS Commitments
Date: Wednesday, 23 November 2016 8:53:06 AM
Attachments: IRONROADORANGE62-95STACKEDSmallTest11NoDPIAdjust_182e25a4-9960-4956-a57b-87f3794b8b02.jpg
High level commitments - EIS only.docx
Importance: High

Hi all,
I have asked for and received a list of the high level commitments (in the EIS/Response) for the CEIP development. Please see attached for your information. I may refer to this email and list in the Assessment Report.

Regards
Karen

From: 6(1) Personal affairs
Sent: Tuesday, 22 November 2016 4:29 PM
To: Ferguson, Karen (DPTI) 6(1) Personal affairs
Subject: FW: EIS Commitments
Importance: High

Hi Karen

Ignore my first email please and use this attachment.

Cheers
6(1) Personal affairs

6(1) Personal affairs

6(1) Personal affairs
Project Approvals Manager

Iron Road House, Level 6, 30 Currie Street, Adelaide, South Australia 5000 * GPO Box 1164, Adelaide, South Australia 5001, Australia
ironroadlimited.com.au

From: 6(1) Personal affairs
Sent: Tuesday, 22 November 2016 3:10 PM
To: Ferguson, Karen (DPTI)
Subject: EIS Commitments
Importance: High

Hi Karen

Further to our phone discussion last week, please find attached a list of Iron Road's high level commitments as set out in its EIS and/or corresponding Response Document. As suggested, I have not included any commitments that specifically relate to the CEMP and/or OEMP.

I hope this is what you are looking for and that it assists with your assessment, and apologies for not getting it to you yesterday. Please feel free to call if you require clarification on anything.

Kind regards
6(1) Personal affairs

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File 2018/06886/01 - Document 011

IRON ROAD

HIGH LEVEL COMMITMENTS – ENVIRONMENTAL IMPACT STATEMENT

CHAPTER/RESPONSE DOCUMENT REF.	COMMITMENT
Response Document – Attachment B, DPTI Issues #2, #4 and #5.	• Work with DPTI in a constructive and efficient manner to determine the appropriate treatment for each and every crossing to be impacted by the CEIP, acknowledging the principles and intent of the Government's *Railway Crossing Policy* dated September 2015 is to minimise risk to all road and rail users. • The outcome of the review of the crossings may include grade-separated crossings, at-grade crossings that meet Australian Standards or at-grade crossings that have been further enhanced including boom gates. This review will lead to formalised Interface Agreements with the appropriate parties prior to construction. • Fund the upgrade of any crossings that are required as a direct result of Iron Road's activities and which have been formalised in the Interface Agreements.
Response Document – Attachment B, DPTI Issue #9 and #11.	• Iron Road to establish relevant agreements with DPTI relating to a proposed change in the Modular Access Route (MAR), away from public roads and along the infrastructure corridor via an upgraded service road in order to alleviate upgrades to numerous intersections across the Eyre Peninsula.
Chapter 4.6.2 – Project Description Response Document	• Rail wagons will be covered.
Chapter 6 – Stakeholder Consultation and Engagement Executive Summary Response Document	• Continue to work with communities and stakeholders throughout every phase of the CEIP and building on Iron Road's extensive network of relationships gained over many years of consultation • Engage independent professionals to undertake regular reviews of the company's effectiveness in consulting and communicating with stakeholders to ensure continual improvement.
Chapter 10 - Air Quality (Table 10-15) Response Document	• Ensure compliance with air quality criteria by: o the regular use of water sprays or suitable chemical wetting agents on susceptible earthen material loads, active earthen stockpiles; unpaved roads or other exposed areas; o locating earthen stockpiles as far from sensitive receivers as practicable; o implementing a dust monitoring programme. • Should visible air quality impacts be clearly observed, reduce or cease relevant work activities to stop the impacts and implement alternative work methods prior to recommencing activities. • Maintain the complaints and ideas hotline (as referred to in Chapter 22). • Maintain, inspect and verify requirements for dust control equipment and technology. • Maintain vehicles and rail wagons.
Chapter 11 – Climate Change and Greenhouse	• Incorporate energy efficient design elements within the accommodation, administration and workshop facilities to reduce electricity demands

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Gas (Table 11-3)	(including the use of energy-efficient fixtures, fittings and appliances, and the use of passive solar design elements within the plant and accommodation facilities). • Consider small scale renewable options, where practicable, such as solar powered monitoring stations and solar power for site administration, accommodation and workshop facilities. • Investigate opportunities for the application of greenhouse emission offset programs under the Emissions Reduction Fund and associated Carbon Farming Initiative.
Chapter 12 – Noise and Vibration (Table 12-19) Executive Summary Response Document	• Railway line will be continuously welded so as to avoid the noise of the wheels impacting on rail joints. • No construction activities with noise impacts on amenity will occur on Sundays or public holidays without prior approval. • The rail loading and unloading facilities will be enclosed to protect equipment, control dust and minimise noise. • Noise impacts will be minimised by: o the use of modern locomotives which meet the Australian Standards for railway rolling stock and emit less noise than older locomotives; o shutting off or throttling down equipment when not in actual use; o fitting noise reduction devises on equipment such as mufflers; o regularly servicing equipment, vehicles, locomotives and rail wagons; o locating noisy equipment or processes in strategic areas to minimise their impact on nearby sensitive receivers. • Train schedules and potential noise impacts will be communicated widely to the local and regional community. • A monitoring programme will be developed in accordance with statutory requirements.
Chapter 13 – Terrestrial Flora and Fauna (Table 13-23)	• No clearance of native vegetation will commence until approval has been obtained from the Native Vegetation Council. • Native vegetation clearance will be offset via implementation of an appropriate Significant Environmental Benefit. • Vegetation will be retained on site wherever practicable and progressive rehabilitation of vegetation will occur as soon as practicable. • Periodic monitoring of the occurrence and extent of weed species, particularly following trigger events (e.g. seasonally after winter rains or following fire) and within areas adjacent or in close proximity to high value vegetation (e.g. Hambidge WPA). • Education regarding conservation significant flora and fauna to be given to all staff, their families and contractors.
Chapter 14 – Marine and Coastal Environment (Table 14-8) Executive Summary	• No dredging. • Covered conveyor system and telescopic ship-loader for concentrate transport from land to ship. • Develop and implement piling management procedures. • Develop and implement whale management procedures incorporating a description of all threats, a monitoring plan, and the identification and indication of noise sources in order to manage/mitigate noise impacts.

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	• Develop and implement a Marine Mammal Notice to Mariners incorporating mandatory reporting of marine mammal sightings, mandated reductions of speed in shipping lanes during periods of peak marine mammal movements and response procedures should an entangled marine mammal be sighted, or a collision occur. • Develop and implement waste management measures to identify, separate and provide adequate waste disposal for all waste streams. • Shutdown and observation zone for marine mammals during jetty construction. • Restriction of vessel speed within the port by using tugs for manoeuvring the large ships. • Record sightings of protected marine species.
Chapter 15 – Surface Water (Table 15-2)	• Water sensitive urban design principles will be incorporated into the port and long-term employee village sites, including the collection of roof run-off in rainwater tanks for use on site.
Chapter 17 – Soil and Land Quality (Table 17-5)	• Develop an ASS management plan with respect to the infrastructure corridor on the principles of avoidance, minimisation of disturbance and treatment using a risk-based approach. • Develop and implement dune management procedures. • Develop and implement soil management procedures to manage soil compaction and loss of soil quantity.
Chapter 18 – Traffic and Transport (Table 18-12) Response Document	• Proposed road closures and alignments to be reviewed and confirmed in consultation with relevant District Councils. • Enter into appropriate management agreements with each relevant District Council relating to the upgrade of roads, including Iron Road's commitment to fund such upgrades. • Iron Road will be responsible for financial implications relating to any upgrade of DC roads and will enter into appropriate management agreements with each impacted DC in due course. • Liaise with local schools to discuss any impacts to bus routes due to road closures or traffic movements. • Develop a pavement monitoring, management and rehabilitation plan in consultation with DPTI. • Schedule slow moving heavy equipment outside of peak traffic periods and avoid potential conflict times identified during harvest. • Implement an incident reporting system for the management and implementation of traffic improvement measures.
Chapter 19 – Aboriginal Heritage and Native Title (Table 19-3) Executive Summary	• Develop and implement an Aboriginal heritage management protocol in accordance with the ILUA, including procedures to be followed in the event that Aboriginal heritage sites are uncovered during any phase of the CEIP. • Continue to develop a relationship with the Barngarla people and ensure that all operations are compliant with the terms and conditions of the ILUA, the Heritage Protocol and the heritage survey report.
Chapter 21 – Economic Environment (Table 21-14) Executive Summary	• Develop and implement a local employment policy to provide local and regional workers with priority access to employment opportunities through the CEIP. • Maximise employment and economic opportunities for local, regional, South Australian and Australian people and businesses by:

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Response Document	○ developing an Australian Industry Participation Plan; ○ working collaboratively with government, education and training providers and other relevant organisations to train and up skill local and regional people and to enhance business capacity among local and regional suppliers; ○ implementing a trainee and apprenticeship program; ○ working with business groups to identify and provide information on CEIP business opportunities including tendering and procurement processes and standards to facilitate the pre-qualification of local and regional businesses. • Prior to project completion, work with stakeholders, including future land users, to have a coordinated approach for parties to be able to access the infrastructure upon project completion.
Chapter 22 – Social Environment (Table 22-23) Executive Summary Response Document	• Encourage Iron Road's operational workforce to reside locally rather than on a long distance commute basis by developing policies and/or offering incentives. • Develop induction procedures and information for our workforce so that they understand the values and expectations of the local community. • Support the preparation of a Structure Plan at Wudinna, to be undertaken by the Wudinna DC, to integrate the long-term employee village within the existing township. • Work with the Wudinna DC and community members to develop strategies to strengthen social cohesion and social interactions between non-residents, incoming residents and existing residents. • Participate in local and State Government planning to provide for social services and facilities for the benefit of both existing and incoming residents and workers. • Work closely with Renewal SA, Wudinna DC and other district councils to monitor housing demand in order to manage prices. • Collaborate with key government agencies to plan for and support appropriate and sustainable services and amenities that benefit existing and incoming residents. • Develop flexible work practices to accommodate farm work as best as practicable, including peak agricultural periods such as harvesting, and other seasonal business activities. • Provide a family friendly work environment. • Provide a regular bus service to transport employees to work at the mine. • Operate a zero tolerance policy with regular drug and alcohol testing of all workers to ensure workplace safety. • Provide regular and timely information to local residents and communities about the CEIP and planned works to assist in reducing disruptions and the number of complaints. • Continue to operate a toll free phone hotline and a complaints register. • Work with impacted landowners openly and with consistency and respect. • Locate a temporary construction camp at the port site to minimise disruption to local communities.

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File 2018/06886/01 - Document 012

Australian Government
Department of the Environment

Notification of
REFERRAL DECISION AND DESIGNATED PROPONENT – controlled action

Central Eyre Iron Project Infrastructure, Eyre Peninsula, SA (EPBC 2014/7285)

This decision is made under section 75 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

proposed action	To clear native vegetation and develop an infrastructure corridor, borefield and port facility in the central Eyre Peninsula region of South Australia [See EPBC Act referral 2014/7285].
decision on proposed action	The proposed action is a controlled action. The project will require assessment and approval under the EPBC Act before it can proceed.
relevant controlling provisions	• Listed threatened species and communities (sections 18 & 18A) • Migratory species (sections 20 & 20A)
designated proponent	Iron Road Limited ABN: 51 128 698 108
assessment approach	To be advised.
Decision-maker	
name and position	6(1) Personal affairs Assistant Secretary West Assessment Branch
signature	6(1) Personal affairs
date of decision	21 August 2014

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Ferguson, Karen (DPTI)

From: Kleeman, Robert (DPTI)
Sent: Monday, 12 September 2016 3:39 PM
To: Ferguson, Karen (DPTI)
Subject: FW: transport wording

From: 6(1) Personal affairs
Sent: Monday, 12 September 2016 12:48 PM
To: Smith, Sally (DPTI) 6(1) Personal affairs
Cc: Kleeman, Robert (DPTI) 6(1) Personal affairs
Subject: Re: transport wording

Thanks Sally.
This all looks fine and I'll get some answers to the questions to you.
Appreciate yours and Rob's assistance.
Cheers
6(1) Personal affairs

IRON ROAD | 6(1) Personal affairs
Environmental Manager
6(1) Personal affairs
Iron Road House, Level 6, 30 Currie Street, Adelaide, South Australia 5000 * GPO Box 1164, Adelaide, South Australia 5001, Australia
ironroadlimited.com.au

On 12 Sep 2016, at 11:09 AM, Smith, Sally (DPTI) 6(1) Personal affairs wrote:

Hi 6(1) Personal affairs

I have checked the wording with 6(1) Personal affairs sorry for delay – my fault). He has suggested the following amendments as the Rail Commissioner does not have any 'jurisdiction' on eyre peninsula:

Iron Road acknowledges the ~~new~~ DPTI Policy relating to Rail Crossings which will require the Company to obtain a secondary approval from ~~either the Rail Commissioner or~~ the Commissioner of Highways ~~(whichever is applicable)~~ as set out in that Policy. In accordance with the Policy, Iron Road commits to working with DPTI in a constructive and efficient manner to determine the appropriate treatment for each and every crossing to be impacted by the CEIP, acknowledging the principles and intent of the Policy is to minimise risk to all road and rail users. It should be noted that this is also the intent of Iron Road. Through the provision of information relating to safety and risk management assessments, the outcomes of this detailed review by DPTI and Iron Road may include grade-separated crossings, at-grade crossings that meet Australian Standards or at-grade crossings that have been further enhanced ~~up to,~~ and including boom gates. This review will lead to formalised Interface Agreements with the appropriate parties prior to construction. Iron Road commits to funding the upgrade of any crossings that are required as a direct result of its activities and which have been formalised in the Interface Agreements.

6(1) Personal affairs also asked the following questions:

- Will Iron Road be operating the railway? In other words, who will be the 'rolling stock operator' for any new line?
- I assume that they will be the 'rail infrastructure manager'? These are terms from the Rail Safety Act

Happy to chat.

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Ta Sal

Sally Smith
General Manager, Planning and Development

Development Division
Department of Planning, Transport and Infrastructure
6(1) Personal affairs
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<image001.gif> <image002.gif> <image003.gif> <image004.gif>

collaboration . honesty . excellence . enjoyment . respect

We acknowledge and respect Aboriginal peoples as South Australia's first peoples and nations, we recognise Aboriginal peoples as traditional owners and occupants of land and waters in South Australia and that their spiritual, social, cultural and economic practices come from their traditional lands and waters; and they maintain their cultural and heritage beliefs, languages and laws which are of ongoing importance; We pay our respects to their ancestors and to their Elders.

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Ferguson, Karen (DPTI)

From: 6(1) Personal affairs
Sent: Monday, 19 December 2016 9:56 AM
To: Ferguson, Karen (DPTI)
Cc: 6(1) Personal affairs
Subject: EIS Assessment Report - Fencing

Importance: High

Hi Karen

Thanks for your call this morning in relation to the proposed infrastructure corridor.

Module Access Route (e.g. Haul Road) vs Rail Maintenance Track

As you know, Iron Road has agreed to DPTI's request to transport modules up to the proposed mine site along the infrastructure corridor in order to keep the oversize vehicles away from public roads. As noted in our Response Document (refer to DCTB submission, question #5 on page 23 of Attachment A) further detailed engineering and impact assessment will need to be undertaken by Iron Road prior to anything commencing. However, I can advise that there is no intention – or need - to go beyond the current width of the infrastructure corridor which is a maximum of 110m.

Once the modules have been transported up to the mine site, the infrastructure corridor will revert into what has been proposed all along in the EIS for operations - rail line, power line, water pipeline and rail maintenance/access track – and the larger haul road will 'disappear'.

Fencing

Figure 4-4 of the EIS is correct with respect to the location of the fencing. The rail maintenance/access track) will not be fenced 1) so that adjoining farmers can utilise the track to assist with their farming operations (subject to prior agreement with Iron Road), and 2) for safety reasons and to reduce risk. If the fencing – with gates – included the maintenance track then there would be a much higher chance of stock wandering onto the rail line, and of humans being on the actual rail line when trying to retrieve their stock.

Note that during construction activities, particularly with respect to the module access route, our impact assessment may indicate that fencing should include the width of the haul road during the transport of modules to the mine site. It will not, however, be the long term case as indicated above.

I trust this helps.

Kind regards

6(1) Personal affairs

6(1) Personal affairs

IRON ROAD | 6(1) Personal affairs
Project Approvals Manager

Iron Road House, Level 6, 30 Currie Street, Adelaide, South Australia 5000 GPO Box 1164, Adelaide, South Australia 5001, Australia
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EPBC 2014/7285. Cape Hardy sea port, infrastructure corridors and long term employee village, South Australia

Comments on the draft Environmental Impact Statement (EIS)

The matters to be addressed by this draft EIS for assessment under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) are within the Guidelines for the preparation of an Environmental Impact Statement (the Guidelines) provided to the proponent. Table 1 contains an assessment of how the information in this draft EIS addresses the requirements of the Guidelines with reference to Matters of National Environmental Significance (MNES). Table 2 contains an assessment of the draft EIS in response to the matters that need to be addressed in the draft EIS according to Schedule 4 of the EPBC Act Regulations 2000.

Table 1. assessment on how the information in the draft PER addresses the requirements of the ESD with reference to MNES.

Work Required (with reference to MNES)	Addressed in draft EIS?	Department's Comments
AVOIDANCE, MITIGATION, OFFSET MANAGEMENT AND CONTROL OF ADVERSE EFFECTS • The EIS should demonstrate that the proposed avoidance, mitigation, offset, management and control measures are consistent with the EPBC Act offsets policy and relevant recovery plans, conservation advice and threat abatement plans.	Design measures to avoid and mitigate impacts described in each of Chapters 10 to 23. Environmental management framework outlined in Chapter 24, Appendix W & Appendix X	• The Department considers that the draft EIS adequately demonstrates that the proposed action avoids or is likely to have a negligible impact on terrestrial EPBC Act listed threatened species and communities. • The Department notes that whale management procedures will be developed and incorporated into the Construction Environmental Management Plan (CEMP) and Operation Environmental Plan (OEMP) for the proposed action. • The Department re-iterates the importance of applying the *Conservation Management Plan for the Southern Right Whale 2011-2021* and the *Marine bioregional plan for the South-west marine Region* within the EIS documentation. • The Department recommends referring to the approval conditions for Port Spencer Stages 1 and 2, Eyre Peninsula, South Australia (EPBC 2012/6590) for likely management measures and conditions for approval under the EPBC Act (for inclusion into relevant management plans).

ASSESSMENT OF EXPECTED ENVIRONMENTAL,SOCIAL AND ECONOMIC EFFECTS • Describe the proposal's consistency with other State and Commonwealth legislation; including provisions of the EPBC Act 1999 (include consideration of principles of sustainable development and relevant bioregional plans).	Chapter 5.	• The Department considers that Chapter 5 of the draft EIS adequately addresses the proposal's consistency with State and Commonwealth legislation. • The Department considers that the principles of sustainable development are adequately addressed in Chapter 5 of the draft EIS. • The Department considers that the *Marine bioregional plan for the South-west marine Region* must be considered in Chapter 5 of the final EIS.
ENVIRONMENTAL ISSUES • Describe how the proposal is not inconsistent with any relevant EPBC Act guidelines, conservation advice and/or recovery plans. For instance, the conservation advice for the Eyre Peninsula Blue Gum (*Eucalyptus petiolaris*) Woodland Threatened Ecological Community.	Chapter 5, Chapter 13	• The Department considers that the EIS must be improved by explicitly stating how the proposal is not inconsistent with the *Conservation Management Plan for the Southern Right Whale 2011-2021* in Chapter 14.

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• Quantify and detail the extent, condition and significance of potential native fauna habitat loss or disturbance during construction and operation and the ability of communities and individual species to recover, especially for resident and migratory shore birds, and Threatened, Endangered and Protected Species (TEPS) under the EPBC Act and the South Australian National Parks and Wildlife Act 1972 (NP&W).	Chapter 13, Chapter 14 Appendix K, Appendix L and Appendix M	• The Department considers that the draft EIS adequately quantifies and details the extent, condition and significance of potential native fauna habitat loss or disturbance during construction and operation, and the ability of EPBC Act listed species and communities to recover.
• Describe the measures taken to address displaced native fauna (if any).	Chapter 13, Chapter 24. Appendix W.	• The Department notes that the Draft EIS states that a qualified fauna handling expert will be present on site during construction to remove any trapped animals from trenches and to manage displaced fauna during vegetation clearance.
• Detail appropriate buffer distances that will be required between the proposed development and TEPS, including feeding areas, nesting sites and roosting sites.	Chapter 13	• The Department considers that the EIS must improve the detail regarding appropriate buffer distance between the proposed development and TEPS within Chapter 13. For instance, what is the proposed minimum buffer distance between the proposed development and EPBC Act listed species?, and, if a species is within this buffer distance, how will it be managed?

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• Outline the effect of light pollution, noise emissions and vibrations on TEPS (including those listed under the EPBC and NPW Act's) and how these will be managed.	Chapter 13, Chapter 14, Chapter 24. Appendix M. Appendix O. Appendix W. Appendix X.	• The Department considers that the effects of light pollution, noise emissions and vibrations on EPBC Act listed species, and subsequent management has been adequately addressed.
• Describe how the proposal is not inconsistent with any relevant EPBC Act guidelines, conservation advice and/or recovery plans. For instance, the recovery plan for the endangered Southern Right Whale.	Chapter 13, Chapter 14.	• The Department considers that the EIS must be improved by explicitly stating how the proposal is not inconsistent with the *Conservation Management Plan for the Southern Right Whale 2011-2021* in Chapter 14.

