

**From:** EPBC Referrals  
**Sent:** Tuesday, 19 August 2014 10:41 AM  
**To:** s22  
**Subject:** FW: Invitation to comment on Referral - (EPBC 2014/7285) - Central Eyre Iron Project, Eyre Peninsula, SA [SEC=UNCLASSIFIED]

s22 (have you changed your name by deed poll?)

Please find comments from Defence. Please note I haven't saved them in SPIRE or the tdrive.

Cheers

s22

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**From:** s22 MRS 2 [mailto:s22@defence.gov.au]  
**Sent:** Friday, 15 August 2014 3:45 PM  
**To:** s22  
**Cc:** s22 MR 1  
**Subject:** FW: Invitation to comment on Referral - (EPBC 2014/7285) - Central Eyre Iron Project, Eyre Peninsula, SA [SEC=UNCLASSIFIED]

UNCLASSIFIED

Hi s22  
I received an email bounce back for s22. Would you kindly on forward it to the appropriate area or indeed s22.

Many thanks.

s22

A/g Assistant Director | DEPA | EE | ID | DSRG | Ph: 02 6266 8047

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**From:** s22 MRS 2  
**Sent:** Friday, 15 August 2014 15:42  
**To:** s22@environment.gov.au  
**Cc:** s22 MR 1  
**Subject:** FW: Invitation to comment on Referral - (EPBC 2014/7285) - Central Eyre Iron Project, Eyre Peninsula, SA [SEC=UNCLASSIFIED]

UNCLASSIFIED

Hi s22

Defence has reviewed this proposal and it is not expected to impact on any Defence land or activities.

Kind regards

s22

A/g Assistant Director | Directorate of Environmental Protection and Assessments | Environment and Engineering Branch | DSRG



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**From:** EPBC Referrals [mailto:xxxx.xxxxxxxx@xxxxxxxxxx.xxx.xx]  
**Sent:** Thursday, 14 August 2014 09:24  
**To:** s22 MRS 2; s22 MR 1  
**Cc:** EPBC Referrals  
**Subject:** Invitation to comment on Referral - (EPBC 2014/7285) - Central Eyre Iron Project, Eyre Peninsula, SA  
[SEC=UNCLASSIFIED]

Good morning

Apologies for this late request for comment. Public comment period has closed, however we have received advice that Defence may wish to make comments on this proposed action. We would appreciate a quick response by early next week if possible.

We are sending you the attached link to a referral received for consideration under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) for your comments, as it falls within your area of interest: [http://www.environment.gov.au/cgi-bin/epbc/epbc\\_ap.pl?name=current\\_referral\\_detail&proposal\\_id=7285](http://www.environment.gov.au/cgi-bin/epbc/epbc_ap.pl?name=current_referral_detail&proposal_id=7285).

Any comment should be sent by 18 August 2014 via:

by letter s22  
A/g Director  
South West Section  
South West Assessment Branch  
Department of the Environment  
GPO Box 787  
CANBERRA ACT 2601

by email s22 @environment.gov.au  
by fax (02) 6274 s22

Formal notification has been sent in the postal mail s22, delegate to Senator the Hon David Johnston, Minister for Defence.

Regards

s22  
Referrals Gateway Section  
Queensland & Sea Dumping Assessment Branch  
Department of the Environment

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From: [Stop Invasive Mining Group Inc.](#)  
To: s22  
Cc: [Stop Invasive Mining Group Inc.](#)  
Subject: Environmental Assessment Submission  
Date: Friday, 15 August 2014 2:35:51 PM  
Attachments: [LOCK THE GATE SMALL.png](#)

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s47F

Stop Invasive Mining Group Inc.  
[epsimgi@gmail.com](mailto:epsimgi@gmail.com)  
[www.epsimgi.com](http://www.epsimgi.com)



To s22

Environment Assessment Officer

s47F and s47F  
Representing Stop Invasive Mining Group Inc.  
Submission to EPBC on reply for transport corridor for Central Eyre  
Iron Infrastructure Project

The SKM report states and I quote: "with respect to the proposed infrastructure corridor this study has ground-truthed in the field 43 of the 147 patches (29%) that intersect the preferred corridor. In addition vegetation type and condition have been inferred from (with binoculars) and/ or from adjacent similar patches for 21 patches (14%) the remaining 84 patches were inferred for vegetation and type and IBBA association, but not condition, from aerial imagery and

available DEWNR data".

It also states " The rapid field surveys undertaken to produce the report does not constitute a targeted species search for any of the listed species considered for the study area"

Yet 15 patches of 8:1 quality vegetation are to be intersected by preferred corridor that would have provided good habitat for threatened species, and 21 patches of good condition 6:1 rating vegetation to be intersected by the preferred corridor would have provided good to moderate habitat for threatened species with these patches providing a refuge or "stepping stones" between larger tracts of vegetation.

With potential habitat for Mallee Fowl and EPBC Listed species Sandhill Dunnart recorded within good Quality patches of vegetation near Rudall (DEWNR 2010), and South Australian NPW Act species Australian Bustard (*Ardeotis Australis*) and Shy Heath Wren (*Calamanthus cautus*) recorded within 1km of corridor centre line and Endangered species *Acacia Enterocharpa* (Jumping Jack Wattle) recorded less than 490m from alignment, shouldn't there have been a " targeted species" search done for these species by SKM ?

Is rapid field surveys and inferred vegetation type and condition sufficient to protect the 11 EPBC listed species relevant to the project ?

These are: Australian Fairy Tern, Cattle Egret Common Sandpiper, Osprey, Fork-Tailed Swift, Mallee Fowl, Pacific Golden Plover, Rainbow Bee-Eater, Red-Lored Whistler, Sandhill Dunnart, White-Bellied Sea Eagle, and Marine species with National Park and Wildlife Act., the Cape Baron Goose, the Hooded Plover, the Rock Parrot.

Also the impact on the Southern Right Whale ' *Eubalaena australis* ' is of a concern because of the findings of the South Australian museums examination of a carcass that washed up on a beach near Tumby Bay in 2013 . They concluded the whales death was caused by a ship and the proposed increased shipping traffic is a major concern for the survival of the migrating whale population.

Of fauna with State Significance with potential to occur 1 is likely Gilberts Whistler and 5 are possible ie Bardicks snake, Purple-gaped Honeyeater, Shy Heathwren, Slender-billed Thornbill, and Sooty Oyster Catcher, is their habitat in the greatest clearance area that will occur for native vegetation in the Hambidge Association( 93.09ha) ?

How come the specific vegetation communities and types for all intersected patches was not recorded and ground-truthed but was inferred due to the "Rapid Method" ? In the 133,2ha of Native Vegetation that needs to be cleared for the development of the preferred infrastructure corridor *Eucalyptus Calycogona* was observed , in patch 103b which is intersected by the transmission spur line, why was it "Inferred" that this was not the sub-species *E. Calycogono* ssp. *spaffordii* , which has a conservation rating, without ground-truthing?

In conclusion we believe that the field study to be flawed with misleading information and needs to be carried out over all the seasonal changes on Eyre Peninsula . Could these questions be answered please.

Thank you for the extension of time to allow this group to collect the

information for submissions . We have encouraged other members to voice their democratic rights .

Firstly, let me say that for the first time in my 65 years it feels to me like Australia is not the lucky country. There is a rush on to stake out mining or oil or gas leases over the whole of the country, and we in regional Australia are made to feel the pain of it. Regional people, regional land, regional industries, regional business's, regional flora, fauna and environment are all asked to sacrifice themselves to the mining industry.

The people affected by mining leases are treated like a commodity to be used up and thrown out and made to hand their land over to be exploited by mining companies, many with overseas interests. Government is fast tracking the approvals with hardly enough time for people to get submissions in, but one of the worst things of all is the feeling of betrayal by our politicians, from both sides, who, one by one go quiet and approve mine after mine. It's un-Australian. Lincoln Minerals on 13/8/20 had their appeal upheld to reinstate their water license to mine in the Uley Basin, the water supply for 35,000 people on Eyre Peninsula.

Nick Xenophon was on Eyre Peninsula at the Cleve Field Days and told farmers, agricultural business people, and just ordinary country folk, who had packed into a pavilion to hear him, that there was no hope as it was all about city jobs, in 3 years time when GMH and the submarine corp. closes that there will be 28,000 people out of work. However, mining is not going to solve that problem, according to ASX reports Lincoln Minerals will need 60 people during construction then provide 30 continuing operational positions. Then Iron Road has 600 jobs in constructional stage and requires 100 operational workforce, or another report says there are 480 jobs for 30 years.

Mining is a bigger problem than unemployment, it's permanent. Iron Road's project has the potential to permanently destroy 11,000ha of good agricultural land and potentially destroy the livelihoods of people by cutting their properties in half with the rail corridor, depriving them of the water and causing a salt issue.

My other concern is about the permanent effect that the mine site, corridor and port could have on our vulnerable flora, fauna and marine life in Spencer Gulf.

In reading the SKM environmental report I notice many instances of areas being given “rapid assessments” and of many instances of it being “inferred” that an endangered species is not present.

One section states : “of the 9 flora with national conservation significance with potential to occur, 6 are considered unlikely, 2 are possible and 1 is known to occur (The Jumping Jack Wattle *enterocarpa*, endangered). Rapid assessment and inferred condition of 103 patches of remnant native vegetation intersected by the railway corridor is not sufficient to exclude the occurrence of these protected and endangered species.” What is the Minister going to do about that ? Is the Minister going to insist that SKM go back and ground-truth these patches?

In identifying that The Grey-tailed Tattler habitat exists within the study area, and the Ruddy Turnstone was observed at Port site , and the Western Whipbird (eastern) occurs in small remnant patches of suitable habitat,( which the mining project will further reduce), where does it state that these vulnerable species should be left alone?

Again: “as the alignment (corridor) moves closer to coast there is the potential to affect the habitat of EPBC Act Hooded Plover, Eastern Osprey, Oriental Plover , White Bellied Sea Eagle, with NPWAct rating as well as listed marine and /or migratory ratings under EPBCAct including Cape Baron Goose, Common Sandpiper, Grey-Tailed Tattler, Sand Plover, Pacific Golden Plover, Rock Parrot and Ruddy Turnstone”. Why are Iron Road permitted to potentially affect these protected species habitat?

Also there is the potential impact on the habitat of the Rainbow Bee-eater, Forktail Swift, Australian Fairy Turn, Cattle Egret, Red lored Whistler, and Gilbert’s Whistler. Why don’t their protection ratings count ?

