

Webb, Lee (DPTI)

From: Ann Baillie [REDACTED] >
Sent: Thursday, 20 February 2020 6:33 PM
To: DPTI:State Commission Assessment Panel
Subject: Port Spencer Project

To the Minister for Planning
Attention: Robert Kleeman.
Unit manager-Policy and Strategic Assessment, Planning and Land Use Services
DPTI

Dear Sir,

I am a very concerned resident of Tumby Bay and Lipson, and do not agree with the Port Spencer Project going ahead with so many problems unresolved and not discussed. I am on the Tumby Bay District Community Consultative Group and have been to all the meetings since its inception (2013 Iron Road, Centrex etc) and listened and questioned many aspects of the Port Spencer project. I believe ProManage need to speak to a much wider audience as what they are proposing affects more than just the farmers on Lipson Cove Road and the Tumby Council.

1. The Lipson Cove Road 'upgrade'. This does not just affect the farmers; but the LOCALS who use Lipson Cove to camp, use the beach, walk along the coast, have picnics, swim and go fishing. The council rubbish truck also drives on it to collect the rubbish. The Lipson Progress Association use it to collect the cans and bottles to recycle; this small income is very useful in raising money for developments in the Lipson district. People come from all over the world to enjoy the remoteness, the non-development; the peace and solitude as do the tourists, caravaners and campers from inter and intra state. My family have been going there for over 100 years for family outings, fishing etc It has been a big escape from the heat after and during harvest. All this will done in prime time = summer, = harvest and school/term/Christmas holidays. The huge trucks would seriously affect this traffic. The Project would seriously affect the tourists and locals.

Who is paying for this sealed road? Do the council pick up costs for the small dirt section? Who maintains it? and at what cost?

The same questions apply to the unsealed roads that will be picking up the extra truck E/W movement.

2. The Lincoln Highway and Lipson Cove Road Intersection. Who is funding this huge major roadworks? It will not be the District Council. The money for the development of passing lanes etc on the Lincoln Highway and Elliston Highway, to cope with the closure of the railway cannot be used for this project How is it to work? Surely it cannot slow down the 110km/hour traffic (as it is not a town so should have a bypass built as into Port Neill, Arno Bay) which includes interstate transport, intrastate transport, local traffic for work to Lincoln/Tumby, refrigerated trucks, freight trucks (carting hay, water etc) caravans, and 'locals' from Lower Eyre Peninsula etc driving to Adelaide on business, medical and family visits. This needs to be discussed with a very wide cross section of the whole community of Lower Eyre Peninsula. Until this is finalised how on earth can the Project say it can proceed? The responsibility, the finance and the design must all be discussed and approved before the port can proceed. ProManage seem to think they will be ready by September 2021!! How?

ProManage say a detailed draft management plan is to be prepared in consultation with DPTI and Councils and who else?? Many people use this Highway.

The plans of the intersection need to be much clearer than what has been presented in the report! I cannot understand it? It looks like an elevated road but think it could just be the yellow bump strips they

put on the road. We need more information!!! The speed limits proposed for the Lipson Cove Road definitely need discussion with the wider community.

3. More detailed information of the ILUA . (this acronym needs to be spelt out. Who knows what it means) How many Barngala people were involved? Do they know the area? We haven't seen Aboriginal people around Lipson Cove for at least 100 years - ever since agriculture took over. What is the Barngala Land Management Officer to do? What does the training as a marine mammal observer entail? Who employs this person? What is the pay? How long does the position go for? Where are they to be stationed? How are these marine mammals observed by the Officer? especially during the night? How much time needs to be given to the Panamax ship if a mammal has been sighted? How far away do they have to be? It all seems a placation to the public and very improbable.

4. The map of the site doesn't show where the diesel generators are situated. Where is diesel stored? 'Noise modeling is underway and will form part of the PER' - this was told at our October 22 2019 meeting, but hasn't been told or shown at our 19 February 2020 meeting. The noise will definitely affect people at Lipson Cove especially as it will be operating 24/7.

5. The water situation needs clarification. How is it collected? How is it stored?

6. Tugs? This February meeting = NO tug pen will be needed as it is direct load. Plus the tugs in Port Lincoln can be used!!! I don't understand? Do they need Tugs or not? and if the tugs are stored and used in Lincoln how and why are they used at Port Spencer?? And Yes 2 tugs are required??!! Very confusing. We need clarification.

7. Even though ProManage know that a causeway is not preferred they are going ahead with this idea. Many of us are very worried about the movement of sands and the effect on the sea grass and erosion on the north side. Questions were not answered satisfactorily. Greater clarification and assurance is needed.

8. ProManage seems to be pushing their Project as fast as they can. I do not think enough wide community consultation has occurred in many areas (especially the roads, funding, disasters) nor enough detailed information given. Why do they think everybody is going to take their grain there?

It will definitely affect a valuable area for tourists (whether local or not) the peaceful, isolated and beautiful, fragile environment will never be the same. People travel all round Australia and the world to go here (I have personally spoken to many of them (France, Germany) - while visiting and when collecting cans and bottles)

Thankyou
Ann Baillie

██████████, Tumby Bay. ██████████.

18/2/20

The Secretary,
State Commission Assessment Panel,
GPO Box 1815,
ADELAIDE SA 5001
scapreps@sa.gov.au

Port Spencer Grain Export Facility - Project No: IW219900

I'd like to submit my opinion on the proposed grain export facility at Port Spencer. My reason is the waste of resources currently occurring as various group fight for supremacy!

I run a grain growing operation with my husband approximately 45km north west of Port Spencer.

Port Spencer is not my preferred option for the future of our grain export.

It makes much more sense to me to plan for a multi-user Port, as is the Cape Hardy proposal.

A multi user Port may not have full functionality straight away, but could have stages and room to grow into whatever shipping evolves into the future. *I accept that mining might be a part of that shipping, but for the record, I do not accept or support the current arrangements afforded to open cut miners when negotiating with landowners.*

We need to include container shipping in the future plan – grain, legumes, fish, hydrogen, whatever commodity can be shipped this way. Granted there are current issues with obtaining 20-foot containers so that would need to be overcome.

The grains industry certainly does need to plan for 'life after Port Lincoln', as I think socially, the current silo facility has a time limit due to its location and the poor town planning of Port Lincoln.

Lower EP farmers complain about freight cost, but they make substantially more money and have lower freight costs than farmers from other areas of EP. I want a plan for grain export for the whole of Eyre Peninsula, not just for those consumed by their own pockets.

Our road network is so pivotal to safety and success. Local councils have struggled now for many years to try and keep up with the maintenance and upgrades required of our roads. It is a huge financial burden on small rural councils so planning for any future Port requires major consideration of the freight network from farm to Port and how this will be funded and maintained into the future.

Why I'm not in favour of Port Spencer:

- Locals have camped at Lipson Cove for many years, it is a pristine place to holiday. A Port and heavy vehicle traffic will adversely affect the inclination to visit and camp here
- There is less land available at this site which would constrain expansion
- Options for a major East-West corridor are more 'hodge podge' from this site, there are some possibilities but none are a direct route

Why I am more inclined to favour Cape Hardy:

- Cape Hardy has no one living directly at the location of the proposed infrastructure – although there are residences along the road leading to the site that need to be considered
- Cape Hardy has more land to allow for growth into other shipping options such as containers
- Brayfield Road intersection onto East Dog Fence Road would provide a direct East-West connector without having to travel north or south on the Lincoln Highway or other inland roads
- East Dog Fence Road would still need substantial re-modelling along the route

Roads

- The best road that extends an East-West corridor from the Tod Highway to the Lincoln Highway is the Butler/Brooker road, but this is further north of the proposed Ports so would require travel along the Lincoln Highway to and from the Port, which I would think is best kept minimised.
- East Dog Fence Road from Brayfield road:
 - Direct corridor, on one road, to the Tod Highway
 - Major works would be needed at Ungarra to create a straight through road to the west
 - It's current diversion over the railway line onto Ungarra/Yeelanna road would not be suitable for more heavy truck traffic
 - It's obviously working okay now with our current truck traffic, but if you were going to make it a major HV thoroughfare, I suggest we would need a re-model in several sections of this road

These are my thoughts. I don't want to participate in the SCAP hearing. I don't want a phone call from anyone trying to change my opinion.

Kind Regards

Karen Baines
Farmer

████████████████████, Moody, SA 5607

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Webb, Lee (DPTI)

From: Lisa Graney [REDACTED] >
Sent: Thursday, 20 February 2020 5:27 PM
To: DPTI:State Commission Assessment Panel
Subject: Port Spencer development / Lipson Cove

To Whom it may concern,

As a resident of Lipson for the past 29 years I oppose the port spencer development that is being planned by free eyre.

A development the size of which they are talking about will absolutely destroy the unique and wonderful place that is Lipson Cove and Rogers beach

I really don't think you people care about what you are doing I think you are only doing it for money, and if it goes ahead it will deny future generations

of families the solitude and remoteness of a beautiful place for camping and fishing. To seal the Lipson Cove road for all the trucks that are going to

use it is a mammoth task, and who is going to maintain it? What about all the tourists and their caravans along that road with all those trucks it will be an

accident waiting to happen. I don't agree with your development one little bit and will NOT support it ever. Lisa Graney.

-----Original Message-----

From: Peter Swaffer [REDACTED]
Sent: Tuesday, 18 February 2020 8:31 PM
To: DPTI:Planning Engagement <DPTI.PlanningEngagement@sa.gov.au>
Subject: Port Spencer proposal

Dear sir/ madam,

In relation to the proposed port access and roads. The existing Lipson cove road which is the proposed route is only gazetted a 2 chain road and is therefore very insufficient (even if sealed) to accommodate large road trains and the heavy traffic. I also question the likely impact of the Lipson island rookery along with the district councils camping area being so close. There is a much better (with less impact on natural coastline and camping facilities) site to accommodate a port further north at Cape Hardy of which the federal government has recognised. This site also has a gazetted 3 chain road access which will accommodate the ever evolving larger trucks.

Therefore I urge this department to carefully consider the negative aspects before supporting this site.

The board and chairman of the Free Eyre and Peninsula Ports (the same people I might add) are very persuasive in their view in canvassing but unfortunately do not listen or represent their shareholder members.

Regards

Peter Swaffer
[REDACTED]

Sent from my iPad



Tumby Bay Residents and Ratepayers Association Inc.

P.O. Box 95, Tumby Bay, S.A. 5605
secretary@tbrara.com.au

Minister for Planning
Attention: Mr Robert Kleeman
Policy and strategic Assessment
Planning and Land Use Services
Department of Planning, Transport and Infrastructure
GPO Box 1815
Adelaide
South Australia 5001

20 February 2020

Dear Minister,

The Tumby Bay Residents and Ratepayers have pleasure in responding to the amended PER pertaining to Pt Spencer as proposed by Peninsula Ports in association with Free Eyre.

Noting the extent of the amended PER application and the limited resources available to it at this time, the Association has provided comment upon matters contained in Volumes 1 and 2 and Appendix C, being areas of principle concern. It notes the inclusion of some management plans, but points to the fact that these are not site specific but are indicative of what one could expect. This is of concern as the specific of what is being proposed are not included in the amended documents and are highly likely to be altered prior to implementation, without any public consultation occurring.

The Associations position with respect to the Centrex model is well documented, inclusive of highlighting areas of weakness in the original PER.

The Association maintains its opposition to the proposed development on economic, environmental and health and safety concerns.

Much of the document is speculative in nature as outlined in our response.

It is our considered opinion that the costs and benefits alluded to in the amended document are not achievable, even more-so when considered alongside of another significantly larger proposal, namely the Cape Hardy development.

Yours sincerely,

Milton Stevens
Chairperson

Application to Amend Pt Spencer PER

Peninsula Ports Pty Ltd
(subsidiary of Free Eyre Ltd)

Submission by Tumby Bay Residents and Ratepayers
Association Inc.

20 February 2020

PT SPENCER AMENDED PER COMMENTARY ON VOLUME ONE

EXECUTIVE SUMMARY

The Evaluated Project comprised a deep-water marine port, capable of accommodating Panamax and Cape class vessels, suitable for export of up to 2 million tonnes of ore per annum and up to 1 million tonnes of grain. At this time, FEL was the preferred grain supplier and were involved in assessing the potential grain export demand for the project. The Proposed Amendment removes the storage and export of iron ore from the Evaluated Project and seeks to reconfigure the site for efficient grain storage, handling and export.

Question: did the original PER nominate 2M ore and 1M grain?

The introduction failed to identify Free Eyre Ltd as grain partners to Centrex, who, after a detailed financial evaluation of the grain component, officially withdrew from the partnership and hence the approval process

Transport of grain to site will generally occur during grain harvest (i.e. typically October-December with a significant peak in November). Vehicles will be mixed in size and type, however the dominant vehicle type is expected to be a B-Double and Double Road Train. The maximum vehicle to be accommodated at site is a B triple.

It is assumed a full transport assessment is contained in this amendment to (a) ensure that the road network under consideration is able to carry the suggested loads, (b) an agreement between the operator and the affected District Councils is in place so that costs associated with road repair and maintenance are paid for by the proponent and not the ratepayers of the District.

Vessels calling at Port Spencer are bulk grain carriers only. No servicing or other provisioning will be provided. The port will be outside the limits of the Sir Joseph Banks Group Marine Park

BUT adjacent to the Lipson Island Marine Conservation Park

As a result of the lack of domestic market and supply chain competition in the region, grain prices have historically been low relative to other regions in Australia, and grain is predominantly exported to international customers

The report fails to acknowledge the recent ACCC enquiry into the cost of transport of grain on Lower EP (through Viterra) and has identified a significant cost disadvantage arising from

Government regulations which Viterra is subject to and, apparently, not to other players in the market.

The inference being that any new player will be at a considerable economic advantage to Viterra, noting that said regulations are not applicable to new players.

Any economic analysis of the viability of the new venture must include a detailed examination of the non-competitive aspects of the Government regulations applicable to competitors.

Benefits of the Project

The Proposed Amendment will provide an alternative supply chain for grain growers on the Eyre Peninsula and an opportunity for grain growers to improve their economic returns through increased competition

Perhaps an examination of the viability of the project as previously undertaken by Free Eyre prior to their withdrawal from the Centrex arrangement should also be included in this amendment. Clearly if the grain option was not considered viable then, what has changed so far as the Company is concerned, that makes it viable, now?

The Proposed Amendment will provide three levels of economic benefits to local grain growers:

- Extra competition in the grain handling and marketing industry
- Freight savings from reduced travel and double handling
- The ability to transport directly to port.

An independent economic assessment as to the validity of the above three points needs to accompany the application.

A grain production target zone of approximately 1.6 million tonnes of grain is expected to be freight advantaged to Port Spencer by up to \$10 per tonne (average \$3.50 per tonne) as compared to Port Lincoln or Thevenard. Freight advantages are further enhanced if a grower is unable to deliver grain to Port Lincoln at harvest. Port Lincoln can only receive certain commodities and grades at harvest time and is limited by storage capacity. Port Spencer will ultimately have the capacity to store approximately 860,000 tonnes directly at harvest, as well as having the ability to continue shipping during harvest.

The proponent 'conveniently overlooks the existing off-site storage capacity at Cummins, Tumby Bay, Pt Neill and other surrounding infrastructure held by Viterra.

The inference that everything is transported direct to Pt Lincoln is a fallacious argument.

Furthermore, access to 1.6M tonnes of grain with a suggested 'freight advantage for Pt Spencer and an economic advantage of \$3.50 per tonne' is supposition.

The ability to export during harvest is not a point of separation between the proponent and the existing Viterra.

The development of Port Spencer is expected to contribute significant, reoccurring annual economic savings to grain growers in the catchment zone. Based on an assumed one million tonnes of grain exported through Port Spencer, the annual grower freight savings alone may be in the order of \$3.5 - \$5M p.a.

The introduction of a new grain export facility will create immediate competition for the incumbent grain terminal operator(s) and initiatives to capture supply could realise a further \$10-\$15/ton increase across Eyre Peninsula's growing region (subject to a large number of factors which ultimately determine the price a grower is paid). Those potential further benefits for Eyre Peninsula growers may then result in an increase in the price realised for grain of \$27 - \$40M p.a. assuming a 2.7 Mt harvest and competitive pressure between the supply chain operator(s) and exporters to capture supply. (These assumptions are theoretical in nature, difficult to predict and may or may not be ultimately realised). (Underlining added)

Interestingly a series of assumptions have been proposed in support of the economics of the venture. As mentioned earlier, the economic analysis undertaken by Free Eyre when in partnership with Centrex, indicated that the grain venture was not viable. What has changed to suggest it is now viable?

It is understood at the time, Free Eyre indicated the cost of grain infrastructure to be in the vicinity of \$90M with the principle partner, Centrex providing the greater part of construction costs of the port infrastructure.

The community is now expected to support a venture whereby the total cost of the facility is to be borne by Free Eyre and its Associates, when the financial position of the proponents is unknown..

The 'economic modelling(assumptions)' based upon an 'expected' 900K-1M tonne delivery to Pt Spencer, taken alongside of what Viterra actually takes; the 800+K delivered to Lucky Bay and the suggested 1M+ proposed for Cape Hardy from an existing pool of around 2.7M raises serious questions with respect to the

'modelling' and overall viability of this proposal. Simply put, there does not appear to be enough grain produced to warrant a another stand alone grain export facility.

Alignment with State and Regional Policy

The Port site exists within two different zoning areas, which have altered since the Evaluated Project: The Coastal Conservation and Primary Production zone. The site is not located within the boundaries of any Marine Parks or aquaculture areas.

But adjacent to the Lipson Island Marine Conservation Park, and, by the information provided, the port's exclusion zone actually intersects the northern boundary of the Marine Park. Clearly this is totally unacceptable.

The Amended Proposal generally finds an improved level of compliance with Development Plan policy when compared to the Evaluated Project.

By whose assessment? Self assessment is a wonderful tool, especially in the absence of public commentary in the development of the proposal.

The impacts of the Proposed Amendment on sediment transfer patterns along the coast are to a similar degree as the Evaluated Project, however, there is some accretion and erosion anticipated in localised areas. The development is cognisant of sea level rise and does not require coastal protection measures.

Clearly the construction of a 238metre groyne will have significant impacts upon coastal sediment movements, contrary to the opinion of the proponents. The original construction of the jetty infrastructure had little impact upon tidal movements and sand deposition

What appears to be omitted at this stage is any reference to the fact that the two beaches impacted (Roger's and Lipson Cove) are known habitats (nesting) of listed species.

The Proposed Amendment finds synergies with the Eyre and Western Region Plan, which aims to:

- Support and develop the region's export-oriented industries, including fishing, mining and agriculture;
- Protect and develop further the region's strategic infrastructure;
- and · Protect and strengthen the economic potential of the region's primary production land.

The question being whether grain dust pollution in the pristine environment of the adjacent marine conservation park, Lipson Cove and Roger's Beach and any pollution arising from associated activities of the proposed port is considered an advantage to the local community or simply the cost of providing an uneconomic, poorly located export facility which will do little or anything to improve primary production on Lower Eyre Peninsula.

A detailed review of the Evaluated Project has been undertaken compared to the Proposed Amendment, including a comparison of impacts and risks between to two projects. A summary is provided in Sections 5 and 6.1, which indicates that while some of the impacts and risks are expected to differ (e.g. due to seasonal nature of grain delivery, increased grain storage capacity, use of Lipson Cove Road and inclusion of a causeway structure), a similar level of effect and risk profile is expected for the Proposed Amendment (underlining added)

The assumption of a similar level of risk is just that, an assumption.

The proposed site does not support threatened flora or fauna.

It is assumed that the evidence to support this supposition has been provide through new assessments undertaken over a period of 12 months and that suitable modifications to the EPBC approval have been made in accordance with the assessment. Desktop assessments are not recognised as a legitimate form of assessment

It would appear from the limited amount of information provided in the 'summary', that environmental impacts are limited to the actual property boundaries.

The Proposed Amendment would not require operational dredging and therefore many of the significant environmental marine impacts of port management would be avoided when compared to the Evaluated Project.

It is understood that the original project did not include dredging.

The Project is located on a relatively remote part of the Eyre Peninsula coastline with a small camping ground associated with the Lipson Cove beach south of the project. Based on air and noise assessments it is not anticipated that camp ground amenity would be disturbed by the development.

The proponents appear to be oblivious to the Eyes on Eyre/District Council development proposal for Lipson Cove.

The claim that noise and air pollution is not anticipated to impact on the Cove is highly questionable. Where is the scientific monitoring evidence (undertaken at the site) upon which the claim is made, given that it is understood blasting will occur to construct the causeway and may be used in order to construct the jetty component, noting that the substrate is actual bedrock of granite/metamorphic origin.

There would be distinct visual changes to the coastline associated with the silos, jetty infrastructure and shipping, however this is limited to direct viewing from the Gulf and has limited lines of sight from north and south of the site. As with the Evaluated Project, the Proposed Amendment would be visible from the Lipson Cove beach

Clearly the proponents have not undertaken a visual assessment of the proposal from the Lipson Cove Roadway travelling towards the East. The whole of the proposed storage facility and infrastructure will be visible as will any denuding of the hillside as a consequence of blasting to obtain rock for the causeway.

Traffic has been considered as part of the development for access to the Port and is unlikely to have significant impacts on Lincoln Highway. Road upgrade benefits are expected for Lipson Cove Road, and the intersection with Lincoln Highway would also be upgraded to allow for suitable large haul access to site. The expected traffic vehicle numbers expected to Lipson Cove Road are not expected to impact safety or level of service of the roads.

This is a major deviation from the previous approval where access to the proposed port was via Swaffers Road. This option removed competition of heavy vehicles (BDoubles and triples) and tourist and local traffic on Lipson Road, a roadway where it would be considered dangerous to allow the suggested traffic model to occur.

Clearly the proponents have no understanding of the actual road network farmers/contractors would use to deliver grain to the proposed port. The majority of grain production lies to the west of the port and will require transports to actually cross Lincoln Highway. The transporters will be competing for access to Lipson Cove Road with all tourist traffic as well as local traffic and the general traffic on the Lincoln Highway, inclusive of competition carriers.

Any suggestion of land acquisition for road widening will be opposed.

It also appears that the proponents fail to recognise the water pipeline is on one side of the existing roadway and communication cables, the other.

Left hand turning into Lipson Cove Road from the Lincoln Highway for large vehicles would present a safety hazard to other road users. Significant water infrastructure would have to be moved in order to widen the intersection. The issue of slip lanes on both sides of the Highway would need to be considered.

It is assumed that a transport plan has been included in the amended PER to ensure costs of road-works lies with the proponent and NOT the ratepayers of the District Council of Tumby Bay.

Public access to Rogers Beach, adjacent to the site's north, would be maintained.

It is therefore assumed that an appropriate roadway would be constructed to provide access outside of the boundary of the port site (ie a public roadway) (ie the proponent would give up some property on which the roadway is to be constructed) to ensure the public are covered by normal State road rules and not rules of access set by the proponents. Such a provision ensure normal insurance requirements are met and unrestricted access to the current camping ground at the beach's southern end, is achieved.