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Table 2: matters to be addressed in the draft EIS according to Schedule 4 of the EPBC Act Regulations 2000

Requirements	Comments
General Description	
1. Title of the action	Title not clear in the draft EIS. The Department assumes it is Cape Hardy deep sea port, infrastructure corridor and long term employee village (as per the Guidelines). This is must be clarified.
2. The full name and postal address of the designated proponent	The postal address of the designated proponent is not within the draft EIS. The Department considers that the postal address is best placed within Chapter 1: Introduction, near the title page. This must be added.
3. A clear outline of the objective of the action	OK. Chapter 1.
4. The location of the action	OK. Chapter 4. Project Description.
5. The background to the development of the action	OK. Chapter 1.
6. How the action relates to any other actions (of which the proponent should reasonably be aware) that have been, or are being, taken or that have been approved in the region affected by the action	OK
7. The current status of the action	OK
8. The consequences of not proceeding with the action	OK.

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Requirements	Comments
Description	
1. All the components of the action	OK
2. The precise location of any works to be undertaken, structures to be built or elements of the action that may have relevant impacts	OK. Covered in Chapter 4: Project Description.
3. How the works are to be undertaken and design parameters for those aspects of the structures or elements of the action that may have relevant impacts	OK
4. Relevant impacts of the action	OK
4(a). A description of the relevant impacts of the action	OK
4(b). A detailed assessment of the nature and extent of the likely short term and long term relevant impacts	OK. Covered in Chapter 14, Table 14-9.
4(c). A statement whether any relevant impacts are likely to be unknown, unpredictable or irreversible	As commented in 4(b)
4(d). Analysis of the significance of the relevant impacts	As commented in 4(b)

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Requirements	Comments
4(e). Any technical data and other information used or needed to make a detailed assessment of the relevant impacts	OK.
5. Proposed safeguards and mitigation measures to deal with relevant impacts of the action	OK.
5(a). A description and an assessment of the expected or predicted effectiveness of the mitigation measures.	The Department considers that a description and an assessment of the expected or predicated effectiveness of the mitigation measures for the EPBC Act listed Southern Right Whale should be improved by providing more detail.
5(b). Any statutory or policy basis for the mitigation measures	OK
5(c). The cost of the mitigation measures	The Department considers that the EIS should be improved by including estimated costs of mitigation measures (i.e. SEB offsets and mitigation strategies for the protection of the Southern Right Whale)
5(d). An outline of an environmental management plan that sets out the framework for continuing management, mitigation and monitoring programs for the relevant impacts of the action, including any provisions for independent environmental auditing	OK. Detailed in the draft Construction Environmental Management Plan (CEMP) and draft Operational Environmental Management Plan (OEMP). The Department considers that the CEMP and OEMP should be improved by detailing which audits will be conducted by and independent reviewer. The Department understands that these management plans will be reviewed at the time of approval.
5(e). The name of the agency responsible for endorsing or approving each mitigation measure or monitoring program	The Department considers that the EIS (and specifically the CEMP and OEMP) must include details addressing the name of every agency responsible for endorsing or approving each mitigation measure or monitoring program.

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Requirements	Comments
5(f). A consolidated list of mitigation measures proposed to be undertaken to prevent, minimise or compensate for the relevant impacts of the action, including mitigation measures proposed to be taken by State governments, local governments or the proponent.	The EIS should include a consolidated list or table of mitigation measures proposed to be undertaken to prevent, minimise or compensate for the relevant impacts of the action, including mitigation measures proposed to be taken by State governments, local governments or the proponent.
6. Any other requirements for approval or conditions that apply, or that the proponent reasonably believes are likely to apply, to the proposed action	OK. Chapter 5.
6(a). Details of any local or State government planning scheme, or plan or policy under any local or State government planning system that deals with the proposed action, including:	OK.
6(a)(i). What environmental assessment of the proposed action has been, or is being, carried out under the scheme, plan or policy;	OK
6(a)(ii). How the scheme provides for the prevention, minimisation and management of any relevant impacts;	OK
6(b). A description of any approval that has been obtained from a State, Territory or Commonwealth agency or authority (other than an approval under the Act), including any conditions that apply to the	OK

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Requirements	Comments
action;	
6(c). A statement identifying any additional approval that is required;	OK
6(d). A description of the monitoring, enforcement and review procedures that apply, or are proposed to apply, to the action.	OK. Detailed in the draft Construction Environmental Management Plan (CEMP) and draft Operational Environmental Management Plan (OEMP).
7. To the extent reasonably practicable, any feasible alternatives to the action, including:	OK. Chapter 3. Alternatives.
7(a). If relevant, the alternative of taking no action;	OK. Detailed in Chapter 2. Project Justification.
7(b). A comparative description of the impacts of each alternative on the matters protected by the controlling provisions for the action;	OK. Detailed in Chapter 3. Project Alternatives.
7(c). Sufficient detail to make clear why any alternative is preferred to another;	OK
8. Any consultation about the action, including:	Chapter 6. Stakeholder Consultation.
8(a). Any consultation that has already taken place;	OK
8(b). Proposed consultation about relevant impacts of the action;	OK
8(c). If there has been consultation about the proposed action — any documented response to,	OK

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Requirements	Comments
or result of, the consultation	
9. Identification of affected parties, including a statement mentioning any communities that may be affected and describing their views	OK
Environmental record of person proposing to take the action	
1. Details of any proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against:	OK
1(a). The person proposing to take the action; and	OK
1(b). For an action for which a person has applied for a permit, the person making the application.	OK
2. If the person proposing to take the action is a corporation — details of the corporation's environmental policy and planning framework.	OK. Appendix B: Iron Road Environment Policy, Chapter 1 and Chapter 24.
Information Sources	
1. For information given in a draft public environment report or environmental impact statement, the draft must state:	
1(a). The source of the information; and	OK

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Requirements	Comments
1(b). How recent the information is; and	OK
1(c). How the reliability of the information was tested; and	OK
1(d). What uncertainties (if any) are in the information	OK

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File 2018/06886/01 - Document 016

Australian Government
Department of the Environment

EPBC Ref: 2014/7285

Mr Robert Kleeman
General Manager Assessment
Department of Planning, Transport and Infrastructure
GPO BOX 1533
ADELAIDE SA 5001

RECEIVED
10 OCT 2014
DPTI
PLANNING DIVISION

Dear Mr Kleeman

Assessment approach: state assessment under a bilateral agreement
Central Eyre Iron Project Infrastructure, South Australia (EPBC 2014/7285).

I am writing to you in relation to the proposal by Iron Road Limited to develop an infrastructure corridor, borefield and port facility to support the export from a future iron ore mine near Warramboo, in the central Eyre Peninsula region of South Australia.

On 26 August 2014, the then delegate decided that the above proposed action requires assessment and approval under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). At that time, an assessment approach decision was not advised in order to await advice as to whether the *Bilateral agreement made under section 45 of the Environment Protection and Biodiversity Conservation Act 1999 (Cth) relating to environment assessment* between the Commonwealth of Australia and the State of South Australia applies. Following advice received from the South Australian Minister for Planning on 30 September 2014, that the bilateral agreement applies, a decision on assessment approach under the EPBC Act is not required.

The proposed action will need to be assessed through state assessment under the bilateral agreement with South Australia.

I have also written to the proponent and Ms Angela Crimes, Senior Policy Officer, Department of Environment, Water & Natural Resources to advise them of this decision.

If you have any questions about the assessment process or this decision, please contact the project manager, Matt Barwick, by email to 6(1) Personal affairs or telephone 6(1) Personal affairs and quote the EPBC reference number shown at the beginning of this letter.

Yours sincerely

6(1) Personal affairs

Acting Assistant Secretary
West Assessment Branch
3 October 2014

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
4	EIS 4.2.1	Project Description	Infrastructure corridor	What will be the process if livestock do access the corridor?	The corridor will be fenced so stock should not be able to wander onto the rail track. At rail crossings, appropriate measures will be undertaken in consultation with landowners to ensure that stock are not able to wander into the corridor. However, despite these measures, should stock enter the corridor, the owners will be responsible for ensuring retrieval and will be able to do so under specific access protocols during rail operations.
5	EIS 4.2.1	Project Description	Infrastructure corridor	Who manages compensation claims if livestock access the corridor and are killed?	Refer to Submission #30, Issue #7.
6	EIS 4.5	Project Description	Construction phase	How will soil erosion and drift be managed during corridor construction?	Refer to Submission #49, Issue #5.
7	EIS 6.4	Stakeholder Consultation and Engagement	Impacted Landowners	Lack of or conflicting information from Iron Road.	Iron Road appreciates the detail the submitter has included regarding the challenges his business and family will face managing their properties due to the proposed rail development. The Company would appreciate the opportunity to meet and work through each of those issues/challenges with the submitter and document them in an IMP.
8	EIS 13	Terrestrial Flora & Fauna	Weeds in corridor	How will weeds be managed/monitored along the corridor?	Refer to Submission #4, Issue #1.
9	EIS 13	Terrestrial Flora & Fauna	Fencing of corridor	There will be 12 fences that will have to join up to the corridor – there will the expense of time and materials. There has been no information regarding this issue.	Refer to response to Issue #7 above.
10	EIS 4.5.1	Project Description	Construction Phase	How long will the construction process take? And how will it be managed?	The entire construction process will take up to three years, with the corridor itself expected to take 2.5 years in total. Refer to EIS Chapter 4.5.1, Figure 4-39 which shows an indicative construction program.

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
11	EIS 13	Terrestrial Flora & Fauna	Fencing of corridor	After initial construction who will have responsibility for repairs and maintenance in the short and long term?	Refer to Submission #30, Issue #6.
12	EIS 17	Soil & Land Quality	Erosion	How will erosion/drift created by stock movements on sandy soils be managed?	This will be considered in the design of any underpasses/stock crossings and associated facilities and will be no different to stock crossings on local roads. Erosion control measures are shown in Table 17-5 of Chapter 17.
13	EIS 18	Traffic & Transport	Risks (fire)	Will the train be required to cease in fire ban/harvest ban conditions?	Refer to Submission #1, Issue #1.
14	EIS 23	Landscape & Visual Amenity	Visual impact	Currently enjoy an unobstructed view from our home, will have clear view of the rail.	Iron Road has sought to minimise impacts wherever practicable and is committed to liaising with this submitter during each phase of the project. Refer to Table 23-4 of the EIS for control and management strategies relating to visual amenity.
15	EIS 12	Noise & Vibration	Noise impact	The noise from the frequently passing trains will change our current quiet environment.	Refer to Submission #20, Issue #5.
16	EIS 18.5.10	Traffic & Transport	Changes to local access from road closures and road re-alignments	Emergency access for landowner could be compromised through passive crossings north and south of the property.	Refer to Submission #22, Issue #6.
Submission 86 – Name and address withheld. Supportive submission; no issues raised.					
Submission 87 – Sallyann and Richard Hill. Relates to EIS only.					
1	EIS	Out of Scope	Adjoining land	The opportunity for us to try and sell our once pristine coastal block to anyone will now not be available. Only the mining company could use our block and they are not interested in it.	Refer to Question 7.8 in the Out of Scope section of the EIS Response Document.

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
2	EIS	Out of Scope	CEIP footprint	A lot of the information we have seen and read online about the project has our block with in the boundary.	Refer to Question 7.9 in the Out of Scope section of the EIS Response Document.
3	EIS 8.2.7	Land Use & Tenure	Land Management Agreement	We were required to sign a land management agreement- the proposed port will break many rules outlined in the agreement.	Refer to Submission #60, Issue #1. Iron Road would welcome the opportunity to meet with the submitters to discuss this matter in detail.
Submission 88 – Name and Address withheld. Supportive submission; no issues raised.					
Submission 89 – ElectraNet. Supportive submission; no issues raised.					
Submission 90 – Clarke Energy (Australia) Ltd. Supportive submission; no issues raised.					
Submission 91 – Name and Address withheld. Supportive submission; no issues raised.					
Submission 92 – Name and Address withheld. Refer to MLP Response Document for Q&A relating to MLP.					
1	EIS	Out of Scope	Foreign owned entity	Iron Road is considered a foreign owned entity yet the company profile states that is an Adelaide based resources company.	Refer to Question 7.13 in the Out of Scope section of the EIS Response Document.
2	EIS	Out of Scope	Disclaimer	Iron Road has a disclaimer on every section of the documentation – why?	Refer to Question 7.12 in the Out of Scope section of the EIS Response Document.
3	EIS	Out of Scope	Data	Most data quoted by Iron Road is out of date	Refer to Question 7.22 in the Out of Scope section of the EIS Response Document.
4	EIS	Out of Scope	Timing of submission/free copies	Inflexibility in time is unjust over harvest period. Why weren't hard copies of the MLP and EIS made available for free?	Refer to Question 7.1 in the Out of Scope section of the EIS Response Document.
5	EIS	Out of Scope	Farming land	How will removing sustainable farming affect global food markets?	Refer to Question 7.29 in the Out of Scope section of the EIS Response Document.
6	EIS	Out of Scope	Market decline	Why hasn't Iron Road realised that the mining boom is in decline?	Refer to Question 7.30 in the Out of Scope section of the EIS Response Document.
7	EIS	Out of Scope	Process optimisation studies	Why are they still ongoing?	Refer to Question 7.18 in the Out of Scope section of the EIS Response Document.

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
8	EIS 10	Air Quality	Impacts on Agricultural values	Lack of information in EIS has no information about economic losses on grain producers and impact from dust contaminating grain.	Iron Road has undertaken extensive assessments in relation to Air Quality, Economic and Social Environment which are all detailed within the EIS (Chapters 10, 21 and 22 respectively).
9	EIS 4.2.3	Project Description	Power transmission line	Are the steel monopoles of varying pole heights? What are the implications for aerial water bombers during firefighting? How much firefighting access will there be along the corridor?	The current design has the poles at an industry standard height which is low enough not to interfere with potential aerial water bombing. Refer to Submission #1, Issue #1 for response in relation to fire management.
10	EIS 4.3.3	Project Description	Port design	Will customs office and Harbour Master only be manned part time?	This will be discussed and agreed in consultation with relevant Government agencies during the application process for a Port Operating Agreement.
11	EIS 4.3.3	Project Description	Module laydown area	Module Laydown area is a potential risk to agriculture. What is the bio-security management plan and treatment? What Quarantine arrangements are proposed?	The submitter has not stated why there is a potential risk to agriculture because of a module laydown area within the port area. Regardless, the land is owned by an Iron Road subsidiary company and all biosecurity and quarantine requirements will be met. As set out in Chapter 4 of the EIS, the biosecurity management plan will ensure compliance with the relevant quarantine legislation. This will be a 'secondary approval' as noted in Chapter 5.
12	EIS 4.3.4	Project Description	Port construction camp	What are the proposed daily and annual water usage estimates for the approx. 650 people at the construction camp?	The construction camp potable supply will be fed from the SA Water main along Lincoln Highway, into peak supply surge tanks near the camp. The design allowances for the potable water supply per site personnel have been based on the individual fixture allowances specified in Table 5-2 of 'Onsite Wastewater System Code', SA Health (April 2013) which indicates that the Daily Flow will equate to 119 L/person/day.

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
					The usage for the short term construction camp is not expected to have any negative impact on existing town supplies. Iron Road will continue to liaise with stakeholders, including SA Water and the DCTB, to ensure the supply is managed efficiently and effectively.
13	EIS 4.3.4	Project Description	Port construction camp	I understand that power will be supplied by diesel generators. They will generate a massive amount of noise which will impact on local residents. Will they run 24/7 or will there be a curfew period? Will there be banks of batteries to store power?	Diesel generators do not generate a "massive amount of noise" and will be designed to ensure noise limits are complied with. Power will be required 24/7. It is unknown at this stage of project development whether a battery back-up system will be provided.
14	EIS 4.3.4	Project Description	Port construction camp	Will IRD provide a mosque or prayer room in the construction camp?	There is no intention to provide any religious infrastructure.
15	EIS 4.4	Project Description	Long term employee village	What are the proposed daily and annual water usage estimates for the approx. 300 people at the long term employee village?	The design allowances for the potable water supply per site personnel have been based on the individual fixture allowances specified in Table 5-2 of 'Onsite Wastewater System Code', SA Health (April 2013) which indicates that the Daily Flow will equate to 119 L/person/day. The usage for the long term employee village is not expected to have any negative impact on existing town supplies. Iron Road will continue to liaise with stakeholders, including SA Water and the Wudinna DC, to ensure the supply is managed efficiently and effectively.
16	EIS 4.5	Project Description	Construction Phase	Environmental Protection Policy 2007 (Noise) - do residents get to decide what acceptable levels are?	Acceptable noise limits are determined by SA Government Policy.

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
					It should also be noted that Iron Road has undertaken a comprehensive noise impact assessment in accordance with government legislation and policies and the EIS Guidelines issued by the Minister for Planning. Should the CEIP Infrastructure be approved, Iron Road will undertake continuous noise monitoring in accordance with Australian Standards as required by both the CEMP and OEMP. The data will be published online and available for members of the public to see.
17	EIS 4.5.2	Project Description	Temporary Laydown areas	Are these within the corridor or on landowner's property?	These will be located within the corridor wherever possible. Should any laydown yards be required outside of this area, appropriate discussions will be undertaken with the impacted landowners.
18	EIS 4.5.4	Project Description	Quarrying materials	What Mining Licence does Iron Road have to quarry materials anywhere in their project?	No mining tenement will be required for the excavation of material as the Major Development declaration (Government Gazette 15 August 2013, varied 29 May 2014) allows the use of fill from excavations to be used in the construction of the various infrastructure components. Should any additional material be needed (unlikely), it will be sourced from established quarries.
19	EIS 4.5.5	Project Description	Concrete batching activities	How much water is needed to make the required amount of concrete at the port?	It is difficult to answer this without knowing the final construction techniques that may be utilised. In total, approximately 254 ML of water will be required at the port site annually. Note that EIS Chapter 4.33 states 224 ML per year which was a typographical error.
20	EIS 4.6.2	Project Description	Rail operations	How long will it take for one train to pass a point?	Refer to EIS Chapter 18.5.9 which states sixty seconds for an unloaded train (e.g. travelling from the port to the mine) and 100 seconds for a fully loaded train (travelling from the mine to the port).

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
21	EIS 4.6.2	Project Description	Air quality – rail operations	How will wagons be covered? How will IRD ensure bottom of wagons will not leave ore along the railway?	In relation to wagons being covered, refer to Submission #21, Issue #5. The loaded rail wagons will be covered prior to leaving the proposed mine to prevent the loss of any magnetite concentrate. Minimal dust emissions are expected from the rail wagons due to the high level of dust control proposed. At the port site the rail unloading facility will be enclosed and fitted with a dust control system under the wagons at the bottom dumper tip and conveyor loading point to capture any residual dust generated during unloading. The concentrate being transported is also a damp concentrate, further eliminating the chance of 'dusting'.
22	EIS 4.6.2	Project Description	Railway line operations	Six return trains per day, every day?	As set out in EIS Chapter 4.6.2, six loaded trains per day will be required to transport the magnetite concentrate from the proposed mine to the proposed port. The six loaded trains will comprise three trains running two return trips each per day. Further optimisation study work and future rail operations simulation may potentially reduce this number.
23	EIS 6	Stakeholder consultation and engagement	Not effective	Has not been accessible, thoughtful or timely.	Iron Road has undertaken extensive work over many years to identify and engage with as many stakeholders as possible and to ensure that various forums are provided for people to ask questions, receive updates and meet with Iron Road staff. Chapter 6 of the EIS details activities and events. Also refer to the 53 supportive submissions received during the public consultation process, many of which

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					are authored by Eyre Peninsula residents and businesses, and the results of the Community Perceptions Survey dated 1 June 2015.
24	EIS 6	Stakeholder consultation and engagement	District Councils	There are no agreements between the district councils involved with respect to cost, inclusive of a potential decline of revenue of properties in the area.	A potential decline of revenue of properties in the area is speculative. Regardless, management agreements will be in place with each of the four relevant DCs after Iron Road has secured funding and approvals and prior to construction.
25	EIS 8.2.4	Land Use & Tenure	Marine parks	How will mining shipping be regulated and excluded through the Sir Joseph Banks Group Marine Park? Will boats travel through that Marine Park? How will this be monitored?	Iron Road will liaise with all relevant Government authorities regarding shipping. That level of detail is not required for the EIS.
26	EIS 8.2.4	Land Use & Tenure	The Dog Fence	The Dog Fence is a renowned Snapper fishing area. Will public access be denied?	Iron Road's understanding is that the Dog Fence snapper area is located on the Far West Coast of the Eyre Peninsula, not at Cape Hardy. In relation to fishing generally in the Cape Hardy area, and as noted in Chapter 14.5.10 of the EIS, there will be an exclusion zone at the port site that will restrict public access (refer to Figure 4-18 of the EIS). The exclusion zone is important for biosecurity, quarantine and other security requirements and non-authorised personnel will not be able to access this area. Although those beaches have been known to support recreational fishing, stakeholder consultation has determined that it is not heavily trafficked as most fishing is undertaken from Cowley's Beach to the south which is the known tourist and fishing attraction. As set out in Chapter 22.5.5 of the EIS, public access to

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					Cowley's Beach will not be impacted by the proposed port development, with full access to both the beach and camping grounds maintained.
27	EIS 10	Air Quality	Rail operations	Will concentrate be covered? With what?	Refer to Submission #21, Issue #5.
28	EIS 10.5.1	Air Quality	Sources of air emissions	Why is there no data on such emissions from the port construction camp, e.g. diesel generators? How much greenhouse emissions from ships at berth for an expected 33 hour period per vessel with motor and boiler operating?	No data is required due to there being no credible potential for a material impact.
29	EIS 11.4.2	Climate Change and Greenhouse Gas	Design measures	Reduction in size of truck fleet- the mine is not operating with 93 trucks and has never been so IRD cannot claim credit for a reduction to 12 trucks.	Improvements in the design process provide valuable context to the reader and are a clear demonstration of how stakeholder engagement has altered and improved the project outcomes around minimising emissions of this size and complexity.
30	EIS 11.4.2	Climate Change & Greenhouse Gas	MOF	Does this facility mean overseas assembly, not local jobs?	Refer to Section 3.3 within the EIS Response Document.
31	EIS 12	Noise & Vibration	Rail operations	How long will it take from first hearing an approaching train until it is no longer heard- including whistle blasts?	This is a difficult question to answer in a definitive way due to the many variables involved e.g. the weather at the time (stillness of the air), the elevation of the train and/or the receiver, the degree of other background noise at the time etc. On a still night, with an elevated train and minimal background noise, a person with good hearing perception would be able to hear a train from a long distance away and thus this could be many minutes of audibility. Importantly the noise would be at levels that are below those that are regulated for harm or nuisance. Refer to EIS Appendix M, Section 3.