It also states in the report “that the Osprey could be particularly vulnerable to the human disturbance of it’s breeding ground and the destruction of habitat and bio- accumulation of toxic substances through the consumption of affected prey. The White-Bellied Sea Eagle which occurs sympatrically with the Osprey, and was observed during survey of the Port area which may indicate that suitable habitat features for the Eastern Osprey may be present within the Southern end of the study area, and that any potential disturbance threats to



the Osprey would also affect White-Bellied Sea Eagles where they occur sympatrically . The construction and operation of an infrastructure corridor within the study area may impact individual of this species, and prior to any construction activities a “targeted survey” for both of these conspicuous species within the area would clarify the likelihood of risks associated with the development” .If the survival of these two species is found to be threatened by mining will the Minister then not give approval to the project?

I come now to Spencer Gulf waters, with the protected species in it, the Leafy Sea dragon and the Weedy Sea dragon, both of whom are on the International Red List of Threatened Species. Leafy Sea Dragons, along with Short Snout Short Headed Sea Horses, were seen by a diver in the waters of Tumby Bay, the next town to Cape Hardy. Marine scientist in the PIRSA tent at the Cleve Field Day assured me that Leafy Sea Dragons and Weedy Sea Dragons would live in the sea grasses all the way up to Port Neil. There have been sightings of Sun Fish in the Gulf along with the annual migration of Whales. Will iron ore dust affect the present pristine habitat of these threatened marine species? Can Iron Road guarantee that iron ore dust will not get into filtering mollusc like the Oysters at Cowell or affect the Kingfish Aquaculture in the vicinity?

I would like to recommend that the Minister for the Environment look at a book recently published by the Royal Society of South Australia called “The Natural History of Spencer Gulf”, co-authored by 5 scientists, before he makes his decision on a mining project that could affect that unique ecosystem, or at least consult with some of these independent, dedicated scientists who have probably seen and studied the effect that iron ore mining ports have on a coastline ecology.

We all live in a closed environment, what one does, affects everybody else.

**s47F**

Port Lincoln SA 5606



REF 33/14/0029

Date: 13/6/14

s22

A/g Director  
South West Section  
West Assessment Branch  
Department of the Environment  
GPO Box 787  
CANBERRA ACT 2601

Executive Director  
Conservation and Land  
Management

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25 Grenfell St  
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[www.environment.sa.gov.au](http://www.environment.sa.gov.au)

Dear s22

**Re: 2014/7285 Central Eyre Iron Project, Eyre Peninsula, SA**

I write on behalf of the South Australian Government regarding your invitation to comment on the above referral received by the Australian Government Department of the Environment under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The South Australian Government advises the following in the relation to the Central Eyre Iron Project infrastructure referral:

**State Assessments**

The proposed development has been declared a major development by the SA Minister for Planning, requiring assessment under section 46 of the *SA Development Act 1993* (Development Act). South Australia and the Commonwealth have an assessment bilateral agreement in place under the EPBC Act to enable an accredited assessment of EPBC Act matters under section 46 of the Development Act.

The Development Assessment Commission (DAC) is in the process of preparing draft guidelines for the assessment under the Development Act. DAC will be advised of the referral of this action under the EPBC Act and will await the Commonwealth's decision on whether or not the action is a controlled action requiring assessment, enabling subsequent discussions between the parties to the agreement on whether the assessment bilateral will be triggered, prior to finalising the assessment guidelines.

**Matters of National Environmental Significance (NES)**

The following issues have been identified as matters you might consider in making your determination:

- a) Providing a description of the groundwater environment associated with the borefield and the infrastructure corridor would assist to determine if components of the action will

impact groundwater dependent ecosystems supporting species or ecological communities listed under the EPBC Act.

- b) It is noted that the assessment regarding the endangered Eyre Peninsula Blue Gum ecological community (*Eucalyptus petiolaris*) was undertaken prior to the listing of this ecological community. From the advice provided in the referral documents, it is difficult to confirm whether or not the proposed action will result in a significant impact on this threatened ecological community (EC). As such the referral may benefit from a more detailed analysis of impacts to this EC, particularly as the transmission line easement appears to cross areas where this ecological community may or is likely to occur.
- c) In addition, "Previous records from the SA Department of Environment, Water and Natural Resources (2012)..." is referenced on page 28 of the referral, however the full reference appears to have been omitted.
- d) The referral would benefit from better definition of the habitat value of native vegetation to be impacted by the infrastructure corridor. This would enable the identification of better quality habitat and greater certainty regarding the potential impacts to species such as the Malleefowl and, particularly, the Red-lored Whistler by the proposed action.
- e) It is noted that the infrastructure corridor is located to avoid the Hambidge Wilderness Protection Area (HWP), with the closest action occurring *approximately* 500 metres distance from the HWP. While section 3.11 of the referral gives consideration to the potential for indirect impacts from the proposed action on the HWP, further consideration should be given to specific matters of NES which might be located within the HWP. However this analysis will be made difficult by the lack of ecological data for the northern area of the HWP, with most of the surveys only having been done within the southern boundary area.

### Assessment Approach

Should the proposed action be determined a controlled action, consideration should be given to assessment using the current assessment bilateral agreement.

For further information please contact the SA EPBC Act Referral Team, in particular s22 on (08) 8463 s22 or e-mail: [DLDEWNREPBCReferrals@sa.gov.au](mailto:DLDEWNREPBCReferrals@sa.gov.au).

Yours Sincerely

**s22**

EXECUTIVE DIRECTOR



s47F

WARRAMBOO SA 5650

15<sup>th</sup> August, 2014

s22

Assistant Director  
South West Section  
Environment Assessment and Compliance Division  
33 Allara Street  
CANBERRA ACT 2601

Dear s22

CEIP INFRASTRUCTURE EPBC ACT REFERRAL (REFERENCE NUMBER 2014/7285)

Firstly, I would like to thank you for the opportunity you have provided allowing me as member of the Stop Invasive Mining Group to have an extension to the above referral. As I write to you the comments that are made are mine, my opinion alone, and not representative of the group.

I found out about this document after my husband attended (as an observer) the local Central Eyre Iron Project Community Consultative Committee (CEIP CCC) which deals exclusively with the mine site. The company did mention its lodgement briefly, however, the majority of people in attendance that night did not understand the significance of the document nor where to find it. (We are farming folk not mining folk.) The CEIP CCC has not put in a submission and for that reason I am extremely disappointed.

I have sent an email to Iron Road Limited and am still awaiting a response from the company as to how the railway corridor landholders/stakeholders were informed of the referral. I have checked the Classified Section of the West Coast Sentinel, Eyre Tribune and Port Lincoln Times (all of which are local papers and can find no reference to this). How does the general public have an opportunity to know that the document has been lodged and therefore make a public comment? Is it compulsory that they are advertised?

As a farmer's wife I am concerned and it is my belief after reading some parts (not all of the 400 odd page document) that the land being used as part of the transport corridor is not being portrayed as the productive fertile land it is. I have asked two different landholders (directly affected with the transport corridor) to provide me with some pictures of the typical landscape along the Infrastructure corridor and the typical vegetation. They are attached for your consideration.

For a transport corridor that has the potential for a twenty five year impact I do hope that further field studies can be done to assess if something has been overlooked. Could you please ask the company how many days were actually spent doing field studies on the area that is going to be impacted? It mentions in the report "CEIP Infrastructure Corridor Ecological Assessment" Point 3.3, that it was December 2011 and November 2012. Native Orchids would not be available then. How many landholders consented to the flora and fauna studies? We have a landholder speaking of rare ants that are unfortunately dormant (therefore no sample) provided. Has this been investigated?

I would appreciate it if you took these comments into consideration when assessing this and I ask that my personal details please be not released for publication.

Kind regards

s47F



Transport Corridor – 2 photos taken August 2014, both different landholders.





# Tumby Bay Residents and Ratepayers Association Inc.

www.tbrara.com.au  
secretary@tbrara.com.au

P.O. Box 95, Tumby Bay, S.A. 5605  
Telephone / Fax: 8688 4218

The Hon. Mr G Hunt, MHR  
Federal Minister for the Environment  
GPO Box 787  
Canberra ACT 2601

15<sup>th</sup> August 2014

**RE: Iron Road Limited/Mining/Eyre Peninsula/SA/Central Eyre Iron Project, Eyre Peninsula, SA**  
**Date Received: 29 Jul 2014 Reference Number: 2014/7285**

Dear Minister,

Please find attached an addendum to the Associations' response to the call for public comment on the aforementioned EPBC Referral. The addendum is in the form of a letter forwarded previously to the Department in relation to water and mining on the Peninsula.

The addendum raises issues pertaining to the lack of knowledge in respect to regional hydrology on the Eyre Peninsula and thence the impact of mining and the planned activities of mining companies, in this instance, iron road, on environmental water flows that sustain the habitat of listed species in the transport corridor and the port facility under examination within this referral.

It should be noted that the above referral is part of another action, notably, the mine at Warramboos and the Company's stated intention to dewater the mine area. Also of note will be the drawdown on the bore field to be established in the Kielpa area.

Should there be any questions related to the submission, please contact:

The Secretary,  
Tumby Bay Residents and Ratepayers Association Inc  
PO Box 95, Tumby Bay, South Australia, 5605

Yours sincerely,

s47F

Chairperson

Compliance and Assessment Branch  
Environment Assessment and Compliance Division  
Department of Sustainability, Environment, Water, Population and Communities  
GPO Box 787  
Canberra  
ACT 2601

10<sup>th</sup> October 2013

**RE: Matters relating to the assessment of mining proposals on Eyre Peninsula, South Australia.**

Dear Sir/Madam

The South Australian Parliamentary Standing Committee, Natural Resource Committee has tabled its 85th Report on Eyre Peninsula Water Supply ('Under the Lens') on 24th September 2013, a copy of which is available on the following web site:-

<http://www.parliament.sa.gov.au/Committees/Pages/Committees.aspx?CTId=5&CId=175>

The Report addresses the management of all water supplies and a focus upon the credibility of the management capacity for the underground aquifers by the South Australia's Department of Environment. Water and Natural Resources (DEWNR) and the Eyre Peninsula Natural Resource management Board (WPNRMB). There are no surface potable water storage facilities on Eyre Peninsula, given the Tod Reservoir supply is now not fit for human consumption.

#### **2.4 Tod Reservoir mothballed**

While for some years up to 3,000 ML/year of water was extracted from the reservoir for potable use, negligible water has been extracted since 2001/02 due to increasing salinity (SA Water 2012a, p23). There were also concerns about the level of agricultural chemicals in the reservoir (Treloar 2012, p37). The reservoir has been mothballed since that time; retained as a 'contingency' water supply measure (SA Water 2012a, p23).(p10)

Within the Report, many witnesses identified scientific concerns regarding the potential impact dewatering of the aquifers as a consequence of mining.