The Port location and design are such that identified environmental and social impacts can be managed without unacceptable risk to the community or environment and the Project is predominantly considered low risk.

The question of unacceptable risks to the community is NOT for the proponents to make. The community considers the proposal to be a risk to the environment and economics of the region.

Grain export capacity on Eyre Peninsula is constrained between December and April, when grain prices are at their highest (counter season for international markets). Further, a lack of grain handling competition and an inefficient supply chain, particularly with the closure of the rail lines, means there is scope to provide significant economic benefits to grain growers on Eyre Peninsula through a suitable export alternative

The assumption that the current situation is an inefficient supply chain appears not to be supported by the recent review and experience over the last harvest with road transport to Port Lincoln able to replace the demise of the dated rail system (the economics of which are well known).

The proponents are, for obvious reason, oblivious of other developments proposed within 10 kilometres of Port Spencer which will provide greater advantage to Lower Eyre Peninsula and beyond.

The proposal appears to also ignore the impact of the Lucky Bay development as a competitor for the grain harvest, inclusive of their bunker system at Lock.

It is understood that approximately 900000t of grain are awaiting transport to Lucky Bay this harvest.

The Project has received positive local government and stakeholder support.

It appears that the proponents are not aware of the FACT that the District Council of Tumby Bay has officially sought to have their previous support for Port Spencer (ie the Centrex model) withdrawn in favour of stated support for the Cape Hardy development.

Clearly the above statement lacks credibility.

The extent of stakeholder support is questioned, noting the Association is NOT supportive of the proposal on economic and environmental grounds consistent with its previous position.

.....the region keen for the employment and business development opportunities, which the project is likely to offer directly and indirectly through development of Port Spencer

The reality of the situation is the Lower Eyre Peninsula is supportive of projects that offer sound economic bases which attract appropriate financial investment to the benefit of the proponent and beyond.

The choice of 'likely to offer' suggests that employment would more 'likely' to be in the form of fly in/fly out, with little advantage to the local employment regime.

Has Peninsula Ports and the parent company Free Eyre the financial resources required to achieve that stated aims of the project?

The Region has made representation through the recent enquiry initiated by the Minister for Primary Industries with respect to a regional/State development plan. Port Spencer was identified in a submission the Association presented as an inappropriate development that would not serve the area well, especially in the context of the proposed development at Cape Hardy.

The Proposed Amendment is considered to be of significant strategic and economic value to not only Peninsula Ports, but to grain growers on Eyre Peninsula. It offers potential economic and employment opportunities to local communities as well as regional and State contractors and businesses.

The proposition fails to address the issue of an accommodation village at Tumby Bay which is part of the 2012/3 Provisional Development Authority arising from the original PER.

The issue of FIFO employment is not addressed.

The economic viability of the proposal is highly questionable.

Caveat

The Amendment to the Public Environmental Report shall be read in conjunction with the report '107661001100-R-Rev0 Centrex Metals Ltd, Port Spencer Stage 1 Public Environmental Report' and including all appendices and the 'Port Spencer Stage 1: Response to Public Environmental Report Submissions, October 2012'.

The issue being that the PER included reference to the EPBC referral and thence the submission of Stage 2 leading to the Provisional Development Authorization.

1. Introduction

Port Spencer (the site) was originally proposed by Centrex Metals Limited in 2011 as a deep-sea port facility for the export of iron ore from their Eyre Iron Joint Venture Project. The site was also proposed for the export of grain. At this time, Free Eyre Limited (FEL) was the preferred grain supplier and were involved in assessing the potential grain export demand for the project.

It has been confirmed by the Commonwealth that the existing *Environment Protection and Biodiversity Conservation Act 1999* (EPBC) approval can be transferred from Centrex to Peninsula Ports through a deed of transfer being executed by both parties and the relevant Minister approving the transfer. Following such transfer, Peninsula Ports will need to comply with the conditions in that approval or seek any changes based on the Proposed Amendment (underling added)

What is not recorded is:-

(a) the fact that EPBC Approval was for an ore export facility and MAY be a multipurpose port inclusive of grain.

(b) no environmental impact assessment for grain dust and other pollutants associated with grain, was undertaken and submitted as part of the EPBC approval

(c) the approved transfer of the EPBC approval for Stage 1 AND 2 was granted without condition in November 2019, ie no amendment to the original approval as a result of potential environmental damage from grain dust or other substances used in handling the grain, upon the marine environment including the Marine Conservation Park or other listed species in the immediate environment.

(d) Free Eyre undertook a detailed financial review of the proposal to export grain from Pt Spencer and concluded it was not economical resulting in the withdrawal of its partnership with Centrex Metals.

1.1 Peninsula Ports

Peninsula Ports Pty Ltd was formed in 2019 by FEL and consists of over 475 shareholders comprising farming families and businesses. Peninsula Ports as a subsidiary to FEL, is proposing to develop and manage Port Spencer.

With the limited shareholding as provider, the question remains one of existing financial equity Peninsula Ports has to progress this project to completion and thence operation. Recent reports in the press (Stock Journal facebook 5-2-2020) appear to indicate the raising of capital is difficult in today's economic climate.

The removal of iron ore related infrastructure from the project allows for a significantly higher rate of grain receipts during harvest and greater on-site grain storage capability which reduces the reliance on up-country grain storage, and the resultant double handling of grain prior to export

Is it not more realistic to say that the new facility will be designed to facilitate grain movement and any reference to ore movements is irrelevant and considered a confounder in the debate.

It is assumed the new conveyor will be able to move the equivalent or greater than the previous design. It is assumed the engineering design of the conveyor will ensure fugitive dust will be ALARA through the use of negative air pressures with the handling system.

A critical point in this debate is the introduction of ON SITE FARM storage rather than up-country storage facilities and the assumption that road transport will be available to shift the grain from harvest site to port.

Site access for the Proposed Amendment is proposed via Lipson Cove Road rather than Swaffers Road. Lipson Cove Road has been assessed as providing safer turning conditions to and from the Lincoln Highway and minimises the risk of new road works into the site impacting on potential aboriginal cultural heritage areas in the vicinity of Rogers Beach.

Any entry points from the previous Swaffers Road model did not impact upon the potential aboriginal heritage areas in the vicinity of Rogers Beach. Hence the use of Lipson Cove Road is a MAJOR departure from the original approval.

It is assumed that the assessment of suitability of Lipson Cove Road has been undertaken by the proponents, rather than the Department of Transport.

Land acquisition for road works on Lipson Cove Road will not be supported by the current land owners. The proponents fail to recognise that compulsory acquisition under the Development Act is not an option for private enterprise.

Site entry and exit points are separated by some 760 m, minimising localised traffic impacts on Lipson Cove Road

The conflict between tourist traffic, current farming actions and traffic generated by the proposal will lead to unsafe conditions on Lipson Cove Road.

The site facilities will be shared with the Barngarla Determination Aboriginal Corporation as a base for a future Aboriginal Ranger programme.

It is assumed details of this arrangement are contained further in the application. Not with standing, the issue of vehicular access to the site for non-employees and the public needs to be defined and clearly designated as 'public roadways' for the purposes of the Road Traffic Act and insurance issues. If not, the access is clearly on condition of access at own risk.

Enclosed conveyors for proposed grain conveyors, whenever practical to install and operate. Note that lengths of conveyors where a tripper is used to feed a bunker stacker or the ship loader cannot have covers. Instead, those conveyors may include a type of wind guard to reduce dust generation.

The mitigation of grain dust (ie fugitive dust) is a critical environmental factor, given the sensitivity of the marine environment and existing coastal infrastructure. An appropriate engineering solution of an enclosed negative air pressure facility is required.

Approximately 30,000 litres bulk diesel fuel tank for power generation and 10,000 litres bulk diesel fuel for site machinery and equipment.

It is assumed these facilities are to be suitably bunkered to ensure no marine or environmental damage in case of spillage etc

2 x 1.5 MW diesel generators for on-site power generation

It is noted that the facility will be reliant upon self generation of power using diesel. It is assumed that the pollution thus generated through diesel exhaust and its known environmental and health impacts will be mitigated against. This is especially relevant in the context of the proximity of Lipson Cove and Rogers Beach camping grounds. (Especially Rogers Beach being very close to the generators.)

It is assumed that appropriate on-site weather observations over a period of 12 months have been undertaken to determine the dispersion of such pollutants such that any health impacts have been mitigated against. Unfortunately this is not the case as reference is made to the installation of such a facility in the construction phase.

Further, it is assumed that the system will have suitable noise reduction capabilities so as to not impact on wild life or human occupancy of the Cove or Roger's Beach in the immediate vicinity or the occupants of nearby residences. It is also assumed that ultra low frequency sound (infrasound) emitted from such plant will not impact upon these locations.

In addition, it is assumed that the local resident likely to be impacted by continuous noise and light pollution have been consulted and provided with scientific evidence of actual noise (and vibration) levels and its dilution over the relevant distances for the source, thereby not being an issue.

Fire Service requirements to be determined through fire engineering study. Provision made for fire service tanks.

Given that the proposed facility is to be constructed in a primary production area, the issue of fire prevention is a critical consideration not only to neighbours, but to the wider surrounds. It is not sufficient to suggest that the requirements will be determined through 'fire engineering study'. The study and its results MUST be included in the contents this PER.

The current perception being that fire safety appears to be an afterthought and 'we will get around to it'. Such a perception clearly suggests a lack of confidence in the proponents to meet their public obligations.

The recent fire events should raise the importance of clear and concise fire prevention strategies inclusive of access to water (mains water?) for the purpose of fire fighting.

It is noted that facility will include the construction of silos. It is well known that grain dust, given the right circumstances is highly combustible. Such circumstances add to the necessity to declare as part of the application a complete fire management mitigation strategy.

It is assumed that the adjacent landowners have been consulted as to the planned fire/emergency provisions being proposed so that there is no risk to their properties in the event of fire (or worse, a chemical spill or explosion).

1.3 Why Port Spencer?

The prime driver for the Evaluated Project was to provide a route to market for iron ore, with a secondary driver of creating a new export path for grain. A detailed analysis was provided in the PER regarding the port options assessed, which showed why the Port Spencer site was preferred. Given the Proposed Amendment comprises grain only receipt, storage and export, an updated analysis is provided in Table 1-2.

It must be recognised that the original application examined available ports at the time (2010-11).

It must now be acknowledged that Lucky Bay is operational and a competitor and Cape Hardy has Development Approval , both of which supersede the Centrex approval.

The analysis of port options provided in table 1.2 is clearly not comparing apples with apples. It is an exercise of attempting to promote the Pt Spencer case as a viable alternative.

- 1 The existing facilities at Pt Lincoln, Thevenard and Lucky Bay are operational.*
- 2. The assumption that somehow the green house effects of road transport of grain to Pt Lincoln, Thevenard and Lucky Bay is an issue, but now to Pt Spencer would reduce the green house input. Simply put there is no advantage shown to favour Pt Spencer over the other destinations. In fact, should Pt Spencer be constructed, then there is every likelihood that green house inputs would increase due to additional truck en-route and the need to generate power using diesel fuel. The argument is not sustainable.*
- 3. It is noted that the proponents claim Cape Hardy (private enterprise) does not have sufficient land suitable for grain storage facility. Perhaps the proponents of Cape Hardy require the land for their grain partner's use. A fact not mentioned in the comparison table.*
- 4. Comparing access to ports such as Whyalla, Pt Lowly, Pt Pirie, Wallaroo and Pt Adelaide is a non sustainable comparison due to distance (financial costs and emission impacts). This is clearly the apples and oranges scenario in order to confound readers.*
- 5. The real question being is Pt Spencer financially and environmentally sustainable given the existing facilities and in the knowledge of the approvals for Cape Hardy and its development regime?*

1.4 Alternatives Considered

A detailed assessment of weather related risks, being a combination of wind, wave and rain data, resulted in land based techniques being selected as the lowest schedule, cost, safety and environmental risk methods.

It is noted that a 'detailed assessment of wind, wave and rain data.....'. The issue being, as pointed out in response to the original PER, rain data was not representative of the site. It was a replication of the data

pertaining to Poonindie (Pt Lincoln Airport) some 70 km south of the site. Local records would suggest a very different rain scenario to that used by Centrex.

This highlights the lack of credibility of using the previous Centrex results rather than conducting actual rainfall data collection over a period of at least 12 months on site.

There has been no evidence of on-site weather recordings being undertaken by the proponents.

It would appear that the proponents do not understand the differing densities of grain dust to iron ore dust as it would seem that they are considered to be the same. Dispersion distances for less dense materials are the issue at hand.

Whilst the approach of using a causeway increases the area of seagrass that is impacted compared with the Evaluated Project, it does create an additional rocky reef area all around the structure and the increased sea grass loss will be offset. The net construction cost saving of replacing 220 m of steel structure with Rock Causeway has been costed at approximately \$10 million after allowing for all costs including causeway construction and the necessary offsets due to sea grass impacts.

The causeway is in fact a groyne as pointed out by the consultant's report Volume 5, Appendix C.

It is noted that a significant volume of rock (metamorphic or granitic) will be 'excavated' for the purpose of construction of the silo(s) and the construction platform, it appears that the dumping of the excess rock into the marine environment is seen as a cost effective use of the rock at the expense of the marine environment.

THERE IS NO DISCUSSION AT THIS POINT OF THE ENVIRONMENTAL IMPACT OF CREATING THE 240METRE CAUSEWAY other than to suggest it will be minimal and can be compensated by payment of monies to the 'SEB fund'.

Where is the environmental impact assessment of creating the groyne/causeway and thence the remaining structure using the methodology as outlined?

It would appear that the construction of the seaward portion of the jetty complex is predicated on pile driving and drilling. The first issue being pile driving into igneous rock and secondly the generation of colloidal particulates as a result of the drilling program with its impact upon the marine environment being undisclosed at this point in the debate.

Further, what is the impact of the causeway upon movement of sand in the vicinity with particular reference to sand movements at Roger's Beach and Lipson Cove? There has, to our knowledge, been no on-site scientific studies undertaken to determine the impact of such a structure in the environs.

What impediment to the natural progress of listed marine species does the proposed causeway introduce into the otherwise pristine environment?

It appears for a paltry saving of \$10M the natural environment will be forever impacted by the construction of a rock groyne/causeway.

.....representing a reasonable balance between environmental impact and commercial, constructability and schedule risk issues

It is strongly suggested that there is not a reasonable balance between the environment and commercial considerations.

The suggested sale of the excess rock (crushed) appears to be a viable option, given the prospect of a local contractor(s) being interested in such a proposition.

1.7 Original Conditions and Reserved Matters

(b) road upgrades for the Lincoln Highway, Swaffers Road and associated roads (including overtaking lanes, turning lanes and intersections), finalised plans, drawings, specifications and financial arrangements (including Deeds of Agreement with road authorities), which are to be prepared to the reasonable satisfaction of the Department of Planning, Transport and Infrastructure and the District Council of Tumby Bay (refer to Conditions and Notes to Proponent below)

The Proposed Amendment does not make use of Swaffers Road, instead proposing access along Lipson Cove Road. It is suggested that this item be amended to substitute reference to Swaffers Road with Lipson Cove Road.

The case for the use of Lipson Cove Road rather than Swaffer's Road is major variation to the PER.

Documentation to this point in the application fails to justify the change. In fact, it introduces a major traffic hazard being the conflict of local use, tourism (caravans) and transports (B doubles and triples) on a limited width road bounded by a water supply pipe on one side and communication cables on the other.

Given that the original conditions and reserved matters identified certain requirements, it is noted that the proponents have clearly not addressed these requirements in their application for amendments. The expectation clearly being that they have had the opportunity to do so and chosen not to.

(c) road upgrades for the Lipson Cove Road, finalised plans, drawings, specifications and financial arrangements (including Deeds of Agreement with road authorities), which are to be prepared to the reasonable satisfaction of the District Council of Tumby Bay and the Department of Planning, Transport and Infrastructure (refer to Conditions and Notes to Proponent below)

No Change

The original proposition was for Lipson Road to be used for normal vehicular access to the facility only, a situation which was supported. Such removes the hazards associated with multiple vehicular activity as proposed.

(d)a Road Maintenance and Monitoring Agreement for Swaffers Road and the Lipson Cove Road (including associated intersections) between Centrex Metals Ltd and the District Council of Tumby Bay (refer to Conditions and Notes to Proponent below)

The Proposed Amendment does not propose using Swaffers Road as an access to site and as such, reference to Swaffers Road is requested to be removed from this item. 'Centrex Metals Ltd' should be replaced with 'Peninsula Ports'.

Reference to the deletion of Swaffers Road in the PDA should not be actioned until and if the alternate proposition is agreed by Government despite the opposition of local stakeholders.

(e) road upgrades for the Balumbah-Kinnard Road and associated roads (including intersections with the Lincoln Highway), finalised plans, drawings, specifications and financial arrangements (including Deeds of Agreement with road authorities), which are to be prepared to the reasonable satisfaction of the District

Council of Cleve, the District Council of Tumby Bay and the Department of Planning, Transport and Infrastructure (refer to Conditions and Notes to Proponent below)

Not considered applicable as these related to the location of the mine site, as such it is respectfully requested for this item to be removed from the decision.

(f) road upgrades for the Murdinga-Murlong Road and associated roads (including intersections with the Birdseye Highway), finalised plans, drawings, specifications and financial arrangements (including Deeds of Agreement with road authorities), which are to be prepared to the reasonable satisfaction of the District Council of Cleve and the Department of Planning, Transport and Infrastructure (refer to Conditions and Notes to Proponent below)

Not considered applicable as these related to the location of the mine site, as such it is respectfully requested for this item to be removed from the decision.

(g)a Road Maintenance and Monitoring Agreement for the Balumbah-Kinnard Road and the Murdinga-Murlong Road between Centrex Metals Ltd, the District Council of Cleve and the District Council of Tumby Bay (refer to Conditions and Notes to Proponent below)

Not considered applicable as these related to the location of the mine site, as such it is respectfully requested for this item to be removed from the decision.

The suggested removal of these reserved matters (e), (f) and (g) is not supported as these roads (and others) are key transport routes for grain to the proposed port.

It is acknowledged that these roadways would become redundant to a greater extent for Pt Spencer, if and when Cape Hardy grain facility becomes operational and the haul road were to be used as a major transport corridor for not only iron ore but also grain.

A detailed transport management plan for the proposed Pt Spencer needs to be a feature of the application.

(h)the Construction Environmental Management and Monitoring Plan (CEMMP) for the pre-construction and construction phases, the finalised and consolidated version of which is to be prepared to the reasonable satisfaction of the Environment Protection Authority, other relevant government agencies and the District Council of Tumby Bay (refer to Conditions and Notes to Proponent below)

Draft Construction Environmental Management Plans have been prepared by the primary contractors proposed for the development and are provided for reference with this amendment application (refer to Appendix B). As such, it is respectfully requested that this be removed from the decision as the conditions adequately address the matter.

The issue being that the CEMMP is subject to public scrutiny as part of the application and forms part of the decision making process. As such it should remain.

The impact of blasting both on land and in the marine environment are major differences of approach in the proposal. Noise, dust and under water vibration clearly are issues to be addressed

It is noted that some of the plans referred to are but copies of plans used in other places. The specific plan for Pt Spencer is to be developed in absentia of public scrutiny.

(i)the Operational Environmental Management and Monitoring Plan (OEMMP) for the operational phase of the development, the finalised and consolidated version of which is to be prepared to the reasonable

satisfaction of the Environment Protection Authority, other relevant government agencies and the Tumby Bay District Council (refer to Conditions and Notes to Proponent below)

No change

The claim of no change needs to be questioned given the proposed changes to the project as identified above.

The management of sand movements given the proposed construction of the 240m groyne/causeway is a critical environmental impact to Lipson Cove and potentially Lipson Island both of which are incorporated into the Lipson Island Marine Conservation Park.

The impact of grain dust on the marine environment is a critical factor not discussed in the previous approval or for the purposed of impacts upon listed species under the EPBC Act.

*The environmental impact of power generation by use of diesel needs to be monitored given the proximity to two very popular tourist locations and local (adjacent) primary producers whom are required by law to **certify their produce is chemical free.***

Given the fact that the original proposal was approved in 2012, the proponents have had adequate time to actually develop said plans which should also be an attachment to this application.

(j)the Revegetation and Rehabilitation Plan and Vegetation Management Plan, finalised and consolidated versions of which are to be prepared to the reasonable satisfaction of the Native Vegetation Council and the Eyre Peninsula Natural Resources Management Board (refer to Conditions and Notes to Proponent below)

That the significant environmental benefit is likely to be provided via direct payment into the Native Vegetation Fund for at least some of the proposed clearance. It is suggested this condition be reworded to give effect to this intent.

The conclusion to be drawn from this response is an unequivocal position of environmental vandalism through firstly blasting the landscape in order to achieve a platform for construction and the silo construction and the subsequent construction of what can be described as unsightly bunkers and infrastructure which is considered to be a blight on an otherwise pristine 'natural although de-vegetated landscape'.

Furthermore the proponents are promoting the view that money can buy immunity from having to provide and maintain suitable native vegetation to screen the facility.

In addition, it is assumed that the proponents are aiming to buy their way out of providing a solution to the impediment of sand movement and associated environmental impacts caused by the construction of the causeway.

Clearly such proposed actions are contrary to the public interest.

(k) a Management and Monitoring Plan for Rogers Beach, which is to be prepared in consultation with the District Council of Tumby Bay and to the reasonable satisfaction of the Department of Environment, Water and Natural Resources and the Eyre Peninsula Natural Resources Management Board

No change

The previous comment (j) above is equally applicable to this clause. The issue is not limited to Rogers Beach, but should also include Lipson Cove.

See additional comments on sediment movements further in this response.

(m) a Fire Management Plan, which is to be prepared to the reasonable satisfaction of the Country Fire Service

No change.

Clearly the proponents have had sufficient time in which to prepare and include a fire management plan having regard to the risks which have been identified with such a facility. The question being why is it not included and why is it that the community does not have an opportunity to comment upon its credibility especially in light of recent fire experiences?

1.8 Community and Stakeholder Engagement

The Proposed Amendment is of strong interest to stakeholders and the community of the Lower Eyre Peninsula given the potential benefits to grain growers in the region. Taking a 'no surprises' approach to the Proposed Amendment, and that of engaging early and regularly, has been the approach in the development of the Amendment to PER.

It is noted that 'stakeholder consultation' with the community of Tumby Bay has been limited to two 'public' meetings, the first attended by only a few community members and the second where it is reported very limited support for the proposition as presents was the consensus of those attending.

It is known that consultation with two of the three property owners on Lipson Road has not occurred.

It is acknowledged that a further public meeting in Tumby Bay will be held on 17th Feb 2020, a few days prior to the closing date of submissions.

With respect to the quoted 'strong support from stakeholders', the question must be asked what is the profile of these stakeholders? Are they shareholders in either Free Eyre or the Port. If so, then clearly they are voicing support in protection of their financial interest.

The actual benefit to grain growers has yet to be established by an independent authority. At an estimated average benefit of \$3.50 a tonne and an unsecured quantity of grain to be delivered, it would appear much of what is being promoted is supposition.

Then there is the action of a principal stakeholder, being Council, whereby it sought to have its previous support for Pt Spencer revoked. The same outcome was also sought by the Association.