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32	EIS 12.4	Noise & Vibration	Design measures	Iron Road says that the railway line has been designed with wide bends and loops to minimise wheel squeal. Where is the decibel data?	Refer to EIS Appendix N for the data.
33	EIS 13	Terrestrial Flora & Fauna	Control & management strategies	What consideration has been given to Public Liability Insurance issues for land owners?	The submitter has not advised why he/she believes that would be necessary; however, such issues can be discussed directly with impacted landowners.
34	EIS 14.3.7	Marine and Coastal Environment	Marine fish and mammals	Protection of Leafy Sea Dragons and Whales?	The findings of the marine impact assessment, including leafy sea dragons and whale species, are detailed in Chapter 14.8 of the EIS.
35	EIS 15/16	Surface Water / Groundwater	Design measures	What protections are in place against runoff and leaching? Who is responsible for this?	Chapter 15 of the EIS details the mitigation measures to control run-off and Chapter 16 demonstrates the lack of leaching risk. Iron Road will be responsible for both management and monitoring.
36	EIS 16.5	Groundwater	Erosion	Compaction and erosion of railway tracks.	Refer Submission #21, Issues #2 and #5.
37	EIS 17.7.1	Airblast & Vibration	Blasting impacts	What will the impact of blasting be on holiday homes at Port Neill? What compensation has been planned and budgeted for due to vibration impact and damage to buildings, private and public?	As stated in EIS Chapter 17.7.1, ground vibration and air blast will be below levels that will result in human discomfort at the nearest receptor. The levels that cause structural damage would need to be considerably higher. Consequently, homes and buildings will not be affected.
38	EIS 22.3	Social Environment	Population and Demography	An Iron Road person stated that the Eyre Peninsula was in decline. What is the basis for this statement?	Census data gathered by the ABS (publicly available and independent information) shows a systematic decrease in population in several of the EP Council areas as set out in EIS Chapter 22. Further information on population can be sourced from http://www.abs.gov.au/websitedbs/censushome.nsf/home/data

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Submission 93 – Name and Address withheld. Refer to MLP Response Document for Q&A relating to MLP.					
1	EIS	Out of Scope	General	Why is there a disclaimer for accuracy and completeness in every section?	Refer to Question 7.12 in the Out of Scope section of the EIS Response Document.
2	EIS 10	Air Quality	Photo	Photo is misleading- actually haze from crops- cannot be compared to toxic dust from blasting and mine operation?	The dust will not be toxic. Refer to Appendix J of the EIS for full analytical results.
3	EIS 13	Terrestrial Flora and Fauna	Birds	Plovers are very territorial birds and other plovers and other bird species will resent any intrusion onto new territory. What of Migratory birds?	Plovers are known to be present in the region (refer to Figure 13-11 of the EIS). Individuals may visit the area but are not expected to be reliant on specific habitat features within the project area and thus the impact will be negligible to the health of the population. Also refer to Attachment B of the EIS Response Document, specifically DEWNR – Ecology Issue #4 and Iron Road's response.
Submission 94 – Name and Address withheld. Neutral submission. Refer to MLP Response Document for Q&A relating to MLP.					
1	EIS 21	Economics	Local Procurement	It is hoped that Iron Road will make a commitment to buy local throughout the project.	Iron Road has a stated preference to source local services. Measures to support local businesses are outlined in Table 21-14 of the EIS.
2	EIS 22.7.4	Social Environment	Long term employee village	While I recognize the efficiency and effectiveness of building a separate long tem accommodation village I think it has social and cultural negativities in that it creates an 'us and them' both visually, attitudinally and in daily living. I would prefer to see pockets of flats or apartments integrated throughout the town with common eating areas, laundry areas etc, that don't present as 'Iron Road's' rather they appear as there for all the District's use. This would also provide a better option left behind	The impact of the employee village is discussed in Chapter 22.5.4 of the EIS and measures to encourage integration of employees into the community are outlined in Table 22-23 on page 22-55 of the EIS. Wudinna does not have the capacity at present to accommodate a large increase in population or to allow for "pockets of flats"; however, as stated in Table 22-23, Iron Road will: • Support the preparation of a Structure Plan by Wudinna DC;

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				and more able to be utilized by the community when the mining comes to its conclusion and is closed.	• Collaborate with both the DC and SA Government to facilitate planning for new residential development; and • Encourage its employees to live in town but ensuring the above measures are in place to minimise pressure on housing prices.
Submission 95 – TAFESA Wudinna. Supportive submission; one comment noted.					
1	EIS 21 & 22	Economics/Social Environment	Training	As the Iron Road project has developed we have noticed a significant interest and inquiry into training and reskilling outside of agriculture, which had been our predominant area of training interest. A second sustainable industry will offer a wide range of careers and give real employment choices. This will enable people the choice to stay or move to live in a regional area and enjoy the lifestyle benefits.	Iron Road agrees with these comments and believes that the proposed mine and associated infrastructure will provide diversification for the Eyre Peninsula and will result in economic growth for the region.
Submission 96 – Stop Invasive Mining Group. Relates to MLP only. Refer to MLP Response Document.					
Submission 97 – RESA – Resources & Engineering Skills Alliance. Supportive submission; no issues raised.					
Submission 98 – Name and Address withheld. Refer to MLP Response Document for Q&A relating to MLP.					
1	EIS 7.3.3	Physical Environment	Drought	In Figure 7-6, 2014 rainfall deficiencies are shown for the period September to November 2014, this is hardly surprising for an area which has winter dominated rainfall patterns and Iron Road should know as they are in touch with the community that 3 months rainfall figures do not make a drought! Iron Road should use a more realistic figure to explain the effects of drought.	The submitter has misinterpreted the information provided. Chapter 7.3.3, including Figure 7-6, does not state or indicate that 3 months of figures equates to a drought. The rainfall deficiency map (sourced from the Australian Bureau of Meteorology) shows SA as a whole, not just the Eyre Peninsula, and is merely used as an observation that in recent times, severe rainfall deficiencies have been observed across the CEIP area.

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2	EIS 12.5.4	Noise	Noise pollution from trains	What steps will IRD take to minimise noise pollution from trains – building of noise barriers, planting of native vegetation?	Chapter 12.5.4 and in particular Table 12-18 sets out a summary of noise and vibration impacts to sensitive receivers during construction and operation of the railway. The noise prediction modelling demonstrates that the noise levels will comply with the Rail Noise Guidelines for both the day-time and night-time periods. The train pass-bys will generate relatively short periods of noise (when compared to the background noise levels), intermittently during the day and night, separated by longer periods of quiet. Noise management strategies will be implemented in accordance with the OEMP to minimise noise impacts as much as possible.
Submission 99 – Name and Address withheld. Relates to MLP only. Refer to MLP Response Document.					
Submission 100 – Joy Global. Supportive submission; no issues raised.					
Submission 101 – Corporate Aircraft Charter. Supportive submission; no issues raised.					
Submission 102 – Tumby Bay Residents & Ratepayers Assoc. Inc. Refer to MLP Response Document for Q&A relating to MLP.					
1	EIS	Out of Scope	EPA particulate levels	EPA - particulate levels - What is the legislative authority underpinning the 'adoption' of what appears to be arbitrary data points?	Refer to Question 7.21 in the Out of Scope section of the EIS Response Document.
2	EIS	Out of Scope	Fuel at the port	Given the quantities of fuel likely to be consumed, does the proposed port have the capacity to receive and store fuel?	Refer to Question 7.19 in the Out of Scope section of the EIS Response Document.
3	EIS	Out of Scope	Third parties	Where are the third party players in the project that might give credibility to the claims being made?	Refer to Question 7.20 in the Out of Scope section of the EIS Response Document.
4	EIS	Out of Scope	Impact Management Plans	What are the risks to the project if these issues are not developed to the satisfaction of the property owner?	Refer to Question 7.15 in the Out of Scope section of the EIS Response Document.

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5	EIS 11	Out of Scope	Climate Change & Greenhouse Gas	Who audits the applicant with respect to compliance with the provisions of the approvals granted in this respect?	Refer to Question 7.31 in the Out of Scope section of the EIS Response Document.
6	EIS 4.2.1	Project Description	Railway line	Reference to Figure 4-10: Where does the water generated by this infrastructure drain in the event of rain (or excessive rain)?	To vegetated swales with culverts used where necessary.
7	EIS 4.2.3	Project Description	Power transmission line – port	Where is the power supply for the port coming from? Will the additional drain upon the network place power supplies in the local communities at risk of blackouts or brown outs? Will the additional demand place a price premium on users on Eyre Peninsula, especially community users? If this is new infrastructure, the question is why isn't it subject to an environmental impact assessment if it's essential to the project?	As stated in Chapter 4.2.3 of the EIS, the power supply to the port will be via a 132kV transmission line to be built and operated by ElectraNet which will obtain its own approvals to do this. Iron Road's understanding is that power supply to the CEIP will be on the basis that Government regulators and the relevant service provider will ensure that supply to existing customers and consumers is preserved. Discussions will be ongoing with suppliers to ensure that communities are not impacted from unforeseen disruptions or increased costs due to Iron Road's power usage and the Company will enter into appropriate commercial agreements with those suppliers in due course.
8	EIS 4.3	Project Description	Port	It is noted that the proposed port is listed as an export port for copper concentrate. This is the first occasion that the export of copper has been raised; therefore what are the environmental impacts of copper in the proposed project?	Iron Road does not intend to mine or export copper from the CEIP and has never stated such an intention. The port is designed to be a multi-user port, therefore should another user wish to export copper from Cape Hardy, they would need to seek their own regulatory approvals.

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9	EIS 4.3.3	Project Description	Stormwater management	What is the nature of the contaminants in this 'run-off'? How will these contaminants be monitored?	Contaminants would be mainly inert magnetite concentrate which does not represent a risk to the environment or human health. Measures are also designed to prevent environmental impact in the event of a fuel or chemical spill. Such a spill would need to be cleaned up and monitoring undertaken to the extent necessary to confirm the clean-up has been successful. Other monitoring requirements will be determined by relevant SA Government agencies.
10	EIS 4.3.3	Project Description	Water supply	Source of the water used for dust suppression - is this potable water sourced from SA Water and the Prescribed Wells at Port Lincoln? What is the demand for potable water at the village? What is the estimated potable water use for concrete batching and for the construction village?	Water volumes to be used at the proposed port are detailed in Chapter 4.3.3 and are approximately 254 ML per year and will be sourced from SA Water. This volume is to be supplemented by collected stormwater from the site. The future source of SA Water supplies is a matter for SA Water. It is unnecessary for the environmental assessment to break water usage down further at this stage as all water requirements will be refined at the detailed design stage.
11	EIS 4.3.3 & 4.3.4	Project Description	Long term employee village & port construction camp	Given that both of these facilities are included in the Major Project Development application and therefore come under the auspices of the Minister and Planning SA for ultimate approval, what financial liability has the District Council of Wudinna in the meeting of Council controlled infrastructure (roads, water and waste water) to service these camps, or will the Company totally finance this aspect of the development?	There will be no financial impediment or liability for Wudinna DC in relation to the proposed long term employee village. Note that the DCTB is the correct local authority in relation to the proposed construction camp at the port site (not Wudinna) and will also not be required to finance any portion of its development.
12	EIS 4.5.4	Project Description	Earthworks	Re: material required for the construction of the port and corridor - where is the reference to these licence requirements in the MLA?	There is no reference to licence requirements in the MLP as no mining tenements will be required for the construction of the port and corridor. Refer to Submission #92, Issue #18 for further information.

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13	EIS 4.6.4	Project Description	Port Operations	What is the impact upon the marine environment of propeller wash from either tugs or the Cape size vessels entering or leaving the confines of the port?	Vessels will be under the control of tugs within the port area. Given this, and the water depth, impacts on seagrass from propeller wash will be minimal.
14	EIS 5.4.2	Statutory Framework	Development Plan Framework	Perhaps the applicant can explain how this application contained a definitive statement as to the existence of the Tumby Bay Coastal Zone prior to its Gazettal?	The gazettal notice refers to an amendment of the existing plan, not a new one. As landowners and ratepayers within the TBDC, Iron Road was consulted about the proposed amendments in 2013.
15	EIS 5.4.2	Statutory Framework	Development Plan Framework	What is the extent of any restricted zone as a consequence of the port activities and neighbouring aquaculture activities?	The proposed port operating limit is shown in Figure 4-18 of the EIS and this is subject to agreement with DPTI (as noted in Chapter 4.3).
16	EIS 5.4.2	Statutory Framework	Development Plan Framework	Where is the risk assessment with respect to fire and weed and potential contamination of the native vegetation in the WPA vs a greater separation distance?	Chapter 3.2.5 of the EIS summarises the constraints and optimisation process used to determine the corridor location. The proposed alignment represents a balance between maximising environmental protection, minimising impacts on agricultural operations and engineering constraints.
17	EIS 5	Statutory Framework	DC Tumby Bay 2012-2022 Strategic Plan	Where is the 'needs analysis' supporting the contention that the services available at Port Neill could sustain the 650 construction camp or the 100 port operational workers? Where is the impact assessment upon services available in the Tumby Bay District as a consequence of the application?	These topics have been discussed at length in Chapter 22.5.1 and 22.5.2.
18	EIS 5.2.2.	Statutory Framework	Other legislation	Where is the Commonwealth approval for the purchase of all land subject to this proposal?	Approvals have been obtained from the Foreign Investment Review Board. Those approvals do not form part of the EIS.

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19	EIS 6	Stakeholder consultation and engagement	Public meetings	Why is the company NOT conducting public meetings in the township of Tumby Bay, given that a significant component of the project resides within the DC Tumby Bay and potentially impacts on the ratepayers of the District?	Iron Road has held a public meeting in Tumby Bay (which was attended by TBRARA representatives) together with other engagement forums such as 'open house/drop in sessions'. Port Neill is also located within the DCTB area and will be more heavily impacted than Tumby Bay, therefore many meetings and other engagement forums have been held in that town.
20	EIS 6	Stakeholder consultation and engagement	DC Tumby Bay	What is the level of consultation/engagement being undertaken with the DCTB in this matter? Is the consultation being undertaken in a non-transparent manner?	As set out in Chapter 6, there have been numerous discussions with DCTB over the years, some with staff and others with both staff and elected members. Engagement and consultation is ongoing.
21	EIS 7	Physical Environment	Meteorological data	When will the actual meteorological data relevant to the port site and infrastructure corridor be collected by the applicant to enable 'predictions' having credibility to be undertaken?	Collection of annual observational datasets of meteorological data prior to an assessment, where meteorological data does not exist for the proposal location, is not standard environmental assessment practice for any Australian State. However, it is expected that meteorological data will be collected at the port site for a 12 month period prior to the start of construction, subject to any conditions that may be attached to the approval (if given). It should be noted that the meteorological data were generated using recognised techniques i.e. that draw on spatially and time-varying synoptic conditions and calculating the local effects based on terrain, land use, and other parameters. The meteorological model dataset generated includes three-dimensional spatially varying wind vector fields varying each hour to create 8760 separate hourly tests for testing for the assessment.

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22	EIS 7	Physical Environment	Meteorological data	Where is the site specific meteorological data or have all the factors that are dependent upon site specific meteorological data been mathematically derived from remote data?	The meteorological data used has been recommended by expert air quality consultants. These data were reviewed and deemed appropriate by the experts in the EPA for the modelling task required.
23	EIS 7	Physical Environment	Operational transport risks (fire)	Does the applicant intend to operate the transport corridor on fire ban days? What fire prevention strategy exists to ensure that no fire emanates from the corridor, given that the activities taking place within the corridor are potentially foreseeable fire initiators?	Refer to Submission #1, Issue #1, Submission #17, Issue #1 and Submission #18, Issue #5.
24	EIS 7.3.3	Physical Environment	Natural hazards	What is the relevance of this section of the application, other than to provide an 'apparent justification' for the applicant's position that the proposed infrastructure may provide an alternative to what given the breadth of agriculture on the Peninsula, including the Kimba region which is above the Goyder Line?	This is contextual information with the purpose of identifying any natural hazards that may affect either the construction and/or operation of the CEIP Infrastructure.
25	EIS 7.3.5	Physical Environment	Boron	Given that the corridor is situated in agricultural land, were the soil samples analysed for their boron content? In the event that they were, what are the results of the analytical work? What measures will the applicant take to not spread high boron content soils over existing agricultural land, given the known growth inhibiting properties of boron? If the soil samples were not analysed, when will this work be undertaken and the results made publicly available for the consideration of landowners and the community?	Any soil disturbance for construction of the rail and other linear infrastructure will be limited to the corridor and rehabilitated on completion of construction. Dust and erosion control measures will ensure negligible impacts on adjoining land. For this reason, analysis of soil samples for boron is unnecessary. Note that the land is currently used for agricultural purposes and soil disturbance has been undertaken by farmers for decades, seemingly without any concern that boron might be present.

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26	EIS 8.2.7	Land Use & Tenure	Land Tenure	(Reference to land parcel at the port site which is owned by DC Tumby Bay): Can the applicant provide an explanation as to how this property is to be acquired from the Crown? What is the financial loss accrued by Council?	There is a process under the *Local Government Act 1999* to enable the disposal of DC land to a third party and this process will be followed. There will be no financial loss to DCTB.
27	EIS 8.2.7	Land Use & Tenure	Compulsory acquisition	What is not being declared is that the land can be compulsorily acquired under s78 of the Development Act, given that the project has major development status (s46)	A declaration is unnecessary as having major development status under section 46 of the *Development Act* does not give Iron Road compulsory acquisition rights under section 78 of that Act.
28	EIS 8.2.7	Land Use & Tenure	Impact Management Plans	The corridor may have significant management impacts for those affected. These include re-alignment of fences, water reticulation, crossing points and the potential to not access part(s) of the property. Who bears the expense of these management impediments, given that they are for all intents and purposes permanent?	Refer to Iron Road's response to Submission #47, Issue #2.
29	EIS 8.2.6	Land Use & Tenure	Existing land use - Other exploration tenements	It is assumed, in the absence of evidence to the contrary, that all necessary agreements are in place between the applicant and those parties identified (being the holders of exploration tenements). It is assumed that failure to secure said agreements would mean the project is not able to progress.	No agreements with the holders of the exploration licences are necessary. The EIS for the CEIP Infrastructure has been prepared and submitted under the *Development Act*, not the *Mining Act*.
30	EIS 8.2.6	Land Use & Tenure	Existing land use - Long term employee village	The question is why the District Council of Wudinna is undertaking a planning process for the long term on behalf of the applicant, when the development application is in the name of Iron Road, not Council? An examination of the funding arrangement may also be in order given that an issue of GST may be involved.	Wudinna DC is not undertaking a planning process on behalf of Iron Road and there are no funding/financial matters to be examined. As clearly noted on page 22-43 of the EIS, Iron Road is supporting the preparation of a Structure Plan by the Wudinna DC to facilitate planning for new residential development. This relates to housing demand in Wudinna.

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31	EIS 10	Air Quality	Sensitive receivers	It is noted that only 30 of the 66 residences along the corridor have been identified as 'sensitive receivers' being within 1 km from the corridor.	The selection of sensitive receptors is in accordance with good impact assessment practice and will be the subject of government assessment.
32	EIS 10	Air Quality	Climate and modelling	When will the modelling be revised to represent the actuality of Cape Hardy and the transport corridor?	Modelling is sufficiently rigorous to show that air quality criteria can be met. During operation, real time monitoring will be used to ensure criteria are met.
33	EIS 10	Air Quality	Marine	What mitigation regime has the applicant in place to prevent dissolved substances (unidentified) to enter the marine environment?	The main pathway for material entering the marine environment is through dust. Dust management measures are outlined in Chapter 10, Table 10-15 of the EIS.
34	EIS 10	Air Quality	Ore outside of wagons	What steps are taken to ensure any residual ore on surfaces outside of the wagon are removed before the return journey? (The same question applies at the loading end where ore may reside on the outside flat surfaces of the wagon) .	Refer to Submission #92, Issue #21.
35	EIS 10.5	Air Quality	Gaseous emissions	What are the actual baseline levels of emissions and thence the impact of the proposed project, having regard to actual meteorological conditions that prevail at the port and along the corridor?	This is detailed in Chapter 10 of the EIS.
36	EIS 10.5	Air Quality	Meteorological modelling	What are 'unfavourable' conditions? Where will the forecasting originate, given that the modelling has been based upon remote sites and not representative of the actual climatic conditions encountered at Cape Hardy?	The meteorological modelling is considered to provide representative predictions of key climate information at the project site. The model-predicted wind patterns for the Cape Hardy site were compared with actual observations from the nearest coastal monitoring site (Port Lincoln) and were found to be in general agreement. During operation, real time monitoring will be used to ensure criteria are met.