- The Committee accepted that within the quaternary limestone lenses themselves there is little connectivity, but connectivity via the underlying aquifers does occur, through Tertiary or Basement Aquifers. This may impact on the science underpinning the way in which the annual allowable extraction from the various lenses is applied to the water allocation plans, and consequently the formula used to determine licensed allocations will need to be reviewed (page 25)

#### **Dr Adrian Werner agreed that some lenses in the Southern Basins PWA could be connected:**

*"Everything has a degree of uncertainty about it, but I think that, based on the geology, Uley-Wanilla and Uley East, I think you could say that it is quite likely that they are connected to Uley South because there's tertiary sand—there are two or three sands—that connects the two. Whether it is connected through the quaternary limestone directly, I don't know, but I think the quaternary limestone and the tertiary sand in Uley South are connected. So, you have Uley-Wanilla, Uley East, tertiary sand connected to Uley South, and the tertiary sand in Uley South is connected to the quaternary limestone in Uley South, so I think at least those three in the southern basins are connected. I think the degree of connection of other basins is more uncertain." (Werner 2012a, p10) (p23)*



It is the spectre of connectivity between the various systems which gives rise to the major concerns regarding dewatering as a consequence of mining activities. It would appear that the level of scientific evidence to prove or disprove this contention is not available, leading to the request that a regional, peer assessed, hydrological study be undertaken by the relevant Government authorities and supported by the mining interests in the said region, to answer these questions.

### **2.14 Mining proposals escalate**

Mining proposals began to escalate from the mid-2000s with rapid increases in demand for iron ore, gold and other metals. A long battle has been fought over the proposal to upgrade the existing ore loading facility at Port Lincoln, opposed by local residents and the fishing industry. The Committee is aware of six<sup>7</sup> active mines on the Peninsula. However, there are a significant number of mine proposals approaching operational phase and a large number of exploration licences. Lincoln Minerals alone has 28 mining tenements (Lincoln Minerals 2012b, p14) and more than 30 exploration licences (Lincoln Minerals 2012b, p2).

Water is required at both the exploration and operational stages of mining. At present water use is largely limited to dust control and road maintenance, with most water sourced from SA Water standpipes (see section 4.2.4). If mines become operational, dewatering will be required where the mine intersects aquifers. Lincoln Minerals is proposing recover this water and inject it into nearby lenses (see section 3.9). (p13)

#### **The Committee further recommended:**

- The Minister for Mineral Resources and Energy and the Minister for Sustainability, Environment and Conservation should encourage Eyre Peninsula NRM Board, DEWNR, DMITRE, SA Water and DPTI to develop a mechanism for mining/exploration companies, industry, local government and landholders to access and share information about mining exploration and extraction proposals on Eyre Peninsula with a view to improving understanding of potential impacts of mining and management of mining water use (page 98);

Significant attention was given to the Lincoln Minerals' proposed mines at Gum Flat project and the Centrex Metals/Eyre Iron proposed 'Fusion' magnetite project.

Mention was also made of the recorded depletion of water reserves in Central Eyre Peninsula, particularly the closure of the Poldas Basin. This region is geographically located adjacent to the proposed Centrex Metals' Limited Wilgerup Mine (approved but dewatering not commenced) and the proposed Iron Road Central Eyre Iron Project based initial at Warrambo, but stretching throughout the significant exploration tenement.

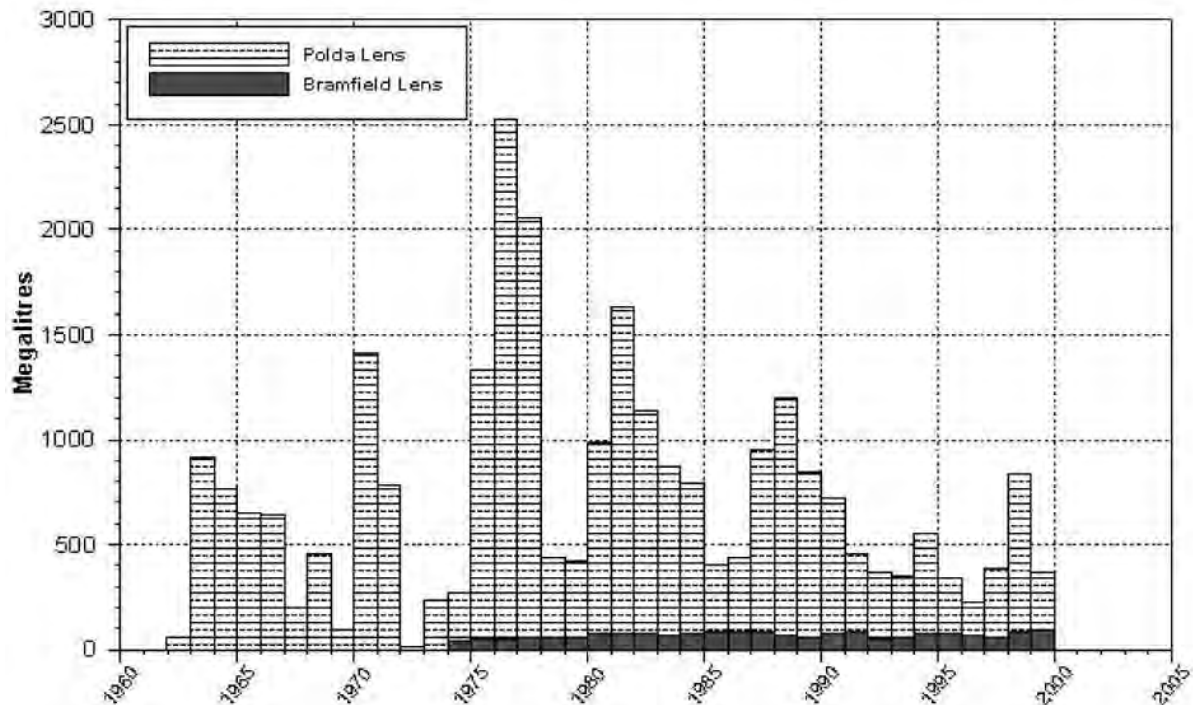
### **3.1.2 Musgrave PWA**

As in the case of the Southern Basins PWA, the sustainable pumping limits for the lenses of the Musgrave PWA were initially over-estimated, but the consequences were even graver because the capacity of the lenses was much less than in the Southern Basins:

- 'The water pumped from Poldas lens augments the Tod Trunk Main, and in the past has supplied up to 43% of that supply (2,495 ML pumped in 1976/77). This high level of extraction reflects the understanding at that time of the available underground water. Current understanding of available long term sustainable extraction indicates that the Poldas lens can support an average extraction of about 720 ML per annum. The level of storage within the aquifer influences this figure, such that, when underground water levels are low the annual extraction rate for SA Water is reduced and when levels are high this rate can be increased.' (Department for Water Resources 2001b, p19)

Consequently, rates of extraction by SA Water had to be reduced by a significant amount. Figure 9 shows the stepped decline in extractions between 1975 and 2000:





**Figure 9:** Annual Volume of Underground Water Extraction from the Musgrave PWA for Reticulated Public Water Supply (Department for Water Resources 2001b, p20)

In hindsight even this dramatic decline in extraction volumes was insufficient to ensure the long term sustainability of the Poldo Lens. A prohibition on pumping by SA Water was introduced in 2008. Furthermore, the Committee heard that community members had warned the level of extraction from Poldo Lens was unsustainable:

- The Committee concluded that extraction by SA Water together with drought and climate change was likely to have contributed to greatly reduced water levels in the Poldo Basin. Members also noted that Poldo Basin's contribution to water supply was small compared with other water sources. Consequently the Committee has recommended that pumping from the Poldo Trench for public supply should be permanently prohibited and the Basin used only to supply water for stock and domestic purposes, as well as fire-fighting (page 22);

Continuing the discussion of the potential extraction of water in a regional context, the Iron Road and Centrex Wilgerup mines lay outside of the imaginary lines that define the Musgrave Prescribed Water Area of which Poldo is a part. Figures A, B and C (as attached) provide an overview of the relative locations of the prescribed water area with known bores and exploration holes identified.

It is understood that Iron Road (CEIP) has had preliminary discussions with the Department as reported in the Annual Financial Statement of 2013 as presented to the ASX.

As mentioned earlier, the current public description of the CEIP focuses on the mine at Warramboos (figure D). However, a close examination of the information contained within the Company's ASX reports reveals a contrastingly different picture. The project is in fact a collection of multiple mines/resources over the whole tenement as evidenced in figures E and F with figure G describing the potential strike lengths and depths of deposits amounting to an additional 31.2 kilometres over the declared lengths of the proposed Warramboos mines.

The question therefore arises as to the impact, or assessment of potential impact, of the mines on the regional ground water reserves, not just a claimed maximum 6 kilometre zone to the east from the Murphy South mine as currently being proposed.

The issue is further complicated by the fact that Lincoln Minerals holds the exploration rights to the adjacent tenement (to the west, see figure E) and has undertaken exploration activities on the iron ore reserves contained therein.



*“Salinity is a fairly big problem and we've got a fairly shallow soil and there's been a lot of time and money spent on re-establishing areas that have gone salty with puccinellia and different draining. It's with assistance from the department of agriculture (which it was then) and if anything upsets that system, well, it's look out for a fairly big area.” (Schneider 2013a, p179)*

At the southern extremity of the redefined Project Fusion lies the wetland of National Significance associated with the Tod Reservoir and the Big Swamp ecosystem, another wetland of National Significance. The impact of mining on these wetlands has not been addressed in the context depletion of either surface water or underground water.

### **Big Swamp**

‘Big Swamp and its ecosystem is a wetland of national significance, and also has been identified as a wetland supporting international visiting avifauna (and therefore subject to International Treaties such as JAMBA, CAMBA, and ANZECC). Given this context, the lack of understanding of the hydrological connection between Big Swamp and the Uley Basin is important. If the hydrology of the Uley Basin is compromised and impacted, regardless of the statement by the mining companies of a small “footprint: of dewatering” (using the traditional “cone of depression” model as the measure of the shape and size of the “footprint”), Big Swamp will be impacted because the shape and size of the “footprint” will be a metaphorical “octopus” with differing sizes and length of arms depending on the structural geology of the local terrain, and with one extra large “octopus arm” extending op the valley tract of the Big Swamp drainage complex.’ (Semeniuk 2012a, p3)

### **The NRC enquiry inferred there were significant holes in the knowledge base of the region's hydrology.**

Accordingly we request the Department undertake strategic assessments on projects involving mining on Eyre Peninsula given the extent of mining company interest in the region (see figure J), specifically those involving Lincoln Minerals, Centrex Metals/Eyre Iron and Iron Road, given the uncertainties relating to:-

- a) the region's hydrology and its relationship to potable water supplies for approximately 35000 persons and 1.5M livestock, and
- b) the cumulative impact of the proposed ports of Cape Hardy, Port Spencer and Lucky Bay in Spencer Gulf and the marine habitats which involve a number of listed species.
- c) the extensive area of potential impact upon the existing communities, townships, agribusinesses and other existing commercial enterprises.