.....a considerable amount of stakeholder and community engagement has been undertaken during the development of the Proposed Amendment.

Despite indicating an interest in the process in writing, the Association has not asked to be engaged in the development of the PER application, despite its involvement in the original Centrex proposal.

It is claimed in table 1.3 regular project presentations have been afforded to the Tumby Bay Residents and Ratepayers Association Inc. As indicated, the Association representatives have attended two meeting over a period of two years, the first held in the Tumby Bay Hotel, the second in the Area School. This is hardly described as 'regular'.

Clearly there is a credibility issue with such statements.

Table 1-4 Stakeholder and Community Engagement Key Matters Raised

A sediment transfer modelling study has been completed that confirms the impacts are expected to be 10-20 mm per annum (or 0.5 m-1 m per 50 years) of sediment build up immediately south of the causeway, similar erosion immediately north of the causeway, with some localised pockets of greater erosion potential. This will be monitored regularly, and the need to move sand from the south to the north is expected to be infrequent, due to the low rates of accretion and erosion. (underlining added)

It is noted that a desk top model of sediment movement has been undertaken with the aforementioned outcomes identified.

It would appear that the data used in generating the 'model' bears no relationship to the reality of circumstances in the area. Sand movements at Lipson Cove are well documented and show seasonal variations in the order of 1-1.5 metres depending on prevailing climatic conditions. Such movements are responsible for the periodic exposure of the wreck of the Three Sisters vessel.

The credibility of the modelling seems to be questionable given the publicly known extent of movement.

The suggested mitigation strategy of pumping sand on an infrequent basis appears to be highly questionable.

For a cost saving of \$10M it would appear that the chosen method of construction of the wharf facility is high questionable on both economic and environmental ground.

The cost of sand re-deposition over the life of the proposed port facility requires to be identified and factored into the economic/financial modelling to establish the project's financial viability over the proposed life span of the facility.

Additional comments on the 'groyne effect' (Volume 5, Appendix C) will be made later in the submission.

Private access to Rogers Beach will be maintained. Noting that this is assumed to be provided by the gazetted public roadway to the west of the subject land.

The issue has been identified previously in this response. It is noted "private access to Rogers Beach will be maintained and it is assumed to be provided by the gazetted public roadway to the west of the subject land".

The gazetted public roadway to the west of the port boundary does not provide access to Roger's Beach.

Unfortunately this statement provides no information as to the actual location of the access roadway alluded to nor to the ownership of the roadway and its maintenance.

It is known that access was provided by agreement of the landowner, now deceased, across land which was subsumed in the actual land purchased originally by Centrex for the purpose of construction of the port facilities. The access point is no longer available given the design of the facility and the port's property boundary.

Clarification is required as to the exact point of access to Roger's Beach in light of the development.

The grain will be loaded onto ships using covered conveyors which will prevent wind blowing any product around.

It is assumed that the conveyors will operate in a negative pressure environment thereby reducing (fugitive) dust escaping to the outside environs outside of the actual ship loader.

It is also assumed that the grain loading facility of the conveyor will also operate within a negative pressure environment again to reduce environmental contamination.

Upgrade the road (Lipson Cove Road) managed through an environmental management plan.

There is a paucity of information as to how this will be achieved; who will pay and maintain the 'new roadway', let alone addressing the safety implication arising from the proposed 1000+ vehicular movements per day.

The approach to water supply and management at the site is intended to avoid adverse impacts on the watershed and comply with the measures put forward in the Evaluated Project

It is noted that this section fails to identify the fact that SA Water is not available to the site.

It is further noted that the reference to the Evaluated Project (Centrex Model) is taken as gospel, despite the fact that rainfall data was grossly misrepresented. It is assumed that the proponents have undertaken a review of such data and adjusted their modelling and designs accordingly.

It is strongly suggested that reliance upon previous data with respect to rainwater catchment and reuse for day to day operations over a year is fundamentally flawed

These issues were raised by the public in submissions to the original PER, but apparently ignored.

It is further noted that the Port Spencer development also included approval for the construction of a small desalination plant to service the project's requirements. It is also noted that a graphite project to the north (Siviour's Graphite) have sought approval to construct a small desalination plant to supply their needs rather than to rely upon the limited supply of water remaining in the Basins around Pt Lincoln.

A conditional of approval, if granted, should include the requirement to construct such a facility, noting additional development approvals will be required.

Some ballast water is required to be in the ship to aid mooring, and this water will be discharged at the port before loading, however will be exchanged local seawater. (underlining added)

It is therefore assumed that potentially contaminated water will be discharged at the port site thereby providing a source of contamination with feral marine organisms/species into an otherwise pristine marine environment and adjacent to the marine conservation park in contravention to current bio-security requirements.

This means access to Lipson Cove Island and Rogers Beach by others will be maintained at all times.

It is understood that access to Lipson Island is actually prohibited, unless the person or persons have obtained the appropriate permit from the relevant authority. It is unfortunate that information provided in this application is factually incorrect.

Does the 2 nautical mile exclusion zone impact the boundary of the Lipson Island Marine Conservation Park?

It should be noted that the Lipson Island Marine Conservation Park is NOT part of the Joseph Banks Marine Park.

Access to Roger's Beach remains unclear and the aforementioned statement does nothing to improve the position.

2. Reason for the Amendment

Centrex Metals has made the decision to transition out of iron ore on the Eyre Peninsula, meaning that the Evaluated Project will not proceed in its current form.

Grain handling and export capability formed part of the infrastructure proposal included in the Evaluated Project. FEL was selected by Centrex Metals in 2010 as the grain grower partner to work with Centrex to develop the grain receipt and exporting precinct at Port Spencer at that time. The inclusion of grain receipt and export are not well described in the PER, as the prime driver for the Evaluated Project was to provide a route to market for iron ore.

The above statement is a representation of the facts of the time EXCEPT for the withdrawal of Free Eyre Ltd from the venture following a detailed financial evaluation of the requirements for a grain handling facility in conjunction with the Centrex model.

The inclusion of a grain facility is NOT well described in the original application, especially the assessment of environmental factors; the EPBC referral or the economic impact of such a venture.

The EPBC referral (Stage 1 and 2; EPBC 2012/6590) is based upon the port being an export facility for iron ore and 'may' be a multi commodity port inclusive of grain.

The environmental impact of iron ore being the significant factor under consideration. The potential impact of grain/grain dust was not addressed.

It is noted that the EPBC approval has been transferred to Peninsula Ports Pty Ltd as of 13 November 2019 without amendment.

2.1 Grain Demand and Export Capacity

The Eyre Peninsula produces an average of 2.7 million tonnes of grain per year,

Grain is predominantly exported via supply chain storages and port infrastructure at Port Lincoln and Thevenard

Approximately 1.6 million tonnes of grain grown on the Eyre Peninsula is expected to be freight advantaged to Port Spencer due to the proximity of Port Spencer as compared to Port Lincoln or Thevenard.

Export capacity on the Eyre Peninsula is constrained between December and April, when grain prices are at their highest (counter season for international markets). Further, a lack of grain handling competition and an inefficient supply chain, particularly with the closure of the rail lines, means there is significant scope to provide economic benefits to grain growers on the Eyre Peninsula through a suitable export alternative.

The above statements represent the basis for Free Eyre and Peninsula Ports to pursue the said PER amendments and subsequent PDA approvals.

The basic assumptions of 1.6M tonnes with an expected freight advantage is speculative at best.

The lack of competition is a common complaint on the Peninsula. However, it is suggested that the imposts faced by the current major provider as a result of government regulation is clearly a major factor in economics of grain handling in this region. This has been complicated by the recent demise of an antiquated railway network (narrow gauge) and associated costs of upgrading.

A recent analysis of the cost of service from the farm to the export facility in Pt Lincoln has identified these cost factors and their impact upon transport costs per tonne.

It also has been noticed that the transportation of the 2019/20 harvest to Pt Lincoln has been highly efficient using road transport, predominantly at night, despite the demise of the railway.

It is suggested, therefore, a more detailed analysis of the costs associated with delivery from the farm gate to the proposed port be undertaken having regard to the findings of the recent study; the cost of government regulations having to be met by the current provider being removed to ensure a level playing field (removal of anti-competitive factors); the impact upon local government roads in terms of maintenance and repair and road upgrades to cater for B-doubles and triple road trains to the proposed port facilities, in order to justify the suggested 'benefit' to farmers of an average of \$3.50 per tonne reduction in transport costs.

2.1.1 Impacts on viability of other operational facilities or facilities under construction

This issue is addressed in part by the previous statement. However, the reality of the construction of a multi commodity port at Cape Hardy with the associated suggested industrial hub and potential rail link to Whyalla and the national rail network, appears to be the most cost effective solution to the issues identified on Lower Eyre Peninsula being increased employment opportunities in a range of industries; greater access to an export facility and access to an import facility, little of which is achieved through the Pt Spencer proposition.

It is noted that Regional Development Australia Western Eyre Peninsula (Whyalla) supports the development of Cape Hardy in preference to Pt Spencer.

The secondary potential impact of freight advantaged ports such as Port Spencer and Cape Hardy, is that there may become (over time) a lesser reliance on up-country storage such as those owned and operated by Viterra.

Another way of viewing the suggested change is that the new management model for grain producers involves the potential requirement for greater on farm storage capacity in order to accommodate higher demands for access to road freight transport to an export facility.

Is this the new model? Have the producers been consulted about the viability of and costs associated with the 'new model'?

2.2.1 Increase the Low Economic Returns for Grain Growers

The opening paragraphs of this section of the application reflect the reality of growers on Eyre Peninsula.

The ACCC and ESCOSA enquiries have highlighted impediments within the current system, inclusive of the anti-competitive regulatory regime (cost drivers) imposed on the existing provider which apparently are not applicable to new comers in the industry.

By the proponents own admissions, the assumptions underlying the argument that Pt Spencer will contribute significant benefit to producers are theoretical in nature, difficult to predict and may or may not be ultimately realised, provides little credibility to achieving the proponent's desired outcomes as expressed in this amended PER.

It is in the public interest that the proponents provide realistic and credible economic outcomes where equivalent conditions to all parties apply (the apple with apples comparison scenario) and not suppositions that may or may not be achieved.

The market will determine, for the most part, the costs/prices equation applicable at the time.

2.2.2 Provide a more economic route to market for a significant grain catchment zone

The suggested modelling provided in this amended PER is one of high risk and uncertainty of assumptions made as identified in the preceding section.

The application has a problem with credibility based upon the 'assumptions' being made.

3. Amended Planning and Environmental Legislation and Policies

The Evaluated Project remains an authorised development in accordance with section 48 of the Development Act.

In accordance with the actual Government Gazette Notice, the Evaluated Project has Provisional Development Authority subject to the reserved matters and conditions imposed.

Prescribed activities of environmental significance to be assessed by the Environment Protection Authority (EPA) as part of the formal amendment process are expected to be the same as for the original PER.....
Dredging (for jetty construction only).

The definition of prescribed activities of environmental significance would appear to cover a multitude of issues. It is assumed such issues have already been identified and are included in the amended application, even though they are not referenced at this point.

The environmental impact of the groyne/causeway vs a metal construct is a significant case at point.

It is understood no dredging would be required for the amended project, yet it is identified here. There is lack of detail pertaining to the need for and impact of, dredging.

3.1 Development Plan Assessment

3.1.1 Tumby Bay District Council Development Plan

Table 3-2 Changes to District Council of Tumby Bay Development Plan applicable to the Proposed Amendment.

The proponents have provided a lengthy analysis of current Development Policy of the District Council of Tumby Bay with the commentary of reasonable compliance with the terms and conditions therein.

The definition of 'reasonable compliance' is clearly left to be determined by the reader.

However the key in this debate is two fold:

- (1) the proposed development is being judged against the provisions of the Development Act which by its intent, over-rides Council's position, and*
- (2) the proponents fails to mention the FACT that the District Council of Tumby Bay has moved to have the existing PDA withdrawn/terminated following the departure of Centrex Metals from this State and the emergence of the Iron Road/Cape Hardy project. The Council has withdrawn its support for the Pt Spencer proposal, a position which is clearly documented in the public record.*

On the basis that Council represents the view of the community at large, clearly the withdrawal of support for Pt Spencer suggests that the proponents claim of significant stakeholder support exists is not credible and that the project does not have development merit.

Table 3-3 Planning Assessment for the Proposed Amendment – Planning and Design Code

The design of the project is cognisant of the site's location within an important ecological, commercial, tourism and recreational locality.

If such a statement was credible, then why hasn't the proponent's given due recognition to the environmental and ecological impacts of the construction of the groyne/causeway adjacent to (a) the beach environs of Roger's Beach and Lipson Cove and (b) the Lipson Island Marine Conservation Park?

It is local knowledge that no additional environmental assessments have been carried out at the site or its neighbouring environs to either validate the 'existing record' or to correct any short comings identified in the public responses to the previous application.

It appears that a total reliance upon the 'assumed' accuracy of the Evaluated Project is the norm.

The revised jetty design incorporates less piers and a reduced total length, resulting in less disturbance to the marine environment. However, introduction of the causeway will increase seagrass disturbance compared to the Evaluated Project.

There appears to an inherent conflict of outcomes in this statement. The construction of a 240m rock groyne/causeway will have a significant impact(disturbance) upon the environment with significant alteration to sediment movements, the destruction of the existing seagrass; the disruption to the normal pathways the whales use in this vicinity (noting the use of Lipson Cove as a staging point and calf mothering location. (the 'groyne effect')

It is noted that the previous (Centrex) model had significantly less impact upon the marine environment to that which is being proposed.

Resultant turbidity and sedimentation disturbance have been modelled and indicate an increased effect immediately south of the wharf, with no significant change at Rogers Beach, Lipson Cove and Lipson Island, where minimal effects on beaches are predicted.

Comment has already been made with respect to increased turbidity (and the colloidal nature of such turbidity) with its impact upon sea grass and the marine environment per se.

The construction of a groyne (causeway) of 240m length has the potential to impact the beaches identified as movement of sediment (sand) in this region is significant.

The issue of any effect caused by berthing of vessels (increasing the groyne effect) is not discussed.

Local knowledge would suggest the 'minimal effects on beaches are predicted' has no credibility.

All built form proposed is situated approximately 1.5km from the nearest Conservation Park (Lipson Island).

The issue of the exclusion zone of 2 nautical miles radius around the wharf has been commented on previously with the question being would this exclusion zone intersect with the boundary of the Lipson Island Conservation Park.

Given the above statement (taken as fact) then clearly the exclusion zone impacts significantly on the marine environment of the Lipson Island Marine Conservation Park.

It is suggested that such a development is contrary to the Marine Park's legislation and thus should be amended accordingly. The exclusion zone for all forms of shipping is the park's boundary.

It is assumed that the proponents will adjust the exclusion zone for the port accordingly. If this has a significant impact upon berthing of shipping when the wind is in the north, ie using the southern aspect of the wharf, then clearly the design has significant limitations and may well be the reason the Centrex model had a berth the ran north south.

the Proposed Amendment will Overlay	Hazard Risk Minimisation PO 2.1, 2.2, 2.4 Coast Protection Works PO 3.1, 3.2	DTS/DPF 2.1, 2.2	. Natural coastal processes will not be unduly impacted; however, sand transfer may be required as part of recommended beach monitoring.
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As commented upon earlier, the statements made are conflicting in their nature as illustrated by the above reference to 'natural coastal processes'. The impact of the proposed causeway (groyne) will be significant to the extent that sand transfers may be required. Is this not a situation where 'natural coastal processes Will be duly impacted?

The issue goes to the credibility of the research or lack thereof pertaining to the construction of a groyne/causeway in this location as opposed to the original (Centrex) proposal.

...however, it is noted the Proposed Amendment does not necessitate coast protection measures

Despite the so called modelling undertaken which identifies significant sediment movements on either side of the groyne/causeway, the proponents maintain their position that proposed amendment does not necessitate coastal protection measures.

Clearly the proponents are devoid of acceptance of any responsibility for environmental impacts associated with the construction of the groyne which may well lead to the denuding of Lipson Cove beach and environs which are part of the Conservation Park, let alone any impact upon Lipson Island per se.

While the change in sediment transport and coastal processes is likely to impact the near shore benthic habitats, the significance of these impacts are determined to be moderate in the context of the extent of the wider benthic habitats within the Spencer Gulf.

The community is not talking about impacts upon the wider benthic habitats of Spencer Gulf. Its focus is specifically upon impacts the proposed project will have on the local environment and what the proponents intend to do to reduce said impacts to the lowest practical level, including the redesign of the jetty complex to that of the Centrex whereby the environmental impact is minimised.

There is an engineering solution!

In addition, the modelling has demonstrated that any changes in the near shore sediment transport regime are not expected to impact Lipson Cove and Lipson Island to the south of the proposed development.

The question being, where does the proponent think the sediment (sand) in question will come from, given the known tidal movements in the area, if not from the Island or beach?

The potential for introduction of non-indigenous marine species associated with the Proposed Amendment is significantly reduced due to the revised construction methodology (majority of marine works being shore-based). (underlining added)

Clearly there exists the potential for non-indigenous marine species to be introduced into the marine environs as a consequence of construction and operational activities. It is noted that construction of the wharf requires marine based barges to be employed. The question being will the risk increase the longer these barges remain on site undertaking the necessary activities or not? They will be employed.

It would appear that the proponent's risk assessment is somewhat flawed, unless of course the barges are constantly rotated throughout the construction period, whereby the risks may well increase.

It is acknowledged the revised design will result in a higher level of seagrass loss than the Evaluated Project (estimated to be 11,108 m² compared with 4,702 m² for the seagrass meadows). Impacts to seagrass (and all marine habitat) will be offset through the Native Vegetation Act SEB offset process

(1) Is it the proponent's intention to buy redemption for the destruction of the sea grass loss identified or (2) is the alternate engineering solution (as proposed in the Centrex model) the preferred and more socially acceptable model whereby the destruction of sea grass and any other marine ecology is minimised?

The aforementioned discussion of the impact of mobile sediment (sand) is also a major factor in considering the fate of the seagrass either side of the groyne. If the groyne is built, will the seagrass in the vicinity of the structure be covered by mobile sand? Such a scenario appears not to have been considered.

The environmental damage may well be greater than implied in the PER amendment

The Proposed Amendment poses a reduced risk to marine mammals when compared to the Evaluated Project, due to the significant reduction in piling required for wharf construction and subsequent reduction in noise and vibration in the marine environment

Clearly the assumption being that marine mammals will avoid the solid groyne area, whereas with the Evaluated Project, they were actually free to navigate between the pylons of the wharf. Is not this a contradictory statement?

It is acknowledged that the reduction of noise and vibration will be reduced when considering the construction of the pylon section of the proposed wharf. Is it not a matter of convenience to overlook the noise and vibration generated by the dumping of a huge volume of rock into the marine environment in the construction of the groyne/causeway?

Is it not true that the dumping of the rock will significantly increase the turbidity of the water and potentially significantly increase the concentration of colloidal suspensions, further damaging the marine environment?

Obviously these matters appear to have been overlooked in the preparation of the table.

The proposed causeway will disturb seagrass habitat beneath its footprint and shading effects will result from the wharf structure. In context with the wider environment, however, the overall level of effect is comparable to the Evaluated Project.

It is noted that additional impacts upon the marine environment due to shading attributed to the causeway.

However, the Centrex model provided for an open structure whose shadow footprint would conceivable be less than that of the proposed causeway (broken shadow compared to solid shadow). In the absence of evidence to the contrary, the conclusion drawn between the two situations is clearly not comparable as claimed.

The Proposed Amendment does not necessitate the need for dredging during operation – consistent with the Evaluated Project

Previously the issue of dredging was mentioned as a requirement. It is assumed as a consequence of this statement, that dredging is not required.

Due to the modelled accretion to the southwest and erosion on the north-east of the development, a draft Beach Monitoring and Management Plan has been developed and is attached as Appendix C. Any beach management would be undertaken based on triggers identified in the plan to avoid erosion of Rogers Beach to the north.

There appears to be an issue of consistency arising when considering the impact of sediment (sand) movement in the study area. It is claimed a significant deposition on the southern side of the groyne and an erosion effect on the northern side.

As raised earlier, where does the sand deposited on the southern side of the groyne come from if not from the beaches of Lipson Cove and Lipson Island?

Is it the position of the proponents that sand erosion from Lipson Cove and the Island (ie within the Marine Park boundaries) and the consequential destruction of the Cove environs, is not of any significance to this project, (not forgetting that the exclusion zone for the Port intersects significantly with the Marine Park)?

The Proposed Amendment maintains public access to the coast.

Clearly this statement requires clarification as the boundary of the property precludes public access to Roger's Beach and the existing unmade public road does not provide access to Roger's Beach.

It is suggested that this statement is not supported by the actually layout of the facility whereupon access to Rogers Beach is not serviced by a roadway, be it within the boundary of the facility or external to it.

Then there is the question of border security arising from the fact that vessels visiting the port for the most part will have foreign registration and foreign national crews need to be addressed in relation to public access to the groyne or the beaches/foreshore below the boundary of the property

Access to Lipson Cove is not at issue as access is outside of the property via Lipson Cove Road.

The proposed built form will not compromise any located historic shipwrecks. It is noted the Three Sister Wreck has been previously positively identified and is located at Lipson Cove, over one km to the south of site.

It is acknowledged that the construction of the port facilities will not impact the wreck of Three Sisters. What will impact the wreck is the potential loss of sand from Lipson Cove as outlined within the response.

The modelling of sand movements from the South and the impact of the constructed groyne is of significant concern should replenishment of sand be not achieved. The wreck has been exposed on occasions as a result of the removal of significantly large quantities of sand.

Photographic evidence to this effect exists.

There is a risk that the proposed construction will expose the wreck and potential consequential damage or worse, vandalism.

The risk is real.

Of note also is the distance of the wreck site from the development (being 1Km). If this is true, then the clearly the exclusion zone lies within the boundary of the Marine Conservation Park.

It is strongly suggested that an accurate map of the location be generated onto which is plotted the exact location of the boundary of the Marine Park, the groyne and the exclusion zone for the port.

Air quality and noise modelling undertaken for the Proposed Amendment demonstrates the facility can be operated to meet the requirements of the EPPs for air quality and noise.

It is assumed that the proponents have undertaken the necessary on-site meteorological observations over a period of 12 months in order to validate the claims made with respect to air quality and noise transmission. Unfortunately this is NOT the case as it is the need for a weather station is identified as requirement of operations.

Infrasound emissions from the facility do not appear to have been assessed and hence the impact on residential properties located in the vicinity of the proposed port are unknown.

Dust and particulate matter concentrations and distributions arising from the construction and operation of the port have not been articulated, leading to the question be re-asked, what are the environmental impacts of operational noise and pollution on residential properties in the vicinity and upon the camping grounds (especially in the context of the proposed upgrading of the Lipson Cove camping ground currently under consideration by RDAWEP and District Council of Tumby Bay)?

The causeway and wharf structures will maintain a low profile within the marine environment.

A 240m long rock wall (groyne) protruding into the marine environment to which an additional 200+m steel wharf extension is attached, is hardly a low profile structure. It will of course be lit with the appropriate navigation lights and operational lighting for night time loading, again, hardly a low profile structure.