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37	EIS 10.5.2	Air Quality	Impacts on Agricultural Values	What is the impact on the individual receptors for the period of time that the construction work is in their vicinity? What appears to have been overlooked in the assessment is the fact that the majority of the sensitive receivers rely on rain water catchment. The issue being, what impact does the construction work have on their catchment facilities, apart from any nuisance generated?	The nearest receptor is 140 m from the corridor. Major roadworks frequently occur at a closer distance to receptors and dust can be managed through water application and other standard measures. These are outlined in Table 10-15 of the EIS. Given the buffer distance and these measures, dust from construction activities on roof catchment areas will be negligible compared to background dust. In addition, the project dust deposition criteria of 4 g/m2/month (total) and 2 g/m2/month (monthly addition) are for the protection of amenity, but provide a level of protection of effects on water catchment.
38	EIS 10.7	Air Quality	Emission rates from locomotives	Where is the actual data relevant to the type and size of the diesel locomotives that will be used in this project?	Refer to EIS Appendices Volume 1, Appendix M, Section 4.3, page 17.
39	EIS 10 App J	Air Quality	Baseline monitoring	Assessment was undertaken for four receptor sites... is four a statistically significant sample given the length of corridor and the varying meteorological conditions over that distance? Where is the baseline data for all receptors?	Four receptors are sufficient for air quality assessment for the corridor, where there is only a very low risk of air quality impact from Iron Road's proposed activities. The minimum distance between the track and sensitive receptors along the length of the corridor is 140 m and this distance was selected for the receptor sites in the modelling. The meteorological data used for the modelling was adopted from the mine site as this was found to be less conducive to dispersion of dust compared to that at the port site. These factors both demonstrate that the 'worst case' conditions were adopted where possible for the modelling of the corridor emissions.

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					Baseline air quality for the corridor was estimated based on a review of monitoring data from Whyalla. Typically baseline air quality for rural areas is good, except when affected by agricultural activities such as tractor, harvester & truck activity, controlled burning, bushfires and dust storms.
40	EIS 10 App J	Air Quality	Baseline monitoring	What are the background concentrations inclusive of particulate matter from diesel combustion (especially the known carcinogens)?	In rural areas, such as the CEIP study areas on the Eyre Peninsula, background concentrations would be small and negligible and therefore not detectable by monitoring.
41	EIS 12	Noise & Vibration	Rails operations	What are the anticipated lay times as well as the time taken for a train (loaded v unloaded) to pass a given receptor?	Refer to Submission #92, Issue #20.
42	EIS 12	Noise & Vibration	Noise and infrasound	Does the application address the level of noise transmission (inclusive of infrasound) emanating from the site, be it across the landform or across the water to Port Neill and other nearby receptors? Given the use of heavy machinery, what are the levels of infrasound transmitted to the receptor sites?	The noise assessments predict the noise and vibration levels due to the construction and operation of the proposed infrastructure. If the noise was predicted to be transmitted off-site then it was assessed against the relevant noise policy/guidelines. Infrasound is not specifically addressed and was not raised by the EPA or in the noise policy.
43	EIS 12.5.3	Noise & Vibration	Blasting at port	What is the impact upon the residents of Port Neill and the local residents?	Impacts will be negligible as set out in Chapter 12.5.3 of the EIS.
44	EIS 13.2	Terrestrial Flora & Fauna	Field survey	What constitutes a rapid field survey? What proportion of the corridor was actually subjected to detailed flora and fauna assessment?	Appendix C within Appendix O of the EIS shows which areas were ground truthed and which were inferred or inferred from binoculars. This information was supplemented by expert knowledge of the area.
45	EIS 13.3.1	Terrestrial Flora & Fauna	Survey	When will the actual flora and fauna survey over a period of 12 months, thereby covering the normal yearly cycle, be undertaken?	Surveys have already been conducted at the optimum time of the year.

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
46	EIS 13.5.5	Terrestrial Flora & Fauna	Effects on fauna	Given the fact that white bellied sea eagles have been observed in the area, will the applicant provide a detailed plan of how they propose to protect these birds and / or provide an ' offset habitat' given the port will operate on a 24/7 basis?	Impacts on the White-bellied Sea Eagle are discussed in Table 13-20 of the EIS. Negligible impacts are expected so no specific protection measures are necessary. Note that the White-bellied Sea Eagle is no longer listed as Migratory Terrestrial under the EPBC Act.
47	EIS 14.3.4	Marine & Coastal Environment	Water Quality	Reference to water samples compared to the Environment Protection (Water Quality) Policy criteria for marine waters. Is it the position of the applicant to accept a lower level of assessment in hope that the final decision on this matter does not occur prior to approval being given?	The CEIP Infrastructure is being assessed via an EIS which is the highest level of assessment under the Development Act. Iron Road's position has always been that it will undertake a rigorous assessment, and it has done so.
48	EIS 14.3.8	Marine & Coastal Environment	EPBC Act controlled action	If the position held by the applicant were correct, then why has the Commonwealth classified the infrastructure component as a 'controlled action'?	It is a controlled action due to the potential impacts on the Southern Right Whale only.
49	EIS 14.4	Marine & Coastal Environment	Design Measures	Given the existence of bedrock beneath the layer of sand (sediment) the question arises how does the applicant intend to carry out pile driving into bedrock?	Bedrock would be drilled first before piles are driven. This is a well-established construction technique.
50	EIS 14.5.1	Marine & Coastal Environment	Habitat clearance	What loss will be attributed to propeller wash from cape size vessels entering and leaving the proposed facility, noting the proximity of the aquaculture zone and the Joseph Banks Marine Park? Given the depth of water cape size vessels draw when fully loaded, what is the extent of prop-wash when these vessels are under power?	Refer to response to Issue #13 above.

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
51	EIS 14.5.7	Marine & Coastal Environment	Marine environment	Will contaminated ore containing copper increase the level of copper to a point where an environmental impact is seen?	Analysis of concentrate has shown that copper makes up 0.002% of the material. This is insignificant and will not represent a risk to the marine environment.
52	EIS 14.6.2	Marine & Coastal Environment	Construction & Environment management	What is the compliance & enforcement regime that will be in place in the proposed port & who will be responsible for it? Whilst it is the position of the applicant that ships entering /leaving this area will adhere to a set of rules, the question is whether the rules are enforceable at law & who will be the compliance officer to ensure the rules are upheld?	Refer to Chapter 5 of the EIS for the statutory framework governing all aspects of the CEIP including the port. For example, a port operating agreement will be required as will various approvals relating to quarantine and biosecurity. Enforcement for any breaches with compliance will be made by the relevant Government agencies, which will be a combination of both State and Federal.
53	EIS 14.8.1	Marine & Coastal Environment	Findings and conclusions on EPBC matters	It is noted that the project is a controlled action for the whales. What protection will be afforded the leafy dragon, a protected species?	Refer to Submission #92, Issue #48.
54	EIS 16	Groundwater	Kielpa aquifer	What is the regional impact upon the Kielpa aquifer as a consequence of this significant extraction rate? What is the annual recharge rate for the aquifer?	Refer to Figure 16-5 within Chapter 16 of the EIS for regional impacts. Recharge varies across the borefield; for this reason, modelling considered a range of recharge rates: 1, 7 and 15 mm per year.
55	EIS 17.3.3	Soil & Land Quality	Site contamination	It is noted that the ore will be transported from the mine in covered bottom dump wagons. Are the wagons sealed to prevent the escape of fugitive dust? Are the wagons decontaminated (cleaned) before leaving the port facility on the return to the mine?	Refer to Submission #92, Issue #21.
56	EIS 18	Traffic & Transport	Port Neill impacts	What is the impact upon the community, especially the community of Port Neill, where a very significant increase in traffic and its consequential risks (accidents, noise, pollution etc) will occur?	The benefits and impacts that will result in the Port Neill community are discussed in a number of EIS chapters including traffic in Chapter 18 and Appendix W. The conclusion from the assessment is that the benefits are significant and the impacts are manageable.

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
57	EIS 21	Economic Environment	Local Procurement	It is noted that a significant quantity of explosives will be required on a daily basis. What is the procurement model for the supply of this commodity? Will it be shipped in from overseas to the port and railed to the mine site or will it be transported from an Australian Manufacturer (South Australian or Interstate) using local transport companies?	Explosives will be brought in by road transport in accordance with dangerous goods and other applicable legislation. Procurement of explosives is outside the scope of this assessment.
58	EIS 21	Economic	Data used	Given that the application was lodged late in 2015, the question of why the economic data used relates to 2010/2011 and 2012/2013?	This was the latest ABS, and thus credible, data source available in late 2015.
59	EIS 22	Social Environment	Housing & Accommodation	In the event the supply is deficient, what is the applicant's position with respect to the provision of long term housing in Tumby Bay, Port Neill and Cleve and to a lesser extent, Wudinna?	Iron Road will continue to work constructively with the relevant DCs to manage any need for additional housing should this be required. Refer to Table 22-23 (page 22-55 of the EIS) for control and management strategies in this regard, together with Submission #74, Issue #4.
60	EIS 22	Social Environment	Population & Social Services	What is the predicted demand upon medical (including dental) services arising from the construction camps at Wudinna and Cape Hardy? What is the capacity of the services in Wudinna and Tumby Bay to meet this need?	It is assumed that the submitter is referring to the long term employee village at Wudinna as opposed to a construction camp at Wudinna (which is not proposed). The detailed impact assessment is located in Chapter 22 and Appendix Y of the EIS and the proposed management actions are outlined in Table 22-23 of the EIS which include collaboration with local and State Government agencies to ensure adequate supply of all social services. An ongoing constructive relationship with DCs and the State Government service providers will ensure appropriate modifications should the need arise.

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
61	EIS 22.3.6	Social Environment	Social Services & Facilities	What representation has been made to SAPOL for the assignment of additional Police resources at Wudinna and Tumby Bay to cope with the significant influx (1950) of single men in the respective Cape Hardy and Warramboo mine camp sites?	This matter has been considered in Table 22-23 (page 22-54) of the EIS which sets out control and management strategies including: • Liaising with police and providing regular updates of construction workforce schedules to ensure adequate police resources would be available; and • Working with police, residents, DCs and other stakeholders to develop and implement community-based safety awareness programmes and strategies to reduce the potential for crime and fear of crime. For clarification, it is misleading and unjust to suggest that the construction workforce will be solely single men or individuals that will require special police attention.
62	EIS 22.3.5	Social Environment	Economy & Labour	Where is the evidence to support the assumption that the workforce for the port would be drawn locally? What is the workforce profile for the port and how does this match the skills of locally available candidates?	It is Iron Road's policy to employ locally and provide opportunities for local businesses. The local community has been appreciative of this position and Iron Road's ongoing consultation with community members have not raised any concerns in this regard, and neither have other stakeholders such as the DCTB. Refer to Table 22-23 of the EIS (page 22-54) for control and management strategies to increase local labour force participation. Should specific expertise be required from outside of the immediate skill base that is available, it is envisaged that those individuals with the relevant skills would choose to reside locally.

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
63	EIS 22	Social Environment	Accommodation	What accommodation will the applicant provide for long term employees associated with the operation of the port? What is the current level of building approvals and then the trend over the past five years to 2015, given that the final version of this component of the report was signed off 4 Nov 2015?	There are no plans for company-built accommodation in the Port Neill region. Historical building approvals are irrelevant to the issue as building only occurs where there is a demand, and recently there has been little development in the Port Neill region. There is significant opportunity for existing or future investors to develop accommodation should the project receive approval and be developed.
64	EIS 22	Social Environment	Impacts on social services	What is the predicted impact upon medical, dental, community health pharmaceutical ambulance, emergency services of an additional 600+ construction workforce available in Tumby Bay? What is the capacity of the services in Wudinna and Tumby Bay to meet this need? A simple question being is there enough doctors in Tumby Bay to cater for the proposed construction work force impact?	Construction is a short term activity. The construction camp at the port is being established to provide accommodation during this period for those workers that do not reside locally. This is typical of many similar projects around the country and the world and the provision of services for this type of activity are well known and will be provided e.g. medical. As the majority of the construction workers will reside elsewhere, they typically will have their hometown doctor to rely upon and thus a significant demand, above that which the company will supply, is not envisaged. Refer to Table 22-23 of the EIS for control and management strategies, which includes Iron Road's commitment to participate in local and State Government planning to provide for social services and facilities for the benefit of both existing and incoming residents and workers.
65	EIS 22	Social Environment	Safety & Security	If this is the management plan for the Wudinna Accommodation Plan, then it would appear to contradict the 'integration' of the workforce with the local community model espoused by the applicant. Which model is to be recognised as that applying to this application?	The submitter is confused between the long term employee village proposed for Wudinna and the construction camp to be located within the boundary of the ML at Warramboo. It is the long term work force at Wudinna that will integrate with that community. Refer to Chapter 22 of the EIS for details.

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
66	EIS 22	Social Environment	Emergency services	What is the current level of emergency services in Wudinna and surrounding districts, especially Warramboo? What will the emergency services requirement be in the following circumstances: a) the construction phase where 1000+ employees located at the mine site, not Wudinna? B) the village of 300 at Wudinna in the operational phase? C) the contractors' camp at the mine for 300 some 45+ km from Wudinna? The existing emergency services, especially ambulance services, that service the existing district, noting staffed in the main by volunteers, compared the that which should be provided in the scenarios (a) (b) and (c) listed above needs to be articulated. How does the Company propose to address the anticipated shortfall?	The current status of emergency services in the Wudinna area along with the anticipated additional load during construction and operation of the CEIP Infrastructure is outlined in EIS Chapter 22 and associated Appendix Y. Iron Road will continue to work closely with the relevant government agencies and DCs to ensure timely contribution to the planning process. It is also worth noting that the proposed mine will have its own internal emergency services that will also service the construction camp and may be able to provide support to external services in the event of a significant regional incident, such as a bush fire.
67	EIS 22	Social Environment	Population & Demography	Can you define through the extensive records of community consultation 'which proportion of the local community and which demographics' expressed a supporting view that the CEIP may bring long-term population to the district?	Iron Road received a large number of public submissions supporting the CEIP (53 out of 105), recognising the many and numerous benefits the project will bring to the Eyre Peninsula such as increases in employment, diversification of industries and an increased population. This is consistent with Iron Road's community consultation over the last few years where those benefits were consistently outlined by various parties. Social and economic benefits are discussed in detail in Chapters 21 and 22 of the EIS.
Submission 103 – SACOME. Supportive submission; no issues raised.					

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Submission 104 – Stop Invasive Mining Group. Relates to EIS only.					
1	EIS	Out of scope	Existing port facilities	Centrex has reduced its iron ore operations on the EP; properties up for sale or sold.	Refer to Question 7.26 in the Out of Scope section of the EIS Response Document.
2	EIS	Out of scope	Tumby Bay CRG	We cannot recall the TBCCG ever holding a public meeting to convey the information they receive to the ratepayers of the DC of Tumby Bay.	Refer to Question 7.27 in the Out of Scope section of the EIS Response Document.
3	EIS	Out of scope	Community Reference Groups	Iron Road has entered into a joint MoU with several peak industry bodies on the Eyre Peninsula including RDAWEP. The "independent chairperson" of TBCCG is on this board. How can this be an independent committee?	Refer to Question 7.28 in the Out of Scope section of the EIS Response Document.
4	EIS	Out of scope	Foreign owned entity	(Iron Road a Foreign Owned entity) We cannot recall this ever being declared by Iron Road.	Refer to Question 7.13 in the Out of Scope section of the EIS Response Document.
5	EIS 4.3	Out of Scope	Port	The grain industry, grain-growers would have the expense of establishing the export facility with no guarantee that grain will not be contaminated by iron ore dust and other heavy metals that could be in the dust. The perceived $10 saving would disappear in the costs of the facility. Will this lead to, in some cases, substandard uncontrolled Chinese imports on EP?	Refer to Question 7.23 in the Out of Scope section of the EIS Response Document.
6	EIS 2.1	Project Justification	Social licence	What social licence has Iron Road Limited obtained?	A definition developed by Robert Boutilier and Ian Thomson is "The social licence is the level of acceptance or approval continually granted to an organisation's operations or project by local community and other stakeholders. It has four levels from lowest to highest: withdrawal, acceptance,

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					approval and psychological identification. Most companies or projects are in the acceptance or approval range most of the time. It can vary across time or between stakeholder groups in response to actions by the company and/or its stakeholders and issues". Iron Road has conducted extensive stakeholder engagement over many years incorporating many different forums in order to capture all views and opinions relating to the CEIP and believes that it is in the 'acceptance' range. This can be substantiated by the results of the Community Perceptions Survey conducted on 1 June 2015 (refer Appendix I of the EIS) and the fact that of the 105 submissions received by the SA Government on the EIS and MLP (combined), 53 of those were supportive of the project.
7	EIS 2.4	Project Justification	Consequences of not proceeding	Is Iron Road Limited profit making for their shareholders more important than established long-term businesses on EP?	See Chapters 21 and 22 of the EIS for details about how long term businesses on the Eyre Peninsula will benefit from the CEIP.
8	EIS 4.2	Project Description	Passing sidings	Why didn't Iron Road identify this (passing sidings) to the affected landowners before. Which landowners have the passing sidings on their properties?	All details relating to impacts to land, which may include passing sidings, have been/will be discussed with those impacted landowners.
9	EIS 4.2	Project Description	Engineering plans	Where are the detailed engineers' plans for the affected landowners to study? Where are the plans that show within 100mm the actual position of the transport corridor?	All plans have been/will be discussed directly with impacted landowners. Detailed plans to the extent suggested by SIMG are unrealistic at this stage of the project but will be in place prior to final design consideration and construction (and in consultation with the impacted landowners).

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
10	EIS 4.2.1	Project Description	Railway line – fencing	Landowners at meetings have expressed the corridor to be fenced all the way and before construction begins. Public liability insurance should require Iron Road to fence the entire corridor. Livestock will be free to roam farm to farm and the entire corridor if it is not fenced.	Fencing will be installed at the appropriate time i.e. well before trains are operating, in consultation with the landowner and in accordance with standard construction practices and legislative requirements. Rail lines are constructed across Australia routinely and contractors have significant experience in ensuring safe outcomes.
11	EIS 4.2.1	Project Description	Rail ballast	Rail ballast locations have never been identified. Landowners wonder whose paddocks will be targeted for a quarry or several properties for several properties for ballast and road works. What mining licence is required for the excavation or quarries? What mining licence does Iron Road have to quarry materials anywhere in their project?	As stated in Chapter 4.5.4, ballast will be sourced from either the proposed rail excavations at the port site, located on land held by a subsidiary company of Iron Road, or from an existing ballast supplier. Also refer to Iron Road's response to Submission #92, Issue #19 for further information about mining tenements.
12	EIS 4.5.2	Project Description	Temporary laydown areas	Are these areas within the 60-150 metre wide corridor? Will these areas be in farmer's paddocks?	Refer to Submission #92, Issue #17.
13	EIS 4.5.6	Project Description	Modules – pre-assembly offshore	Is this adhering to the Australian Jobs Act 2013?	Yes. The pre-assembly of modularised components offsite represents only a small part of the project and the CEIP will bring many more employment and business opportunities. Refer to Chapters 21 and 22 of the EIS for more information.
14	EIS 4.5.7 & 4.8	Project Description	Construction water supply	Does this mean 110mm HDPE pipeline from the Verran groundwater supply well to the port? Where is the 110 mm HDPE pipeline from Verran to the port as mentioned (Table 4-10)	Yes, for a period of up to two years. Table 4-10 within the EIS contains a list of major distances that come up regularly in stakeholder discussions and is not intended to be an exhaustive list of all possible distances.