It is anticipated that the findings of the Natural Resource Committee will support our contention that all mining proposal on Eyre Peninsula, and in particular, those currently being developed by Centrex Metals Limited, Iron Road and Lincoln Minerals, will be subjected to strategic assessments given the significant impact the proposals will have on the region's water supply in addition to the already recognised environmental impact on listed species and their habitats.

Yours faithfully,

**s47F**

Information Officer/Spokesperson

Attachments:



Figure A:

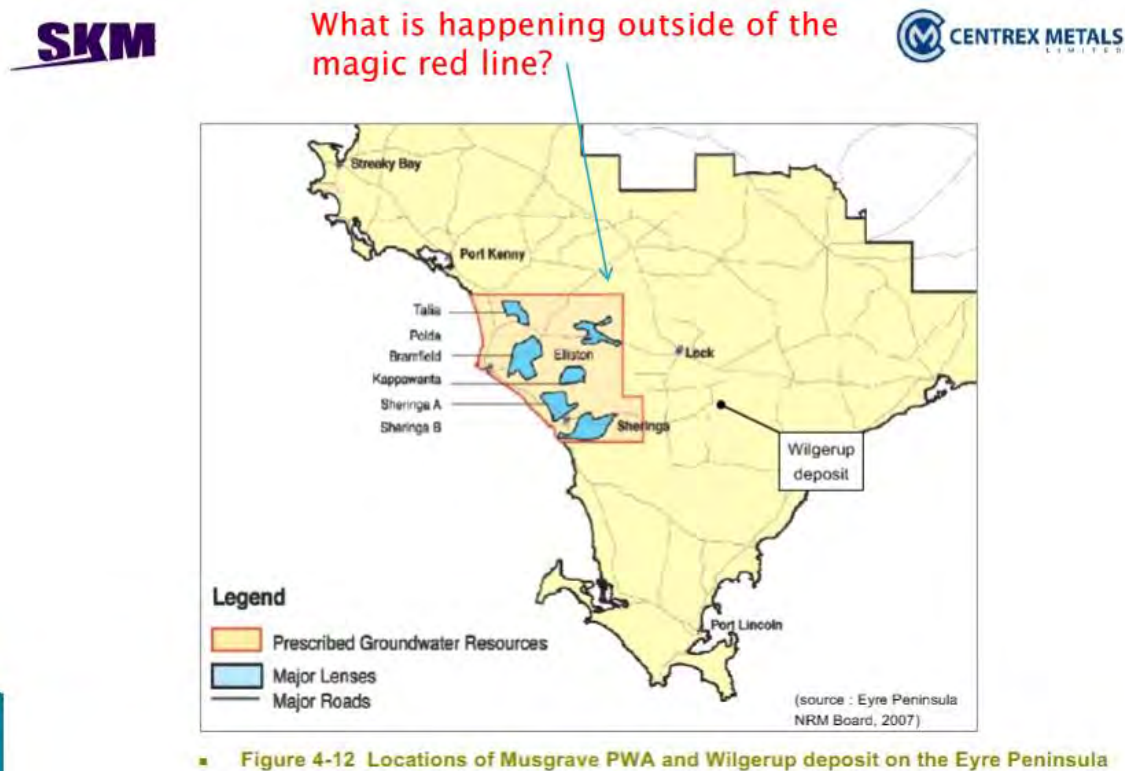


Figure B:

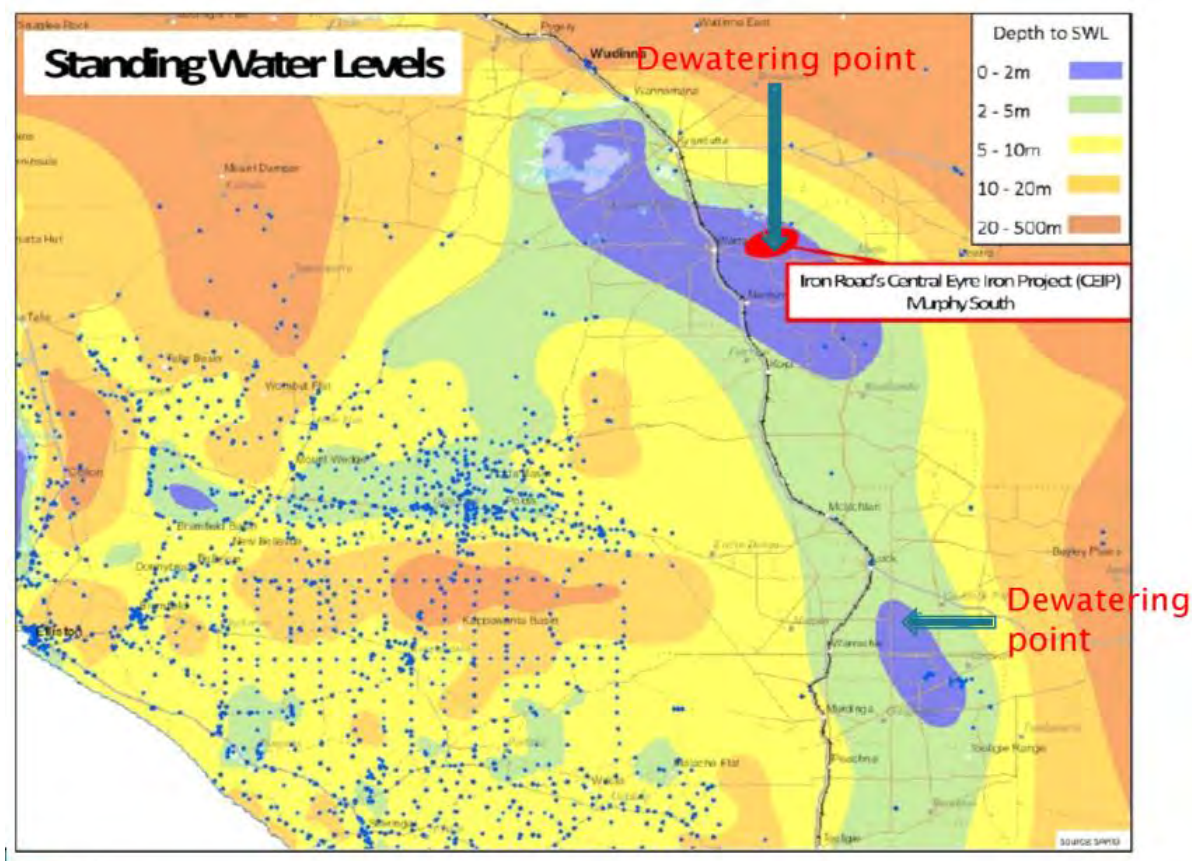


Figure C:

What impact has the mining exploration had on the prescribed wells?

What happens when the mines embark upon a dewatering program?

**WILL THERE BE AN INDEPENDENT PEER ASSESSMENT OF THE DATA PROVIDED WITH RESPECT TO WATER SECURITY?**

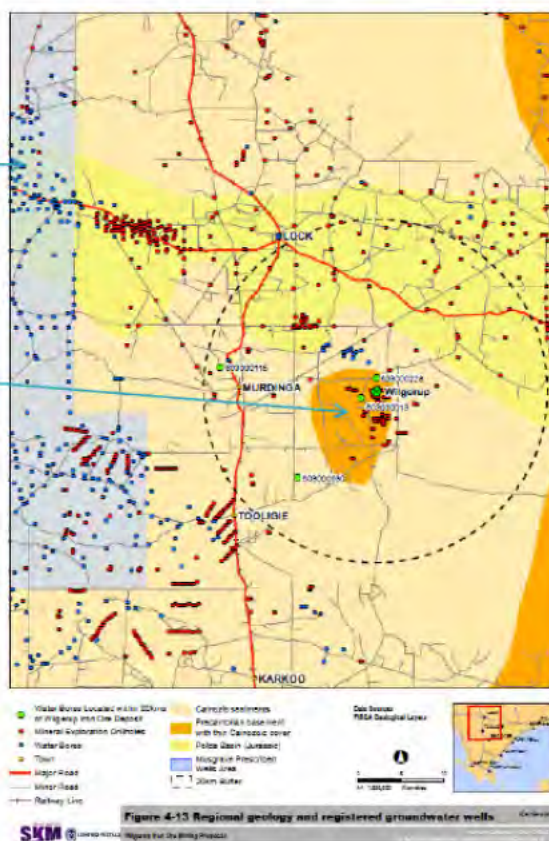


Figure D:

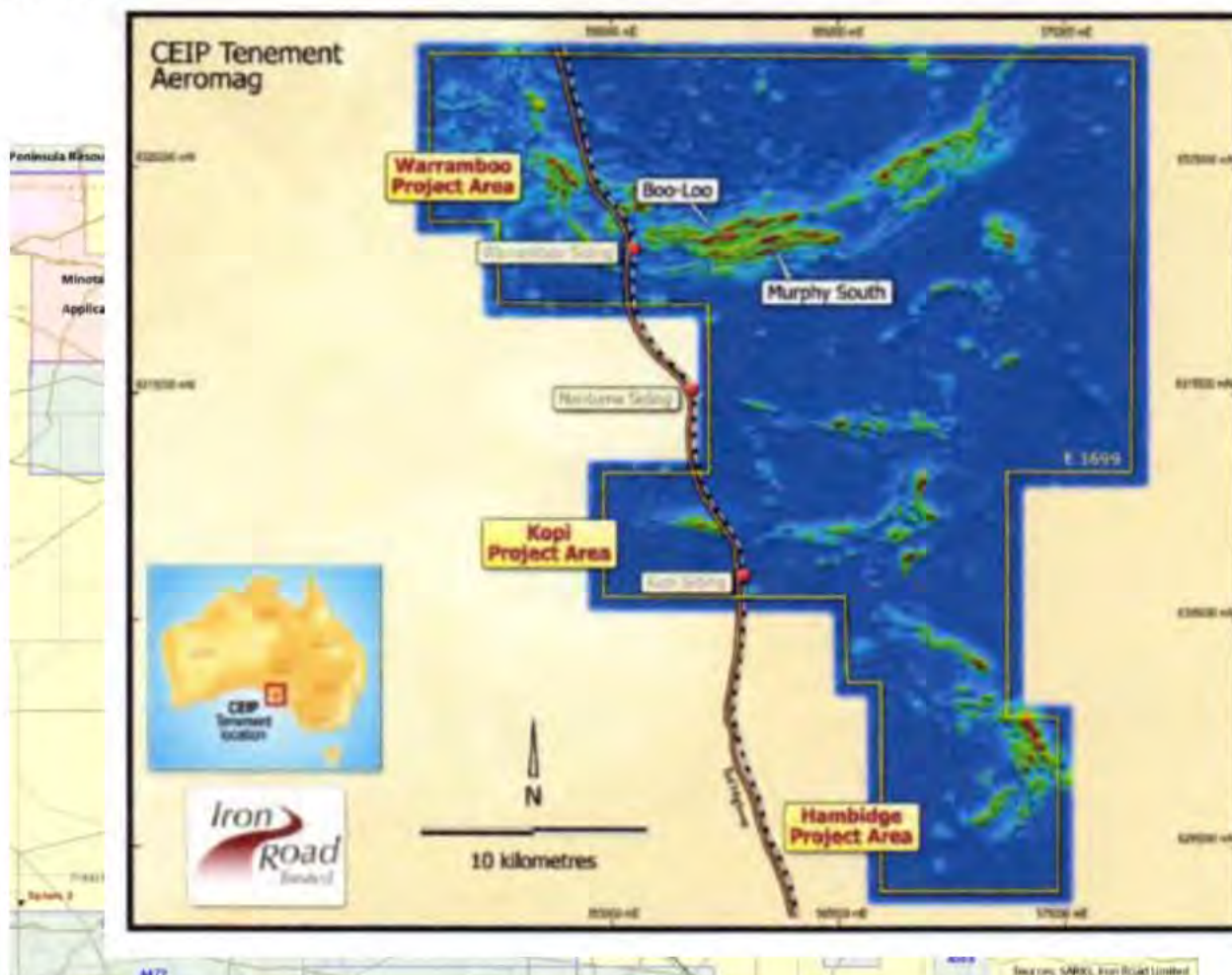




Figure E:

Results of review of the potential for iron mineralization

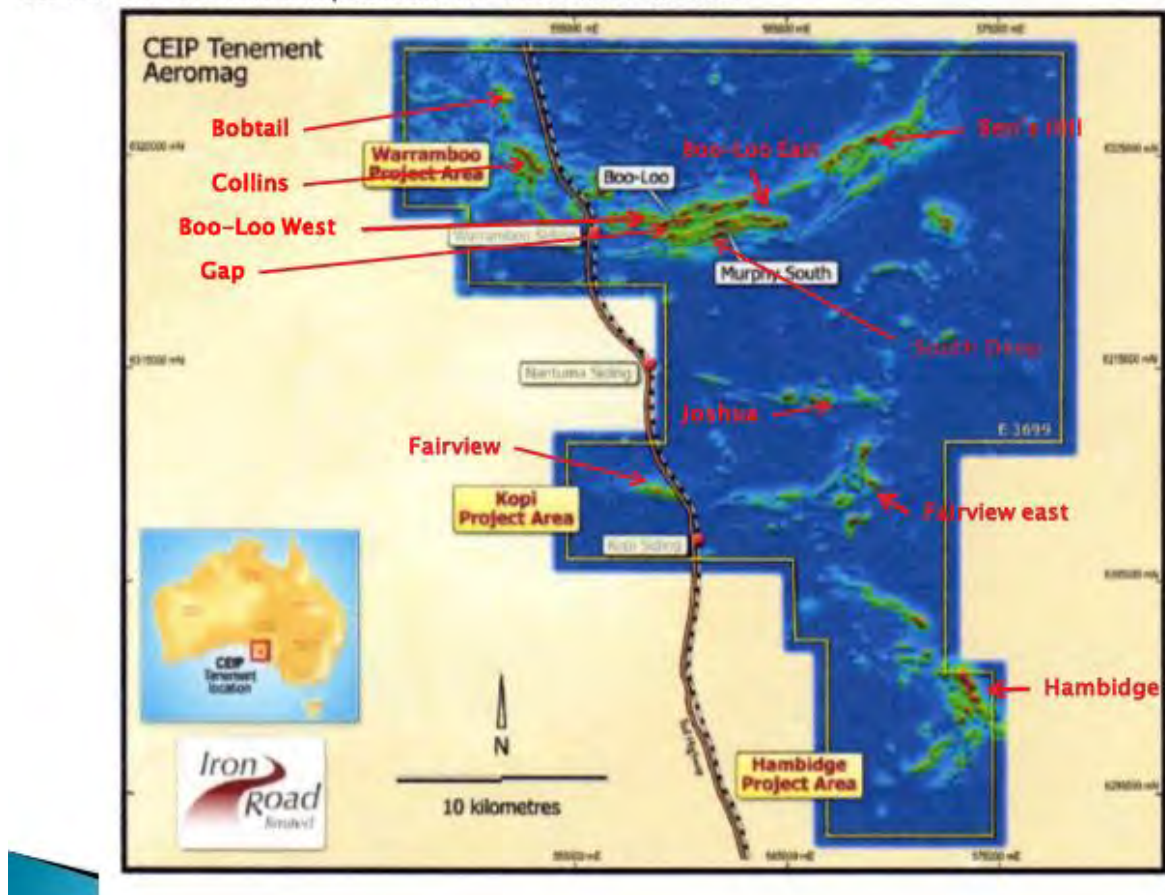


Figure F:

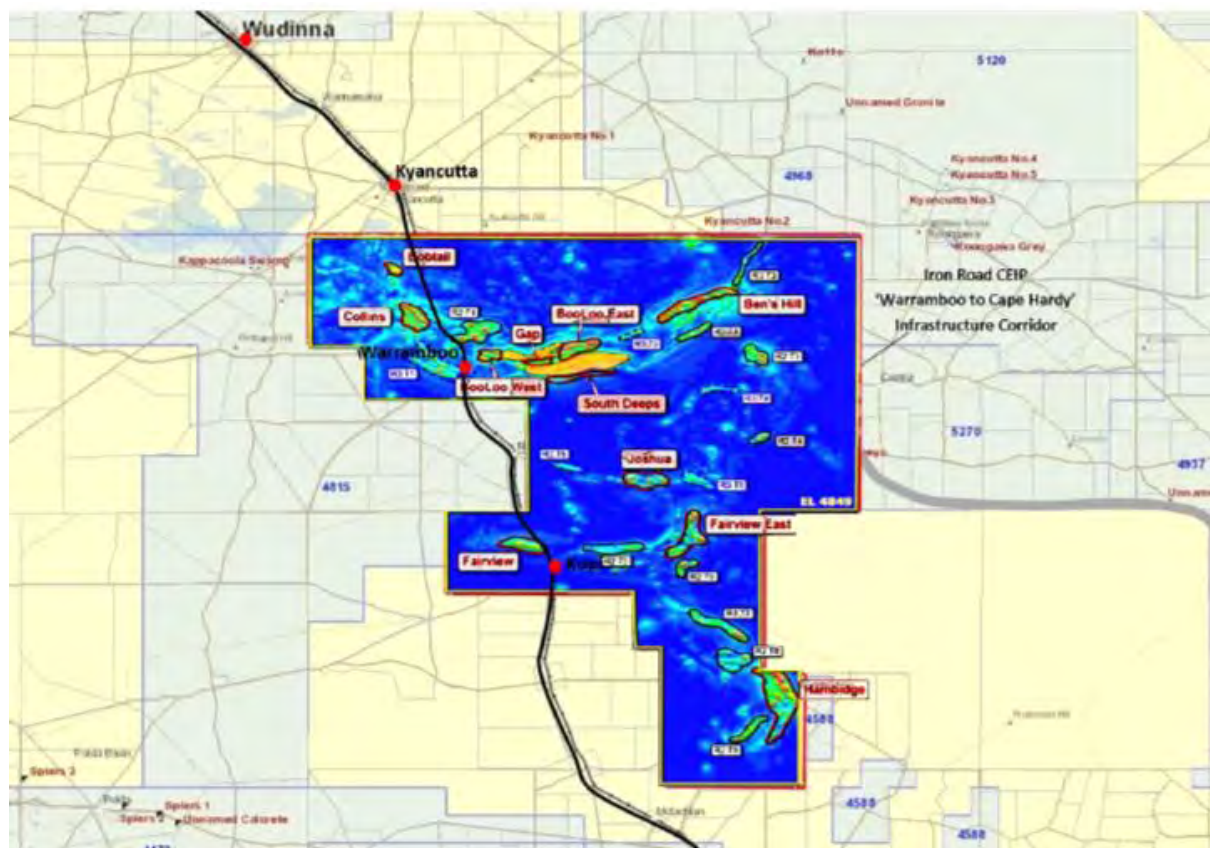


Figure G:

FOR IRON ROAD – potentially, how big is big?		
Target ID	Strike (km)	Depth (m)
Bobtail	1.3	300
Collins	2.2	300
Boo-Loo West	1.1	300
Gap	1.6	300
Boo-Loo East	2.5	300
South Deepes	4.1	600
Ben's Hill	4.7	300
Joshua	2.6	300
Fairview	2.8	250
Fairview East	3.3	250
Hambidge	5.0	200
Total 31.2km		

\*... the interpreted exploration tonnage for the Ranked 1 & 2 targets is 7Bt to 13Bt. These targets account for 52.2km in strike length \*

Figure H:

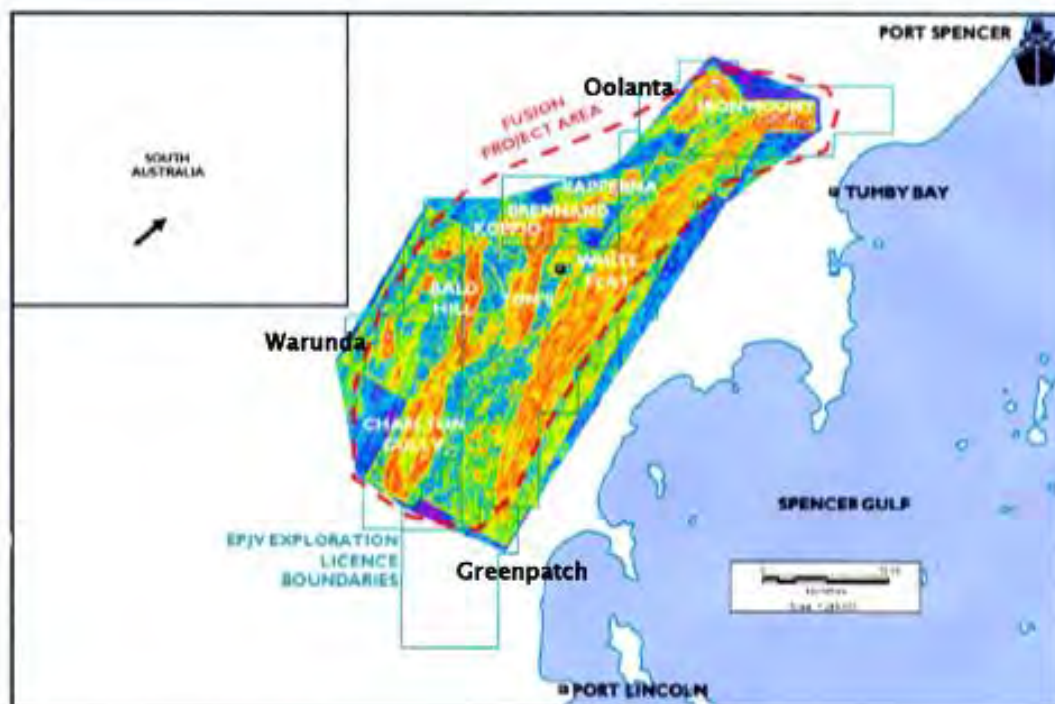


Figure: Location map showing high-resolution aero-magnetic image of Fusion.