Surely the proponents should be able to describe the facility for what it is, a functioning wharf of 400+ m in length with a grain conveyor and ship loading facility attached!

The Proposed Amendment will have a comparable impact upon the landscape and character of the marine environment.

It is assumed that this statement relates to a comparison with the Centrex model, except for the fact that any pollution arising will be in the form of grain dust and not iron ore dust, the impact upon the environment, to date has not been described.

The structures will be designed to withstand the severe environmental conditions expected.

This is a very significant statement. Obviously the proponents expect severe environmental conditions, being weather related conditions of wind, rain and storm.

If by their own admission, these events are expected to occur, what then are the consequential risks to the marine environs and especially to the transportation of sand? There has been no discussion or reference to the potential impact of such events on the marine environment especially in the context of impact arising from the construction of the solid rock groyne/causeway.

It is very much in the public interest to have articulated the impacts of storm events upon the proposed 'new' environment.

The impact upon listed species nesting on the beach or foreshore is not addressed.

The Proposed Amendment will not have an unreasonable impact on adjoining land due to noise or air emissions.

This is a rather profound statement in light of the information to date where the nature and concentration of emissions, being grain dust (and any insecticide used to treat the grain) and exhaust emissions from vehicular traffic and power generation and the dispersion of said pollutants is not indicated herein.

It is understood the proponents have used air quality data for Leigh Creek and the Adelaide CBD as reference points rather than carrying out the required on-site measurements. Both reference points are considered to be inappropriate, if not irrelevant to the actual location of the port.

Clearly this is yet another example of desktop analyses being used to provide inappropriate information is 'support' of the principle proposition.

Given that the adjacent landowner is heavily into the production of high quality lambs and wool together with a requirement to certify clean grain upon delivery to an export facility, there is significant interest in the issue of pollution arising from the proposed port site. Such interest dictates that on-site measurements are taken prior to the establishment of the port facility to establish a baseline from which any impacts arising from pollutants generated from the proposed activities can be identified, mitigated against or compensated for any loss of quality arising.

It is assumed that the application contains a full listing of chemicals to be used on the site together with their Material Safety Data Sheets.

It is also assumed that the Environmental Management Plan contains details of how the proponents plan to minimise, if not eliminate, any contamination to the environment, be it within their boundary or without, due to prevailing wind directions and other weather factors.

Unfortunately such details are not outlined in the debate to this point.

If the amended PER is reliant upon previous 'evidence' with respect to noise dispersion, then such evidence requires validation, given the significant change in the nature of the project. The Centrex model whilst initially reliant upon road transport of ore from the Wilgerup mine, was based to a much greater extent upon an export facility designed to export ore from Project Fusion (a mining enterprise based in the Koppio Hills and one which included the transport of ore to the port via slurry pipeline.

Any reliance upon the 'evaluated report' lacks credibility as the projects are clearly substantially different.

Road noise will be significant, especially to the residents on Lipson Cove Road.

Transmission of noise from the new activities of the proposed port (inclusive of infrasound) needs to be determined and evaluated in consultation with adjacent landowners.

Noise and dust transmission to Lipson Cove needs to be evaluated, especially if the proposed redevelopment of the area is actually undertaken.

Noise and dust transmission to Lipson Island needs to be evaluated over a twelve month period so as to take into account any migratory listed species using the Island and the impact thereon. It is noted that this aspect of the evaluated report documented the consultants' observations following a two day visit to the Island. It is also noted that said consultants indicated that a twelve month study was required, given the environmental sensitivities of the area.

This PER appears to be equally ill-informed of the environmental sensitivities of the area and the potential impact that the proposed action will have.

The Proposed Amendment will not impact known historic shipwrecks or historic relics.

Whilst it is true to say that the location of the historic wreck is some distance away (1km), the issue of concern is the impact of the proposed groyne upon sand migration on Lipson Cove beach and thence the location of the wreck. As mentioned previously, sand movement in this area is significant to the extent that the actual wreck can be exposed.

Where is the scientific evidence undertaken by the proponents over a period of twelve months to determine a base line of sand movements over the period/seasons, which leads to the conclusion that there will not be any impact?

The Proposed Amendment will have differing impacts to transport networks, the landscape and surrounding land uses as a result of the use for exclusive grain handling, differing site layout and peak period of operation. *Siting and Design* The development sea-side is situated no less than 1.4 km from the nearest sensitive land use (residential). The site measures a minimum of 450 m from the nearest sensitive land use (residential). Air quality and noise modelling undertaken for the Proposed Amendment demonstrates the facility can be operated to meet the requirements of the EPPs for air quality and noise.

It is noted that the proponents accept the fact the proposed amendments will have differing impacts to transport networks, the landscape and surrounding land use...etc.

The air quality and noise modelling demonstrates..... But there has been no consultation with the adjacent landowners, nor apparently, any actual scientific investigations undertaken at the residential sites (baseline measurements) or any proposed long term monitoring of noise/dust dispersion arising from the proposed activities, so the conclusion presented is simply supposition.

The Proposed Amendment will not impair commercial or navigational activities. It is acknowledged the Proposed Amendment will have a visual impact upon (informal) recreational use of adjacent public land, including beaches, however, the impact has been determined to be comparable to the Evaluated Project. The marine impacts due to the footprint of the marine infrastructure differ due to the inclusion of a causeway (refer to Section 1.3); a higher level of seagrass clearance will result, while potential effects on marine fauna will be significantly reduced. During operations impacts to the marine environment are primarily a result of accretion and erosion either side of the causeway. However, the overall marine impacts have been assessed as being comparable to the Evaluated Project

Environmental Protection The proposed marine structures are not expected to impact water circulation or exchange. (pp44)

The port's exclusion zone is just that, an exclusion zone. The impact upon commercial activities within this area is potentially real.

The destruction of the sea grass as a consequence of the groyne is accepted. However the suggested reduction of effects on marine fauna is not substantiated. The destruction of the natural habitat has been shown in other places to have an impact. More assumptions!

The conclusion that the impact of the 240m groyne as being comparable to the Centrex model lacks credibility.

The assumption that a 240m groyne will not impact water circulation or exchange is supposition in the absence of scientific data to substantiate the claim. Experience in other places (metropolitan Adelaide beaches) would suggest otherwise.

A few years ago, Tumby Bay Council built a small sandbag groyne on the south side of the town jetty and within a few months it had to be removed due to seaside undermining of the Lions Picnic area between the groyne and jetty. This area had to be repaired. Certainly calmer conditions exist in Tumby Bay than the open coast at Proposed Pt Spencer.

4. Proposed Amendment Description

Project construction is currently anticipated to commence in Q1 2020 and jetty construction is anticipated to take up to 18 months.

Somewhat optimistic given no approvals have yet been granted and no indication of whether the project is financially viable in the long term or that funds are available for construction and operation thereof.

Presumably a licence to extract (quarry) rock under the Mining Act is also required. No mention of this fact is made to date.

The Proposed Amendment proposes to use Lipson Cove Road as the only point of access to site.

This is a major departure from the Centrex model, one which brings all traffic related to the facility in conflict with that accessing an idyllic tourist location and existing farming traffic on a roadway of limited width and not designed to carry the suggested loads.

It is noted that whilst this is declared a major project under the development Act, compulsory acquisition of land for a private enterprise is not permitted under the Act. It is unclear whether the proponents have allowed significant funds for the potential purchase of land to facilitate the widening of the road and compensation for loss of income and other factors or whether the proponents are assuming that the adjacent land owners will simply provide access to said land.

The question does not appear to have been addressed is what happens if the adjacent landowners refuse to sell land for the roadway?

Site infrastructure is being designed to accommodate up to 1 MT per annum of grain receipt, storage and export.

There appears to be a host of assumptions made with respect to the volume of grain available to the proponents. The reality of 1M tonnes of grain being delivered to Pt Spencer on an annual basis is hypothetical at best.

Suggestions abound that the Lucky Bay storage facility at Lock has received some 900,000 tonnes of grain this season which would place the suggested 1Mt Pt Spencer delivery at risk, given that the Lock area is one of the prime target areas.

Design capacity and actual receipts of grain are two entirely different entities.

What is the business case, outlining the economic viability of the proposed port in circumstances where the anticipated volume of grain falls well below the designed capacity?

It is assumed that the business model contains actual contractual arrangements for the sale of grain received and a shipping schedule to match.

4.1.1 Transport to site

Grain will be transported via third party, independent trucking from a diffuse network of growers and potentially up-country storage. The catchment area for grain to be delivered to the site extends across the central Eyre Peninsula.

The business model employed is one where on site farm storage becomes the norm subject to access/availability of contract cartage.

Transport to the facility will be on Local Government maintained roads (in the main), noting that Council ratepayers will be responsible for the maintenance and repair of the road networks at no cost to the proponents.

The nett benefit to ratepayers (and the community) appears to be in the negative in the long term.

As previously noted, the target producing area, being central Eyre Peninsula appears to be well served by either the existing provider or the Luck Bay enterprise. so far as transport arrangements are concerned.

4.1.3 Product Storage and Reclaim

Fumigation will be achieved.....using phosphene.

It is unfortunate that the proponent is unable to correctly identify the fumigant that is proposed to used on site.

The chemical compound in question is phosphine.

The following is an extract from Worksafe Queensland outlining the hazards of use of this material.

It is assumed that the proponents are aware of these hazards and have included consideration the impact of a gas 'escape' from the facility on adjacent landowners or on persons visiting the area, inclusive of Rogers' Beach and Lipson Cove.

"Hazards

Metal phosphide tablets release toxic phosphine gas when they contact moisture (either in air or fluids). These chemicals are effective, cheap and easily applied. However, consideration must be given to the associated hazards from inhalation of toxic gas and explosion.

Inhalation

When phosphine gas is inhaled, it can react with moisture in the lungs to form phosphoric acid, which can be serious or fatal. Other symptoms of poisoning from inhalation are:

- coughing, chest tightness and headache
- double vision and dizziness
- nausea and vomiting.

Exposure may also lead to anaemia, bronchitis, diarrhoea and visual, speech and motor disturbances.

If a person has been overcome by phosphine gas, the rescuer must wear adequate breathing protection to avoid also becoming a victim.

Phosphine gas has an odour of decaying fish. However, do not rely on the odour of phosphine to determine whether the atmosphere is safe, because the odour threshold for phosphine is above the exposure standard. If the odour threshold for phosphine is detected, evacuate the area immediately.

Inhalation of the gas may occur from:

- leakage from fumigated silos or stacks
- inappropriate fumigation practices, including in enclosed sheds
- sleeping in trucks which have had phosphine placed in the load
- entering or examining silos or stacks immediately after fumigation
- leaving tablets and/or canisters in inappropriate places (e.g. floor of utility)
- cleaning and/or hosing out silos that have been used for fumigation when the product has not reacted completely.

Flammability

- Phosphine gas is flammable and may ignite when concentration in the air exceeds 1.8%.
- Flammability risk is greater when humidity is high, which may cause gas to be emitted quickly upon opening the canister.
- Extinguish all potential ignition sources before opening. Open the container slowly, with the top pointing downwind and away from the face or body.
- Materials added to tablets release carbon dioxide and ammonia with phosphine gas, which are designed to prevent spontaneous ignition of the gas under normal circumstances.
- Store canisters correctly to prevent deterioration of the tablets, thereby reducing explosion potential. Keep them in a cool, dry place away from all habitation.
- Phosphine gas also reacts violently with acids and with compounds containing fluorine, chlorine, bromine and iodine.
- Do not place tablets into tarped truck loads of grain.

All pest management operations should comply with the requirements of the [Pest Management Act 2001](#) and the [Pest Management Regulation 2003](#).

Other safety practices

Always read the label before use and follow the manufacturer's instructions.

- Obtain a safety data sheet (SDS) from your chemical supplier which gives information about treatment and symptoms of phosphine poisoning, as well as chemical data.
- Wear correct respirator and protective clothing (see SDS and label). Impervious gloves (e.g. PVC) should be worn when dispensing pellets by hand.
- Have an observer standing by who should have access to respiratory protection.
- Clearly sign all areas under fumigation as directed by the Pest Management Regulation.
- Inform workers that an area is under fumigation.
- Never use phosphine while grain is in transit.
- Monitor the atmosphere around fumigation using a hand pump and gas detector tube; concentration should not be higher than 0.3 ppm.
- Before moving grain after fumigation, ensure that all gas fumes have been dispersed. It is inadvisable to treat grain in airtight containers because of difficulties dispersing all gas fumes.
- Open phosphine containers in the open air, not in the shed or silo.
- Store containers appropriately.
- Dispose of spent phosphine tablets correctly.
- Never dispose of surplus or part-filled containers in tips or other rubbish by burial. Others, especially children, could locate the container and be exposed to injury risk.

- Never increase dosage to have a 'better kill' of insects.
- Always keep out of reach of children.

Respiratory protection

- A full-face filter respirator or self-contained breathing apparatus must be worn if concentrations exceed 0.3 ppm.
- The filter must be approved for phosphine and suitable for short-term exposure only (type B for inorganic gases).
- The filter should be immediately discarded and destroyed if there is any hint of phosphine odour inside the face-piece.
- Self-contained breathing apparatus should be used for operations, such as breakdowns, when longer exposures at higher concentrations may occur.
- Facial hair will prevent an adequate seal of the mask against the skin.
- A suggested life of one hour for filters, at usual exposure levels of operators in routine testing procedures, is a recommended safeguard.

Last updated

04 April 2017

<https://www.worksafe.qld.gov.au/injury-prevention-safety/hazardous-chemicals/specific-hazardous-chemicals/phosphine-fumigation>"

A number of options for reclaim from bunkers are being considered for the Proposed Amendment. The final system or mix of systems adopted will be governed by capital and technical constraints as the project progresses.

It is assumed that the proponents have identified the risks associated with each option and addressed mitigation requirements.

The problem being the audience to which this amended PER, namely the public, are unable to appreciate the actuality of the proposal given the 'wiggle room' based upon 'cost and technicality' which have not adequately been described.

Simply put, what are we, the public, providing comment on?

4.1.4 Ship-Loading

The silo-system will incorporate methyl-bromide fumigation when required for certain export markets

The proponents have introduced another fumigant (methyl bromide) into the 'process'.

It is known that the use of methyl bromide is banned in Australia as noted on the following website.

<https://www.environment.gov.au/protection/ozone/methyl-bromide>

Is it to be assumed that the proponents will be using a banned substance in contravention to the aforementioned Environmental regime?

All conveyors, bucket elevators and transfer points on the silo infrastructure will be fully enclosed and active dust capture systems are included.

It is therefore assumed that all such systems will operate within enclosed negative pressure environs to reduce fugitive dust (etc) to as low as possible levels (preferably approaching zero).

Impact on Lipson Island Marine Park.

It is noted that the port lies outside the limits of the Joseph Banks Marine Park, but it is unsure whether it impacts upon the limits of the Lipson Island Marine Conservation Park. Figure 4,2 fails to show the boundary of the Lipson Island Marine Park.

This berth is not a permanent mooring facility and it is envisaged that the GPV would be brought to Tumby Bay and dry docked in extreme weather or periods of inservice.

It is assumed that such a facility exists within Tumby Bay (or the Marina). The business plan for this component of the proposal appears to be not included, inclusive of the relevant approvals of Council should they be needed.

It is noted that the position of Council in the Centrex model was an unconditional support for the proposal. The question now being whether that approval remains, given Council has made representations to the Minister(previous Government) for a revocation of the PER?

It is noted in the 'port operations' summary (p49) there is no mention of the potential contamination of the marine environment through discharges from the visiting vessels or from the hulls of said vessels, a known source of exotic marine species to be avoided at all costs.

The issue may well arise when vessels used to support the proposed port transport exotic species to the Tumby Bay Marina as outline. This would be an environmental disaster.

4.2.1 Roads and Road Upgrades

4.2.1.1 External Roads

Access corridor, approximately 5.6 km in length from the Lincoln Highway via Lipson Cove Road.

Currently a dirt road of limited width with a significant safety hazard at the entrance of the road to the Lincoln Highway.

SA Water pipe runs on the northern side of the road whilst Telstra cables on the south.

There will be significant conflict of use between carriers (Bdoubles and Triple road trains), local farmers and tourists.

Previous comments provided that this is a major departure from the Centrex model.

High probability (foreseeable) mortality conditions introduced with 1000+ vehicular movements per day.

4.2.1.2 Internal Roads and Marshalling Areas

The internal road network will separate light and heavy vehicles movements by providing dedicated light and heavy vehicle lanes.

The internal roads for heavy vehicles provide for all-weather operation and have been designed for safe low speed manoeuvring of grain delivery vehicles.

Marshalling areas will be provided:

- Two lanes at the site entry running parallel to Un-named Road on the western boundary, accommodating approximately 10 trucks prior to the site opening for operation. This is to address the possibility of contract drivers queuing prior to opening in peak periods and avoid impact to the public network (underlining added)

Experience would indicate that at peak times the likelihood of only 10 b-doubles or triples queuing prior to opening is an underestimate. It is strongly suggested that this is insufficient provision and will result in parking of vehicles of the public road, potentially impeding through traffic to Lipson Cove.

As mentioned in preceding sections, the above infrastructure forms Peninsula Port's preferred load in method. Depending on capital and operational requirements as the project continues to develop, it may be necessary to provide grain loading through a number of DOG stackers, dispersed across site.

The only conclusion that can be drawn here is that the proponents do not have access to funds sufficient to meet their design, leaving the reader with a 'bob each way' design.

Such a position gives rise to a lack of confidence in that the proponents are not able to provide a clear outline of what is being proposed and open to the probability of yet other options being proposed post approval based upon cost savings and no environmental impact assessments.

4.2.4 Ancillary Infrastructure and Services

4.2.4.1 Security

The wharf will be subject to maritime security and customs regulations, commencing at the abutment of the wharf structure.

There appears to be a number of internal inconsistencies in this submission. In this instance, on the one hand access to the beach/foreshore will be maintained, but clearly the public will be prevented from crossing the groyne as this is a 'secure' area.

The question, therefore being, how does the proponent propose to allow unimpeded access at the foreshore?

4.2.4.3 Water Supply and Stormwater Management

The approach to water supply and management at the site is intended to avoid adverse impacts on the watershed and comply with the measures put forward in the Evaluated Project. In contrast with the Evaluated Project, potable water requirements do not envisage a mains connection or desalination at any point, with potable needs to be met by water purchase, treatment of on-site captured water or a combination of both. Fire water needs are to be met via on-site capture, with dedicated fire water storage tanks provided.

As previously mentioned, the Centrex model's meteorological data was derived from data relevant to a site some 70+kms to the South and not on actual on-site rainfall measures. The documented rainfall attributed to the Pt Spencer location was in excess of 20 inches per annum (ie the annual rainfall at Poonindie).

This is yet another instance where on-site data has not been verified but translated directly from the previous application.

Local knowledge would suggest that the actual rainfall would not support the proposed position, having regard to a significantly lower rainfall and a high evaporation rate of standing water.

The reality being the construction of a potable water supply from the Lincoln Highway would also have a community benefit in that an extension of the pipeline to Lipson Cove could be included, giving the proposed re-development access to potable water also.

Given the hazards associated with grain dust in confined spaces and the known flammability of phosphine, an adequate and replenishable water supply would be highly advisable as there are no other water supplies in the vicinity of the proposed development.

Water is a comparatively scarce commodity on Lower Eyre Peninsula with reliance upon the various basins in the Pt Lincoln region. It is known future demand arising from mining and other ventures will place increasing demands on the finite reserves. Given the previous Provisional Development Authority included the construction of a desalination plant, the question arises, why is this not in the application?.

Zero discharge of the site runoff to the marine environment.

The major flow path through the site still flows through the site instead of being diverted around the site. However, it's a portion of the flow path is shifted from its natural path.

The preceding statement is somewhat ambiguous.

It appears that the natural water courses in the vicinity of the site still flow through the site and as such have the potential to collect on-site polluted water prior to apparent discharge into the Gulf.

In the event that water is discharged to the Gulf, the question being not only one of quantity of water directed to Roger's Beach, but also one of water quality and the environmental impact thereof.

There appears to be no discussion of water quality, or the concentration of pollutants present in water leaving the site and entering the pristine of the Gulf following rain events.

The assessed project water demand based on WSUD approach was determined as follows:

- Approx. 1 ML/day for 10 months during initial construction period for earthworks.
- Approx. 0.25 ML/day for the following 15 months for construction of jetty and site infrastructure.
- Approximately 0.25 ML/day during port operation.

The Proposed Amendment does not require water for process or dust mitigation measures (i.e. stockpile watering).

Operational water needs are therefore limited to wash-down water only and can be met through the captured site run-off.

Construction water demands are similar to the Evaluated Project and are intended to be met through a brackish bore onsite.

It is noted that the quantity of water required to undertake the required activities is in excess of 450,000,000 litres, excluding the 250,000 litres per day during the operational phase.

It is known that the Centrex construction model was predicated upon an agreement with SA Water to provide its requirements.

The questions therefore arising are:

(a) is the proposed bore capable of providing water at the rate of 1Ml/day for all construction activities, or is it the proponents intend to use sea water for all purposes other than for preparation of cement?

(b) does the proponent have the necessary approval to extract water from the bore?

(c) it is stated that the proposed amendment does not require water for dust suppression. That being the case, it is assumed that whole of the site will be covered with asphalt (as roadways between all bunkers) to avoid the generation of fugitive dust during operations.

(d) further to (a), it is assumed that there will be no dust suppression during the construction phase, especially where stockpiling of material is an integral part of the process.

(e) the issue of drift is clearly not addressed. In this instance drifting saline water onto adjacent cropping land is a major concern and its impact potentially giving rise to compensation claim.

There appears to be no mention of the management of waste water (sewerage) generated or that exiting the laboratory. Where does this material go?

4.3 Construction Phase

Construction activities may require both day and night shifts to operate for the duration of construction. Blasting will be limited to day works only. Crushing, welding and piling activities may be required to operate on day and night shift. All other activities can be accommodated in day shift only.

Given the environmental sensitivities of this sight, the question arises of the impact of the proposed program upon listed species (State and Federal) in the region.

Apparently, this is not an issue.

The impact of noise, dust and light upon the residents of the area appear to be not assessed or mitigated against. The issue of noise, inclusive of infrasound, on a 24/7 basis is clearly unacceptable.

Table 4-1 Indicative construction schedule for each work package

The schedule outlined in the table is somewhat optimistic, given no approval exist.

4.3.1.1 Blasting

It is assumed that the proponents will consult directly with adjacent landowners with respect to blasting and the potential impacts upon their agricultural businesses, including lambing programs.

The issue of vibration transmitted through the ground and impacting upon solid constructions of adjacent landowners as well as travelling seaward to the Gulf appear to be poorly articulated.

It is also a potential characteristic of blasting such ancient rock, that Radon will be released. What provisions will be in place to monitor the concentration of Radon so produced as well as other by-products of the use of explosives?

Does the proponent have the necessary licences to undertake the proposed quarrying activities?