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15	EIS 4.6	Project Description	Operation phase	Will Iron Road and all their subcontractors obey fire ban days and halt dangerous activities? The trains should not travel when the local farmers call a halt to harvest due to adverse weather conditions.	Refer to Submission #1, Issue #1.
16	EIS 5.2.2	Statutory Framework	Local jobs	Portrayed local jobs disappearing again, offshore and China? Where offshore? Does Iron Road mean cement or pre-fabricated panels or what by this statement? How can Iron Road have a prepared and approved participation plan when they stated imports of steel, concrete from China and offshore pre-assembly? Has an Australian company been given the chance to quote?	Refer to Section 3.3 of the EIS Response Document.
17	EIS 7.3.1 & 7.3.2	Physical environment	Climate and wind	BOM at Cleve, Adelaide, Wudinna, Kimba and Port Lincoln certainly are not site specific to the project. The wind and climate is certainly different to all these sites. Iron Road modelling is immediately questioned for correctness?	The use of specific background BOM data has been agreed with SA EPA air modelling experts and will be the subject of assessment by State Government experts.
18	EIS 10.3.2	Air Quality	Baseline data from sensitive receivers	Where is the baseline data collected at least 12 months before start of construction?	Specific site baseline data is not required for a modelling assessment. As the assessment is predicting what the project will ADD to the background, regional baselines are sufficient for comparative and conditioning purposes. These data will require validation and ongoing monitoring for compliance should the project receive approval and funding.
19	EIS 12.1.2	Noise & Vibration	Railway construction noise	(Relates to the use of noise policies): Is this a licence to do what they please? What government department is going to be onsite monitoring 24/7?	Noise policies are developed, implemented and regulated by the SA EPA. It is not necessary or practical to have a government department onsite monitoring noise levels. What does

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					occur in practice is that 24/7 data is gathered by monitoring equipment which is reported by the Company and audited by government agencies. Iron Road will operate a 24 hour toll free complaints line with target timeframes for responses.
20	EIS 13	Terrestrial Flora & Fauna	SEB	Delivery of SEB - spent where?	The legal requirement of all SEB's in South Australia is that the money is spent in the region where the impact occurs.
21	EIS 15.5.1	Surface Water	Soil compaction	Soil compaction is a huge concern throughout the entire project area. The creek area soil will be compacted in the construction of the corridor, especially under the railway. We think Iron Road has not considered this problem seriously enough.	Refer to Submission #21, Issue #4.
22	EIS 16.3.1	Groundwater	Baseline data	There is not enough baseline data on aquifers on Eyre Peninsula. There are varying statements from hydrologists as to whether the aquifers are connected.	Refer to Chapter 16 and Appendix U of the EIS where the findings of independent, expert hydrogeologists are documented. This will now be the subject to the assessment of expert government hydrogeologists.
23	EIS 17.3.2	Soil & Land Quality	Acid Sulfate Soils	Construction of the corridor and huge amounts of saline water for dust suppression could cause more acid sulfate soils.	Potential acid sulfate soil occurrence has been mapped and impact assessed (refer to Chapter 17.3.2 of the EIS). To suggest 'huge amounts' is incorrect and in fact there are small isolated occurrences that are likely. Management of acid sulfate soils is very common and easily achieved with industry standard management practices.
24	EIS 17.7	Soil & Land Quality	Residual Risk assessment	Re: the risks- acceptable to whom, the mining company or the landowner? Independent monitoring should be demanded.	The risks have been carefully assessed by Iron Road as set out in detail in Chapter 17.7 of the EIS. These risks will now be assessed by DPTI and appropriate conditions imposed on the CEIP Infrastructure should approval be given.

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25	EIS 18.5.5	Traffic & Transport	Impacts to School bus operations	School buses will be stopping at crossings so an increase in time for bus routes. The CEIP will add more travelling time to all road users?	Refer to Submission #23, Issue #5.
26	EIS 18.5.6	Traffic & Transport	Repairs to pavement	Has the weight and width of the low-loaders transporting the equipment from port to mine site been considered? Will Iron Road pay for the widening and repair of roads or is the onus on the affected councils? Will Iron Road pay for the alterations to power lines or relocation of power lines to allow for height and width of modules? What compensation will be paid to network power consumers for loss of power due to CEIP activities?	The weight and width of the transporters taking equipment to the mine site has been considered. Iron Road will bear costs regarding road repairs, upgrades, maintenance, etc, which will be set out in management agreements with all relevant DCs prior to construction and after securing all funding and approvals. Any alterations or relocation of power lines will also be the responsibility of Iron Road. Compensation for any loss of power is out of scope of this document as it is merely an assumption. All CEIP works will be designed and programmed to minimise service disruptions.
27	EIS 21	Economic Environment	Wudinna airport upgrade	Do the Wudinna ratepayers pay for this?	Refer to Section 3.3 of the EIS Response Document.
28	EIS 21 & 22	Economic / & Social Environment	Definition of 'local'	Does 'local' mean from the four affected councils, EP, South Australia or Australia?	Local means within the four affected DCs and regional means Eyre Peninsula.
29	EIS 21	Economic Environment	Viability	(many statements that the economics are incorrect/misleading as they were not assessed at 'today's' iron ore price).	As with anything, a line needs to be drawn in the sand when detailed impact assessments are going to be undertaken and so, while the iron price was higher at the time EconSearch was preparing the Economic Impact Assessment than it was during the public consultation period, it has in fact risen again. Regardless, as Iron Road's optimisation studies and financial modelling have shown, low cycles in the market are actually the best time to build as costs are generally lower.

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					Refer to Iron Road's announcement to the ASX dated 20 April 2016 for the latest information on costs to build the CEIP.
30	EIS 22.4	Social Environment	Design modification to protect social values	What Council insurance is needed for these saline bores that could leak and contaminate adjoining properties?	The submitter has not explained why DCs would need to have insurance for the bores which will be owned, operated and maintained by Iron Road.
31	EIS 22.5	Social Environment	Safety and security	Stated at a TBCCC meeting that the reputation of construction camps hasn't improved much so you would not want camps near towns. Farmhouses are not important? "Code of Conduct" depends on how it is enforced! Has Iron Road not recognised the risk to farm residences?	The proposed port site construction camp will reduce potential impacts on existing housing stock and short term accommodation and will also minimise disruption to local communities. Iron Road's extensive stakeholder engagement has consistently revealed that local communities do not want a construction work force living in their towns or interacting with locals, primarily due to perceived safety and security concerns. Experience around the country has shown that this is standard and is why Iron Road has deliberately proposed to locate a construction camp at the port site. Some construction workers may visit a local town for a meal or community event but the reality is that they will be working long hours and at the end of their shift will likely eat on site and go to bed. As set out in Chapter 22.5.4 (pages 22-46 to 22-48), this issue has been extensively considered and strategies will be put in place to reduce any risk to the community. For example, the construction camp at Cape Hardy will be contained with security systems and Iron Road will liaise with the SA Police to ensure adequate police resources are available.

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
					Despite the strategies outlined, it is unjust to assume that construction workers are criminals and a risk to farm residences.
32	EIS 22.5	Social Environment	Increased business development opportunities	How can this be believed as already Iron Road has stated cement and steel from China and offshore assembly of modules? Iron Road is claiming reduced emissions by using less trucks but this also means less jobs for locals. Too many assumptions for employment in this document. With today's iron ore price around $40, the competition for supply of goods and services will be strong and the smaller local supplier won't be able to compete with the state, nation or overseas companies. We believe Iron Road would have to cut costs wherever possible and that questions all the figures presented in the MLP and EIS. Other established iron ore companies at the moment are cutting costs and dismissing workers. This also allows experienced workers available to other projects and could cause locals missing jobs if the CEIP is approved.	Refer to Section 3.3 of the EIS Response Document concerning allegations relating to China. The CEIP must be globally competitive and as a consequence, Iron Road will always seek efficiency improvements. This will strengthen the business and ensure its viability during times of low commodity prices. Using fewer trucks is also a win for the environment and there will still be many employment opportunities for locals. The SIA in Chapter 22 and Appendix Y of the EIS is an extensively researched document and any assumptions made are conservative. The iron ore price is volatile but has increased recently and the CEIP operation can be undertaken at a lower cost than other comparable iron ore mines. Iron Road's financial model is updated regularly based on current prices.
33	EIS 22.5.2	Social Environment	Effects from the construction workforce	Construction workforce would typically comprise young men? Largely of FIFO and DIDO so what benefit for Wudinna? Stated that free time at the camps while working on the CEIP infrastructure construction. What benefit for Wudinna? Would FIFO and DIDO workers bank or shop in Wudinna?	There appears to be confusion between the construction camps that will house the temporary construction workforce both within the proposed ML and at the port site, and the long-term employee village at Wudinna. The long-term employee village at Wudinna will provide many benefits to the town, all of which are detailed in Chapters 21 and 22 of the EIS, specifically Table 21-14 and Table 22-23.

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Issue #	Chapter #	Topic	Component	Description of Issue Raised in Public Submission	Iron Road's Response
34	EIS 22.5.2	Social Environment	Effects from the port operational workforce	Existing residents from where?	As set out in Chapter 22.5.2 of the EIS, existing residents from towns within a one hour drive of the proposed port could potentially become part of the operational workforce. Those towns include Cummins, Cleve, Cowell, Port Lincoln, Port Neill, Tumby Bay and Arno Bay.
35	EIS 22	Social Environment	Benefits from construction camps	How are the nearby towns going to benefit from self-contained camps and Iron Road suggesting workforce will rarely leave camp other than to go back to usual residence? FIFO, DIDO tends to go to their normal place of residency.	Refer to Issue #33 above.
36	EIS 22.5.2	Social Environment	Housing impacts	(re: the majority of operations workers for the port development expected to live locally) Assumptions or a directive from Iron Road?	As set out in Table 22-23 of the EIS, Iron Road will develop policies and/or offer incentives to encourage the CEIP Infrastructure operational workforce to reside locally.
37	EIS 24	Environmental Management	Environmental Management System	Will this be put into practice? Easy to put on paper but difficult to implement and monitor?	As set out in Chapter 24 of the EIS, Iron Road is committed to setting objectives and targets to manage significant aspects of the CEIP Infrastructure, complying with a range of legislation, policies and other requirements, and preparing and complying with a CEMP and OEMP (drafts of both are set out in Appendix AA and Appendix BB).
Submission 105 – Name and Address withheld. Supportive submission; no issues raised.					

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ATTACHMENT B – CEIP EIS - GOVERNMENT ISSUES/COMMENTS AND IRON ROAD'S RESPONSES

#	Topic & Chapter	Description of Issues and Key Comments raised by SA Government and Requirements/Solutions requested from Applicant	Iron Road's Response
EPA – Planning and environmental legislation and policies			
1	EIS 24.2.3	General. The EPA notes that noise has been considered in the draft Construction Environmental Management Plan (CEMP) but air quality and noise are not referenced in Section 24.2.3 of the EIS. The EPA considers that an air quality and a noise management strategy should be included in the CEMP and Operational Environmental Management Plan (OEMP).	Noted. Iron Road will ensure that it provides air quality and noise management strategies in both the CEMP and the OEMP.
EPA – Coastal and Marine			
2	EIS 14	Marine While Iron Road Ltd (IR) has undertaken a multi criteria analysis to choose the site with the most appropriate combination of factors, the proposed site will still result in a significant amount of benthic habitat loss. The EIS states that there will be a potential loss of 17 ha of seagrass. IR have not shown on a map the areas considered to be potentially impacted but state that the seagrass density is sparse (<5 % density). The EPA has interrogated the map provided and suggests that this is actually 5-15% in density while there is also an area of medium cover that is likely to be impacted (Fig 14-3). The same section suggests that almost 250 ha of macroalgal rocky reef will be potentially impacted. This is a significant area of habitat loss which will only be off-set to some extent by creation of new habitat with the dumping of rock for the Module Off-loading Facility (MOF). IR has undertaken adequate surveys but does not propose to quantify the amount of habitat lost or impacted due to the development. IR has proposed Native Vegetation Clearance for this loss and have mentioned significant environmental benefit (SEB) offsets for the loss.	The assessment undertaken has been conservative as detailed in Chapter 14.5 and summarised in Table 14-5. Examples of conservatism in the assessment include: • An entire calculation of 'Potential Disturbance' where clearance is not anticipated but minor and/or temporary impacts may be experienced; • Total clearance areas assumed in areas where it is known that this will not be the case e.g. under the jetty; and • Areas are independent of seagrass density i.e. a <5% coverage is given equal weighting to a >50% coverage in terms of SEB. An area of 241.2 ha of rocky reef has been quantified as potentially disturbed in a total of 246.79 ha. A total of 2.66 ha is proposed to be directly cleared which is 5.4% of the rocky reef in the study area and a tiny fraction of the rocky reef in the local or regional area and this does not qualify as "a significant area" in this context. The next phase will require an SEB and Iron Road will work with the appropriate government agencies and other key stakeholders to propose a fair and reasonable off-set.

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		Refer to EPA comment 12.1 for more comments about this issue. The EIS does not describe the method of construction for the MOF. This is not currently covered in the Construction Environmental Management Plan (CEMP) but the construction method should minimise impacts on benthic habitats. It should also be noted that running heavy machinery through the intertidal and subtidal habitats is not seen as best practice. The EIS states that there will be permanent changes to the sedimentation and hydrodynamics of the marine environment due to the construction of the MOF and jetty. These changes include a change of "less than 1% around the MOF". However, it is unclear where the boundaries to this statement have been considered and whether they include the bay directly to the west of the MOF as the changes to the sedimentation in this region appear more significant than 1% based on the two figures supplied. More detail is needed explaining these changes, particularly to the sedimentation of the bay located directly west of the MOF and an assessment of the annual changes to the sedimentation. The EIS states that the seagrasses in this area should be able to naturally accrete this increase in sediment but has not outlined the location of the habitats impacted. There has also been no consideration given to impacts on the macroalgal reef habitats, particularly as they are far more susceptible to sedimentation. The EPA considers the permanent changes to adjacent habitats warrants a low to medium risk rating and monitoring to assess changes. These issues should be addressed in the Response document. EIS still mistakenly states that common dolphins have higher metal levels probably due to their coastal habitat and prey. However, this should be 'bottlenose dolphins', not 'common dolphins'.	Please refer to EIS Appendix R: Cape Hardy Coastal Modelling, which includes a total of 85 figures, including 5 figures on sedimentation and 16 figures on bed shear stress, demonstrating the very low impacts that would occur. It is incorrect to state that "There has also been no consideration given to impacts on the macroalgal reef habitats" as an SEB has been proposed for this potential impact on a conservative basis. A change to the risk rating in this case would not alter the proposed management actions given the conclusions of the comprehensive impact assessment. The comment in relation to dolphins has been noted.

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3	EIS 14	Marine/Air Quality There is very little likelihood of marine ecological impact from iron dust but there may be aesthetic impacts, however there are very few human 'sensitive receivers' nearby. The EPA considers that the dust mitigation from the overall proposal is of a high standard and therefore acceptable.	Noted.
4	EIS 14	Marine. Although there are currently no active aquaculture licences in the Port Neill Aquaculture Zone, the proposed development must not inhibit future potential development of aquaculture in this area from an access or environmental perspective. There does not appear to be any significant issues that may impact aquaculture development in the Port Neil aquaculture zone. However, the EIS only addresses impacts to aquaculture associated with access and not water pollution. The latter issue should be addressed in the Response document.	There is no scenario envisaged whereby there would be impacts to potential future aquaculture developments, be it air or water quality. The development of Cape Hardy opens up future opportunities for the aquaculture industry given the land and waterside infrastructure that will be available for potential third party use.
5	EIS 14	Marine. The invasive marine species (IMS) monitoring proposed should be consistent with BiosecuritySA or federal monitoring programs so that it dove tails into existing programs and the information is publicly available.	Agreed. Iron Road will ensure that monitoring of IMS is consistent with both SA and Commonwealth biosecurity programs.
6	EIS Appendix Q	Marine. Appendix Q states that in areas of deeper water the sediment becomes increasingly fine, and is expected to be more easily suspended in the water column. Propeller wash and vessel scour from tug movements during operation are expected to have medium impacts on the nearshore. This increases the likelihood of impacts to the additional 14 ha of seagrass and 240 ha of macroalgal reef that was highlighted as potentially impacted due to operation of the facility. Given IR are not proposing to monitor the loss of habitats in	As discussed in the EIS and in previous responses, the next phase of work will require a detailed SEB requiring additional government approval. Iron Road will propose a fair and reasonable off-set that will, as a minimum, comply with the intent of the Native Vegetation Act and associated Guidelines.

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		the region, the significant environment benefit (SEB) of the full extent of potentially impacted habitats (including reef – Table 14-5) should be committed proportional to the 'ecosystem services' to be lost, rather than default value of rehabilitation based on terrestrial vegetation. This should be defined in the Response Document in consultation with DEWNR and EPA.	
EPA – Geology and Soils - Water Supply			
8.1	EIS 15 & 16	Stormwater and Groundwater. Groundwater is considered suitable for stock up to salinity of 13,000 mg/L, not 5,000mg/L as stated in page 3-13. This requires a minor edit.	ANZECC Guidelines state that for sheep (most salt tolerant livestock listed) the following salinity limits apply to drinking water: <5,000 mg/L TDS: No adverse effects on animals are expected. 5,000 – 10,000 mg/L TDS: Animals may have initial reluctance to drink or there may be some scouring, but stock should adapt without loss of production. 10,000 – 13,000 mg/L TDS: Loss of production and a decline in animal condition and health would be expected. The technical Appendix U applies the most conservative limit on water suitable for livestock use of <13,000 mg/L TDS. Nonetheless, the quality of groundwater impacted by mining exceeds both limits and does not change the outcome of the assessment.
8.2	EIS 15 & 16	A spring fed creek is briefly discussed on page 19-12 and is identified as a key environmental value. Despite this being a 'key environmental value' this spring fed creek is not discussed in the groundwater chapter (Chapter 16), nor is it considered in the risk assessments (if appropriate). This should be rectified.	The reference to the spring fed creek being a key environmental value is incorrect as the saline groundwater discharge is highly saline and of limited environmental value. Two sites located 2 km from the coast are of Aboriginal Heritage significance and are outside of any proposed disturbance. Please refer to Plate 19-1, Page 19-12 of the EIS which clearly shows the salt deposits from the highly saline flows. Due to this area being outside of the areas of disturbance, no significant impacts on this regime are expected therefore a formal risk assessment is not appropriate.

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8.3	EIS 15 & 16	Section 16.3.3 on page 16-7 discusses the Quaternary Aquifers. The EIS states the tertiary clay provides a 'barrier'. This is incorrect. The correct statement should include words to the effect that the tertiary clay ensures a low degree of connectivity between the two aquifers.	Noted. This does not alter the proposed management actions.
8.4	EIS 15 & 16	Section 16.3.4 on page 16-11 discusses 'ecosystems dependent on the subsurface presence of groundwater' however it is unclear if the area around the rail unloading facility has been considered in the assessment. This should be made clear.	The rail unloading facility at the proposed port site has been considered in the assessment outlined in Chapter 16.3.4 of the EIS. No significant impacts on this regime are expected therefore a formal risk assessment is not appropriate.
8.5	EIS 15 & 16	Monitoring for groundwater quality is not detailed in the Construction Environmental Management Plan (Table 3-6) or Operational Environmental Management Plan (Table 2-6). Further detail on this is required, ideally in IR's Response document.	Details around the monitoring for groundwater quality will be included in the CEMP and OEMP in due course. It is too early in the design process for Iron Road to commit to firm details in this Response Document. This level of detail is not required at this stage in any primary regulatory approval process.
8.6	EIS 15 & 16	Groundwater dependent ecosystems (e.g. springs/soaks and downstream watercourses) should be listed as an environmental value in the OEMP (App BB, s.2.3.2, page 9).	Agreed. Section 2.3.3 of the OEMP may now be read to include 'groundwater dependent ecosystems' as an environmental value.
EPA – Air Quality and Noise			
9	EIS 12	Noise. The EIS shows that Scenario 2 (Table 12-12, p.p.12-20 & 12-21) would comply with the Environment Protection (Noise) Policy 2007 in relation to construction noise and that, with the right management of construction activities, compliance is possible.	Noted.
10	EIS 12	Noise. The rail noise section in the EIS is comprehensive. The predicted noise levels used within the model have been confirmed and found to be reasonable. As long as suitable regular maintenance is undertaken to ensure that the rail activity does not produce annoying noise characteristics, rail noise levels should be able to meet the noise criteria contained in the EPA's Rail Noise Guidelines.	Noted. Rail maintenance will form a significant component of future contractual obligations of any rail operator.

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11.1	EIS 10	Air Quality. The EPA notes that there is a commitment by IR to undertake moisture monitoring, the application of water through spray systems and the use of veneering agents if required. However, when such measures would be undertaken is not detailed. The EPA considers this should form part of the CEMP and OEMP and should be addressed in the Response document.	Moisture monitoring, the application of water through spray systems and the use of veneering agents will all be included in the CEMP and OEMP in due course. It is too early in the design process for Iron Road to commit to such details in the EIS Response Document. This level of detail is not required at this stage of the regulatory approval process.
11.2	EIS 10	Table 10-8 and 10-9 (page 10-14) present a series of emission rate numbers without any detail on how they were derived or a reference. The EPA asks for this to be clarified in the Response document.	The reference is Appendix J of the EIS "CEIP Air Quality Impact Assessment – Infrastructure" by Jacobs, Section 3.2.2, Tables 3-8, in particular the footnotes. The National Pollutant Inventory (NPI) Emissions Estimation Technique Manual (EETM) is a government produced document and one of the primary references used by governments and industry experts.
11.3	EIS 10	There has been no decision in South Australia regarding sulphur levels in shipping fuel. Despite this, the EPA still questions what fuel quality is being considered in the Table 10-11 that derives an SO_2 level of 0.0111kg/kWhr, and whether it is likely to be a realistic emission rate. The EPA notes this factor is taken from the NPI Emission Estimation Technique Manual, but that appears to be based on US EPA data. The EPA would like IR to confirm what sulphur in fuel level is this based on, and is that realistic for this project?	It is not possible to ascertain the sulphur levels in shipping fuels at this stage of the project given this contract will be tendered following project approvals and funding. The sulphur levels in fuel of any future shipping contractor will also change over time as fuels globally improve, thus an estimate has been calculated based on the only reference available i.e. the NPI EETM. Iron Road and its expert air quality consultants requested other known data sources of references from the SA Government and the broader industry but no alternatives were forthcoming. The outcomes of the emission estimation assessment based on the best data available demonstrate that the emissions will be very low (almost 20 times lower than similar projects in Sydney) and are thus predicted to cause no impacts (Appendix J: CEIP Air Quality Impact Assessment – Infrastructure, Section 3.3.5.1)
11.4	EIS 10	The monitoring section in Table 10-15 states that the purpose of the monitoring program is to confirm compliance with air quality criteria, and that it is proposed that monitoring be undertaken to allow for the implementation and/or application of reactive mitigation if leading	Iron Road will continue to liaise with the EPA in relation to its dust monitoring program for air quality criteria, including consultation in relation to any amendments or updates, as part of the CEMP and OEMP implementation phases.