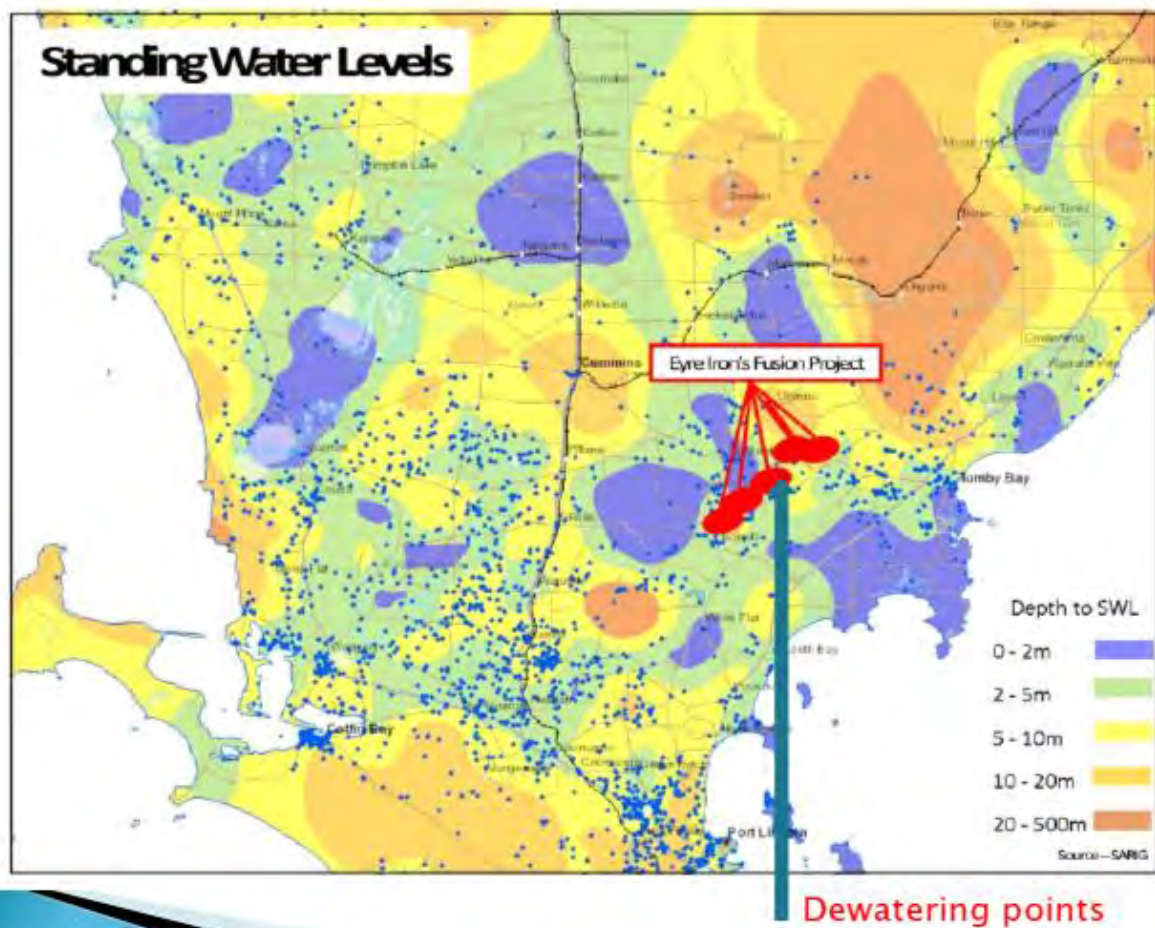
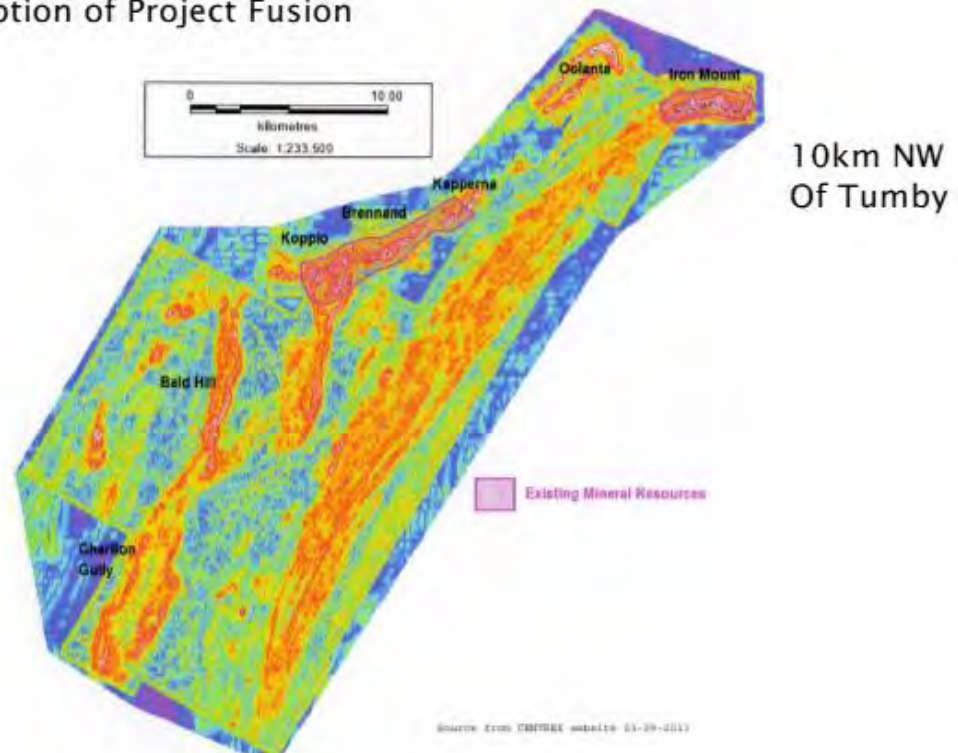
NOTE: Project Fusion is the whole area, not just the Mines identified at Koppio.



Figure I:

## Latest description of Project Fusion

Sept 2 2013



The extent of mineral exploration interests/tenements



Exploration License/Application	Area	Comps
4014	112 km²	Chesapeake
4015	192 km²	Chesapeake
4016	138 km²	Chesapeake
4017	117 km²	Chesapeake
4018	108 km²	Chesapeake
4019	278 km²	Chesapeake
4020	76 km²	Chesapeake
4021	177 km²	Chesapeake
4022	272 km²	Chesapeake
4023	182 km²	Chesapeake
4024	485 km²	Chesapeake
4025	682 km²	Chesapeake
4026	61 km²	Chesapeake
4027	81 km²	Chesapeake

626,900 PM

There are Exploration Licences and Licence Applications covering 426,500 Ha of land across Lower Eyre Peninsula.

s22

**From:** s22  
**Sent:** Friday, 15 August 2014 1:56 PM  
**To:** MinisterialCorrespondence  
**Subject:** FW: Public Submission regarding CEIP Infrastructure EPBC Act Referral (reference number 2014/7285) [SEC=UNCLASSIFIED]  
**Attachments:** CEIP Infrastructure EPBC Act.doc

Minister reply

EACD -

Departmental Liaison Officer  
Office of the Hon Greg Hunt MP | Minister for the Environment  
Ph: 02 6277 s22 | s22  
s22 @environment.gov.au | Parliament House, Canberra, ACT 2600

**From:** s47F @bigpond.com]  
**Sent:** Friday, 15 August 2014 12:31 PM  
**To:** Greg.Hunt.MP  
**Subject:** Public Submission regarding CEIP Infrastructure EPBC Act Referral (reference number 2014/7285)

Greg,

Please find our submission regarding CEIP Infrastructure EPBC Act (Reference Number 2014/7285)

s47F

PMB 43  
CLEVE SA 5640

s47F

PMB 43

CLEVE SA 5640

Phones s47F

Friday, August 15, 2014

Minister for Environment  
Mr Greg, Hunt, MP

Dear Sir,

We are writing to register our concerns about the proposed train corridor proposed for the transport of minerals from the Iron Road Central Eyre Peninsula Mine at Warramboo. We are landowners along this train corridor in the Darke Peak area.

Our first concern is the buses from the Cleve Area School will need to cross this train corridor numerous times as they carry our children to school. Currently we have 2 children on the Darke Peak bus route which we believe is the longest bus route within the State.

Kids commence on this bus at 7.30am in the morning to get home again by 4.30pm. If they meet a train at the crossing each way it will add an extra 20 minutes to the journey, makes it a long day for our kids. We already are isolated enough with some children travelling up to 180km per day to sit idle for another 20 minutes waiting for a train to go past is not fair on our children and their education.

With the talk of a third party using this train line it is for certain that there will be a clash with predictions of a train every hour.

We also have concerns about the impact of numerous sand hills they need to cut through to enable the formation of a train corridor throughout our property. We, as a the fourth generation of farmers within our business we have throughout time implemented many land conservation practices to maintain good soil cover as this land is very prone to wind erosion with little cover on the soil surface. We ask that a full independent environmental study be done along this train corridor so we can continue to be able to look after our land in the best way possible.

We also have grave concerns about our water table as well. What happens when you start extracting out water to help feed this mine, what is going to happen to our soil structure?

Again we ask that a full independent environmental study needs to be done on the impact of this too. We will be here for generations to come producing grain; the mines only have a 25 year life. What happens when the mines go and have sucked the life out of our soils.

We also have grave concerns of the dust contaminating our crops and sheep along the track. We produce grain for the food bowl for some domestic markets and many overseas markets. Are we going to be penalised for the quality of our grain because of dust contamination from these trains? Will our income be affected because of this?

Again we ask that a full independent environmental study needs to be done of the impact of this too.

We aren't against mining but we are grain producers doing our job and producing high quality grain for the food bowl of the Eyre Peninsula. Let us get on and do our job and we say **NO** against invasive mining in our area. We ask that you too seriously look at the impact it will have on this state and the agricultural industry of this state.

We feel it is absolutely disgusting that mining companies can come onto our properties and put these proposals before our eyes, it is an invasion of our privacy, an invasion of our rights. Rulings and laws need to be changed to stop this happening in South Australia's and Australia's agricultural land. We need this agricultural land to be untouched from mining, rail corridors and ports.

We would like to invite you to come and see the impact that this train corridor will have upon our farming business and our land.