4.3.1.2 Crushing

Subject to crushing trials it is anticipated a suitable crushed product will be produced with a two stage (jaw crusher + secondary crusher) process. It is expected that this process will producing approximately 7,000-

9,000 tonnes per week on a dayshift only basis. Subject to productivity targets night shift crushing may be required.

Whilst not specifically addressed herein, it is anticipated that such activities will require fugitive dust and noise (inclusive of infrasound) mitigation. It is strongly recommended that the operation of the crusher on a 24/7 basis be prohibited, having regard to adjacent landowners (and their business requirements) as well as tourists at Lipson Cove.

Due to the requirement to establish the Launch and Silo pads as soon as practically possible, the material for the crushing will be excavated from the blast site, transported by off road trucks and stockpiled on the south of the site. The proposed location for crushing and stockpiling is shown in Figure 4-5.

The dust mitigation program for such stockpiling is identified as non-existent previously in this report. Clearly any environmental or public health issues arising are ignored.

4.3.1.3 Causeway Construction

Prior to construction a floating silt curtain will be placed around the causeway footprint. It is likely that this will be placed progressively and extended as the works proceeds to the final footprint.

It is noted that the silt curtain is 'likely.....placed progressively', hardly language that provides confidence in the management of colloidal particulates arising from the construction activities and its potential impact upon the marine environment.

To meet construction scheduling requirements, causeway construction is proposed as a day / night (double shift) operation.

It is assumed that such activities is compliant with the requirements of the EPBC approval. The question here being the ability of the proponent to identify the presence of whales at night and thence to stop activities in line with the EPBC requirements.

It is also suggested that such activities would have significant impact upon tourists at Lipson Cove.

4.3.2 Marine

In order to meet construction timeframes, 24 hour construction is proposed (including for piling activities).

It is assumed that such activities is compliant with the requirements of the EPBC approval.

It is also suggested that such activities would have significant impact upon tourists at Lipson Cove

It is noted that the piling operation is scheduled to e a 24/7 activity. The question being what noise mitigation (including infrasound) for residents in the location is planned?

See earlier note with respect impact on whales entering the site at night..

4.3.3 Construction Workforce

A peak construction workforce of approximately 150 is anticipated to be required. The construction workforce will be accommodated locally. No on-site living accommodation is proposed as part of the Proposed Amendment.

It is noted that the previous Development Authority included the provision of an accommodation village on the outskirts of Tumby Bay.

It is noted that the construction (and presumably the operational) workforce will be accommodated off site. Does this mean that the previously approved village will be required.

That being the case, what is the social impact of importing 150 construction workers into Tumby Bay?

Is there enough rentable houses in Tumby Bay and Port Neill. Prevent tourists from visiting the area and they might never return?

Are the ratepayers of Tumby Bay expected to provided services through the District Council of Tumby Bay as part of their rates, or is it envisaged that all expenses associated with the proposed workforce accommodation requirements are to be met by the proponents?

What are the proponents health and safety requirements of its workforce in relation to drugs and alcohol?

4.3.4 Construction Water Supply

Construction water is required for all of the above activities. For bulk earthworks, fresh potable water is not mandatory except for the production of concrete.

Salt water (saline bore water or sea water) may be used to construct pavements, earthworks and dust suppression. Salt water will be sourced by placing a sump in the location of the retention basin.

As mentioned previously, salt water spray emanating from the construction site may have a detrimental impact on adjacent crops. What mitigation processes will be in place to prevent such occurrences?

It is assumed that access to seawater requires the granting of permits. No mention of such requirements occur to date.

5. Proposed Amendment Impact Assessment Summary

.....increased impacts due to the Proposed Amendment are anticipated; associated with traffic along Lipson Cove Road during construction and operations and the presence of the causeway. However, the level of impact has been assessed as acceptable to the project. The removal of iron ore receipt, storage and handling from the project scope means that several potential impacts are no longer applicable.

It is noted that a review of the Centrex PDA/PER has been undertaken and summarised in this section of the application.

The review appears to that of a desktop analysis of what was previously written and lacks any validation of, or correction of, known deficiencies in the original approval process as evidenced in the public submissions.

The environmental assessment of the impact of the 'project' on Lipson Island was inadequate for the iron ore proposal and appears equally inadequate for the current proposition, given that no apparent 12 month assessment of the impact of grain dust (and any pollutants arising from the facility) has been undertaken on the environment or specifically Lipson Island and its associated Marine Conservation Park, a park not attached to the Joseph Banks Group. Assumptions are not scientific studies to prove the impact one way or the other.

The public is required to have confidence in the 'evidence' provided in support of the proposal being credible. Clearly there may be a case to suggest otherwise. The 'evidence', apparently in the guise of 'modelling' based upon unknown inputs in support of statements made re the groyne/causeway, give rise to little public confidence in the validity of the conclusions presented. The credibility of these statements is further eroded by experience clearly identified of sand movements on Adelaide beaches over an extended period of time.

The conflict of significant numbers of heavy vehicles (B-doubles, road trains, triples) with tourist and local traffic(caravans and farm machinery) on Lipson Cove Road has been judged as acceptable, obviously having complete disregard to the actual operational width of Lipson Cove Road and its intersection with the Lincoln Highway and the Coast Road.

Table 5-1 Review of Evaluated Project – Summary of outcomes

Definition of Impact (Compared to Evaluated Project)	Number of Impacts	Relevant Environmental Aspect Categories
No change	86	· Climate change · Noise · GHG Emissions · Waste · Soils · Terrestrial Ecology · Surface water · Lipson Cove Ecology · Groundwater · Marine Ecology · Air quality · Visual Amenity
Similar level of effect	29	· Climate change · Terrestrial Ecology · Soils · Coastal Environment · Air quality and Sediment · Noise · Visual Amenity · Traffic · Socio-Economics
Reduced effect (impact)	2	· Marine ecology
Reduced effect (benefit)	2	· Socio-Economics

The claim of 'no change (86)' with respect to the original Centrex proposal is clearly misleading.

There is a major change in the nature of the project, being a single use grain export facility as opposed to what was originally approved and documented in the Provisional Development Authority and EPBC approval.

Putting aside any comment upon climate change, there are significant differences in regard to noise as outlined above. Principally the proposal will be based around different construction regime inclusive of blasting; predominantly road transport on a roadway not previously designated for heavy vehicles as opposed to a slurry pipeline from the ore source at Koppio (Project Fusion); construction of the causeway and the like.

The reliance upon diesel power generation and the proliferation of the use of diesel powered transports clearly increases the Green House Gas emissions at the site compared to the previous proposal.

A discussion of waste removal has not been dealt with to date in the amendment.

Surface water and run off from the site has been mentioned, but issues remain in regard to the quantities of run off from the site given that the majority of the site will be covered with bunkers and roadways, both of which will facilitate runoff which will ultimately be to the Gulf. The rainfall assumption being the same as a location some 70kms to the South is clearly in error with the effect being an error of some 50% in the assumed water catchment and retention assessment. Further, the assumed flow of water in the 'stream' to the west of the site and thence around the site is fundamentally flawed, given the inaccuracies arising from

inaccurate assessment of rainfall. This points to the fact that the current proponents have failed to undertaken any meteorological validation of the previous data.

There is a complete lack of understanding of the ecology of Lipson Cove and especially Lipson Island. Two significant issues arise being the movement of sediment in the Cove and thence across the proposed project site with the now proposed groyne rather than the previous open construction of the wharf and a complete lack of knowledge pertaining to the impact of the proposed development on Lipson Island and its declared Conservation status. It is well documented in the previous PER by the consultant who was contracted to provide an environmental impact assessment of the then project on Lipson Island that the two day assessment on the Island was insufficient to provide such an assessment and recommended a full twelve month evaluation, the likes of which were ignored. Furthermore, the evaluation was being undertaken in the context of the impact of iron ore dust NOT grain dust. The so called 'no change' clearly indicated a total lack of understanding that iron ore dust and grain dust are different with differing environmental impacts.

The potential exposure of the historic wreck of the Three Sisters due to accelerated sediment movement places this site at risk, but apparently not according to the 'no change' assessment.

Ground water impacts; The introduction of the use of a brackish bore for a water source is a significant change over the original submission which included an 'arrangement' with SA Water to provide a water supply. No evidence pertaining to the impact on existing ground water was tendered in the original. Clearly this is another significant variation other than 'no change'.

Air Quality: The original project was predicated on an iron ore export facility and air quality assessments were designed around fugitive iron ore dust arising from the site and dispersed into the surrounding environment. The 'no change' position would suggest that the proponents do not know the difference between iron ore dust and grain dust, let alone the potential health impacts arising from grain dust as opposed to iron ore dust. This is yet another example of the lack of due diligence exhibited by the proponents of the 'amended PER' using a pre-existing report without undertaking the necessary validation of the findings relevant to the new proposition. Given the differing densities of iron ore dust to grain dust, what is the dispersion pattern for grain dust across the environment, and especially across Lipson Cove and Lipson Island (the Marine Conservation area)?

Marine ecology: By its own admission, the construction of the groyne will have a significant impact upon the marine ecology through loss of marine grassland, yet the claim is 'no change'. The impact of grain dust on the marine ecology is also not recognised as this was not an issue of concern in the original assessment.

Visual amenity: The claim of 'no change' is clearly ridiculous. The landscape will be altered through the proposed blasting and levelling process,, let alone the construction of the multitude of bunkers and the concrete for the foundations of the steel silos and other infrastructure. The impact of a significant number of transports entering and leaving the site on a continuous basis is also a major detractor so far as visual amenity is concerned.

Similar level of effect (29)

Climate change · Terrestrial Ecology · Soils · Coastal Environment · Air quality and Sediment · Noise · Visual Amenity · Traffic · Socio-Economics

Coastal environment: The impact of the groyne is clearly not well defined and at worst can be described as supposition in the absence of on-site scientific studies. The interruption of the natural coastal tide effects arising are clearly unknown as are the impacts upon the two beaches under consideration. Experiences on the Adelaide beach front point to a complete lack of understanding of the effects of the groyne and the inappropriate assessment that there will be a 'similar level of effect'.

It is also noteworthy that the proponents have not considered the impact of the proposal upon listed species whom frequent the costal environment for nesting purposes.

Air quality and sediment: As indicated on a number of occasions in this response, clearly the proponents do not understand the difference between iron ore dust and grain dust with their obvious conclusion being that the impact is the similar. Reference to the extensive literature library on the health effects of grain dust and or iron ore dust appear not to have been undertaken in arriving at the aforementioned conclusions.

Comment has already been made as to the paucity of research undertaken by the proponent in regard to the potential impact of the groyne on the existing marine and terrestrial environment (sand hill and beach front).

Noise: The claim of a similar level of effect arising from the introduction of a constant stream of transport vehicles through the facility is clearly misleading when the Centrex model was predicated on the use of a slurry pipeline from the Koppio Hills (Project Fusion) as the main supply chain, noting, however, the initial source of ore being via transport from the Wilgerup mine until such time as the Koppio venture came on line.

Visual amenity: By the proponents own admission, the visual amenity of the marine structure is significantly different to the original proposition, not 'similar level of effect'. The previous comment on visual amenity from Lipson Road also suggests a misleading assessment on behalf of the proponent.

Traffic: The first point being the significant change in the access route proposed in the amendment with the conclusion that there will be a similar level of effect. As pointed out in the commentary preceding this section, the proposal brings into conflict a significant volume of heavy vehicles accessing and departing the facility with tourist traffic (including caravans) accessing Lipson Cove and local farmers moving machinery and stock on a roadway not designed for this level of traffic. Any suggestion that this is the same level of effect is clearly misleading.

Socioeconomics: To date Volume 1 has not addressed the issue of the socio-economic impacts of the proposal outside of 'expectations' that the project will attract some 1M tonnes of grain of which there is no concrete evidence in support of the claim, nor a full independent assessment of the viability of the project having regard to the existing competition or potential competition, or an assessment whether the entities involved with the proposal have the financial backing to proceed and sustain the venture in the long run.

It is noted that the proponents have indicated that there will be no accommodation provided on site for the workforce and that the workforce will be accommodated locally. Volume 1 of the submission does not point to any other social impact outside of this statement. Is it therefore assumed that the proponents will make use of the existing approval to construct a work camp as per the accommodation village in the Centrex model? That being the case, what is the impact of this proposition on the residents of Tumby Bay and any expectation that the facility will be serviced by Council at ratepayers' expense. Little change in effect is clearly not necessarily valid.

As previously mentioned, the proposed port is clearly a receival entity only. It is wholly reliant upon external transport carriers to deliver the product to the facilities. The result being that the proponents business model relies on the ratepayers of the District Council of Tumby Bay (and beyond) to fund a road network capable of sustaining continued used of heavy vehicles (Bdoubles, triples or road trains) on roads otherwise not capable or authorized to do so. In short, those costs are transferred to the ratepayers, most of whom do not have an interest in grain transport as they are residents of the townships. This is an economic disincentive for the majority.

Where is the community cost benefit statement that shows economic support for the venture?

Reduced effect (impact)	2	· Marine ecology
Reduced effect (benefit)	2	· Socio-Economics

Apart from a recognition that the groyne will have an impact on marine ecology (although not recognising the impact upon the Cove or Lipson Island and listed species using the foreshore as nesting grounds), the discussion to date fails to address these issues to enable the public to be informed of the impacts arising.

No longer applicable / No impact Lipson Island

To claim that the proposed amended PER will have no impact or is no longer applicable, upon Lipson Island (or for that matter, the Lipson Island Marine Conservation Park) is consistent with the proponent's lack of consultation with the local community as well as an understanding of the environmental impact assessment undertaken (although incomplete) by the previous applicant in obtaining the Provisional Development Authority to proceed.

It is assumed that this attitude of virtually no impact upon the marine indicates a lack of credibility on the part of the proponents to review not only the previous PER, but the public responses to the document and to undertake corrective action to address public concerns/identified deficiencies. A desktop review does not have the capacity to undertake corrective research in order to provide answers the public require.

It is acknowledged that the inclusion of a solid causeway as part of the wharf structure will increase the seagrass disturbance due to the Proposed Amendment compared to the Evaluated Project. However, in the context of the broader Spencer Gulf, the level of effect has been assessed as similar to the Evaluated Project.

The PER is a device to identify the actualities of the site. It is acknowledged that the groyne will increase seagrass disturbance over the previous model. The conclusion that in the 'context of the broader Spencer Gulf....the level of effect has been assessed as similar', fails to meet public expectations as the public is concerned with the local impact of the proposed development on the local marine and terrestrial environments. The issue of relevance to the community is the point. There needs to be comparisons made on the same basis of fact (ie the apples to apples syndrome) and not as presented the apples to oranges scenario.

In addition, seagrass clearance will be offset through the provision of a SEB.

In short the proponents will attempt to buy their way out of the situation, noting that any contribution offered to the SEB process does not necessarily mean the monies will be directed to meeting environmental requirements on site, unless specific requirements are placed upon the proponents in the Reserved Matters of any approval that may be forth-coming.

Countering the increase to seagrass clearance, reduced impacts to marine fauna are expected due to the significantly lower number of piles required for construction of the Proposed Amendment.

The above conclusion (expectation) is misleading to the extreme given that the groyne (of some 240m) poses a significant barrier to marine fauna as opposed to the previous open pile construction of the entire wharf.

Table 5-2 Summary of Effects- Evaluated Project compared to the Proposed Amendment

Variability of rainfall may cause flooding, vegetative stress or reduction in captured rainwater volumes for on-site use should rainfall decrease

The assumption that no change is the comparative outcome belies the fact that the rainfall data of Poonindie is totally irrelevant as it fails to represent the actuality of rainfall at the site. This also goes to the issue of credibility of adopting information as fact without first undertaking a process of validation.

Potential seabed disturbance, coastal erosion, recession and vulnerability brought about by variations in offshore wave climate such as large wave events or changes in wave events

There appears to be no assessment of the impact of the groyne on the naturally occurring events as identified contrary to experiences observed in other places where such weather impacts upon manmade structures such as groynes.

It is known that there have been wave events that have broken over Lipson Island. The advice offered in the amended application does not appear to discuss the impacts of this eventuality on the groyne, its marine and terrestrial environs nor on the superstructure on the groyne.

Greenhouse gas emissions during construction	Similar level of effect.
7 Greenhouse gas emissions during operations	Similar level of effect.

As previously mentioned such statements of similarity are supposition and are not quantified in the discussion to date in order to validate the assumption.

Potential impacts from blasting (low impact)	No change.
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It is understood the Centrex model did not include the necessity for blasting to occur. The extent planned is significant.

Pollution from spills of fuel and other substances (insignificant impact)	No change
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Whilst it is acknowledged that the potential for diesel spills is limited and mitigated by bunding, there are other chemical substance now in use which were not included in the previous assessment, namely methyl bromide and phosphine and its precursors.

In addition, there is a significant difference in the exhaust emissions from vehicles entering/exiting the facility adding to the pollution footprint, not accounted for.

Spill of hematite ores and dust from the storage shed and ship loading, which may result in elevated levels of iron in the surrounding soils (insignificant impact)	Not applicable – iron ore excluded from Proposed Amendment
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It is noted that iron ore dust as described is no longer applicable in the discussion. However it is noted that a detailed examination of the impact of grain dust (and any pollutants it might also carry) was not a feature of the previous application.

Impacts on Rogers Beach from berthed ships.	Similar level of effect.
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The question being what evidence has been tendered to validate the conclusion, given that berthing will be different from that proposed in the Centrex model? Yet another assumption without apparent valid data. A berthed vessel may also be considered as an extension of the groyne. The issue then being what is the impact on the environment?.

Surface water controls (points 18-24)

The assumption of no change is predicated on the 'assumption' of rainfall data of Poonindie being relevant to the site. As indicated an error of some 50% or more exists when compared to local knowledge of rainfall.

Migration of chemicals and hydrocarbons to groundwater due to spills or leakage due to the storage and use of chemicals on-site including fuels, oils, greases and solvents.	No change
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As indicated earlier, the assumption of the proponents being comparison of like with like, fails as there are significantly different chemicals (other than fuel) to consider, namely those involved in the generation of phosphine and methyl bromide, to name but two. Clearly the assumption of no change is inaccurate.

Migration of chemicals and hydrocarbons to groundwater due to spills or leakage due to the storage and use of chemicals on-site, including fuels, oils, greases and solvents.	No change
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Refer previous comment.

Dust generated from construction activities including wind-borne dust from exposed surfaces, vehicle movements, earthworks, crushing, blasting of rock material.	No change
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There seems to be a lack of understanding that the dust generated from the construction activities as identified above result in a no change scenario. Dust generated from blasting activities in igneous/highly metamorphosed may contain radioactive isotopes(Radon) which would be released into the dust. The conclusion of no change, therefore requires clarification with advice from EPA, not the proponent.

Dust emissions associated with the transport and handling of materials.	Similar level of effect. <i>Operational controls will be implemented when required to achieve PM10 and PM2.5 compliance with the assessment criteria</i>
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The issue of 'similar level of effect' is not accepted given the total reliance upon road transport and diesel power generation and a change in chemicals handled.

The compliance with PM10 and PM2.5 levels is noted and supported on the basis that the 'dust and other emissions' are adequately identified and monitored.

Products of combustion from fuel use in vehicles and mobile plant.	No change
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As previously mentioned, the reliance on vehicular transport underpins the operation of the facility. Exhaust emissions containing known cancer causing particulates will be significantly different to the Centrex model.

Noise emissions from project construction impacting nearby noise sensitive receptors.	No change.
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Given an entirely different mode of construction and site works requirement, together with the use of explosives as outlined, the assumption of 'no change' is not credible. It points to the lack of re-evaluating the noise impacts at said nearby noise sensitive receptors having regard to the change of circumstances. It is understood that local residents have not been approached regarding the significant changes mooted.

Noise emissions from site operations impacting nearby noise sensitive receptors. Night-time noise criterion exceeded at one residence with no acoustic treatment in place. Upon application of acoustic treatments, modelling demonstrated compliance with acoustic treatments,	Similar level of effect. Operational controls will be implemented when required to achieve night time assessment criteria
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The issue being that no consultation with a nearby noise receptor in respect to this issue. Any conclusion of a similar level of effect is speculative.

The question also being what acoustic treatments were used to populate said modelling. Furthermore, what impacts upon animal husbandry (especially sheep breeding time) has been taken into account in the so called modelling of impact on neighbouring farming properties? It is suggested, none.

The assumption being that the adjacent landowner stands the loss caused by the foreseeable actions of the proponent.

Noise emissions from operational traffic impacting nearby noise sensitive receptors. Predicted noise levels indicated exceedance of criteria at one residential dwelling along Swaffers Road. Acoustics treatments proposed at the dwelling. Similar level of effect.

Firstly the statement is factually incorrect, given the reliance upon the use of Lipson Road, where three residents will be directly impacted by substantial road noise.

There is no scientific evidence presented to identify the extent of the 'exceedance of noise levels' at the identified residences.

Secondly, there has been no consultation with landowners so affected in relation to acoustic treatments of said residences.

Yet again, the public is expected to accept the inaccuracies of assumptions made in the proponents support of data presented in relation to the Centrex model rather than actually commissioning enquiries to validate or otherwise the data to provide credible argument in support of their proposal.

Lipson Cove Road - Light vehicle access has the potential to impede local traffic or cause congestion.	Increased effect due to the use of Lipson Cove Road for heavy vehicle grain deliveries.
45 Traffic impacts to the regional road network.	Altered effect due to the seasonal delivery of grain and absence of a specified haul route (associated with iron ore).

It is noted item 43 identifies the removal of Swaffer's Road from the proposal.

Item 44 in respect to Lipson Cove Road, the impact is clearly underscored due to (a) the nature of the intersection with Lincoln Highway (b) the width and construct of Lipson Cove Road (c) the conflict of a significant increase in heavy vehicles (as previously described) with local farm traffic and traffic (tourist) visiting Lipson Cove (inclusive of caravan traffic).

Item 45: Reference to the haul road (Kinnaird Rd) associated with the Centrex PDA is noteworthy in that the ratepayers of the District Council of Tumby Bay contributed significantly to its upgrade, with no contribution made by Centrex. The inference now being that this roadway becomes of considerable benefit to the proposed grain port at no cost to the proponents.

It is agreed that there will be significant impacts to the regional network of roads for which either the State Government (major highways) or Local Government (and hence ratepayers) will be required to upgrade for the convenience of the proponents, UNLESS a condition of approval is for the payment of substantial sums of monies to offset impacts of local government agencies for their anticipated expenditure.

This cost must be included in the cost benefit analysis pertaining to the whole operation of the port. Community freebies are not the order of the day.

Generation of waste and materials from shipping activities.	No change.
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As with the previous PER/PDA, discharge of ballast from visiting vessels is of considerable interest, given the environmental sensitivities of the Lipson Island Marine Conservation Park and its surroundings.

Shipping activities include vessels from differing ports than those likely to have visited for iron ore.

The assumption of 'no change' is considered to be inappropriate.

54	Impacts to rare and/or threatened species and communities	No change.
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As mentioned on previous occasions in this response, the impact of the changes mooted in this amendment have not been adequately assessed in relation to rare or threatened species.