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		indicators are exceeded. The EPA considers that a period of monitoring 'beyond compliance' checking should be confirmed by IR. Any amendments or updates to the proposed monitoring program should be undertaken in consultation with the EPA.	
EPA – Management and Monitoring			
12.1	EIS 14, Appendix AA	Marine. The EIS does state that proposals are being considered with Eyre Peninsula Natural Resources Management Board and Nature Foundation (in terms of SEB) but there is no commitment and no statements about whether they will cover the extent of the direct clearance or the potential disturbance. As outlined in EPA comment 6, in lieu of habitat monitoring to assess area impacted, the full disturbance area should be used for both seagrass and reef.	Please see response to EPA comment #6 above.
12.2	EIS 14, Appendix AA	The Construction Environmental Management Plan (CEMP) does have various strategies for minimisation of impacts. However, some aspects do not have detail on methods for monitoring or frequency, hold and alarm criteria etc., particularly for turbidity monitoring.	This level of detail will be included in the CEMP where appropriate.
12.3	EIS 14, Appendix AA	Piling marine animal observer monitoring needs to be consistent between table 14-8 and page 14-41, particularly as there are differences between noise monitoring protocols between piling and Module Off-loading Facility (MOF) within table 14-8.	Noted. This will be addressed in the final CEMP.
12.4	EIS 14, Appendix AA	The final CEMP should have a high level of detail (hold and alarm criteria, frequency and location of sampling) and should be prepared to the reasonable satisfaction of the Minister for Planning in consultation with the EPA (and Biosecurity SA for invasive marine species) prior to construction commencing.	Noted.
13	EIS 10	Air Quality. The monitoring section in Table 10-15 states that the purpose of the monitoring program is to confirm compliance with air quality criteria	Iron Road will continue to liaise with the EPA in relation to its dust monitoring program for air quality criteria, including consultation in relation to any amendments or updates, as part of the CEMP and OEMP implementation phases.

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		for the project, and that monitoring would be undertaken to allow for the implementation and/or application of reactive mitigation if leading indicators are exceeded. The EPA considers that a period of monitoring beyond compliance checking should be confirmed by IR. Any amendments or updates to the proposed monitoring program should be undertaken in consultation with the EPA.	
EPA – Transport and Access Risk/Hazard Management			
14	EIS 17	Site Contamination. The EIS provides a basic site history to identify potential sources of site contamination within the areas of the proposed Central Eyre Iron Project (CEIP) infrastructure. Whilst the presence of existing site contamination has not been confirmed anywhere within the areas of the proposed CEIP infrastructure (as no intrusive investigations have been undertaken), a number of potential sources (not exclusively associated with agricultural practices) have been identified within the port site and the long-term employee village. The likelihood of disturbing existing site contamination was assessed as rare; however there is no associated assessment of the most likely locations of potential site contamination with regards to areas of the port site and long-term employee village subject to soil disturbance and stripping. The EIS also indicates that the consequences of encountering site contamination will be moderate and able to be remediated in the long-term. However, no information is provided to indicate how site contamination would be identified for subsequent remediation (given that most site contamination will not have any visual or olfactory impacts), or the risk to on-site workers from encountering site contamination during construction and operations. The EPA considers that further information/assessment is required to justify the conclusion that no control measures are required for the management of any existing site contamination.	Control and management strategies for potential contaminated land are listed in Table 17-5 of the EIS. As with any construction project of this nature, more detailed geotechnical site investigations would be required prior to any construction taking place on either site. As part of this future data gathering, an expert contamination consultant will be engaged to ensure appropriate ASS data is gathered, however the results of the site history investigation and many hours of walking the site and talking to stakeholders have concluded the risk is low. Should data indicate otherwise, a Preliminary Site Investigation may be initiated followed by a Detailed Site Investigation and a Remediation Action Plan as per standard industry practice.

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15.1	EIS 17, Appendix AA	The EPA considers that management measures for site contamination should be reviewed once further information/assessment has been documented to justify/re-assess the associated risks (see EPA comment 14).	Noted. Please see response to comment #14 above.
15.2	EIS 17, Appendix AA	A reference to the need for notification under S83A of the Environment Protection Act 1993 should be specifically included as part of the reporting requirements for accidental releases from chemical/hydrocarbon storage (where appropriate).	Noted.
16	Appendix AA	Marine. MD-C8 & SL_011 refers to "National Maritime Oil Spill Contingency Management Plan 2011". This should be the "National Plan for Maritime Environmental Emergencies".	Noted.
17	Not noted	Marine/Stormwater. There is no detail in the EIS about the location and size of the stormwater sedimentation basins. Sedimentation basins need to be sized appropriately to ensure they have the capacity to capture all runoff from the Cape Hardy site. In addition, they should not be constructed within 500m of the high water mark. The Response document should confirm the size and location of stormwater sedimentation basins along with identifying broader principles with Stormwater management as part of any CEMP.	Details of the stormwater sedimentation basin, including the broader principles of management, are contained in Section 4.3.3 with the location and dimensions shown on Figure 4-19. The basin is designed to capture run-off from stormwater that has come in to contact with laydown areas and stockpiles, not the entire, mostly undisturbed site. The proposal is for a sedimentation basin, not a waste water treatment pond. Waste water treatment ponds are subject to draft guidelines recommending that these facilities are not constructed within 500 m of the high water mark, not sedimentation basins.
EPA – Effects on infrastructure requirements			
18	EIS 15.4.3	Wastewater. Section 15.4.3 of the EIS refers to wastewater being directed to the DC Wudinna Community Wastewater Management Scheme. However, there is no detail on the existing capacity of the scheme to take this	All details relating to the proposed long term employee village at Wudinna, including wastewater will be discussed in detail with Wudinna DC in due course. As noted in the EIS, Iron Road will support the preparation of a Structure Plan by Wudinna DC and will

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		wastewater or if an upgrade is required. This should be clearly addressed in the Response document.	collaborate with both the DC and SA Government to facilitate planning for the new residential development. Any upgrades to infrastructure required as a result of the CEIP will be documented in a Management Agreement with Wudinna DC in due course.
EPA – Construction and Operational impacts			
19	Appendix AA	Air quality, Marine, Noise & Stormwater. The draft Construction Environmental Management Plan (CEMP) provides information regarding erosion and drainage management. However, it should be made clear if this information is applicable to both the Cape Hardy and Wudinna.	Information regarding erosion and drainage management will apply to both Cape Hardy and Wudinna and the CEMP will be amended to clearly reflect this.
19.1	Appendix AA	Sedimentation basins are not mentioned in the CEMP and it is therefore assumed they will be constructed to only capture runoff post-construction. This is suitable provided sediment erosion is managed sufficiently in other ways. Sediment-laden runoff produced during the construction should not be allowed to reach the marine environment. The final CEMP should address such requirements.	The final CEMP will address sediment erosion and provide management measures to ensure that any sediment-laden runoff that may be produced during construction will not reach the marine environment.
19.2	Appendix AA	With regards to addressing potential marine environmental impacts the proposed CEMP has very little technical information regarding locations, frequency and criteria to be tested against. The final CEMP should have a high level of detail (hold and alarm criteria, frequency and location of sampling) and should be prepared to the reasonable satisfaction of the Minister for Planning in consultation with EPA (and Biosecurity SA for Invasive Marine Species) prior to construction.	Noted.
19.3	Appendix AA	There are inconsistencies between the noise mitigation and control measures in pages 14-40 and 14-41 and the statements in the draft CEMP (Table 2-7). The final CEMP should reflect the procedures on page 14-41. These procedures should also be consistent for the jetty piling and construction of the tug berth-Module offloading Facility or	Noted. The final CEMP will reflect the procedures set out on page 14-41 of the EIS and will be consistent for the jetty piling and construction of both the tug berth and MOF (or any other significant marine noise generating activity).

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		any significant marine noise generating activity. This inconsistency should be rectified.	
20	EIS 5.3.2	Statutory Framework. The EPA notes that section 5.3.2 of the EIS refers to the 'Environment Protection (Water Quality) Policy 1993'. This is a mistake which should have been the *Environment Protection (Water Quality) Policy 2003*. The proponent should also be aware that on 1 January 2016 the *Environment Protection (Water Quality) Policy 2015* will come in affect. Whilst the appropriate assessment tool for the IR EIS is the *Environment Protection (Water Quality) Policy 2003*, IR should be mindful that they will be required to ensure compliance with the *Environment Protection (Water Quality) Policy 2015* for construction and ongoing operations after 1 January 2016.	Changes to the relevant policies are noted and Iron Road will comply with the *Environment Protection (Water Quality) Policy 2015* for construction and ongoing operations.
DEWNR – Coast and Marine			
1	EIS 4.3.2	Marine infrastructure design specific captions are inconsistent throughout the document. Chapter 4.3.2 states the proposed causeway/land reclamation is to be 200m in length. However, Appendix R, the Jacobs "Cape Hardy Coastal Modelling report" bases their hydrodynamic modelling on a 350m long causeway. Chapter 4, Figure 4-26, also indicates that it is 350m long. Presumably earthworks quantities, intertidal habitat clearance considerations etc. are based on the Jacob's figure of 350m long causeway and that 350m is the final design proposal?	The confusion arises from the use of terms. The reference to 'causeway' in the Jacobs report includes the causeway and the MOF shown in Figure 4-26. Together, these add up to 350 m. It is more appropriate to refer to the whole reclaimed areas as the 'causeway' as used in the Jacobs report.
2	EIS 4.3.2	Marine infrastructure design specifications are inconsistent throughout the document. The jetty and wharf length varies throughout the document. Chapter 4 describes them to be 900m and 400m long, respectively. Whereas the Jacob's report (Appendix R, 1.2) bases its hydrodynamic modelling on a 600m jetty and 400m wharf.	This is a terminology issue. The Jacobs report is referring to the structure shown in pink in Figure 4-26 of the EIS. However the jetty length of 900 m, shown in this figure, also includes the causeway (and MOF).

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3	EIS 14.5.5	Coastal access is not described in detail. DEWNR is unable to assess as insufficient information has been provided. Chapter 14.5.5 states that the impacts of restricting public access to the coastal reserve are discussed in Chapter 22. No information detailing the impacts of restricting public access was located in Chapter 22.	As noted in Chapter 14.5.10 of the EIS, there will be an exclusion zone at the port site that will restrict public access (Figure 4-18 of the EIS shows the area that will be excluded). The exclusion zone is important for biosecurity, quarantine and other security requirements and non-authorised personnel will not be able to access this area. Although those beaches have been known to support recreational fishing, stakeholder consultation has determined that it is not heavily trafficked as most fishing is undertaken from Cowley's Beach to the south which is the known tourist and fishing attraction. As set out in Chapter 22.5.5 of the EIS, public access to Cowley's Beach will not be impacted by the proposed port development, with full access to both the beach and informal camping grounds to be maintained. The exclusion zone was raised by Iron Road during the course of its extensive community and stakeholder consultation and was not considered by any party to be an impediment. In view of this, and the importance of maintaining security at the port site, the impact is considered to be low.
DEWNR - Ecology			
4 & 5	EIS Appendix P & Q, Table 5.5	Changes to species listings since first publication of report. Several of the threatened species listed in the report have changed conservation status over the course of the project. Hooded Plover are under the EPBC Act. White-bellied Sea Eagle are no longer listed as Migratory Terrestrial (MT) under the EPBC Act. There are also references to these species and their rating in other locations of the documents.	Iron Road is aware of this and acknowledges that these changes have occurred. This is not unusual with the passage of time. The removal of the WBSE does not have any material impact to the outcomes of the project. The upgrading of the threatened status of the Hooded Plover is noted. Iron Road is aware of the EPBC status of the Hooded Plover and has acknowledged stakeholder interest in this species. It is noted that while some aspects of the EIS have not been updated (e.g. technical Appendices that were finalised earlier in the document preparation process), Hooded Plover records along the coast obtained

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			from Birdlife Australia (following a census in 2015) are shown on Figure 13-10 and Figure 13-11 in the EIS (and are listed as EPBC rated). In addition Chapter 13 discusses the Hooded Plover (as EPBC Vulnerable) in the Port Fauna Section (13.3.3 page 13-52, Table 13-13), impacts to the Hooded Plover are addressed in Table 13-20, and this species is specifically addressed in control and management strategy F1_C7 (Table 13-23 of Section 13.6) due to its status. Changes to species listing were therefore included, and do not alter the outcomes of the risk/impact assessment undertaken for the project.
6	Throughout EIS	Scientific evidence of anthropogenic disturbance to Dutton River and Byres Bay Creek. There is a statement on p15-10 of the EIS that the "Driver River is considered to be in poor ecological condition due to human disturbance resulting in increased salinity and acidity" which is based on an EPA report from field studies completed in 2010. The author then goes on to state that 'these conditions are echoed for Dutton Riverland Byres Bay Creek'. It is acknowledged that these systems are likely degraded however there is no evidence provided to confirm that this is the case.	The comments about the Dutton River and Byres Bay Creek are anecdotal, based on site inspections, technical knowledge gained about the region (farming practices, groundwater depth) and the similarity between the creeks and rivers of the area. The developers and reviewers of the EIS have visited the region on numerous occasions and are familiar with the degraded condition of the local creeks within the study area (e.g. Plate 15-3). It is not unreasonable to assume that the same pressures which have degraded the Driver River are applicable to the Dutton River and Byres Bay Creek.
7	EIS 13.4.1	Hambidge Wilderness Protection Area infrastructure corridor buffer. DEWNR supports the 35m buffer and inclusion of a 10m wide maintenance track; acknowledging that DEWNR's preferred option of a 500m buffer is difficult to implement. It is understood that final confirmation of the location of the railway centreline and power transmission line will not be available until the design phase of the project.	Noted.

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8	EIS 5.6.3	Objectives do not identify environment as something that should not be adversely impacted. Objective 5.6.3 currently reads 'Ensure that human health and safety is not adversely affected'. DEWNR strongly agrees with the objective and suggests that a complementary objective be added to ensure that the environment is not adversely affected.	Iron Road acknowledges this omission. This comment refers to the Fire Risk section of the draft OEMP. Ecological values are noted in Chapter 5.6.2. It is therefore appropriate to amend the current objective to include ecological values. This will be done in the final OEMP.
9	EIS Appendix AA & Appendix BB	Further detail into activities that will support OEMP objective 5.6.4. DEWNR notes the inclusion of several management measures for example 5.6.4 BF_02 in the OEMP. DEWNR requests the opportunity to review the final CEMP and OEMP.	The CEMP and OEMP are approved and managed by DPTI under the Development Act, so any review by DEWNR of these documents is at the discretion of DPTI. Iron Road has no objection to DEWNR reviewing the final CEMP an OEMP.
10	EIS Chapter 13	There is a risk of fire within Hambidge WPA as a result of operational rail activities. The majority of Hambidge WPA burnt in the year 2000 resulting in the majority of the reserves Major Vegetation Sub groups (MVS) being below the Threshold of Potential Concern 1 (TPC1) as described in DEWNR Fire Management Guidelines for Native Vegetation in SA. In the event of another fire occurring, long term negative impacts on the MVS are considered highly likely by DEWNR. Recent documented events have shown the impact a bushfire can have when a whole reserve is burnt in a single event, including the occurrence of local and State wide extinctions.	Iron Road acknowledges that railway operations can, and have, started bushfires. Consequently, rail operations present a threat to the Hambidge WPA, however, with appropriate modern construction techniques and equipment, along with ongoing preventative measures, this threat is expected to be minimal. Ongoing preventative measures include removal of vegetation on or adjoining the track, monitoring of rail wheel condition, regular maintenance of locomotives and rolling stock, including exhausts and brakes and avoidance of 'hot works' (e.g. welding) on days of high fire danger. These measures will be described in more detail in the OEMP. A benefit of the infrastructure corridor is that it will act as a fire break between agricultural land and the Hambidge WPA. Furthermore, the train drivers will become valuable early spotters of fires as they travel the length of the corridor every two hours. Iron Road will work with DEWNR and other agencies and stakeholders to implement effective fire management planning as part of its ongoing operations to ensure a world class and safe logistics corridor.

For Public Consultation

#	Topic & Chapter	Description of Issues and Key Comments raised by SA Government and Requirements/ Solutions requested from Applicant	Iron Road's Response
11	EIS 4.2.3 (page 4-27)	Clearance in relation to the transmission line. This section states that in relation to transmission lines, only vegetation that may infringe on the safety clearance areas under the transmission lines will be pruned or cleared. If trees will be subject to repeat and serve trimming or complete clearance, and this is likely to compromise their long term health, habitat value or viability, then such vegetation should be considered as part of the calculations for the SEB offset requirements.	Chapter 13.6.1 of the EIS notes that clearance of vegetation requires approval from the Native Vegetation Council and an SEB offset. Iron Road acknowledges that pruning of vegetation may require an SEB in some circumstances and this will be taken into account when the SEB offset is fully developed.
12	EIS 13.2.1 (page 13-4)	Assessment of vegetation within the infrastructure Corridor. This section states that not all patches of vegetation that will be impacted within the infrastructure corridor have been assessed on the ground. Rather, condition of the vegetation has been inferred from aerial imagery, associated records and the condition of nearby patches of vegetation. Describe the process to verify the condition of vegetation and the presence of rare or threatened species. This will ensure the SEB requirements are determined to be accurate and appropriate for the scale of the proposal.	As noted, appraisal of native vegetation patches impacted by the proposed rail corridor included in-field assessment as well as inferring condition of patches which were not accessed via aerial imagery and condition of adjacent similar patches. In general, the condition of inferred patches was overestimated therefore providing a conservative estimate of the required SEB. It is envisaged that a more comprehensive assessment of the condition of impacted vegetation will be undertaken to calculate the required SEB (utilising the BushRAT methodologies to the satisfaction of the Native Vegetation Council); however, Iron Road does not envisage that this will require assessment of every intersected patch. This process will identify the presence of rare or threatened flora species and will be included as part of the CEMP.
13	EIS 13.6.1 (page 13-83)	SEB Offset options. This section outlines the options being considered for SEB offsetting. Whilst the options identified within this section are largely supported as a means of providing an SEB offset, the following options are not supported: contributing to local weed and pest control activities, monitoring, research, weed and pest management inputs to regions. An SEB should generally be an area of land that is protected and managed for the establishment and growth of native vegetation. Activities such as monitoring, research and weed and pest control by	It is noted that DEWNR do not support some of the potential options suggested. Iron Road will develop SEB offset options via the standard process and submit a Native Vegetation Management Plan for approval. Iron Road has commenced preliminary discussions with the Native Vegetation Biodiversity Unit (DEWNR) and the NRM Region and will submit a Native Vegetation Clearance Application to the Native Vegetation Council when all the information is available (e.g. regarding final clearance areas and condition of clearance areas).

FOR PUBLIC REVIEW

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		themselves will not ensure an improvement in vegetation condition and/or extent and therefore will not offset the loss of vegetation from the clearance activities. Additionally, weed and pest control activities are generally a legislative requirement under the NRM Act and therefore this is unlikely to meet the requirements of additionality. Regardless of the option chosen to provide the SEB offset, it must be located within the same region as the impact. The region is taken as being the NRM Region.	Iron Road has a number of options for such SEB offset. There is great potential for a combination of options to be utilised that will benefit the Eyre Peninsula NRM region and offset impacts that will occur as part of the project. It is incorrect, however, to say that weed and pest control cannot result in an improvement in vegetation condition and/or extent. DEWNR spends a considerable, although arguably inadequate, sum of money on weed control in its parks every year for conservation purposes. Furthermore, the requirement under the NRM Act to control pest plants and animals, beyond a general duty of care, only extends to declared plants and animals. Consequently, additionality may still be achieved through a more comprehensive weed control program. As noted above, Iron Road will continue to discuss the SEB with DEWNR.
14	EIS 11.1.2	Inclusion of South Australia's Climate Change Strategy. The EIS was published prior to release of South Australia's Climate Change Strategy; however it would be of benefit to Include a reference to it in documents that are still in draft format such as CEMP and OEMP.	This will be noted in both the CEMP and OEMP as they are further developed.
15	EIS 15	Byrnes Bay Creek is not mentioned in the hydrology description in the groundwater chapter but is mentioned in the surface water chapter. Hydrology resources in surface water and ground water chapters should be consistent.	Noted that Chapter 16.3.1 of the EIS should have also referred to Byrnes Bay Creek. This is contextual information and does not affect the groundwater assessment. As noted by DEWNR, the information is available in the Surface Water chapter.
16	EIS 15	Description of hydrological systems along the infrastructure corridor north of Cleve is required. Potential impacts as a result of construction should be addressed. Figure 15-2 shows the proposed transmission line crossing at least two creek catchments and drainage lines for example Yadnarie Creek and Sheoak Creek. These hydrological systems are not considered in terms	Surface water along the power transmission spur was not described in any detail as the surface water values are low and the potential for impact is negligible. The power transmission line is described in Chapter 4.2.3 of the EIS. Poles will be approximately 350 m apart and each pole will have a concrete foundation pad of approximately 2 m^2. A disturbance

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		of the infrastructure corridor north of Cleve and potential impacts associated with construction and operation. Baseline hydrology should be established for all areas within the infrastructure corridor.	footprint during construction is conservatively noted in Chapter 13.5.2 of the EIS as 30 m x 30 m. In most cases, minimal disturbance will be required as the site will already be cleared. As Iron Road will not be erecting poles within ephemeral watercourses the risk to surface water values is negligible. It is also noted that the EPA Aquatic Ecosystem Conditions Reports show aquatic ecosystems in the general vicinity of the transmission line spur are in poor to fair condition. Surface water features are shown in Figure 15-2 of the EIS. The area north of Cleve is mainly in the Gairdner Basin. Section 3.2 of Appendix H of the MLP notes that this basin has no major surface water drainage system. As noted in Chapter 15.3.2 of the EIS, the surface water environment north and west of Cleve is typified by dunes that capture rainfall in natural swales. As noted by the EPA (http://www.epa.sa.gov.au/reports_water/ep_creeks-ecosystem-2015), surface water environmental values are generally low across the Eyre Peninsula: • Low rainfall and the largely flat topography restricts streams to the wetter, southern and south-central parts of the Eyre Peninsula; • No sites were assessed in Excellent, Very Good or Good condition, and 40%, 40% and 20% of sites were assessed in Fair, Poor and Very Poor condition, respectively; • Macroinvertebrate communities comprised a low to moderate diversity of saline tolerant species, with no rare or sensitive species recorded; • All streams were saline (eg. salinity >3,000 mg/L) and ranged 4-7,000 mg/L from sites on the Tod River to nearly 40,000 mg/L from the Driver River in spring; the latter was more saline than seawater (>35,000 mg/L);

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			• Most streams were probably naturally saline prior to European settlement but have been further salinised by extensive vegetation clearance that occurred from the 1880's to about the mid-1970's; • All streams were enriched with nutrients and generally characterised by large growths of algae and/or aquatic plants; and • Riparian zones were often reduced and degraded; lacking in trees and shrubs and dominated by introduced grasses and weeds that were frequently grazed by cattle or sheep. Of the ten sites sampled by the EPA in 2015, the site closest to the corridor is the Driver River site. This was assessed as being in very poor condition: • Permanently wet, saline, slow-flowing stream in autumn and spring; • Depauperate macroinvertebrate community with no rare or sensitive species; • Obvious signs of gross nutrient enrichment; • Riparian vegetation limited to samphire, paperbark and bare soil; and • Large silt deposit in the channel. Consequently, Iron Road considers it is appropriate to describe the condition of surface water values as Low. Impacts to surface water are discussed in Chapter 15.5 of the EIS. Given the absence of creeks and significant drainage lines in the northern section of the corridor, potential impacts relate to restriction of overland flow as discussed in Chapter 15.5.4. The impact is assessed as Low as all locations where the rail crosses identifiable drainage lines will have flows retained by culverts. It is noted that if the easement within which the transmission line is constructed extends into a watercourse, a permit for a water affecting activity may be required.