Yours sincerely,

**s47F**

PMB 43

Cleve SA 5640

Members of the EPSIMGI Group

Photos taken on Section **s47F** where the proposed train corridor is going through our property.



Sand hill that the proposed train corridor would have to go through and therefore would be many metres of sand would have to be moved from this site. Therefore leaving risk to massive soil erosion.





Medic pasture and native vegetation in background that will be destroyed due to the proposed train corridor. This land is some of our higher producing areas of our property.



Our wheat crop from this year where the proposed train corridor will go through. Dividing cropping areas in half, therefore reducing our productivity in our grain producing operations.

MC14-017630

s22

**From:** s22  
**Sent:** Friday, 15 August 2014 5:31 PM  
**To:** MinisterialCorrespondence  
**Subject:** FW: CEIP Infrastructure EPBC Act Referral [SEC=UNCLASSIFIED]  
**Attachments:** Ian and Helen Burton Members of the doc

Minister reply

EACD

Departmental Liaison Officer  
Office of the Hon Greg Hunt MP | Minister for the Environment  
Ph: s22 | s22  
s22 @environment.gov.au | Parliament House, Canberra, ACT 2600

**From:** s47F @bigpond.com]  
**Sent:** Friday, 15 August 2014 3:40 PM  
**To:** Greg.Hunt.MP  
**Subject:** (CEIP Infrastructure EPBC Act Referral )

Dear Minister

Please find attached our objections to the Iron Road Submission. Reference number 2014/7285.

Regards

s47F

①

②

COMPLETED - FOR FILING

s47F

Box 32

Rudall 5642

Members of the "Stop Invasive Mining Group on Eyre Peninsula"

Subject EPBC Act referral

Minister for Environment,

Greg Hunt

Dear Minister,

We are writing to make known our concerns about the proposed railway corridor by iron road on Eyre Peninsula and the EPBC submission ref no 2014 / 7285 lodged with the federal government on 29/7/2014. We as corridor land owners have never been informed of this submission we only found out about it through the stop invasive mining group in Tumby Bay.

Below please find some of the important reasons why we know this is not a good project.

1. We have fragile sandy soils which are extremely subject to wind and water erosion. Iron road propose to cut through these sand hills to put in a rail corridor which will create an environmental disaster because the hills will be exposed and barren and drift. Revegetation in these climatic conditions is a very slow process
2. We already have had damage from power lines put through our property and have areas which have been made useless by the contractors and need to be continually monitored. The area for this rail corridor is massive in comparison to the power line area.
3. At present trees have to be left for animal and birdlife along road sides to act as a corridor. With this proposed rail corridor trees will be cut down on every road crossed and the area will be left environmentally scarred.
5. Dust from the ore will blow from the open rail wagons and contaminate our soil, grain and animals which could lead to the rejection of our exports. Red dust, which has come from covered trucks from Iron Duke, can be clearly seen along the Lincoln highway from Iron Duke to Whyalla. It is also known that stock does not graze on land where this dust has settled.
6. This is a 25 year approx. mine deal. We have been farming in this district over 100 years creating employment paying taxes and this could continue endlessly. If this proposed deal goes ahead you are condemning this land to be useless.
7. Drilling through the aquifer to take salt water will contaminate the fresh water and upset the delicate balance of our environment.

8. As this proposed rail corridor is going through the driver river catchment which already has salt lakes all along it the weight and speed of these heavy ore trains running continually over it will draw the salt closer to the surface and cause another environmental disaster.

We are extremely upset about this project we feel it will not be of benefit to the people of South Australia and we feel our rights as care takers of the land for the last 100 years is being overlooked.

Regards

s47F



s22

MC14-018218

**From:** s22  
**Sent:** Friday, 15 August 2014 2:11 PM  
**To:** MinisterialCorrespondence  
**Subject:** FW: CEIP Infrastructure EPBC Act referral (Reference number 2014/7285)  
[SEC=UNCLASSIFIED]  
**Attachments:** IMAG0782.jpg; IMAG0783.jpg; IMAG0786.jpg; IMAG0787.jpg; IMAG0789.jpg

Appropriate action

EACD

Departmental Liaison Officer  
Office of the Hon Greg Hunt MP | Minister for the Environment  
Ph: 0-**s22** | **s22**  
**s22** @environment.gov.au | Parliament House, Canberra, ACT 2600

**From:** s47F [redacted] @bigpond.com] (1)  
**Sent:** Friday, 15 August 2014 2:03 PM  
**To:** Greg.Hunt.MP  
**Subject:** CEIP Infrastructure EPBC Act referral (Reference number 2014/7285)

**On the CEIP Infrastructure EPBC Act referral (Reference number 2014/7285) that has been lodged with the Federal Government on the 29th of July 2014.**

Dear Greg,

We are appalled at the application submitted to your department by Iron Road regarding the possibility of a railway corridor right through the middle of our farming land.

We have looked at the photos they have included in the submission and we suggest that you come and visit the region yourself to see what is at stake.

We believe the photos they included in the submission would not give you an accurate or thorough representation of the land that will be lost should this corridor go ahead.

I have taken a few quick photos this morning for you to look at and these are in no way a complete picture of the land it will go through.

We have been farming in this district for 60 years and over the past 20 years, we like all of our neighbours have spent a lot of money changing our farming practices to protect our land, which is quite sandy in parts, from soil erosion. We have planted native trees and salt bush to protect our land from the threat of salt damage.

Should this proposed corridor go ahead we believe that it would do untold environmental damage to what is an important farming region of South Australia.

We would draw your particular attention to the last 2 photos attached to this letter.

These are looking North on s47F [redacted] [our home property]. The proposed railway would go right through here. This is deep sand on the rise of the land and we know from experience that you can not excavate near sand as it will blow and erode uncontrollably!! The proposal to move our boundary fence to the top of this sand rise will mean our paddock will finish on a sand hill which any farmer will tell you is a recipe for disaster, as you are turning heavy seeding equipment on sand thus causing acres of uncontrollable eroding land.

Farmers work very hard to look after their land to make it viable and sustainable for generations to come but why is our government allowing mining companies, largely being controlled by foreign investment to have the right of way to ruin and destroy farming land owned by tax paying Australian farmers? We have explained to Iron

Road that with all of the money to build this railway coming from Foreign Companies they will not understand or care about the ongoing environmental issues facing the farming land and native flora and fauna.

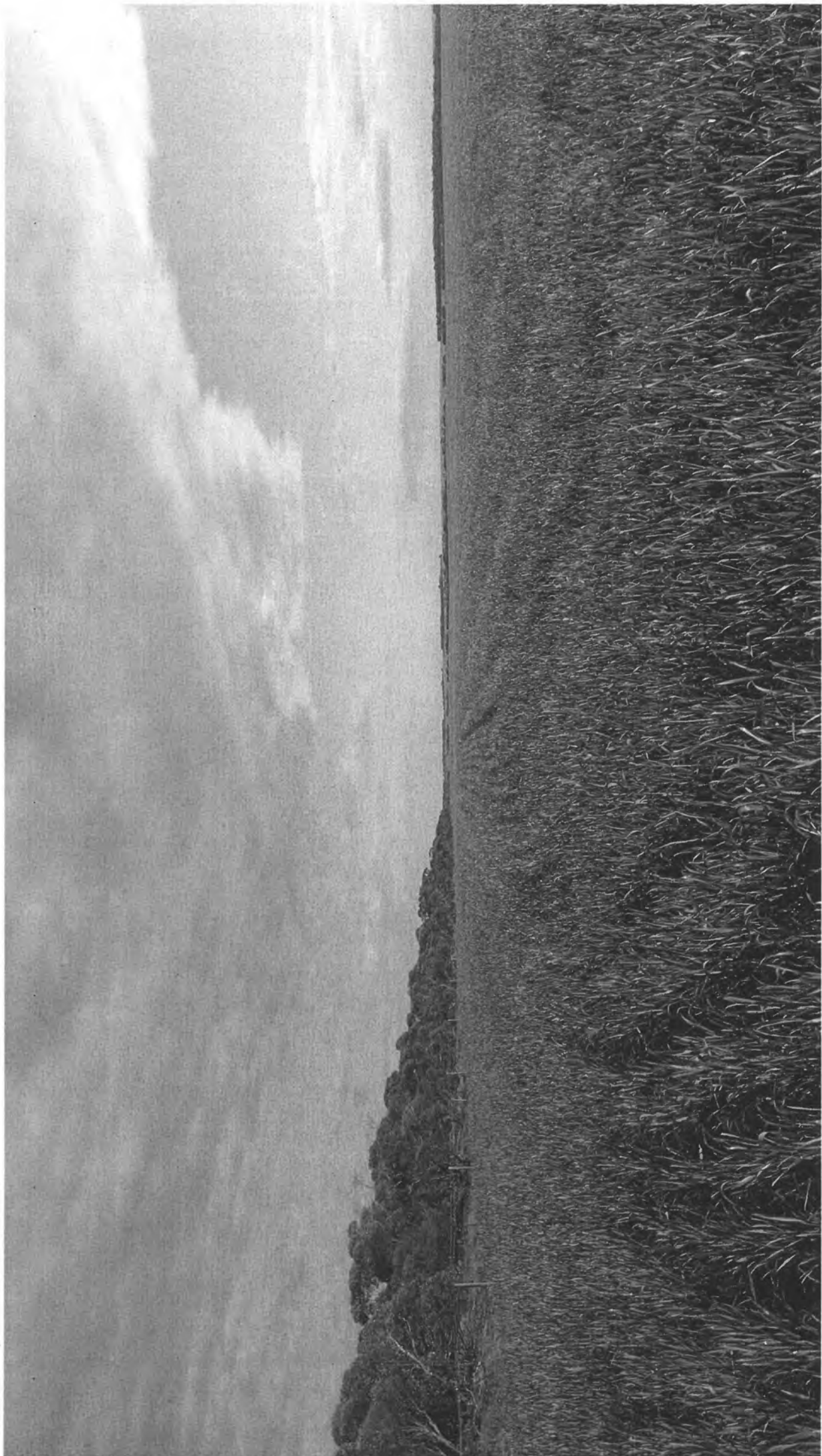
Could you please make a visit to the Eyre Peninsula to see what a devastating impact this Railway Corridor would have on our sustainable farming practices. We know there would be many farmers wanting to meet with you.