57	Potential for an increase in already established weed species or the introduction of new weed species via the importation of soil and rock or soil attached to earth moving plant.	No change.
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Bio-security is an issue that appears to have been overlooked in the amended application. It is noted that the expectation is carriers will be coming from potentially all over the Eyre Peninsula and inadvertently transferring listed weeds from one area into this location with the high potential of spreading to adjacent farming land.

No change is not an appropriate answer to this real issue.

62	Impacts to rare and/or threatened species and communities.	No change. Peninsula Ports is currently seeking to transfer the EPBC Act Approval and will undertake the project in accordance with the conditions of approval.
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It is noted that the official transfer of EPBC referral was effected 13 November 2019 for stages 1 and 2 of the approval granted 2012/6590, without any conditions or requirements given that it is now proposed a single use grain port as opposed to a multi-user port.

No reference to any inadequacy of the original approval in light of the new proposal was made.

63	Direct mortality of individuals due to increased traffic movements along Swaffers Road.	Altered effect – the potential for impact would occur along Lipson Cove Road.
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This is a major departure from the Centrex model. Apparently human life accounts for nothing so long as the proponent achieves its end result. This impact is foreseeable, yet apparently ignored.

64	Revegetation, habitat enhancement and compensation	No change – An appropriate SEB will be provided for the clearance proposed as part of the Proposed Amendment
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As previously identified, the proponents seek to contribute to the SEB fund, monies which are not necessarily re-invested in the site. A more appropriate solution would be the requirement of the proponents to undertake a detailed revegetation program on the site in order to screen the facility from the roadways and thus enhance the visual amenity of the location.

66	Impacts to terrestrial flora and fauna due to dust, noise and light. Assessed to be insignificant.	No change.
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The so called 'assessed to be insignificant' is a measure of the environmental credentials of the proponent given the paucity of environmental impact data relating to impact on Lipson Island and surrounding habitats. The noise, dust (now grain dust etc) and light is known to have an impact upon native species, but not according to this amended document.

69	Noise disturbance to seabird rookeries and roots.	No change.
70	Light disturbance to seabird rookeries and roots during construction.	No change.
71	Soil erosion and siltation of adjacent coastal marine environments.	No change.

See note attached to item 66.

73	Siltation and turbidity pollution of Lipson Island marine environment.	No change
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There has been no scientific investigation undertaken to assess the extent of change of siltation and turbidity as a consequence of the proposed construction of the groyne nor the impact of grain dust on the marine environment per se

The conclusion of no change is clearly not credible.

74	Smothering of terrestrial vegetation on Lipson Island due to dust generation from the project.	No change
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Given that dispersion projections for grain dust were not a feature of the Centrex model and that meteorological data relevant to the site is questionable, there is no evidence to suggest that the Island will not be impacted. The no change assumption is premature.

75	Impacts to wildlife through exposure to dust containing metals.	Not applicable – No potential for impact due to the removal of iron ore from the project scope
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But what is the impact on wildlife of grain dust (and any pollutants it may contain)?

77	Release of invasive marine species from ballast water.	No change.
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Given that the port of origin of visiting vessels is potentially different to those exporting iron ore, the assumption of no change is misleading, if not negligent in intent. The potential for exotic species migration may well be different, requiring a different mitigation process, clearly not considered in the context of the 'no change' assessment.

80	Disturbance to Lipson Island from increased visitation due to interest in the project.	No change.
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Apparently the proponents are unaware of the fact that public access to Lipson Island is by permit only. The inferred no change is irrelevant.

82	Native vegetation (i.e. seagrass) and other benthic habitat loss due to disturbance of the seabed.	Similar level of effect – Reduced overall marine footprint, but the area of seagrass disturbance is expected to increase. A similar level of effect in the context of the broader Spencer Gulf
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The conclusion that the construction of the groyne somehow results in a reduction of overall marine footprint appears contradictory in light of the Centrex model jetty proposition whereby the structure was totally open in nature save for the actual piles, compare to the footprint of the groyne. The further conclusion that the groyne will have a similar level of effect in the broader context of the Gulf, appears irrelevant to the local community.

83	Impacts to rare and/or threatened species and communities	No change
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As mentioned previously, assumptions pertaining to the effect of the proposal on listed species and communities is identified as no change go to the credibility of the proponents and their environmental credentials. As reported on a number of times the Centrex model was limited to 2 days actual onsite examination of the existence of the habitat of listed species in the immediate environment. The report identified the limitations of the two day examination and made recommendations to the necessity for a 12 month review, which did not eventuate.

The prime contaminant in the Centrex model was iron ore dust. The latest application supposedly deals with grain dust contamination, although clearly the inference is that iron ore dust impacts are the same as grain dust impacts resulting in the assessment of no change.

The issue of beach degradation (habitat degradation) due to the construction of the 240m groyne is limited to the assumption of no change. On-site scientific data undertaken or commissioned by the proponents to support this proposition appears to be non-existent.

84.	Direct mortality of individuals of (primarily sessile or slow moving) species directly beneath where piles are installed.	Increased potential for effect (recognising that rock dumping activities will also have an impact).
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Is it not a fact that all work is required to cease when whales are in the vicinity as per the EPBC approval conditions. Clearly such a statement is in violation of the EPBC conditions.

85	Direct mortality of individuals smothered by sediment generated from construction.	Similar level of effect.
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See above comment

86	Impacts to marine biota (direct mortality or behavioural impacts) due to noise pollution.	Reduced effect.
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It is claimed that construction noise will be reduced. This is not supported by the fact that not only will pile driving/drilling occur, but also the construction of the groyne and associated blasting. Clearly the proponents are not aware that sound travels not only through air, but solids and liquids. Credibility of conclusion??

88	Introduction of additional marine pests via marine vessels / construction equipment.	Reduced potential for effect.
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Refer to earlier comments on this issue in light of differing origins of vessels likely to visit the port facility.

89	Habitat fragmentation and native vegetation loss due to vegetation loss from shading or sedimentation	Similar level of effect
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There will be complete loss of native seagrass due to the construction of the groyne as well as any shadow effect compared to the open construction employed in the Centrex model. Add to this an unknown impact of changed sedimentation due to the action of the groyne leading to anything but a similar level of effect. Goes to credibility and lack of data supporting the proposition.

90	Shading causes loss of species which are dependent on high light levels.	Similar level of effect.
91	Potential impacts on marine communities due to sedimentation	Similar level of effect

Refer to above comment and previous commentary. The conclusion offered lacks scientific credibility.

93	Impacts to marine biota (direct mortality or behavioural) due to noise pollution (vessel traffic).	No change.
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Refer to comment item 86.

94	Establishment and spread of marine pest species	No change
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Bio-security extends to the marine environment as well as terrestrial. As previously mentioned the risk of the introduction of exotic species into this environment exists and the risk assessment may change due to the origin of vessels calling. No change is not acceptable as a risk assessment.

95	Impacts to fauna behaviour due to light from operations	No change
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The assessment of light pollution on marine life and that associated with Lipson Island has not been assessed. The 'no change' statement lacks credibility.

96	Impacts to fishing activities and the sustainability of fishing stocks.	No change
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The impact of grain dust on the marine environment and fish stocks in this location is unknown. The no change assessment is therefore not credible.

98	Creation of artificial substrates altering the marine ecosystem.	No change
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The creation of the groyne is the creation of an artificial substrate, one which did not exist in the Centrex model. The no change assessment is not credible.

99	Disturbance to sandy substrates from propeller wash.	No change.
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It is assumed that the movement of incoming and outgoing vessels be via the tugs which, it is assumed, will have less of an impact upon of propeller wash than the large ship. If however, the departing vessel is under its own power, then the issue of sediment wash that is closer to the beach (relative to the Centrex model) needs to be described in detail together with its appropriate risk assessment. The no change assessment may be appropriate but at present there is insufficient evidence to judge.

101	Impacts to organisms due to accumulation of shipping related contaminants in sediments.	Reduced potential for effect.
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The question is one of contamination due to anti-fouling materials used on vessels. What evidence supports the proposition that there is reduced potential from contamination, or is this yet another assumption?

103	Incidental grain spillage to the marine environment.	No change
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Clearly there is a change, given that this amendment deals solely with the construction of a port facility based on grain. So what is the impact on the marine environment of an 'incidental spillage of grain'? Moreover, what is the impact of said spillage if the grain is treated?

106	Movement of sediment due to a combination of waves, tidal currents and wave induced currents.	Similar level of effect.
107	Beach impacts at Rogers Beach due to jetty construction and operation.	Similar level of effect.
108	Beach impact south of the jetty due to jetty construction and operation.	Increased effect immediately south of the wharf, with no significant change at Lipson Cove and Lipson

		Island.
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And the scientific evidence to substantiate the claims made is...? As previously mentioned sediment/sand movements in this vicinity are significant. The introduction of the groyne (and the groyne effect) will have a significant impact, one which the proponents appear not to recognise or quantify.

10 9	Formation of scour holes due to the jetty.	Reduced level of effect.
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And the evidence in support of this assumption is...?

11 6	Disturbance to historic shipwreck site.	No change.
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Given the fact that no scientific assessment of sand/sediment movements have been undertaken by the proponents, and the impact of the groyne assessed over time, the assumption of no change relating to a 'disturbance' of the historic ship wreck lacks credibility, especially in line with local knowledge of the significant sand movement in the area.

11 7	Visual impact at key observation viewpoints due to construction.	No change.
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Hardly credible when one puts the Centrex model overlay onto the proposed model. Sheds, vs canvas stacks and steel silos for a start and significant numbers of very large vehicles. No comparison!

11 8	Visual impact at key observation viewpoints due project infrastructure and operations (e.g. ships at berth). <i>Overall magnitude of effect assessed as:</i> <ul style="list-style-type: none"> · VP-1 Rogers Beach – Moderate · VP-2 Ocean – Low · VP-3 Lipson Cove Beach – Moderate · VP-4 Lipson Cove Road – Low · VP- 5 Swaffers Road - Negligible 	Similar level of effect.
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Clearly the proponents view and that of the local community differ substantially.

Previous comments on the visual impact have been made and are equally relevant here. (see above)

11 9	Visual impact of shipping vessel travel.	No longer applicable / No impact.
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Does this mean that ships will not visit the facility?

12 1	Construction workforce -Population and demographic impacts.	Similar level of effect.
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It is assumed that the proponents are reading the original PER and PDA of the Centrex application and approval, ie the one where there is clearly identified a significant workforce located off site in an accommodation village adjacent to the cemetery at Tumby Bay. Also of interest is the actual size of the Centrex workforce, given its dependence also upon Project Fusion.

It is strongly suggested that the socio-economic impact of the workforces are significantly different warranting a new study to be undertaken which will change the assessment from 'similar level of effect'.

12 3	Construction workforce accommodation	Altered effect as no construction village proposed
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Given the statement that no on site accommodation to be provided and that no accommodation village (per se), then what is the proponents solution to accommodating the work force and its socio-economic impact upon the local community. OR is the intention of the company to use a FIFO workforce, with some undefined accommodation regime?

12 4	Benefits for local business and industry.	Similar level of effect.
12 5	Social infrastructure	Similar level of effect.

The validity as the suggested outcome is clearly challenged in light of the answer to points 121 and 123.

12 6	Haul road transport and infrastructure access corridor – changes to access and connectivity.	Altered effect due to the use of Lipson Cove Road for construction deliveries.
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Refer previous comment upon the use of Local Government and State Government road, especially in light of Local Government funding the upgrade to Kinnaird Rd without contribution from Centrex. Ratepayers are not required to fund private enterprise activities, so where in the proposal does the Company identify its financial liability to upgrade the road network to a suitable standard to accommodate its needs?

12 7	Impacts to community values including visual amenity.	Similar level of effect
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Where is the evidence to support such an assumption. Certainly not conveyed at the Public meeting held late last year in Tumby Bay.

12 8	Operational workforce - Population and demographic impacts.	Similar level of effect.
12 9	Operational workforce housing and accommodation.	Altered effect due to the seasonal nature of some positions.
13 0	Operational workforce - Changes in local employment	Reduced effect (benefit).
13 1	Benefits for local business and industry.	Reduced of effect (benefit).

Refer to earlier commentary re 128 and 129.

Articulation of the actual anticipated benefit to the community of the proposal (noting the identified REDUCTION) need to be articulated. Is the project of net benefit to the community or does it have a price tag for the community (ie hidden costs)?

13 2	Impacts to local tourism	Similar level of effect.
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It is strongly suggested that the construction and operation of the port, as envisaged will have a net NEGATIVE impact upon tourism, once the safety aspects of access to Lipson Cove and Rogers Beach become well know. Caravans and heavy vehicles conflict giving rise to significant safety issues. (All rentals, holiday rentals, caravan park cabins, Tumby and Port Neill, could be occupied by the workforce during peak holiday periods.

13 3	Social infrastructure	Similar level of effect.
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An inconsistent assessment/conclusion having regard to statements 128-131.

13 4	Impacts to community values including visual amenity.	Similar level of effect - particularly in relation to such things as scenic amenity, natural environment, local amenity and health and safety.
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Similar level of effect.....see previous commentary on factors other than health and Safety. With respect to health and safety, there are a number of significant variations which appear to be overlooked, namely the significant green house gas emissions due to increased exhaust emissions, which is known to have health implication arising from the nature of the particulates and gases contained therein (known carcinogenic properties) and the increase mortality factor arising from the proposed use of Lipson Cove Road. Further the environmental impacts of the proposal have not been fully identified and mitigated against by the proponents. The potential destruction of the environment arising from the proposal is clearly not in the public interest, which , combined with the negative impacts identified, lead to a general held position of non support for the project.

13 5	Impacts to traffic due to haulage of ore and grain on the regional network	Similar level of effect.
13 6	Impacts to traffic due to haulage of ore and grain associated with site access	Altered effect

The assessment above is somewhat confusing in its intent given that the proposal is predicated upon a single user export facility for grain.

Specific commentary has been made on these issues throughout this response.

13 7	Regional traffic benefits due to the location of the port.	Increased effect (benefit).
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The evidence to support this claim is based where? It is well known that the grain transport regime that operated over the recent 2019-20 harvest period was undertaken in a manner which had little impact upon local/regional traffic. The claim of increased effect/benefit is without foundation.

6. Risk and Mitigation

Table 6-1 Summary comparison of qualitative risk assessment for the Evaluated Project and Proposed Amendment (mitigated risk)

1	Air emissions – dust and fugitive emissions Risk of exceedance of project air quality criteria.	Low (Unlikely x Minor) <i>Air dispersion modelling predicted compliance with Ambient Air Quality NEPM criteria (1988 and 2003) at sensitive receptors.</i>	Moderate (Unlikely x Moderate) <i>Air dispersion modelling predicted compliance with the air quality criteria for the Proposed Amendment. Moderate consequence rating considered appropriate as if the risk were to eventuate, an offsite receptor would be impacted in the short term.</i>
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The issue of fugitive dust during construction and thence operation requires further investigation, noting that no scientific data collection with respect to dispersion of the new component of grain dust and the increase in particulates arising from the significant increase in vehicular traffic has been undertaken relevant to the actual meteorological conditions of the site, It is suggested an offsite receptor(s) may well be impacted having regard to the terrain.

2	Greenhouse Gas (GHG) Emissions	Moderate (Almost Certain x Insignificant) <i>Overall the port offers the potential to significantly reduce GHG emissions associated with ore transport to other port options, while it is recognised the Ports establishment will create GHG.</i>	Low (Unlikely x Insignificant) <i>Overall the port offers the potential to reduce GHG emissions associated with road transport of grain to Port Spencer compared with the distance of road transport to Port Lincoln, while it is recognised the Ports establishment will create GHG.</i>
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As mentioned previously, the function of the Centrex model was predicated on the construction of a slurry pipeline from the mine site. The argument presented that there would be a reduction of GHG as a consequence of the port requires substantiation given the 'expected' target source and having regard to existing competitors.

There will a significant increase in GHG emissions associated with the actual function of the port compared to the Centrex model.

3	Noise Risk of exceedance of project air noise criteria.	Low (Unlikely x Insignificant) <i>Noise modelling estimates indicate residences along Lipson Cove Road will not exceed noise criteria from road traffic, although the noise criterion was exceeded for a residence along Swaffers Road</i>	Moderate (Unlikely x Moderate) <i>Moderate consequence rating considered appropriate as if the risk were to eventuate, an offsite receptor would be impacted in the short term.</i>
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Clearly no noise assessment measurements have been undertaken with respect to the impacted residences on Lipson Road not only during construction, but also once operational. The conclusion that noise impacts would be 'short term' is clearly not substantiated. More supposition.

8	Terrestrial Weeds, Pests and Pathogens	Low (Possible x Insignificant)	Moderate (Unlikely x Moderate) <i>The mitigation measures are considered to reduce the likelihood of weed, pest and pathogen risks, not the consequence.</i>
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As mentioned previously, bio-security is a major concern in the farming community. The transport of grain from the 'target locations' increases the risk of introduction of noxious weeds etc into this environment.

More-over marine bio-security is a major concern with the potential for exotic species to be introduced into otherwise pristine waters. It is assumed that the proponents have the capacity to deal with the consequences of such infestations.

9	Lipson Island Terrestrial Fauna	Low (Unlikely x Minor)	Moderate (Unlikely x Moderate)
10	Lipson Island Terrestrial Flora	Low (Rare x Insignificant)	Low (Rare x Insignificant)
11	Lipson Island Marine Fauna and Flora	Low (Unlikely x Minor)	Low (Unlikely x Minor)

Given that the environmental assessment undertaken for the Centrex model over a 2 day period and so recorded in the original PER together with the consultant's recommendation for a 12 month review, clearly the proponents have chosen to ignore the advice tendered previously and assumed any impact would be low, despite the fact that the conditions have significantly altered. The Island and its environs will be subjected to grain dust pollution, not iron ore dust. But apparently the proponents consider this to be equivalent. The impact of an organic pollutant on the environment (terrestrial and marine) has not been considered.

It is apparent that the proponent have ignored the fact that there is a marine conservation park immediately adjacent to the proposed port.

The question being what is the long term impact of fugitive grain dust (and any contaminants it contains) on the marine park per se?

13	Marine Flora (Jetty)	Moderate (Possible x Minor)	High (Almost certain x Minor) <i>Considered appropriate to maintain an 'almost certain' likelihood, as vegetation clearance will occur (as for the Evaluated Project) despite the fact it will be offset.</i>
14	Marine Fauna (Jetty)	Moderate (Possible x Minor)	Low (Unlikely x Minor) <i>Duration and extent of underwater noise from piling activities significantly reduced. Monitoring and controls expected to further reduce likelihood</i>

The assessment for the jetty appears to be appropriate, but what of the 240m groyne?

15	Marine Pests	High (Possible x Moderate)	High (Possible x Moderate)
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Agreed.

16	Coastal Processes	Low (Possible x Insignificant) <i>Based on hydrodynamic modelling only localised sediment and scouring effects around the jetty are expected. Significant impacts to beaches around the Project are not expected, including Rogers Beach and Lipson Island.</i>	Moderate (Possible x Minor) <i>Based on hydrodynamic modelling localised sediment and scouring effects around the causeway are expected. Significant impacts to beaches around the Project are not expected, including Rogers Beach and Lipson Island.</i>
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It is strongly suggested that this assessment is flawed having regard to the experiences on the Adelaide beach front. Issues to this impact have been raised earlier in the response. It is a groyne NOT a causeway.

17	Traffic	Moderate (Possible x Minor)	Moderate (Unlikely x Moderate) Moderate consequence retained as any effects will be experienced off the project site Measures will reduce potential for traffic safety or capacity risks
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The conclusion tendered is somewhat confusing. The impact of traffic as a consequence of the project is NOT confined to the actual site but to access roads leading to the site.

The impact will be significant for road users of Lipson Cove Road, be they local residents and or tourists visiting Lipson Cove or Rogers Beach. The conflict between heavy vehicles (B doubles, triples, road trains), farm machinery, local traffic and tourist traffic (including caravans) is high risk given the nature of the roadway and poor vision in certain areas.

The probability of mortality is correspondingly high.

19	Maritime Heritage	Low (Rare x Insignificant)	Low (Rare x Insignificant)
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The potential impact upon the historic wreck (Three Sisters) not adequately identified.

20	Indigenous Heritage	Low (Unlikely x Minor)	Low (Unlikely x Minor)
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Given that the current public access to Rogers Beach and thence the surrounding areas of aboriginal heritage will be denied, the assessment appears to be adequate.

21	Visual Amenity	Low (Possible x Insignificant)	Moderate (Almost certain x Insignificant) Following mitigations, development of a port at the site will still have a visual impact.
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Whilst it is acknowledged that visual amenity is very subjective, to suggest that the proposal will have a 'moderate' impact, is a complete under-estimate. The bunkers, silos and conveyor superstructure will have a significant visual impact, whilst the marine visual amenity will be impacted by the groyne, jetty and its superstructure, which is a significantly different view that would have been achieved in the Centrex model.

23	Chemical Storage and Handling	Low (Unlikely x Minor)	Low (Unlikely x Minor)
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As previously commented upon, there are new risks associated with the proposal for a grain port as opposed to the iron ore port. Risk associated with methyl bromide, phosphine (precursors) and grain dust (explosion in silo vs terrestrial fugitive dust) need to be specifically identified and mitigated. The assumed 'low' may well be revisited upwards.

24	Maritime Spills,	Low (Unlikely x Minor)	Low (Unlikely x Minor)
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	Leaks and Anti-foulants (Port area)		
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There is an uncertainty associated with anti-foulant treatments applied to overseas vessels in that do they meet Australian standards?

25	Spencer Gulf: Maritime Spills	Low (Rare x Minor)	Moderate (Rare x Moderate) Moderate rating retained as by definition, effects would impact waters outside of the project area.
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It is strongly suggested that mention is made of the potential risk to the Lipson Island Marine Conservation Park which is adjacent to, if not intersecting with, the port marine boundary.

26	Spencer Gulf: Marine Mammal Collision	Low (Unlikely x Minor)	Low (Unlikely x Minor)
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There is a legal requirement under the conditions of the EPBC approval with respect to listed marine species which include issues of collision in the construction phase. Within the operational stage of the proposal, a more specific statement as to the risks of propeller strike with listed species is deemed necessary as such occurrences have happened in the past. It is recognised that Lipson Cove and the immediate waters are frequented by whales as a staging point, giving rise to an increase risk during the 'season'.

28	Local and Regional Economics	Low (Unlikely x Insignificant)	Low (Unlikely x Insignificant)
29	Local and Regional Infrastructure	Low (Unlikely x Insignificant)	Low (Unlikely x Insignificant)
30	Local and Regional Services	Low (Unlikely x Minor)	Low (Unlikely x Minor)

It is assumed that an appropriate cost benefit analysis for the project has been undertaken enabling the above risk determination to be made on the basis of fact.

As described in this response, there is a risk to the local economy arising from competition in the market place for a finite resource (grain production); a risk associated with infrastructure being the road network funded in the main through local government and ratepayer funds and the cost of additional local government services (again to be met by ratepayers)

Elsewhere in the document, it has been indicated a reduction in benefit to the local community, the extent of which being not quantified, inclusive of the potential to use FIFO for the construction workforce.

