

30/01/2014

Anthony Sutton
Office of the EPA
Locked Bag 10
East Perth WA 6892

Dear Anthony,

Thank you for your letter dated 24 January 2014 summarising the issues raised by public submissions on the J4 referral document and notifying Mineral Resources of the EPA's request for further information.

I am pleased to provide the EPA with the enclosed information in response to the key issues raised during the public comment period on the proposal. I trust this information is sufficient to enable a timely decision on the appropriate level of assessment for the J4 Mine and Haul Road proposal.

Yours Faithfully,



Sean Gregory
General Manager – Technical Services

Enc: Response to public comments

J4 Mine and Haul Road - EPA Referral

Response to Individual Comments:

Comment Number	Key Issues	MRL Response
1	The impact on ecological values associated with the Helena-Aurora Range	The J4 proposal is situated within the Jackson Range, not the Helena and Aurora Range. The proposal is approximately 20 kilometres northwest of the Helena and Aurora Range on a physically separate landform, being the Jackson Range, and is mapped by DPaW as being part of the Mt Jackson Priority Ecological Community (PEC) not the Helena Aurora PEC.
2	Due to its high environmental values and relative intactness, the area should be protected from mining and reserved for conservation	Polaris recognises the environmental values of the area. Polaris believes that the environmental values of the area can successfully co-exist with mining.
3	Lack of confidence in the ability of the proponent to manage issues, especially rehabilitation	Polaris' commitment to defining and implementing successful rehabilitation and mine closure practices has been addressed in Section 5.4 of the referral supporting document.
4	The potential impact to the water table	There are no groundwater dependent ecosystems, restricted/remarkable subterranean fauna or other potential ground water users in the vicinity of the project area that will be affected through groundwater use and temporary drawdown from dewatering below water table mining.
5	The proximity of the proposal area to the Helena and Aurora Range Conservation Park (HARCP) and the potential to reduce/impepe/prevent access to the HARCP	Vehicle access to HARCP from the west will be retained.
6	A view that mining in the proposal area is contrary to the EPA's statement in its 2013 annual report about redressing the balance between mining and conservation.	In its 2013 Annual Report, the EPA stated that it is "adopting a presumption against any further development for those parts of the range that are within the conservation park identified in the government's framework for the Mt Manning region". The J4 mine and haul road proposal is consistent with the EPA's public statements as no ranges within the HARCP will be impacted as part of this proposal.
7	Concern raised over the growing cumulative impacts in the region	The predicted extent of cumulative impact on the region's primary conservation value, i.e. flora, is presented in Section 5 of the referral supporting document.
8	The potential adverse implications for future generations.	The proposal will partially impact a 2km section of the Jackson Range, which has a total length of more than 60 km.

Response to Proforma Comments

Comment Number	Key Issue	MRL Response
9	High conservation values and sensitivity of the area (e.g. the proposal is located on part of the Helena-Aurora Range, within proximity of the HARCP, and is within a Priority Ecological Community).	The proposal is located in the Jackson Range. Refer to the response outlined in 1 above.
10	Potential high extent of impact (e.g. 831 ha land clearing, 2 ML/a water use, impact to significant flora and fauna species, visual amenity adversely impact by waste dumps and fragmentation of landscape)	<p>The impact of this proposal is intense but highly localised and small in extent – it affects 2 km of the Jackson Range’s overall length of more than 60 km. Of the 831 ha of clearing required, 523 ha is associated with the mine and related infrastructure whilst the remaining 308 ha are distributed over a linear distance of 75 km.</p> <p>Water use of 2 gigalitres per annum will not occur until mining proceeds below the water table, which is anticipated to occur during years 3-5 of the mine life. Refer to response outlined in 4 above.</p> <p>The impact on conservation significant flora and fauna species has been assessed as being not significant on the basis that: (a) no threatened ecological communities or flora species have been found in the disturbance area, despite exhaustive botanical survey; (b) the few conservation significant fauna species recorded are all highly mobile and there is extensive habitat for these species in the surrounding landscape and across the region; and (c) the impact on Priority flora species is not expected to result in a change to their conservation status.</p> <p>The proposal area is situated outside the HARCP and is separated by a large distance from areas within the HARCP that are actively used for recreation.</p> <p>There will only be minor fragmentation of the landscape. This level of fragmentation is influenced by the largely intact nature of the landscape and the relatively small extent of disturbance caused by the proposal. The haul road will not be an impermeable barrier to the movement of ground-dwelling fauna through the landscape.</p>

11	<p>Consequence of impacts and cumulative impacts (e.g. the adverse effect on the water table, impediment of access to the western section of the HARCP thereby impacting tourism/recreation, and the cumulative impacts need to be addressed.</p>	<p>Refer to responses outlined in 4, 5, and 7 above.</p>
12	<p>High level of public concern. There is a belief that there needs to be greater balance in regard to mining and conservation so as not to diminish the values of the area. There is public support for reservation of the J4 and J5 areas in their entirety. Commenters have a preference to reject the proposal but otherwise want a high level of public scrutiny.</p>	<p>Refer to response outlined in 6 above. The J4 mine is outside the HARCP. Polaris is mindful of public concern regarding the proposal and is committed to contributing towards a balance between development and conservation of the area.</p>