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17	EIS 15.3.2	Terminology used to describe regional hydrology requires clarification. The EIS states that "Rainfall predominantly occurs in the winter months...however major rainfall events can also occur in December, January and February during summer storms when in rare circumstances intense daily rainfall can occur." Implying that while there can sometimes be large rainfall events in these months, it does not happen often and when rainfall does occur it is rarely intense. The RPS report states that "Although rainfall predominantly occurs in the winter months, major rainfall events statistically occur in the months of December, January and February, when local summer storms are common, causing intense daily rainfalls." This implies that, while winter months have the greater total volume of rainfall, large intense rainfall events mainly occur in summer months and that such events are common. Response/solution: Further information as to why the EIS does not align with the RPS report is to be provided.	Iron Road acknowledges that the wording in the EIS could have been improved to avoid confusion with the RPS report. This is an editorial matter, not a substantive one. Information is provided on the intensity of summer rainfall events and Iron Road considers the climatic information was adequately considered in the assessment. Subject to further design considerations, construction control measures will be designed for a 1 in 5 year rainfall event while operational measures will be designed for a 1 in 50 year event. Measures to minimise erosion during heavy rain events are described in Chapter 15.7.1 of the EIS and are considered appropriate to handle any intense summer rainfall events.
18	EIS 16, Appendix U Appendix V & Appendix AA	For noting, no action Details of the numerical modelling have been provided in Appendix V. However elements of the previously outlined issue was confirmed, as the model's boundary conditions are constrained by data availability (p 41 Appendix V). This situation has required assumptions to be made about aquifer boundaries, and assign arbitrary constant head boundaries (p 35). These assumptions may not reflect the aquifer's response to long-term pumping. If this is the case, drawdown curves would differ to what has been presented in Figure 16-5.	Noted.
19	EIS 16, Appendix U	Not all relevant groundwater supporting documents have been provided in the EIS.	The following reports have been provided to DPTI on a strictly commercial in confidence basis. These reports are not authorised for publication or release outside of SA Government and do not form part

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		In section 1.1 of Appendix U, it has been stated that Appendix U should be read in conjunction with 3 other documents. Only one of the documents has been provided in the EIS submission (Appendix V). References GWS 2014b and GWS 2013 were not included in the final documentation.	of Iron Road's Response Document: • E-F-66-RPT-0039 Construction Water Supply Field Investigation; and • E-F-66-RPT-2002: Kielpa Groundwater Supply Model Sensitivity Analysis.
20	EIS 16	The distance between the predicted drawdown impacts and Musgrave PWA is greater than 40 km. The drawdown contours presented in figure 16-6 is approximately 30 km from the PWA boundary, not 40 as stated in the text. Even considering the base case modelling scenario as per figure 9 of Appendix U, the 1m drawdown contour is within 40 km of the PWA boundary.	Noted. Chapter 16, page 16-18 of the EIS, last sentence of paragraph 4 is corrected to read 30 km, not 40 km as currently stated. This error has no impact on achieving outcomes.
21	EIS 16.3.3	Referencing incorrect. GWS2014a is referenced for the description of Jurassic sediments in the Polda Trough; however no description is provided in GWS2014a.	The correct reference for Jurassic Sediments is (DMITRE, Undated, *Polda Basin Petroleum and Geothermal Prospectivity Notes*). Downloaded 4/2/2014 from: http://petroleum.statedevelopment.sa.gov.au/prospectivity/polda_basin
22	EIS 16.3.3	No regional description provided for Tertiary sediments. No regional description was provided for the Tertiary sediments that extend regionally from the mine site to the Kielpa Borefield and to the Musgrave PWA.	The western Eyre Peninsula is draped with Tertiary Sediments; the lower part of the Tertiary sediment, the Poelpena Formation is typically sandy and comprises a variably productive aquifer. These sediments thicken across the northern, fault bounded part of the Polda Trough, and the thick sandy facies form the target aquifer for the Kielpa groundwater supply. The Tertiary Sediment and the aquifer extend regionally from basement outcrop in the central Eyre Peninsula west, across the Polda Trough and across to the coast on the western Eyre Peninsula. Within the Musgrave PWA, the Tertiary aquifer is overlain by the fresh groundwater lenses utilised for agricultural and domestic supply. Tertiary clays separate the Tertiary aquifer from the overlying freshwater lenses.

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			Groundwater flow in the Tertiary aquifer is interpreted to be in a westerly direction. Isolated areas exist where no Tertiary sediments have been mapped and these coincide with basement and topographic highs. Measured salinity in the Tertiary aquifer at the Kielpa borefield ranged from 24,600 mg/L TDS to 41,300 mg/L TDS. Regionally the Tertiary aquifer exhibits salinity generally exceeding 10,000 mg/L TDS east of the Musgrave PWA. A bore audit failed to identify any bores accessing the Tertiary aquifer within 10 km of the borefield and its radius of impact yielding non-saline water. Only one saline bore (18,000 mg/L TDS) was identified; however the bore is not in use. The salinity of the Tertiary aquifer within the Musgrave Prescribed Wells area is reported to range from 500 to 5,500 mg/L TDS (DFW, 2010 Musgrave PWA Groundwater Level and Salinity Status Report 2011-2012).
23	EIS 16.3.3	Further information regarding hydrogeology of the Port. No comment has been provided on the hydrogeology of the fractured rock aquifers at the port facility.	The following information is provided on the fractured rock aquifer at the port site: Basement Rock comprises Gneiss and Granitoids of the Lincoln Complex and there is little evidence of faulting to provide secondary permeability and hence aquifer transmissivity. Existing bores report yields less than 80 m^3/day (<1 L/s). The regional groundwater salinity is around that of seawater (35,000 mg/L TDS). One shallow "beach well" at the outlet of a minor creek 3 km south of the project yields water with reported salinity <5000 mg/L TDS. The Aboriginal Heritage Survey describes a "spring fed creek" to the south of the port site. Saline groundwater discharge (baseflow) to drainage lines in this landscape on the Eastern Eyre Peninsula is typical (refer Dutton, Driver, and other minor drainage lines). The above information does not change the outcomes of the impact assessment.

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24	EIS 16.5.2	Referencing not provided. Information regarding numerical modelling of the groundwater recovery is not in the reference cited.	Noted. The correct reference is: Groundwater Science 2014c Kielpa Groundwater Supply Model Sensitivity Analysis (E-F-66-RPT-2002).
25	EIS 16.5.3	Potential impact to GDE's has not been addressed for the operation of the wells along the infrastructure corridor, during the construction phase.	GDE's identified near construction water supply wells are limited to the Driver River near well IC5. Impacts on this river have been considered and presented in Chapter 16.5.3 of the EIS. GDE monitoring during the operation of the short term supply borefield will be considered in the CEMP.
26	EIS 16.5.4	Potential impacts to subsurface GDE's. Subsurface GDE's have been identified in the Cape Hardy region, within the port facility parcel which should be addressed within the EIS. A spring fed creek is discussed in Chapter 19 but is not further described in the groundwater section of the EIS.	The Aboriginal Heritage Survey report describes a "spring fed creek" to the south of the port site. Saline groundwater discharge (baseflow) to drainage lines in this landscape is typical. No significant impacts on this regime are expected.
27	EIS Appendix U, EIS 16.5.4	Reliability of information regarding a groundwater divide. The occurrence of a groundwater divide is referred to only in the Groundwater summary. The reference cited is 35 years old with no up to date information provided.	The groundwater divide described in the GIA and referenced to *Eberhard and Waterhouse 1979* is still observed in the shallow water table data synthesised by DEWNR and reported by that agency as: *"Eyre Peninsula NRM Region simplified Hydrostratigraphic 3D Model, 2013"* which was accessed by Iron Road on 29 May 2014.
28	EIS Appendix U, Section 3.3.1, Figure 7, EIS 16.3.4	Consistency in groundwater user data. The number of existing groundwater users presented in Figure 7 appears less than the number of water wells in the CEIP study area. Clarification is sought as to whether all existing users have been accounted for in the assessment. In addition further information is requested as to the risk to changes in water quality for those users (with recorded fresher quality groundwater) who fall within the predicted drawdown impact area of the Kielpa borefield.	Figure 7 presents recorded water bores (WaterConnect Database) after removal of the following: • Bores recorded as abandoned or backfilled; or • Bores confirmed as no longer existent during bore audit and landowner consultation conducted by Iron Road. The Iron Road bore audit specifically queried the presence of bores reporting fresher quality groundwater (bore number 6130-115). The landowners reported that the bore does not exist and that they were not aware of any neighbours having bores yielding useable quality groundwater. The landowners have been on the property since 1987.

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29	EIS Appendix U, Table 7	Consistency in operational life of Kielpa borefield. There are variations to the duration of drawdown data for the Kielpa Borefield. Table 7 in Appendix U notes a period of 25 years while Table E1 in Appendix V notes a life of 20 years. After 20 years of operation the total drawdown ranges from 78% to 92% (average 87.5%) of available drawdown. Accounting for an extra 5 years may exceed the available drawdown.	Drawdown at the pumped bores is reported for a pumping duration of 20 years. The reference to 25 years in Appendix U is an error. Additional drawdown at the pumped bores may be managed if required by optimisation of the borefield (modifying flow rates at individual bores to match bore efficiency) or by the addition of bores. Note that radius of drawdown impacts are correctly reported for 25 year model simulation. The above information does not change the outcomes of the impact assessment.
30	EIS Appendix U, Figure 9	No Figure 9 provided. Figure 9 is referenced to Appendix V; however figure is not present in Appendix.	The reference to Appendix V in Figure 9 is incorrect. The correct reference is: Groundwater Science 2014c Kielpa Groundwater Supply Model Sensitivity Analysis (E-F-66-RPT-2002).
31	EIS Appendix V	Recovery modelling to be extended to provide an indication of how long it will take for groundwater resources to recover.	Recovery Modelling was extended to 350 years and the results are summarised in Chapter 16.5.2 of the EIS. Full details are provided in: Groundwater Science 2014c Kielpa Groundwater Supply Model Sensitivity Analysis (E-F-66-RPT-2002).
32	EIS Appendix V	Sensitivity analysis as presented in Appendix U shows the 1m drawdown contour near the boundary or extending into the park areas. Further information is requested regarding potential impacts to Hambidge and Hincks WPA.	Both the Hambidge and Hincks Wilderness Protection Areas comprise mallee scrub on a dunal topology overlying saline groundwater. A slight reduction in the saline water table cannot and will not have a credible impact on this system due to the vegetation not relying on this saline water to survive or grow.
33	EIS Appendix V	Information regarding the water budget used for the groundwater model to be provided.	Please refer to Section 4.1 of the EIS Response Document for information on the groundwater water budget model.
34	EIS Appendix V	DEWNR completed a review of groundwater modelling conducted for the EIS. Modelling has been completed for a 20 year period however the mine will be operational for 25 years, DEWNR requests clarification as to why modelling was completed for a 20 year period. This also has	Modelling was in fact completed for 25 years. The extended model runs (undertaken once the project scope had changed) are reported in "E-F-66-RPT-2002: Kielpa Groundwater Supply Model Sensitivity", which was provided to SA Government on a Commercial in Confidence basis (due to contained financial information) on 30 June 2016).

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		implications in terms of drawdown averages, if modelled for 25 year is it possible that total drawdown will exceed the available drawdown?	All drawdown figures and radius of influence figures that were provided in the EIS have been exported from the 25 year duration model. If total drawdown exceeds available drawdown at individual wells this can be managed if required by optimisation of the borefield (modifying flow rates at individual bores to match bore efficiency), or by the addition of bores. This is standard procedure for development of a water supply borefield. The individual well efficiency is not precisely defined until the bore is installed. The Groundwater report referred to above should be read in conjunction with the detail provided in Iron Road's Mining Lease Proposal as the 15 GL/yr groundwater extracted from the model is the upper limit of calculated water demand from the mine. The base case water demand from the mine is 12 GL/yr, hence the borefield modelling already has conservatism built into the flow rate simulation. Iron Road's expert consultants advise that the outcomes as described in the EIS can be achieved.
35	EIS Appendix V	Figures provided in Table E1 indicate the aquifer will be in unconfined conditions. Further information is required as to why this has not been accounted for in the model.	The Tertiary aquifer is variably confined. Refer cross sections Pages 13 to 20 of Appendix V and the description in Section 4.2.1 (Page 33). The upper Tertiary clay confining layer is not continuous and the Tertiary aquifer is naturally unconfined in some locations. To simulate this the flow model was set up with all Layers specified as "Type 3" layers which allow confined (Fixed Transmissivity and Storativity) and unconfined (Variable Transmissivity and Specific Yield) simulation depending on the calculated water level. A relatively low vertical conductivity is applied to Layer three in the model to simulate the leakage that is expected through this unit on a regional scale. The above information does not change the outcomes of the impact assessment.

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36	EIS Appendix V	Modelling review. Further information regarding conceptualisation of groundwater conditions of the borefield area, in particular; the existence of the tertiary clay confining layer, which is not evident in cross sections for Appendix V, to be provided. In addition, further information regarding the presence of a quaternary aquifer is requested.	For comment on Tertiary confining layer, please see response to comment #35 above. Please refer to Section 4.2 of the EIS Response Document for information on the other matters raised.
37	EIS Appendix V	Additional information regarding the cone of depression and its possible extent following cessation of pumping to be provided.	Please refer to Section 4.3 of the EIS Response Document for information on the cone of depression.
38	EIS 2.6.6, Appendix Q	Incorrect guideline reference. The text in section 2.6.6 references "State Environment Protection Policy Groundwater of Victoria". Water quality and beneficial use of groundwater is presented as per guidelines relevant to South Australia.	Noted. The water quality and beneficial use assessment should reference the ANZECC/ARMCANZ 2000 Australian and New Zealand Guidelines for Fresh and Marine Water Quality. Reference to these guidelines does not change the outcome of the water quality assessment.
39	EIS Chapter 1	Figure 1-1 does not align with the information provided. Information presented in this figure does not align with the latest information stated in Section 1.2.	Noted. A new Figure 1-1 is located within Section 6 of the EIS response document.
40	EIS 3.3, Page 3-13	Consistency of information. Section 3.3 notes that salinity greater 5000mg/L is unsuitable for stock which does not supports the information provided in Table 4, App U.	Also raised by the EPA – refer to Comment #8.1 above for clarification.
41	EIS 4, Table 4-33	Class of PVC to be used for construction of Kielpa wellfield. The EIS notes that construction wells will be constructed with Class 12 PVC. Due to the depth of the wells it is recommended a higher class of PVC is used. In addition all wells are to be constructed in accordance with minimum construction requirements for water bores in Australia.	The recommendation to use suitable bore casing and to construct bores in accordance with industry guidelines is noted.

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42	EIS 7	Chapter 7 describes the physical environment; however no information is provided in relation to the occurrence of groundwater at the Port facility or within the proposed infrastructure corridor. Further information to be provided on the occurrence of groundwater at the port facility and within the proposed infrastructure corridor.	Groundwater at the port site is described in response to Comment #23 above. The occurrence of groundwater along the infrastructure corridor is summarised in EIS Appendix U, Sections 2.6.1 and 2.6.5. Further detail is provided below: The infrastructure corridor extends from the mine site boundary some 130 km to the east and south to the port site boundary on the eastern coast of the Eyre Peninsula. The corridor traverses several geological domains (Figure 5 and Figure 6). Initially Tertiary sediments up to around 60 m thick cover basement rock comprising Sleaford Complex Gneiss. The corridor then crosses the Polda Basin, an east-west intracratonic graben infilled with Permian and Jurassic sediments. This structure exhibits a significant fault throw at the northern margin with basement shallowing towards the south. Overlying Tertiary sediments also thicken across this structure. The route then crosses outcropping, to thinly covered Gawler Craton rocks of the Cleve subdomain. The Blue Range Beds, which infill the Itiledoo Basin, outcrop and sub-crop beneath thin recent cover. The route then crosses schists of the Hutchinson Group and then, approaching the coast, gneiss and granitoids of the Lincoln Complex. In this area thin Tertiary cover infills valleys associated with drainage lines. Groundwater is hosted within Tertiary sediments where these are sufficiently low in elevation to be below the regional water table. In elevated terrain the only groundwater is held within the basement fractured rock aquifers. Reported bore yields are consistently low (with the exception of IRD test bores in the Polda Trough Tertiary aquifer). Groundwater salinity consistently exceeds 10,000 mg/L (typically >20,000 mg/L TDS).

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			Some lower salinity groundwater is reported at the base of Darke Peak. These bores are located more than 4 km up-gradient of the infrastructure corridor in surface drainage lines and will not be impacted by the operation of the corridor. A detailed review of the non-prescribed groundwater resources traversed by the corridor is provided in "Department for Water (2011) Non-prescribed groundwater resources assessment - Eyre Peninsula Natural Resources Management Region – Phase 1 Literature and data review Report 2011/16)". The above information does not change the outcomes of the impact assessment.
DPTI			
1	EIS 4.3 P 4-29 and P 4-38	Port Design description and marine description In general, DPTI is supportive of the marine infrastructure identified in the report. Meetings have been held with Iron Road, and DPTI understands that the applicant is fully aware of its obligations to obtain agreement from the Minister for Transport and Infrastructure before occupying his land. The proponent should note that there will be a requirement to enter into a Ports Operating Agreement with the Minister for Transport under the Harbors and Navigation Act 1993. It is likely that Iron Road will be subject to the Maritime Services (Access) Act 2000 allowing for third party access. With respect to navigational safety, the applicant is encouraged to consult with DPTI, Principal Navigation Specialist , Mr Gordon Panton (Ph 8360 0027/mob 0488 105 230) to discuss and develop appropriate strategies for navigational safety, notice to mariners, etc.	Noted. Chapter 5, Table 5-3 of the EIS states a range of other State approvals that may need to be obtained, including a Port Operating Agreement with the Minister for Transport under the *Harbors and Navigation Act 1993*. Iron Road acknowledges that it will likely be subject to the *Maritime Services (Access) Act 2000* in order to allow for third party access.