Yours sincerely,

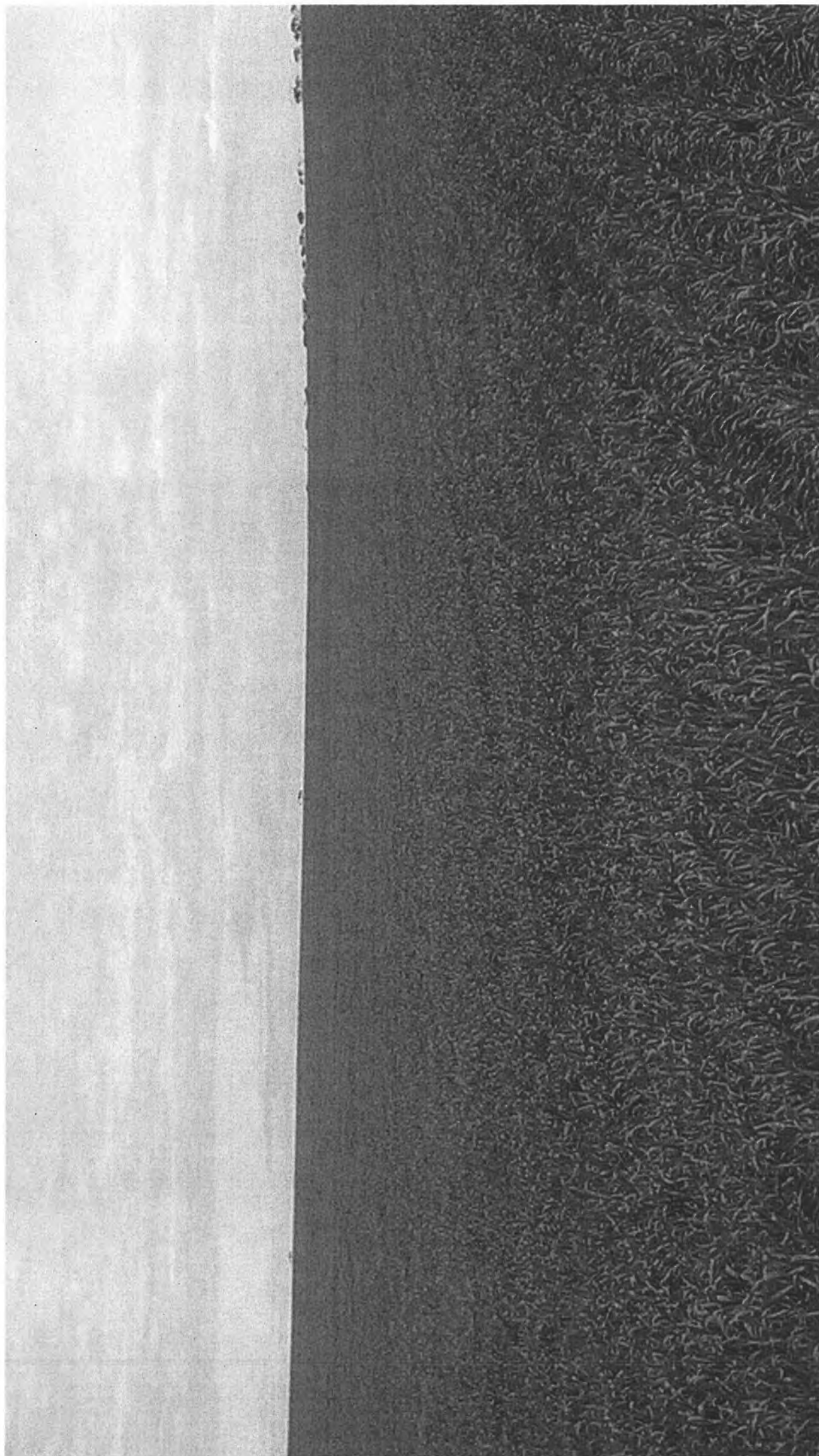
**s47F**

① ✕ ②











MC14-017106

s22

**From:** s22  
**Sent:** Monday, 11 August 2014 12:05 PM  
**To:** MinisterialCorrespondence  
**Cc:** s22  
**Subject:** FW: CEIP Infrastructure EPBC Act Referral [SEC=UNCLASSIFIED]

**ACTION:** Dep Reply = EACD

**NOTES** (if required): N/A

s22  
DLO, Office of the Hon Greg Hunt MP  
Ph s22

**From:** s47F [mailto:s47F@bigpond.com]  
**Sent:** Sunday, 10 August 2014 11:45 PM  
**To:** Greg.Hunt.MP  
**Subject:** CEIP Infrastructure EPBC Act Referral

I would like to request an extension, so that I may submit a submission on the CEIP Infrastructure EPBC Act Referral (Reference number 2014/7285), that has been lodged with the Federal Government on 29th July, on the grounds of , 1. How were the landowners/farmers informed of the transport corridor going through their properties?

2. Where was it advertised in the three District Councils?
3. What affect will Iron Ore dust from the port have on Marine Organisms in

Spencer Gulf?

s47F

Port Lincoln SA 5606

MC14-017885

s22

**From:** s22  
**Sent:** Monday, 11 August 2014 2:31 PM  
**To:** s22; MinisterialCorrespondence  
**Cc:** s22  
**Subject:** RE: CEIP INFRASTRUCTURE EPBC ACT REFERRAL [SEC=UNCLASSIFIED]

Please adjust to AA.

EAAD

**From:** s22  
**Sent:** Monday, 11 August 2014 11:57 AM  
**To:** MinisterialCorrespondence  
**Cc:** s22  
**Subject:** FW: CEIP INFRASTRUCTURE EPBC ACT REFERRAL [SEC=UNCLASSIFIED]

**ACTION:** Min Reply

**NOTES** (if required): Matt, please discuss with Heidi if you think Dep Reply more appropriate.

s22  
DLO, Office of the Hon Greg Hunt MP  
Ph s22

**From:** EPSIMGI [mailto:epsimg@gmail.com]  
**Sent:** Sunday, 10 August 2014 9:06 PM  
**To:** Greg.Hunt.MP  
**Subject:** (CEIP INFRASTRUCTURE EPBC ACT) REFERRAL

Minister for Environment, Greg Hunt, [greg.hunt.mp@environment.gov.au](mailto:greg.hunt.mp@environment.gov.au).

We s47F and s47F representing the members of Stop Invasive Mining Group Incorporated request an extension, so a submission may be made by the Stop Invasive Mining Group Inc. On the CEIP Infrastructure EPBC Act referral (Reference number 2014/7285) that has been lodged with the Federal Government on the 29th of July 2014.

Questions we have been ask by the land owner and stakeholders.  
How have the railway corridor landholders/stakeholders been informed?  
Where was it publically advertised?

By the time you receive this email the opportunity for public comment will be as good as over.

With thanks

s47F

①

Stop Invasive Mining Group Inc.  
Po Box 134 Tumbly Bay 5605  
s47F @gmail.com

s22

MC14-017886

**From:** s22  
**Sent:** Monday, 11 August 2014 2:37 PM  
**To:** MinisterialCorrespondence  
**Cc:** s22  
**Subject:** FW: extension of time [SEC=UNCLASSIFIED]

ACTION: AA

CACD

NOTES (if required): Attn: s22

s22  
DLO, Office of the Hon Greg Hunt MP  
Ph s22

**From:** s47F@yahoocom] ①  
**Sent:** Monday, 11 August 2014 12:39 PM  
**To:** Greg.Hunt.MP  
**Subject:** extension of time

Minister for Environment, Greg Hunt,

Please extend the time frame for submissions regarding the (CEIP Infrastructure EPBC Act referral) (Reference number 2014/7285) that has been lodged with the Federal Government on the 29th of July 2014.

By the time you receive this email the opportunity for public comment will be as good as over.

Thankyou,  
s47F ①



s22

**From:** s22  
**Sent:** Monday, 11 August 2014 12:07 PM  
**To:** MinisterialCorrespondence  
**Subject:** FW: Railway Corridor [SEC=UNCLASSIFIED]

**ACTION:** AA = EACD

**NOTES** (if required): to EACD s22 )

s22  
DLO, Office of the Hon Greg Hunt MP  
Ph s22

---

**From:** s47F [mailto:s47F@bigpond.com]  
**Sent:** Monday, 11 August 2014 11:39 AM  
**To:** Greg.Hunt.MP  
**Subject:** Railway Corridor

Minister for Environment, Greg Hunt, [greg.hunt.mp@environment.gov.au](mailto:greg.hunt.mp@environment.gov.au).

On the CEIP Infrastructure EPBC Act referral (Reference number 2014/7285) that has been lodged with the Federal Government on the 29th of July 2014.  
Your government needs to seriously find out..

Dear Mr Hunt,

We are farmers living in the Rudall district on EP and according from 2 brief visits from a representative from Iron Road, the last being in September 2013 we "may" have this railway going through our property.

I suggest your government and office consider the following 2 things very carefully:

How have the railway corridor landholders/stakeholders been informed? We certainly haven't agreed to anything or been told it's definitely happening.

and secondly, **Where** was it publically advertised?

Yours sincerely,

s47F  
Rudall 5642  
s47F [mailto:s47F@bigpond.com]

s22

MC14-017930

From: s47F [redacted]@bigpond.com]  
Sent: Wednesday, 13 August 2014 4:51 PM  
To: Greg.Hunt.MP  
Subject: (CEIP Infrastructure EPBC Act referral)

(1)

EACD - NFA

Sections of this 'Act' are extremely misleading. The photos showing the 'area' for this rail corridor are misleading to say the least! Why not show the cropping/grazing land the corridor will go through, be truthful about the area. Also, how and when were these meetings for the public to attend published. The objection from the communities involved in this venture have not been presented correctly. I expect an answer to how and when were these meetings supposed to be held for public opinion....

s47F

s22

MC14-017969

**From:** s22  
**Sent:** Tuesday, 12 August 2014 10:01 AM  
**To:** MinisterialCorrespondence  
**Subject:** FW: (CEIP INFRASTRUCTURE EPBC ACT REFERRAL) [SEC=UNCLASSIFIED]

Appropriate action = EACD

Departmental Liaison Officer  
Office of the Hon Greg Hunt MP | Minister for the Environment  
Ph: 02 s22 | s22  
s22 @environment.gov.au | Parliament House, Canberra, ACT 2600

**From:** s47F [mailto:s47F@bigpond.com]  
**Sent:** Monday, 11 August 2014 9:27 PM  
**To:** Greg.Hunt.MP  
**Subject:** CEIP INFRASTRUCTURE EPBC ACT REFERRAL

Minister for environment , Greg Hunt , [greg.hunt.mp@environment.gov.au](mailto:greg.hunt.mp@environment.gov.au)

I, s47F, concerned citizen , member of stop invasive mining group incorporated , request an extension , so submissions can be made on the CEIP infrastructure EPBC act referral , ( reference number 2014/7285) that has been lodged with the federal government on 29 July 2014.  
How have the railway corridor landholders and stakeholders been informed?  
Where was it publicly advertised?

The lack of making this very visible to the public is not being very "transparent".

By the time you receive this email the opportunity for public comment will be as good as over.

With thanks

s47F

s47F [mailto:s47F@bigpond.com]  
s47F

This email is free from viruses and malware because avast! Antivirus protection is active.