31	Social amenity	Low (Unlikely x Minor)	Low (Unlikely x Minor)
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Judging the view of the community towards the project is subjective and very much dependent upon selection of the audience to which the questions are put. The 'low' risk is yet another assumption or expectation on behalf of the proponents in light of the fact that only one public meeting has been held in

Tumby Bay with respect to the project. It is noted a second has been scheduled a few days prior to the conclusion of the public consultation period. It is understood consultation with landowners adjacent to the proposed site has been minimal or non-existent.

32	Tourism and Recreation Values	Low (Unlikely x Insignificant)	Low (Unlikely x Insignificant)
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The impact upon tourism to Lipson Cove and Roger's Beach may well be severely impacted upon in peak tourism periods simply by virtue of the conflict of grain trucks and caravans on Lipson Road. It is highly probable unfavourable reports will be well promulgated by tourists with the loss of patronage for the Cove caravan/camping site and potentially local townships.

Based on the management and monitoring measures proposed (refer to 6.3), it is considered that the environmental risks can be reasonably managed, and the likelihood and consequence of these risks have been reduced to as low as reasonably practicable (i.e. as per the ratings summarised in Table 6-1. The potential risks associated with development of Port Spencer are considered to be commensurate with such activities and the site offers an overall low risk environmental impact option for such a facility.

Based upon the concerns raised in this response, it is suggested that the assumption that risk defined can be 'reasonably' managed and that the 'likelihood and consequences reduced to as low as reasonably practicable', requires review. The overall assumption that the site 'offers low risk environmental impact option', is clearly not demonstrable.

The reliance upon a previous 'evaluated' PER ignoring the issues raised in public submission and known deficiencies in the processes leading to said report, is a fundamental flaw in the 'amended application'.

A meteorological station at the site will be installed (pp 79)

It is noted that a weather station will be installed on site. The question being now, why hasn't the station been installed now in order to validate actual site conditions and inform the proponents of the actuality of what they will be confronted with, rather than outcomes being presented based upon assumptions arising from weather data collected so 70km to the south ie totally irrelevant to the site?

6.3.1 Mitigation Measures for Air Quality

Construction Phase

All access roads and internal roads will be sealed, and vehicle and mobile plant movement confined to those roads as much as practicable. Sealing of onsite roads will not occur until the end of construction. (underlining added)

Fugitive dust will therefore be an issue for the duration of the construction period. It is noted that the proponents intend to suppress dust with sea water. That being the case, the issue now arises of fugitive sea water spray onto adjacent properties which may well be in crop. Sea water cannot be used to spray on Lipson Cove road, or all access roads,

Blasting work will be undertaken by personnel certified to design and execute blasting operations, and will be carried out considering wind direction and weather forecasts, but also in accordance with all relevant codes and government and regulatory requirements.

It is assumed that local owners of land will be advised in advance of any blasting that is to occur. The importance of this being the presence of sheep in paddocks adjacent to the blasting area, and even more-so, should it be lambing time.

Truck unloading will include tipping payloads into a hopper through Burnley Baffles or similar. Burnley Baffles are a dust suppression device for reducing fugitive dust emissions from dump hoppers and chutes handling dry granular bulk raw materials such as grains and ores.

Presumably these will be housed in a negative pressured environment, to further reduce fugitive dust.

5 sealed silos with dust collectors on all grain handling processes and conveyors.

The unanswered question appears to be what processes/provisions have been (or will be) put in place in order to prevent grain dust explosions (which occur from time to time across the world)? Are the dust collectors enclosed in negative pressure environs to eliminate fugitive dust escaping?

Design, construction and operation of grain storages in accordance with fumigation rules.

Given the chemical nature of the fumigants, such a brief statement provides the reader with no assurance that any accidental release of these chemicals has been considered for health and safety of the staff or of those adjacent to the facility.

Yard conveyors will comprise uncovered conveyor loading system, covered reclaim conveyor. No dust collection at transfer points.

· Silo conveyors will be serviced by ventilation systems with pulsed jet fabric filters at each of the conveyor transfer points

There appears to be insufficient information to gain an understanding of the fugitive dust mitigation processes involved here.

A meteorological station at the site will be installed.

One of the fundamental flaws in the proposal is the lack of on-site meteorological data and the reliance upon data originating some 70km to the South. Clearly a 12 month meteorological assessment has not been undertaken by the proponents to verify or correct inaccuracies of the past.

The issue being, when will the weather station be installed and where are the locations of the so called receptors identified in the text of this proposal?

During the harvest period, forecasting of meteorological conditions at the site will be used to assist in decisions to temporarily restrict truck in-loading operations, thereby reducing the likelihood of dust impact at any of the sensitive receptor sites.

Given that the majority of activity will occur during harvest time, where in this proposal is the policy of shutting down activities on fire ban or high fire risk days, given the proximity of the facility to adjacent farming lands?

Operational mitigations not carried forward by the Proposed Amendment:

- Trucks will unload within a covered gantry (two sides and a roof).
- The hematite shed will be serviced by a ventilation system and reverse air filters, 24 hours per day to reduce fugitive dust emissions.

The grain storage shed will be sealed and utilise dust collectors on all grain handling processes within the shed.

· Conveyors will be fully enclosed and serviced by ventilation systems with pulsed jet fabric filters at each of the conveyor transfer points to minimise fugitive dust emissions. · The hopper head space, elevator and conveyor will be ventilated through a reverse air fabric filter before being discharged.

It is interesting to note that the original proposition undertook engineering solutions to reduce fugitive dust arising from its proposed operations to as low as practicable. Apparently the current proponents are not prepared to meet this level of mitigation, rather, its modus operandi is to pollute the environment with grain dust.

6.3.2 Mitigation Measures for Greenhouse Gas Emissions

Commentary has already been made on this aspect of the project. Suffice to say that the GHG issue requires significant additional work given the reliance upon diesel in all aspects of the operation. Such additional work to include the GHG generated through the transport network proposed by the proponents.

A quantification of the amount of carcinogenic particulates and oxides of nitrogen emissions should also be included.

The transport scenario generating the lowest transport related estimated GHG emissions is the development of the Project. The Proposed Amendment will directly load Panamax sized vessels with product from a freight advantaged grain catchment zone, which will provide savings on road transport impacts (i.e. additional distance to Port Lincoln).

More assumptions?

Options to install small-scale renewable energy generation, such as solar, to supply electricity for office buildings will be investigated during the detailed design phase.(underlining added)

Had an appropriate weather station been on site for at least 12 months, perhaps sufficient evidence would have been obtained to examine not only solar but the use of wind power as an alternative source for the site as a whole, with diesel generation as a fail safe.

In any event, it should be mandatory for solar power to be used for all buildings.

If the annual reporting threshold is triggered, energy and GHG emissions will be reported as required under the NGER Act.

It is assumed that for at least 7 months of the year, the site will be potentially shut down (subject to shipping). In short, the peak use period is for the 5 months surrounding harvest. The law of averages would predict that the facility would most likely never exceed the yearly trigger, but for the peak period, who knows.

6.3.3 Mitigation Measures for Noise

The key objective of the noise management measures is to manage noise and vibration generation to protect the environment, human health and amenity.

Implementing staging of the construction activities such that sufficient respite is provided between periods of high impact activity, particularly for night works.

The proponents have now indicated that high impact activities, particularly at night, will occur. The question being, what is the impact upon residents in the vicinity and those whom may be visiting Lipson Cove?

It is noted that noise receptors have not been installed on at least one of the occupied properties within the vicinity. More assumptions appear to be made with respect to the impact upon these residents, not supported by scientific data.

Infrasound (very low frequency sound generated by machinery) is not mentioned, despite its properties being well known, including the distances such sound waves can travel. Noise of safety reversing beepers on construction equipment and wheeled loaders as grain is shifted for export is also of concern.

The following additional controls will be implemented for night-time operations (i.e. prior to 7am and after 10pm):

· Limit site throughput prior to 7am or after 10pm to the following

The operational time for the facility, ie the period of maximum impact upon the residences along Lipson Road will be traffic arriving prior to 7am and departing after 10pm and operational noise emitted from the facility per se.

The level of noise and vibration arising from a fully laden triple and an empty triple as it passes each resident on Lipson Cove Road, has not been determined. The impact, therefore not determined.

The impact upon lambing in paddocks adjacent to the road undetermined. Is it to be assumed that compensation will be forthcoming from the proponents for losses suffered, or is the expectation of the proponents that owners of adjacent land will have to re-organise their programmes to accommodate the development (inconvenience arising)?

Operational mitigations not carried forward by the Proposed Amendment:

- All unloading activities will occur in fully enclosed buildings.
- Conveyor belts will be fully enclosed – this is unable to be achieved for the Proposed Amendment's conveyor loading system.
- To ensure the 40 dB(A) night-time goal noise level is achieved at all surrounding noise-sensitive locations, a number of acoustic treatments for generators were identified.

If it was 'convenient' or environmentally responsible for Centrex to undertake all activities as described above, the question remains, why is it not convenient or environmentally responsible for the proponents to do likewise.

Is this a case of attempting to do it on the cheap at the expense of the environment and the health and welfare of those in the immediate vicinity? Clearly the answer is in the affirmative.

6.3.4 Mitigation Measures for Surface Water

The key principles in the stormwater management of the site remain the same from the Evaluated Project to the Proposed Amendment.

Whilst this appears on the surface to be a reasonable position to take, the fact remains that the underlying stormwater management (assessment) plan is flawed by virtue of the fact that data used to establish it relied upon data collected at the Poonindie (Pt Lincoln Airport) BoM weather station some 60km to the South. The claim of a 20+inch rainfall for the site defies all observations taken by the local farmers over an extended period of time.

The proponents failure to verify the data would suggest that the storm water management plan requires significant revision (as previously commented upon in this submission).

6.3.5 Mitigation Measures for Groundwater

Use of saline water will be contained within the site boundary and avoid retained areas of native vegetation

As raised earlier, the assumption that airborne saline mist will most likely travel to adjacent farm land. What measures are proposed to eliminate this eventuality?

Sanitary wastewater will be managed by on-site facilities in accordance with approval conditions. These facilities will be inspected and maintained in accordance with manufacturer requirements and approval conditions

What assurances are included in the proposal to ensure that waste water will not escape the site and impact on the Gulf?

6.3.6 Mitigation Measures for Terrestrial Ecology

"it is not considered practicable to deliver an on-site SEB for the Proposed Amendment".

Peninsula Ports proposes to undertake a SEB through direct payment to the Native Vegetation Fund.

In light of the aforementioned conclusions, the previously raised position that the proponents intent is to buy its way out of any responsibility with respect to improvement to the terrestrial ecology is confirmed.

The environmental credentials of the proponent are therefore questioned.

Policy positions are noted but the actual plans are needed in order to respond to the 'ideal' positions being proffered.

It is noted that any payment to the 'fund' does not necessarily mean that the monies will be spent at the location in question.

6.3.7 Mitigation Measures for Lipson Island

Peninsula Ports will undertake management and monitoring within its control to minimise the potential impact of the Proposed Amendment upon the environmental values identified for Lipson Island.

There appears to be little understanding that Lipson Island is part of the Lipson Island Marine Conservation Park, a duly Gazetted Marine Park.

The paucity of information with respect to potential impacts the proposal will have on the Lipson Island Marine Conservation Park is of significant concern.

It is assumed the proponents have referred to the Lipson Island Baseline Flora and Fauna Report and Assessment of Risk; Appendix J, Centrex PER, submitted by Donato Environmental Services: Final Report to Golder Associates, November 2011.

Attention is specifically drawn to the limitations of the 'assessment' on pages 49-50 which identifies the two day observation period upon which the 'assessment' was made.

The listed species identified together with the known fact that the Island is a breeding habitat for the little penguin (being the most northerly known site) would suggest the proponents have failed to undertake the necessary environmental impact assessment of their proposal in support of the project.

The reliance upon a decade old report without verification of the facts would suggest the project requires considerable more on-site evaluations to be undertaken prior to any approval being forth coming.

The paucity of information provided with respect to mitigation of impacts is commensurate with the lack of knowledge of the importance of the Marine Conservation Park and the Island.

6.3.8 Mitigation Measures for Soils

Topsoil removed as part of civil will be stored for reuse in site revegetation activities.

There appears to be a significant inconsistency identified throughout the proposal with respect to re-vegetation activities from buying out one's responsibility to now being involved in 'revegetation activities'. Confusion reigns.

Provision of fencing and other controls to limit access to Rogers Beach, especially from vehicles, for the purpose of preventing erosion. This would only be done at the site block boundary and apply to construction workers only as Peninsula Ports does not own Rogers Beach. Private access to Rogers Beach maintained. Noting that this is assumed to be provided by the gazetted public roadway to the west of the subject land.

It is understood that access to Rogers Beach is not served by the unmade Gazetted roadway, but through private property (current track is across the proponent's property).

The provision of fencing et al to limit access to Rogers Beach, especially from vehicles is noted and inconsistent with previous statements that access would be maintained.

Clarification of intent is required.

6.3.9 Mitigation Measures for Marine Ecology

No mitigation measures are proposed for vibrational pile driving, pile drilling, and vessel traffic, as noise generated during these activities is not anticipated to reach levels that would result in injury to marine mammals.

What evidence exists to warrant this assessment?

Mitigation and management strategies not carried forward by the Proposed Amendment: · The nature of the SEB is likely to differ from the rehabilitation and revegetation proposed from the Evaluated Project. · Any sediment generated from drilling activities would be extracted and pumped to the seabed within a disposal area. This disposal area would be banded by silt curtains, established within the construction footprint and located away from the rocky reef and seagrass habitats – This proposed mitigation is not thought to be practical or proportional given the significantly reduced number of piles required for the Proposed Amendment and the proposed application of alternative best practice measures for managing sediment dispersion (i.e. the use of silt curtains). · Use of noise insulation and hammer cushions -The use of physical noise attenuation techniques for the proposed piling is not thought to be practical or proportional given the significantly reduced number of piles required and the proposed application of the alternative best practice measures for managing noise impacts on marine fauna (i.e. use of safety zones). · Underwater noise monitoring would be undertaken during initial pile driving activities to verify that the noise signals being

generated do not overly exceed the modelling predictions used in this risk assessment. Table 7-5 of the PER which lists the proposed monitoring for the Evaluated Project does not specify underwater noise monitoring. Given the significantly lower piling activity required for the Proposed Amendment, underwater noise modelling is not proposed.

If these measures were considered appropriate for the construction of the jetty for the Centrex proposal, the issue now being, why are they considered not appropriate for the construction of the proponents jetty? It is suggested that the construction is being undertaken on the cheap with little concern for the environmental impacts arising providing further evidence to suggest the proponents environmental credentials are flawed.

6.3.10 Mitigation Measures for Traffic

Traffic management is a critical issue, given the proposed change from Swaffer's Road to Lipson Cove Road. Further, upon what basis is the traffic management plan formulated given (1) the original data was generated in 2006 for Lincoln Highway and (2) no apparent traffic survey conducted for Lipson Cove Road? It is foreseeable that the mortality rate from vehicular accidents on Lipson Cove Road under the proposed usage envisage will rise.

Majority of the construction workforce is to be transported to and from the site by bus.

The question being, bussed from where, as there has been no indication of a central accommodation venue (construction village) or is to be assumed that a construction village will be built on land approved under the previous Development Authority adjacent to the Tumbly Bay cemetery? If so, where are the details?

Operational Phase

It is noted that junction and road upgrades will be required for the Proposed Amendment but will differ from the Evaluated Project due to the use of Lipson Cove Road for site access, and the slightly different locations of the access points; however, the treatments are similar.

Obviously the proponents have not visited the proposed access point into Lipson Cove Road. Any similarity to that proposed in the Centrex model is flawed.

Sealing of Lipson Cove Road from the junction with Lincoln Highway through to the access to the project
.....

The focus appears to be on light vehicles and not heavy vehicles actually involved in the construction phase.

It is assumed by this statement that vehicles exiting from the complex will do so on an unsealed road.

The proposed redesign of the Lincoln Highway intersection is noted, but does it take into consideration the location of SA Water's pipeline and associated works as well as Telstra cables? It is noted the turn in/out lanes require additional land. Is there sufficient land for the proposed construction or will land purchases be required? If the latter, it is assumed the individual land owners have been approached and are in agreement. If not, what options are on the table?

6.3.13 Mitigation Measures for Waste and Materials

They also include methods of ballast water exchange that are acceptable to AQIS, such that when a vessel arrives in port its ballast water is not considered foreign and can be discharged during loading at the project.

The question being, how will such waste be managed thus avoiding pollutants being discharged into the pristine waters of the Lipson Island Marine Conservation Park? (Isn't this how the star fish invasion started in Tasmania?)

6.3.14 Mitigation Measures for Socio-Economics

The Socio-Economic Assessment undertaken for the Proposed Amendment, identified little requirement for specific measures to manage socio-economic effects.

Is it therefore assumed that the proponent take little, if any, responsibility for its workforce in relation to alcohol and drug abuse.

The Proposed Amendment will consult with tourism representatives about peak construction worker demand periods to manage potential impacts on tourism in the study area and avoid potential for any residual impacts post-construction.

The biggest issue that is foreseeable is the conflict between tourism traffic and proponent traffic as a result of the proposal.

The Centrex model, through the use of Swaffers Road provided significant separation between these two interests.

The traffic management statements failed to address over spill of transports lining up on Lipson Cove Road awaiting entry into the facility at peak periods, or start of day.

Peninsula Ports will establish a policy and process to enable support to community groups/programs by way of donations/ sponsorship.

Perhaps a more favourable approach would have been to actually have the policy already generated and promulgated in this application.

Peninsula Ports, and its contractors, will open all training positions (e.g., apprenticeships) to locally based applicants to increase local capacity and skill sets

To be commended, but the issue is one of access to formal (academic) training being only available in Port Lincoln or Whyalla.

Peninsula Ports, and its contractors, will maintain ongoing communications with local emergency services including SA Police, health providers, fire services and the State Emergency Service.

· Peninsula Ports will undertake consultation with Tumby Bay Hospital and local ambulance service prior to the start of construction and conduct a risk assessment of local capacity for responding to anticipated requirements during construction.

Critical. Access through the medical services is available to RFDS, but critical care is not immediately available.

It is assumed that the facility will have its own on site first aid complex suitably staffed to cater for occupational accidents not requiring hospitalization. Consideration might be given to having a private ambulance stationed at the site for emergency use, given response times from Tumby or Pt Lincoln.

Peninsula Ports will maintain public access to Rogers Beach and the Lipson Cove campsite throughout construction and operation of the project.

Clarification needed given earlier comments.

After construction and during the operating phase, pedestrian access along the coast (**over the causeway**) would be maintained.

Details and risk assessment not included. How can this be possible for security reasons?

Mitigation and management strategies not carried forward by the Proposed Amendment: · Accommodation will be provided for fly in/fly out workers during construction, most likely at a purpose-built village adjacent to Tumbly Bay. Due to the reduced workforce requirements, this is not considered necessary for the Proposed Amendment. · Worker accommodation would likely provide high quality facilities including catering, internet and recreational facilities · Centrex would pay the capital costs required to extend the ElectraNet transmission line to the Project for operations. Electricity would be self-sourced during construction. An extension of the existing transmission line is not included in the Proposed Amendment. · Centrex would pay the capital costs required to extend the main water pipeline from the intersection of Swaffers Road and Lincoln Highway to provide water services to the Project. An extension of the water main is not included in the Proposed Amendment.

As mentioned, where will the 150 or so workforce be accommodated?

Whilst it may be necessary for start up (should approval and funding be forthcoming), the decision not to access ElectraNet power is an interesting one.

The reliance upon rain water in light of the flawed rainfall data would suggest access to potable water to the extent required will not be achieved.

Access to a guaranteed supply of potable water for fire fighting purposes is dependent upon cartage, It is suggested that a continuous supply of water would be required in the event of a bushfire impinging upon the facility, the risk of which will be heightened by the significant increase in traffic or an internal fire that threatens to escape the boundary into surrounding farmland.

6.4 Construction Monitoring Measures

Interaction with groundwater is not proposed as part of the Proposed Amendment.

Is this not an inconsistency, given the outlined use of brackish ground water in the application?

Table 6-5 Construction phase monitoring measures for the Proposed Amendment

Emissions to Air:	Particulate Emissions
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Daily visual monitoring of dust and implementation of adaptive management strategies.

Is it correct in assuming that monitoring will be undertaken on the basis of looking out the door at least once a day to 'see whether it is dusty'?

Surely the proponents can provide an accurate statement as to monitoring through the installation of an appropriate on site dust and particulate monitoring/recording system which is integrated with the weather station. Remote monitoring stations can be linked into this complex thus providing an overall view of what is happening, the results of which are available to the public via the internet.

Emissions to Air:	Noise and Vibration
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The same outcome as mentioned above is required. Electronic monitoring linked to the weather station will provide the evidence of compliance and inform site managers of any exceedances.

Emissions to Air:	Greenhouse Gas Emissions
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reasonable measures

Define reasonable measures, when one obvious measure would be the ElectraNet link when it comes on line. A rigorous investigation and implementation into the use of wind and solar power appears not to have been undertaken. If the proponents are serious about reduction of GHG, then such alternatives should be included in the application.

Interaction with Natural Resources:	Potential introduction and spread of terrestrial pest plants and animals
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As mentioned earlier in this response the control of terrestrial plants and animals is an issue given the proposed distances travelled by the transport companies to bring product to port.

Is it the intention of the proponent to ensure the propagation of weeds is kept to an absolute minimum through clean down routines of all vehicles entering the site, ie the site is a bio-secure site?

Land Disturbance and Vegetation Clearance	Marine disturbance
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To maintain the structure, function, diversity, distribution and viability of coastal and marine communities and habitats at local and regional scales · To prevent disturbance to flora, fauna and marine values on Lipson Island

The construction of the groyne (causeway) clearly is at odds with the aforementioned statement. Impacts upon the Lipson Island Marine conservation Park (and environs) lacks clarity of assessment and risk assessment.

Baseline and annual monitoring for invasive marine species

The baseline is zero at this time. Annual monitoring for invasive species is akin to shutting the gate after the horse has bolted. Surely the monitoring process will occur every time a vessel arrives in the port facility.

Generation of Wastes and Discharges	Accidental release from chemical/hydrocarbon storage
Objective	· To ensure that human health and safety is not adversely affected

Certainly the principle objective under the Worksafe Act. Presumably the same courtesy extends over the boundary of the facility, especially in the context of chemical hazards already identified previously in this response, especially phosphine gas.

Community Interactions	Traffic generation and access
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To minimise impacts associated with construction traffic and compensate fairly where impacts are recognised and are unavoidable. · To maintain safe access to valued community assets including Rogers Beach and Lipson Cove Beach.

What are the grounds for compensation as this is the first instance that such has been raised? Maintenance of access to Lipson Cove is mandated by the fact that Lipson Cove Road is a public road. Any impact upon the public roadway will be challenged. Issues relating to access to Rogers Beach have been addressed on a number of occasions in this response. The boundary of the site precludes access.

6.5 Operational Monitoring Measures

Emissions to Air:	Particulate Emissions
Objective	· Maintain air quality to protect the environment, human health and amenity.

It is noted that dust (and particulate) monitoring will be confined to the site albeit via a number of monitors around the facility.

