



26/03/2014

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

Dear Anthony,

Thank you for your letter dated 4 March 2014 requesting clarification on the alignment of the haul road within the Helena-Aurora Range Conservation Park (HARCP).

As you are aware Polaris is negotiating with Cliffs Asia Pacific Iron Ore (Cliffs) to obtain access to a portion of its haul road south of J4, which would alleviate the need to construct an additional haul road traversing the southwest corner of the HARCP.

Polaris' preference is to share infrastructure where possible to avoid unnecessary disturbance to the environment. In this instance, however, access to Cliff's haul road cannot be guaranteed within the timeframe required to implement the proposal.

Polaris therefore seeks approval to construct and operate the J4 haul road on the proposed alignment that is not prejudiced by the outcome of negotiation with Cliffs on shared access to the portion of its haul road.

Polaris advises that the proposed alignment is based on implementation of the mitigation hierarchy, which has reduced the extent of disturbance within the HARCP as far as practicable. It is difficult to avoid the HARCP altogether as the alignment is constrained to the south by Cliff's haul road tenure, which cannot be intersected.

Two haul road alignments were assessed for the proposal. The original northern alignment traversed the HARCP in an east-west direction north of the Helena and Aurora Range. That alignment, while shorter than the proposed southern alignment and economically more attractive, resulted in greater disturbance to the HARCP.

Consultation with OEPA was undertaken during the alignment assessment process. The OEPA's views on the potential impact within the HARCP were taken in to consideration by Polaris when defining the preferred alignment option. This option was subsequently referred to the EPA and results in less disturbance within the HARCP.

As part of the L77/252 application process via the *Mining Act 1978*, Polaris has been compelled to locate its haul road as far as possible from Cliff's haul road (up to 300m in some areas) due to objections submitted by Cliff's to the tenure application. Cliff's primary objection relates to potential drainage impacts on its haul road that could result in delays to their haulage operations. Within the HARCP, the haul road will be

constructed close to the north-west boundary of a 200 metre wide corridor corresponding to L77/252. This corridor abuts Cliff's miscellaneous licence to the southwest, within which its haul road is located.

In addition to avoiding impacts where possible, Polaris seeks to minimise unavoidable impacts on ecological communities, species and habitat – the use of Cliff's haul road is one such initiative. Another way Polaris will reduce its environmental impact is by sealing the haul road for its entire length (except for the Cliff's section should access to this infrastructure be achieved). In doing this dust will not be generated other than during construction and therefore ongoing use of saline water will not be required for dust suppression, thereby minimising potential impacts to soil and vegetation.

I trust this information provides the necessary clarification regarding the haul road alignment and its inclusion as part of the assessment of the proposal. I look forward to receiving the EPA's report in due course.

Please do not hesitate to contact me should you require any further information to support the assessment.

Yours Faithfully,

A handwritten signature in blue ink, appearing to read "Sean Gregory".

Sean Gregory
General Manager – Technical Services