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2	EIS 4.2.1 P 4-16	Railway line. In September 2015 DPTI released a *Railway Crossing Policy* (refer https://www.adelaidemetro.com.au/content/download/391045/2084685/version/1/file/Railway-Crossing-Policy.pdf) identifying the following principle: *Principle 2 – New railway crossings on roads classified as Rural Arterial or on roads with a designated function of Major Traffic Route or Freight Route shall be grade separated.* On this basis, DPTI does not support the proposed activation of the level crossing of the Birdseye Highway. This is provided in the context that the Birdseye Highway is classified as a Rural Arterial road, and a designated Freight Route. For noting - The policy also identifies the need for written consent to be obtained from road and rail infrastructure managers, and that an Interface Agreement be prepared. DPTI considers that the crossing of the Birdseye Highway should be grade separated. This would accord with policy, recently formalised as Railway Crossing Policy (refer https://www.adelaidemetro.com.au/content/download/391045/2084685/version/1/file/Railway-Crossing-Policy.pdf) Variation to the policy can be considered by the Rail Commissioner or the Commissioner of Highways through the provision of information such as economic justification, assessment of safety, implications of traffic management, and other key assessments. With regards to the other level crossings identified in Table 4-1- *Proposed Railway Line Road Crossings and Road Diversions* (Chapter 4, page 4-19), DPTI considers that active control should be utilised as a minimum treatment where an at-grade crossing is unavoidable to provide an acceptable level of safety for the travelling public.	Iron Road acknowledges the DPTI Policy relating to Rail Crossings which will require the Company to obtain a secondary approval from the Commissioner of Highways as set out in that Policy. In accordance with the Policy, Iron Road commits to working with DPTI in a constructive and efficient manner to determine the appropriate treatment for each and every crossing to be impacted by the CEIP, acknowledging the principles and intent of the Policy is to minimise risk to all road and rail users. It should be noted that this is also the intent of Iron Road. Through the provision of information relating to safety and risk management assessments, the outcomes of this detailed review by DPTI and Iron Road may include grade-separated crossings, at-grade crossings that meet Australian Standards or at-grade crossings that have been further enhanced including boom gates. This review will lead to formalised Interface Agreements with the appropriate parties prior to construction. Iron Road commits to funding the upgrade of any crossings that are required as a direct result of its activities and which have been formalised in the Interface Agreements.

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		For noting - Written consent should be obtained from the relevant road manager for all new railway crossings. Interface Agreements between the relevant road and rail infrastructure managers must also be prepared in accordance with the *Rail Safety National Law (South Australia) Act 2012*.	
3	EIS 5.3.4 and Table 5-3	*Railways (Operations and Access) Act, 1987*. Rail network subject to third party access. The Objective for the "*Railways (Operations and Access) Act 1997* should be amended to read : "The rail network is subject to third party access in accordance with the Act to provide access to railway services on fair commercial terms."	Noted.
4	EIS 18.4, page 18-13 to 18-15, Table 18-5	Design modifications to protect the transport network. The proponent proposes to install passive level crossings at 17 locations, with activation only if sight distance requirements described in AS1742.7 cannot be met. The proponent also refers to traffic volumes exceeding the "trigger threshold" as a warrant for activation (pg 18-14). DPTI does not consider a trigger exists. DPTI considers that active controls be utilised as a minimum treatment where an at-grade crossing is unavoidable. DPTI also considers that stacking distance must be considered as part of the design considerations as this is a critical consideration in crossing location. **Response/solution: DPTI's considers that active control should be utilised as a minimum treatment where an at-grade crossing is unavoidable to provide an acceptable level of safety for the travelling public. DPTI also considers that stacking distance must be considered as part of the design considerations as this is a critical consideration in crossing location**	Across the Australian rail industry best practice is adopted for assessment of risk associated with rail level crossings. A good industry reference and documented procedure for these assessments is provided in: Railway Crossing Protection in Western Australia - Policy & Guidelines, first issued in May 2004 and revised in June 2015. https://www.mainroads.wa.gov.au/OurRoads/RoadSafety/PolicyGuidelines/Pages/policy_guidelines.aspx In the context of the proposed passive level crossing design considerations, the "trigger" equates to the considerations that warrant a higher level of safety signalling treatment from Passive to Active and ultimately "Boom Gated" crossings, via the derivation of the likelihood of the potential hazard at the road /rail crossing. This likelihood of conflict is normally expressed as the product of the number of road vehicles and trains that use the crossing. Speeds of approaching vehicles are also a factor and therefore it is appropriate to 'weight' the level of conflict based on the speed of approaching vehicles/trains. The various procedures for assessment are contained within the above reference document.

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			Iron Road maintains its intention to design and implement appropriate levels of both Passive and Active level crossing controls, in accordance with National Rail Industry practices as outlined and, where appropriate, will provide additional levels of safety with the adoption of AAWD or Low-cost level crossing warning devices (LCLCWDs) as reviewed by the Cooperative Research Centre (CRC) for Rail Innovation for improving safety across the various types of level crossings with passive controls in the report; R3.111 - New Affordable Level Crossing Control Systems (17 Dec 2010).
5	EIS 18.5.9 page 18-31	Rail Movements and Traffic Delays at Level Crossings. EIS Section 18.5.9: Table 5.9 of the accompanying Transport Impact Assessment states that maximum delay for road traffic on the Birdseye Highway will be 100 seconds, however this doesn't seem to include the delay caused by the active crossing being activated "when an approaching train is 4km away, based on the requirements of AS1742.7" as stated in Section 4.6.2 in the EIS (page 4-64, last paragraph). At a train speed of 80 km/hr the active crossing will be activated three minutes before the train crosses Birdseye Highway and a 1.3km long train will complete the crossing in about 61 seconds, for a total delay of over four minutes. The comment on activation would also be better reflected as a time rather than distance. **Response/solution: DPTI's position is that a grade separation should be provided on the Birdseye Highway. DPTI considers that Section 18.5.9 Table 5.9 of the accompanying Transport Impact Assessment underestimates the maximum delay for road traffic on the Birdseye Highway, stated to be 100 seconds.**	Iron Road acknowledges the total delay for a rail/road crossing as described will be over four minutes.
6	EIS 18.7.3 page 18-36	Summary of risks. The following statement is made in the Summary of Risks: *"Additionally, it is noted that the risk of catastrophic consequences are present at railway and road crossings and along roads across*	Noted and acknowledged.

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		Australia, and the risk assessment of a vehicle accident applied here is not sensitive to the additional traffic generated by the project (i.e. the same risk rating would still apply to public safety if the project did not occur)." The above paragraph doesn't acknowledge that without the new CEIP railway there isn't a residual risk of a road vehicle colliding with a CEIP train, therefore it isn't legitimate to claim that the same risk rating would still apply at proposed level crossing locations if the CEIP project did not occur.	
7	App M & App N	Environmental Noise and Vibration Assessment - Infrastructure and long term employee village. Predicted railway noise figures. Section 3.2 (page 9) refers to the Environment Protection (Noise) Policy 2007 (SA), however there is no reference to the Guidelines for the Assessment of Noise from Rail infrastructure and the need to apply the Noise and Air Emissions – Overlay 3 from the Planning Policy Library in accordance with the Minister Specifications SA 78B. **Response/solution: Section 3.2 (page 9) refers to the Environment Protection (Noise) Policy 2007 (SA). The proponent should demonstrate that it is able to meet the Environment Protection (Noise) Policy 2007) requirements.**	The long term employee village is approximately 35 km from the proposed rail infrastructure and thus will be compliant with the Environment Protection (Noise) Policy 2007 (SA). This is demonstrated by the noise assessment that has been undertaken on the many closer receptors (less than 1 km) which are also compliant. The 'Noise and Air Emissions – Overlay 3 from the Planning Policy Library in accordance with the Minister Specifications SA 78B' has not been mentioned previously, or provided, to Iron Road. It has been reviewed and as described above, has no relevance given the fact that the long term employee village at Wudinna will be approximately 35 km away from the proposed rail infrastructure.
8	App W TIA, Section 1, page 1	Introduction - project overview. The report presents findings from the transport impact assessment undertaken for the Central Eyre Iron Project (CEIP) and identifies the following: • Scale and location of transport activities required to and from the proposed mine site and CEIP Infrastructure during the construction and operational phases of the mine. • Impacts on public roads and infrastructure within the study area (Eyre Peninsula south of Whyalla) from transport activities resulting from CEIP.	Noted. Iron Road will continue to liaise with DPTI in this regard, noting the Company's responses to that agency's comments set out in #2, #4 and #5 above.

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		• Any public infrastructure works or upgrades required to accommodate transport impacts resulting from the CEIP. Prior to approval of the development, DPTI will be seeking to enter into an infrastructure agreement regarding the provision of upgrades required to State Government transport infrastructure. All infrastructure upgrade requirements will be at the proponent's cost.	
9	App W TIA Section 3.2.4 Figure 3.7 page 26 and App W TIA Section 4.1.8 page 42	Module route and local road network. Figure 3.7 – Plan of module delivery route, depicts the proposed haul route for the transportation of Oversize Overmass (OSOM) modules and plant from the Port to the Proposed mine site. This is entirely on the existing public road network. A total of 144 Oversize/Overmass modules (the largest being up to 53m long, x 13m wide x 45m tall) will be moved at speeds varying between 1km/h and 40km/h and take between 1 and fourteen days to reach the mine site – requiring pullover sites at 12km intervals. This will impact on traffic management. The dimensions and mass proposed for the modules (up to 53m long x 13m wide x 45m tall, with a mass of up to 3000 tonnes) are well beyond any conventional OSOM loads. While some public roads are capable of catering for more conventional OSOM vehicles, vehicles of this scale would potentially have a significant impact upon the existing road asset, and require removal and replacement of roadside furniture. DPTI is also concerned that a 'rolling road closure' would be required to allow full use of the available road corridor, which would likely be unacceptable to the local community and industry given the very slow speed of these vehicles. A rolling closure could result in the effective closure of the road to the public for up to 12 hours, for an Oversize/Overmass modules travelling at 1 km/h. A rolling closure would have particularly severe implications during the grain carting	Both Iron Road's DFS and TIA were completed using the existing public road network which depicted the DFS base case of a Modular Access Route (MAR) utilising this network to transport pre-fabricated modules between the proposed port and mine sites. At the same time as the Traffic Impact Assessment (TIA) was being conducted by Jacobs in 2015, a parallel study team within Iron Road were reviewing alternative MAR options. The parallel study identified an alternative MAR that could provide for OSOM modules to be transported off public roads and along a dedicated and engineered route within the proposed infrastructure corridor. With an awareness of the staged construction requirements along the rail formation and provision of temporary heavy earthworks plant haul roads and ultimately the formation of a permanent rail maintenance/access track, it is considered that planned works could also provide a suitable MAR alignment. DPTI should note that Iron Road has not conducted any stakeholder engagement or landowner discussions concerning the possibility of using the proposed infrastructure corridor as a MAR.

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		season. Pullover bays will be required at 12km intervals to allow for the largest modules (53m -long x 13m wide x 45m tall). DPTI considers that the provision of a dedicated infrastructure corridor for the movement of oversize loads is required, and the Response Document must address this.	
10	App W, TIA Section 4.1.3, page 32	Vehicle types. Access for A-Triple Road Trains (which can carry up to 136t) is currently not available on the Eyre Peninsula. The EIS proposes to use vehicles approved under Performance Based Standards (PBS) to transport the same amount of load as the A-triple road trains. The highest PBS level of access available on the Eyre Peninsula is for PBS Level 3A vehicles which can only carry loads to a maximum of 110t. DPTI supports in principle the use of Performance Based Standards (PBS) vehicles, as indicated in Appendix W, Section 4.1.3. It should however be noted that the highest PBS level of access available on the Eyre Peninsula is for PBS Level 3A vehicles which can only carry loads to a maximum of 110t. Relevant approvals for the use of PBS vehicles will need to be sought through the National Heavy Vehicle Regulator. The proposed use of roads by Restricted Access Vehicles exceeding limitations under current gazetted routes during both the construction and operating stages will need to be considered as part of normal application processes through the National Heavy Vehicle Regulator.	Iron Road acknowledges that relevant approvals will be required from the National Heavy Vehicle Regulator.
11	App W, TIA Section 5.1.3 Page 60	Module Delivery Route Safety. "The following intersection upgrades will be required to accommodate turning circle room for a 12m by 52m long module transporter as shown in Figure 5-5 (page 61): • North Coast Road/Port Neill Access Road	It is now proposed that the module transporters carrying process plant and building modules, including mining and materials handling equipment and infrastructure components and buildings, may be delivered to the mine site from the port, away from public roads and along the infrastructure corridor via an upgraded service road. This will alleviate upgrades to the intersections listed.

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		• Port Neill Access Road/Lincoln Highway • Lincoln Highway/Balumbah-Kinnard Road • Birdseye Highway/Tod Highway • Tod Highway/Kimba Road **Response/solution: DPTI seeks advice as to the upgrading needs for the road network in the event that the transportation of OSOM modules/vehicles during the construction phase utilise the infrastructure corridor.**	Iron Road commits to establishing agreements with DPTI related to this infrastructure change prior to construction,
PIRSA			
1		Broad acre agriculture. Issues relating to broad acre agriculture near the mine site, along the transport corridor to the port at Cape hardy and at the port have been adequately addressed.	Noted.
2		Fisheries and Aquaculture. From the EIS it would appear that consultation with the relevant fishing sectors (commercial and recreational) impacted by the port and shipping lanes activity has not occurred. PIRSA was of the understanding that the CEIP EIS would examine the potential impacts and benefits of the ongoing use of that infrastructure including, for example, increased shipping activity in the Spencer Gulf. Impact for the fishing industry should differentiate between the recreational and commercial sectors and all commercial associations whose waters may be affected by the CEIP, including its shipping lanes where they cross fishing zones (for example, Blue crab fishery, Spencer Gulf prawn fishery, marine scalefish fishery etc) should be listed.	Iron Road has presented at many forums and to several government agencies with fishing industry and PIRSA representatives being present. Specifically, a representative from the Tuna Boat Owners Association has been present at a few presentations and a Fisheries executive attended the last meeting Iron Road had with PIRSA. No major concerns have been raised, presumably because the commercial fishing industry recognises the negligible impact that the proposed shipping from the CEIP would cause. It is also noted that no submissions from relevant fishing sectors were received on this issue. Regardless, Iron Road would welcome further opportunity to discuss any areas of concern with the fishing sectors should there be any interest. In addition, should the CEIP be approved and funded, the CEMP will include commitments for ongoing stakeholder engagement and members of the fishing industry are noted as stakeholders.

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3		Biosecurity. The marine biosecurity issues in relation to risks associated with bio fouling and ballast water exchange appear to be understood by the developer and a risk assessment has been conducted. Agree with the assessment of a 'high' residual risk in terms of potential to spread any introduced marine species from the port to elsewhere in the gulf. Agree with the recommendation that national guidelines for bio fouling management are allowed and guidelines/regulatory requirements for ballast water also be followed. Management of bio fouling and ballast water is being considered in a national review of marine pests currently being undertaken in relation to vessel hygiene and movements but nonetheless, current best practice should be followed as detailed on www.marinepests.gov.au. A key issue of concern is in relation to the EIS documents is the lack of any specific mention/plans to undertake monitoring in relation to marine pests. This detail should be incorporated along with a pathway identified for ongoing monitoring of native marine species health/diversity.	It is incorrect to state that there is a "...lack of any specific mention/plans to undertake monitoring in relation to marine pests." The EIS includes a clear commitment to undertake this monitoring in the Draft CEMP and OEMP, Sections 2.4.4 Control and Management Actions, Tables 2.7 Management Measures. Further details will be included in the final CEMP and OEMP following CEIP approval and funding.
4		Regions SA has reviewed the EIS and acknowledges that matters relevant to regional development is discussed in Chapter 22 headed 'Social Environment'. Therefore Regions SA's comments are limited to comments on this chapter. Chapter 22 covers information regarding the existing environment in the region, control measures (i.e. actions Iron Road will take) to protect environmental values and an impact and risk assessment. <u>Residential workforce VLDC workforce</u> The messaging throughout the chapter is based on the premise that a residential workforce is preferable to a Long Distance Commute (LDC)	Noted. Chapter 4.4 of the EIS provides some further information about the long term employee village with the key message being that "Iron Road is flexible around the final layout and design of the village and is working collaboratively with Wudinna DC to ensure an optimal outcome for the Wudinna community". While an indicative table of components plus an example layout are also included within Chapter 4.4, Iron Road will explore the possibility of providing some short term, family-friendly accommodation in the proposed village in consultation with the Wudinna DC.

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		workforce for many reasons which are well documented and, for this reason, Iron Road will do what it can to encourage development of a residential workforce. Region SA's primary comment about the chapter is that, while the messaging of the Chapter revolves around this premise, many of the actions that are proposed to be taken by Iron Road do not appear in their current form to accord with this messaging and will in fact facilitate the establishment, and long term encroachment, of a LDC workforce. The CEIP includes a proposed long term accommodation village located near Wudinna. The EIS states that the accommodation village will consist of single persons' accommodation (single rooms with ensuite bathroom), share living and dining facilities. The Chapter makes the point that there are only 24 dwellings in Wudinna unoccupied and that it will be important to make land available for essential development. However, residential development is a long term proposition. The Chapter does not indicate if Iron Road itself will undertake this type of development. Region SA's view is that if Iron Road is to encourage development of a residential workforce that will integrate with, and contribute to the well-being of the existing community (including paying council rates for services) then it could consider providing some (at least short term) family-friendly accommodation in the accommodation village. This would allow time for families to relocate, purchase land and build a home in the area.	
5		Transport issues. Regions SA's view is that the EIS document could better address the issue of transport options for workers. It would be useful if information could be provided identifying whether neighbouring townships have an airport, bus station/services or taxi service. It must be remembered that a significant proportion of the workforce may ultimately be FIFO workers. The EIS document does refer to a	Noted. Information on regional transport is set out below. Premier Stateliner has regular bus services to Whyalla, Port Lincoln and Ceduna and these buses stop at many regional towns in and around the proposed CEIP such as Wudinna, Kyancutta, Yaninee, Minnipa, Cleve, Arno Bay, Port Neill and Tumby Bay. Bus terminals (for the buses that service these towns) only exist in Port Lincoln and Whyalla. These may conceivably be improved with increased demand.

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		proposed bus service to transport workers from the accommodation village to the mine.	There are two commercial airports in the area of the CEIP being Whyalla and Port Lincoln but there are numerous non-commercial airports in Wudinna, Kimba, Cowell, Lock, Tumby Bay, Cummins and Elliston. To Iron Road's knowledge, taxi services on the Eyre Peninsula are only available in Port Lincoln, Whyalla and Ceduna.
6		Drawn down of workers Separately to the above issue, Regions SA also notes that the risk of increased competition for workers as a result of the mine (i.e. drawn down of workers from other industries thereby resulting in labour shortages in other industries) is high. Regions SA notes that Iron Road is proposing a number of actions and strategies to seek to address or manage this risk. Regions SA notes that liaison with the South Australian Government's Resources Infrastructure Taskforce and Eyre Peninsula Mining, Oil and Gas Community Development Taskforce is one of these actions.	Noted.
Renewal SA			
1		Accommodation/housing requirements. A 100% increase in population is a considerable increase, and will have a large impact on the current residents in Wudinna. Furthermore, until the new residential workforce accommodation is built (estimated at Quarter 2 in Year 2 of the project), it should be anticipated there will be a period of time at the front end of the project where housing will be in high demand in Wudinna. Existing lower and middle cost housing will be quickly picked up by mine-workers on higher incomes, leaving a gap in the housing market for lower income households. The gap is likely to lead to an increase in overall rental and house price costs as supply is not meeting demand.	Noted. Iron Road has committed to ongoing discussions with both Renewal SA and Wudinna DC (via a current MOU and a proposed Management Agreement post approval and funding). This issue will be a topic for cooperative ongoing discussion and management.

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		The State Government has an Affordable Housing Policy that is managed through the State Planning System to help Local Government, developers and the residential industry to ensure a diverse range of housing is built to accommodate a spectrum of households and household incomes. The *Eyre and Western Regional Plan 2012* identifies affordable housing and cost of living and Objectives and Principles for Development. The Principles include: Principle 13.7 - Provide at least 15 per cent affordable housing, including five per cent for high needs housing, in all new significant housing developments. Principle 13.8 - Encourage affordable housing through innovative products, funding arrangements and joint ventures between the not-for-profit and private sectors. The *Wudinna Development Plan* states (in relation to affordable housing) the following under the Residential Development Chapter: Objective 5 - Affordable housing provided in appropriate locations. PDC 4 -Dwellings constituting affordable housing should be located to optimise access to shops, social services and facilities, or public transport. There is scope for the strategies outlined in the Wudinna EIS to ensure that the supply and demand for housing across a range of income types of measured and tracked, and that the existing Planning System including Local Government is used to help address any gaps that may occur. The proponent should identify a methodology to benchmark and track affordable housing in Wudinna using existing affordable housing metrics to ensure that the current and future residents are not disadvantaged by broad-scale housing cost increases. A process for	

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		further work with Wudinna Council to ensure the existing planning framework for addressing affordable housing through Development Plans and the 15% Affordable Housing Policy is applied should also be identified. Under EIS Y - Social Impact Assessment, Table 4-7, Housing and Accommodation, a methodology and ongoing monitoring arrangements are in place to appropriately respond to the following: • the accommodation village planned as a flexible response to initial housing shortages, and in the longer term efforts are made to provide long-term and permanent worker accommodation within planned new residential development zones • housing affordability indices are used as a benchmark and measuring tool to determine the effect of increased population and greater income disparity on housing demand, especially in Wudinna. Current accepted measures for housing stress to determine the need to put in place measures to address housing affordability include: a) Percentage of low income households (lowest 40% of incomes) paying more than 30% of their weekly gross household income on housing (mortgage or rent). b) Affordable housing price points for South Australia identifying acceptable home purchase, advertised by Notice in the Government Gazette. Rental limits are also available from Renewal SA, although these were not included in the most recent Gazette Notice. Proposed Mitigation 20 (new text in bold): Collaborate with the Wudinna DC and South Australian Government in planning for new residential development, including the provision **of at least 15% affordable housing (to meet State Government Criteria)** and strategic infrastructure, to ensure housing demand does not out-strip supply.	

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Country Fire Service			
1		Bushfire Management Plan. As the project develops further it is likely CFS, through the relevant Bushfire Management Committee, would require a Bushfire Management Plan for the mining tenement.	Noted.
DSD – AAR – No additional comments			
DECD – No additional comments			
SA Health – No additional comments			
Department of Treasury and Finance – No additional comments			

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