Such would protect the workforce as required under current legislation.

However, the issue remains in relation to fugitive dust, ie dust which escapes the boundary of the facility into neighbouring properties.

Given the paucity of dust distribution knowledge outside of the complex, will the proponents provide adequate monitoring stations on these properties to further inform management of any exceedance of PM10 and PM2.5 levels thereon which would most likely have a detrimental impact upon worker's health, if impacted either by a single event or an accumulation of exposure events over time?

Emissions to Air:	Noise and Vibration
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To manage noise and vibration generation to protect the environment, human health and amenity
 Noise from Port Spencer operations does not exceed the relevant noise criteria at sensitive receptor locations.
*The locations of which do not appear to have been disclosed, nor to include impacts arising from infrasound.
 It is understood adjoining landowners have not been approached.*

Emissions to Air:	Greenhouse Gas Emissions
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Refer to earlier comments

Interaction with Natural Resources:	Fauna interactions
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To prevent disturbance to flora, fauna and marine values on Lipson Island.

The issue being, if the depth of knowledge of potential impacts upon the Lipson Island Marine Conservation Park is as recorded in Appendix J, Centrex PER, then clearly there is a significant problem because what is it the proponents aim to prevent? The answer is not simply the word 'disturbance'.

Land disturbance and vegetation clearance	Marine Disturbance
Objective	· To maintain the structure, function, diversity, distribution and viability of coastal and marine communities and habitats at local and regional scales. · To maintain and protect beaches north and south of the port.
Performance Indicators (Targets)	· Sedimentation effects are within the limits predicted from hydrodynamic modelling of the causeway and jetty.
Monitoring	· A beach monitoring program will be developed and implemented to validate the quantity of sediment deposition in and around the causeway in line with predicted impacts (refer to Appendix C).

This is a significant issue with the proposal. There is a paucity of data to substantiate the so called risks and the minimization thereof.

Evidence from other places where significant groynes are introduced into the environment have created significant problems (as evidenced on Adelaide beaches and the sand movements thereon).

These issues were minimized (ALARA) in the Centrex model of a jetty, but here, the community is being asked to support a project which has a high risk of destruction of the beach environment of Lipson Cove/Rogers Beach and the Beaches of Lipson Island.

The risk are very high and costly to remediate.

Generation of Wastes and	Accidental release from chemical/hydrocarbon storage
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Discharges	
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No where to date has the issue of the potential for explosion in the silo complex been addressed, nor the impact of an accidental release of phosphine (PH3) or methyl bromide(CH3Br).

Community Interactions	Traffic generation and access
------------------------	-------------------------------

Refer earlier commentary.

7. Conclusion

The port will be outside the limits of the Sir Joseph Banks Group Marine Park.

This comment is irrelevant. The port is proposed to be located adjacent to, if not intersecting with, the duly Gazetted, Lipson Island Marine Conservation Park.

There is significant discussion regarding supply chain costs, the dominance of vertically integrated port operators and a lack of competition in South Australia (refer ACCC's bulk wheat ports monitoring report (December 2017) and ESCOSA's current inquiry).

The significance of which has not been established herein and especially in real terms necessary for a business case or cost benefit analysis on the viability of the proposal.

The development of Port Spencer is expected to contribute significant, reoccurring annual economic savings to grain growers in the catchment zone.

Unfortunately the reality of the situation is that producers in the northern aspects of the so called catchment zone have chosen to support the storage facility at Lock. It is understood that approximately 900,000 tonnes of grain have been delivered to this facility for shipment via Luck Bay.

It is also known that transport from this area to Port Lincoln has been predominantly undertaken at night with minimal impact upon Port Lincoln, contrary to expectations.

The business model predicated upon access to 1M tonnes of grain from Central Eyre Peninsula appears to be flawed.

There is no discussion of the potential impact upon the Pt Spencer proposal, should the deep water port at Cape Hardy be progressed as planned to include a grain export facility in addition to ore and other commodities, none of which are planned for Pt Spencer.

It is also noteworthy that the transport (road network map) provided in the next section of this application (2.8.5) outlined only roads within the District Council of Tumby Bay and not the remainder of the proposed catchment area.

The anticipated 'saving/benefit' to producers (average \$3/tonne) also appears to overlook the outcomes (potential) of the ACCC finding of anti-competitive requirements to which the principal competitor is subjected to. What would the impact be on the proponent's business case should the findings be to the advantage of the competitor thereby allowing a reduction in price.

Lots of speculation and little facts provide the respondent with little evidence of the viability of the proposal, having regard to the potential environmental impact of the proposition on a pristine environment and other ventures being planned in the immediate vicinity.

7.5 Summary

The Proposed Amendment is consistent with planning and regulatory requirements and should be granted the requested variation to the existing approval.

Community support/non support for the proposal is vested in:-

(a) The District Council of Tumby Bay's original one line 'support for the project' as evidenced in the official correspondence pertaining to the approval granted (2011-12)

(b) The Tumby Bay Residents and Ratepayers Association Inc detailed response to the original proposal being in the negative

(c) The District Council of Tumby Bay's official approach to the then Minister Rau in 2015 seeking revocation of the PDA

(d) The Tumby Bay Residents and Ratepayers Association Inc request of the then Minister Rau in 2015 to revoke the PDA, noting Centrex's departure from the State.

(e) Confusion surrounding Council's current position with respect to Pt Spencer and Cape Hardy, where it appears to now support both projects.

(f) representations made by the Association to the recent Regional Development enquiry under the auspices of the Minister for Agriculture in support of Cape Hardy, given the diversity of industry being mooted at this location, in contrast to Pt Spencer.

It would appear to be inconsistent with the local community given that there may well be significant costs attributed to local government and hence ratepayers through required upgrading of roads and the provision of additional services.

The social impact of an accommodation village on the verge of Tumby Bay is not necessarily supported by the community as it has not been raised in the proposal.

NOTES:

1. Reference has been made throughout the response to Poonindie as the location of the BoM weather station used as a data source. The actual location of the station is Lincoln Airport situated adjacent to Poonindie.

2. Causeway and groyne have been used to represent the proposed 240m seawall intended to be constructed leading to the 'jetty' or wharf.

PT SPENCER AMENDED PER COMMENTARY ON VOLUME TWO

EXECUTIVE SUMMARY

The amendment process is required to take account of alterations to the Evaluated Project and to update the PER due to the length of time that has passed since the PER was originally prepared. (underlining added)

The perception of what constitutes an update is open to debate. An update does not mean taking the previous report for granted and reproducing it without correcting any flaws or omissions in the original.

Reduction in ship size to be accommodated from Cape Class to Panamax (including emerging Panamax).

What is the future of shipping with respect to boat size. It would appear that a reduction in capability to handle Cape Class vessels is a retrograde step, when one would suggest the facility should be constructed to handle vessels of the future.

What implications for the project's future viability has this reduction in vessel size introduced into the competition equation between Pt Lincoln, Cape Hardy and Lucky Bay?

A significantly higher rate of grain receivals during harvest (October to December with seasonal variation) and greater on-site grain storage capability which reduces the reliance on up-country grain storage, and the resultant double handling of grain prior to export.

Refer to previous comments on this 'expectation'

Heavy vehicle site access for the Proposed Amendment is proposed via Lipson Cove Road rather than Swaffers Road.

Refer to previous commentary on the implications of this change and the conflict of road users this introduced.

Further comments will be forth coming.

Alteration to the type and configuration of marine infrastructure.

The significant changes to the construction of the jetty complex (both in length and form) creates different set of environmental impacts, which, it is suggested, is not well researched through on-site investigations. The reliance upon desk-top reviews and supposition is of considerable concern.

There appears to be an attitude of we'll build the facility and 'fix up any of the problems as an after thought'. Hardly a responsible attitude, given the proximity to the Lipson Island Marine Conservation Park and two popular beach destinations.

This Review of Evaluated Project has shown that most of the potential impacts considered for the Evaluated Project are expected to be similar (i.e. no change or similar level of effect) for the Proposed Amendment (refer to Table E-1).

It is apparent that the proponents believe that grain dust (and its environmental impacts) are the same as iron ore dust, not to mention the traffic impact and the significant increase in pollutants introduced into this otherwise pristine area from the proponents activities.

Increases in diesel fumes, potential for hazardous chemical exposures, noise, light, coastal impacts arising from the construction of the groyne and the assumptions made that claim to support this application, lead to a conclusion that there are a significant number of unanswered questions, the answers to which will be addressed after approval has been obtained (and potentially the damage done).

The removal of iron ore receival, storage and handling from the project scope means that several potential impacts are no longer applicable.

Table E-1 Review of the Evaluated Project -Summary of outcomes

Whilst it is true that the impacts of iron ore are no longer applicable, the issues surrounding the environmental impact of grain dust and other variations, require significant examination and not as implied, a no change scenario.

Countering the increase to seagrass clearance, reduced impacts to marine fauna are expected due to the significantly lower number of piles required for construction of the Proposed Amendment.

What scientific evidence exists in support of this statement or is this yet another example of the proponents 'assumptions or expectations'?

Lipson cove is a known lay-over site for the migration of Southern Right whales. The question now being, what impact will the new proposal have on this?

Direct impacts on the local community beach access or tourism are not predicted due to seagrass accumulation.

Based upon what scientific study, or is this yet another 'assumption'?

Differences in the mitigated risk ratings and the reasoning for these differences is shown in Table E-2. The risk profile for the Proposed Amendment is not considered to materially differ due to the Proposed Amendment

Given the major differences between the two proposals and the reluctance of the applicant to actually accept that iron ore is substantially different to grain dust, and to accept that the Centrex proposal, whilst initially dependent upon ore transport from the Wilgerup Mine (near Lock) was based on the long term operation of Project Fusion and the transfer of ore from the Koppio Hills to the Port via a slurry pipeline.

Errors and omissions in the original submission have not been corrected in this application, rather it is 'not considered materially different'. Such a position defies scientific logic.

The conclusions drawn in table E-2 lack credibility.

Site access for the Proposed Amendment is proposed via Lipson Cove Road rather than Swaffers Road. Lipson Cove Road has been assessed as providing safer turning conditions to and from the Lincoln Highway and minimises the risk of new road works into the site impacting on potential aboriginal cultural heritage areas in the vicinity of Rogers Beach. (pp8)

Who undertook the 'assessment' of the proposed entry points to the facility and arrived at the decision that Lipson Cove Road was preferred?

What evidence exists that the original road works actually impacted upon aboriginal cultural heritage areas in the vicinity of Rogers Beach?

2. Baseline Environment

Climate data from North Shields (Port Lincoln Automatic Weather Station (AWS)) located approximately 70 km south of Port Spencer was reviewed in August 2019 as only rainfall data was available from the Bureau of Meteorology (BoM) station at Tumby Bay.

No additional wind data is available from North Shields (Port Lincoln AWS) since the Evaluated Project, with data collection ending in 2010. (Underlining added)

As previously indicated in this response, climate data was NOT site specific leading to a host of assumptions (errors) associated with dispersion of fugitive dust, noise and water, leading to our assertion that the application is fundamentally flawed in its environmental assessment regime.

All dispersion patterns attached to this application are therefore based upon supposition.

Table 2-2 Summary of Climate Change Projections on the Eyre Peninsula (PER and SA Climate Ready)

It is noted that the data used in the construct of the aforementioned table is based upon data for the original PER and thence data from Pt Lincoln BoM. As previously stated, the credibility of such data is questionable, moreso with the knowledge that data appears to be in excess of a decade old.

More assumptions to support the proposal???

2.1.2.2 Ocean Wave

The Evaluated Project identified a potential increase of 0.5 - 1.0 m in wave height at the site based on CSIRO and BoM (2008). Coastal and hydrodynamic modelling for the Proposed Amendment has included modelling of baseline conditions and is included as Appendix D.

It is noted the original 'modelling' was based on BoM data of 2008. Upon what basis has the new 'modelling' been undertaken? Presumably using non site specific data.

2.6 Air Quality

Air emissions modelling undertaken for the Proposed Amendment has conservatively used the highest of the 70th percentile concentrations measured at Whyalla EPA monitoring station.

It is noted that NO on-site determination of air quality has been undertaken either in the original PER or for the amended application.

The assumed air quality parameters are just that, assumptions, totally irrelevant to the situation at hand.

It is noted that PM2.5 values have been adopted from the Iron Road proposal (2015), but the source of such determination is unknown.

What is South Australia's EPA standards for fugitive dust and for occupational health & safety of employees at the site?

The conclusion to be drawn from the information provided is clearly one of lack of credibility, one which the public should reject outright, when actual measurements of baseline data can be achieved at a cost over time.

More environmental short cuts!

2.7 Noise

The existing noise environment is described in the PER for the Evaluated Project, based on a noise survey completed in November 2008 (refer to Section 5.7 and Appendix G of the PER). The noise survey data collected is considered suitable to describe the baseline conditions at the site given that no significant development, earthworks or land use changes have occurred which are likely to have altered the noise environment in a significant way.

Clearly the assumptions under which the 2008 noise survey was undertaken are significantly different to those being proposed in this amendment application. Apparently the proponents are asking the public to assume that a facility constructed for iron ore management (as described in the original PER) is the same in every respect to that being now proposed.

Clearly the proponents are not reading the same document as the public are. Road noise; construction noise and ultimately operational noise is significantly different and emanates from a different set of origins.

Where are the noise survey baselines for the new proposal?

It is understood that no sensors have been placed in the three residents along Lipson Cove Road to establish a baseline of current noise, from which the anticipated noise impact of construction, including blasting and operations can be extrapolated. Nor, as it is understood, have sensors been placed at the two beach sites, again to determine a baseline.

This response also highlighted previously, the difference in modus operandi between the two proposal which clearly has not been taken into account.

2.8 Traffic

2.8.1 Lincoln Highway

It is noted that the previous road traffic survey was dated 2006.

Much has been made of the closure of the railway and the impact upon the road network yet the application does not appear able to substantiate this fact. There appears to be no recent (2019) road survey data conducted by DPTI, to which the 'expected' increase in traffic from Lipson Cove Road is to be added.

The extent of trip redistribution (ex Lock to Lucky Bay) of freight traffic on both the Lincoln Highway and throughout the wider Eyre Peninsula road freight network to this new export as a result of its trip generation has not yet been determined.

Clearly this is a significant omission in the development of a transport strategy for the proposal.

2.8.2 Lipson Cove Road

The traffic impact assessment for the Evaluated Project noted the traffic volumes along Lipson Cove Road to be approximately 50 vpd, with approximately 10 percent commercial vehicle content (according to traffic counts undertaken as part of the assessment between 6 and 8 April 2011). This traffic data was collected during the school holiday period.

It is assumed that no new traffic survey has been undertaken on Lipson Cove Road in the anticipated peak periods compared to the off peak period of operation of the proposed facility.

The conclusion being that the proponents do not have any idea of the change in traffic now visiting Lipson Cove other than the 2011 survey carried out during an unknown school holiday period.

What is the current use of the roadway for caravans, holiday traffic, commercial and farm use which will be impacted by the proposal?

The conflict between existing road users and that being proposed (grain transports) is the key question requiring an answer. Public safety is paramount.

The current road width of 7m or so is considered to be inadequate for the heavy vehicular traffic proposed. Further, there are sections of the road where line of sight is restricted (intersection with South Coast Road travelling West) or on the crest of some of the inclines to the east of the aforementioned intersection.

Issues with the entrance from Lincoln Highway have been mentioned previously.

2.8.5 Existing Restricted Access Vehicle Network

This is a critical issue for the proponents.

It is however, more critical for the ratepayers of the District Council through which the proposed grain will be transported to the proposed port. The cost of maintenance of the road network falls on Local Government and hence the ratepayers.

Is it therefore the expectation of the proponents that local ratepayers will maintain the road network for the benefit of a private company, especially where any community benefit is considered to be either non existent or very little.

Is there an expectation that all roads will be reclassified in order to take heavy vehicles? If so, what contribution will the proponents make to all Local Government authorities to maintain the roads accordingly?

Figure 2-7 would give the impression that the only road network under consideration is confined to the District Council of Tumby Bay, which would seem contrary to the expectations of the proponents to access around 1M tonnes of grain from Eyre Peninsula.

2.9.1 Listed Plant and Fauna Species and Threatened Ecological Communities

Yet another example of the inaccuracies of conclusions based upon desktop reviews. Where is the data collected over a twelve month period to substantiate the claim no listed 'communities' (or species) impacted.

Attention has already been drawn to the paucity of information pertaining to Lipson Island and the Marine Park (per se) and the impact of the proposal thereon.

The transfer of the EPBC approval was not amended to take into the significant change of conditions brought about by the amended PER application.

2.10 Lipson Island Ecology

Baseline ecological conditions at Lipson Island are described in the PER for the Evaluated Project, based on a study completed in 2011 (refer to Section 5.10, Appendix I of the PER and Section 5.10 of the Response to PER Submissions). The baseline ecological data collected is considered suitable to describe the Lipson Island ecology.

As previously mentioned the Lipson Island baseline studies were limited to two day visitation as disclosed in Appendix J, pp49-50 of the Centex PER.

The public are being asked to accept that the observations of a two day visitation to the Island in 2011 are appropriate for a project substantially different to the Centrex proposal? Due diligence this is not!

2.11 Marine Ecology

It is noted that the Centrex model undertook a number of studies, the last of which was in 2011.

Having regard to the simple fact that the current project is considerably different to the original, where are the outcomes of any study undertaken (2019) by the proponents to either verify the validity of the previous work or to actually determine whether any significant changes have taken place over the intervening years?

2.12 Coastal Environment and Wave Dynamics

"no new data collection has occurred. However, additional coastal and sediment transport modelling has been undertaken as part of an iterative process of jetty design and impact assessment" (underlining added)

Is it not the case that more assumptions are being made as to the impact upon the coastal environs in absentia of actual site related scientific data?

Local observations would suggest a different result to that being proposed as would the experience of others in Adelaide and the debate (debacle) of sand transfer on suburban Beaches. In the absence of scientific data, is this the outcome the community can expect from the proposals under consideration?

The groyne effect (as identified in this application) is well known by members of the local community through an earlier experience on the seafront of Tumby Bay, and clearly one to avoid.

2.13 Cultural Heritage

The baseline information presented in the PER is considered suitable to describe the heritage values at and near the site given that no significant changes have occurred to the nearby environment which are likely to have altered the heritage values in a significant way and there have been no new archival recordings of heritage values.

There appears to be an obvious inconsistency in the approach taken, noting no impact according to the above, but an impact leading to the rejection of Swaffers Road?

2.14 Visual Amenity

The suggestion of no change is not credible. For such a comparison to be made then the constructed facilities would have equal appearance, something that is clearly not the case.

The introduction of the silos and bunkers are clearly different to the previous sheds and associated conveyors.

There is a paucity of information as to how the proponents intend to 'improve' the visual amenity of the site.

2.15 Socio-Economic Environment

It is noted that the proponents accept that the passage of time may have an impact on socio-economic factors.

It is noted that the new model demographic is based on the 2016 ABS Census, now some 4 years out of date.

The assumption that the project would ultimately result in employment growth is to be off set by loss of jobs in neighbouring area (Tumby Bay, Cummins, Pt Neill etc. The nett benefit of employment requires to be revisited.

2.15.3.3 Fishing and aquaculture

Lipson Cove located approximately 15 kilometres north of Tumby Bay

Where is the internal consistency of presentation of the facts? Lipson Cove seems to be a moving location. This goes to the credibility of the proponents when clearly they do not know where the location of the proposed facility is.

The Lipson Island Conservation Park contains Lipson Island and its surrounding waters. Lipson island is located approximately 170 m from the mainland, can be walked to a low tide and is known for its wildlife and topographic features (Eye on Eyre Tumby Bay, 2018) (underlining added)

Whilst it is true that at very low tides, one can walk across to the Island. Unfortunately the message conveyed appears to ignore the fact that access to the Island is via permit only and secondly, the practice is a dangerous one because of the significant rip generated between the mainland and the Island on the change of tide. There has already been one death recorded as a result.

The application has failed to consider the known fact that the area under consideration is impacted periodically by 'dodge tides'. It is strongly suggested that these conditions, together with fugitive dust being deposited upon the surface of the ocean, would lead to algal blooms to the detriment of the marine ecology.

2.15.5.4 Access and connectivity

The primary and secondary study areas are serviced by a range of transport infrastructure, including roads, ports and airports.

The proponents would have been better served by the use of a map to illustrate the proposed catchment of the project relative to known transport routes. Such an illustration would show the overlap of established services with that proposed. It would also show the relevance (or otherwise) of the locations of port facilities at Lucky Bay, Whyalla and Port Bonython, Pt Pirie and Pt Adelaide.

Furthermore, the overlay should include roads maintained by SA Government (DPTI) and those maintained by Local Government (ratepayers, the majority of whom are not farmers), not just those of the District Council of Tumby Bay.

The relevance of Ceduna and Whyalla airports is questioned. The only commercial airport in the immediate region is located at Pt Lincoln.

The issue being a realistic look at where the proposed port is located and the relative distances to the other mentioned locations, noting distance travelled is a key financial determinant in the proposed port's viability.

3. Impact Assessment

3.1.1.3 Mitigation and management carried forward by the amended project

Should rainfall decrease, operational water demands will be met through other sources.

Attention has been drawn to the fact that the proponents are reliant upon data from the BoM station at the Pt Lincoln Airport, some 70km South of the proposed development. Local knowledge would suggest that the data so used grossly over estimates rainfall and hence any 'expected' catchment for operational requirements.

It is noted the original Development Authority included the construction of a small desalination plant to meet requirements of the port and the mining operations (Project Fusion). Water for construction purposes was to be provided by SA Water.

Given no on-site meteorological data has been collected by the proponents, it is strongly recommended that any forthcoming approvals require the proponents to verify all issues reliant upon local meteorological data through the installation and operation of a weather station for 12 months prior to commencement of any work.

Further, the proponents should be required to provide full details pertaining to 'met through other sources'.

It is well recognised that access to water is a major concern on the Peninsula. Any additional impact/demand needs to be fully understood and incorporated into the Water Allocation Plan for the Region, or by a construction of a small desalination plant by the proponents (following relevant approvals being met).

3.1.2 Greenhouse Gases

Greenhouse gas (GHG) emission estimates for the Proposed Amendmentprovide a direct comparison with the Evaluated Project (refer to Appendix G).

The veracity of this statement needs to be challenged, given the reliance upon road transport.

Table 3-3 Comparison of key GHG calculation outputs for the Evaluated Project and Proposed Amendment

There appears to be a flaw in the argument noting that the GHG calculations for the Centrex model included not only road transport issues from Wilgerup to the port, but also the operations related to Project Fusion, including the desalination plant and the slurry pipeline etc.

It is understood that the PDA was based upon the operation of the port for export of iron ore alone with the caveat of maybe future developments for grain. Such a position was also conveyed in the EPBC application.

The question therefore being how can there be a direct comparison between the two proposals?

The proposal under consideration is a new project requiring its own data in support.

Table 3-4 Summary of GHG impacts for the Evaluated Project and Proposed Amendment

Greenhouse gas emissions during operations	Similar level of effect.
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The evidence in support of this claim is speculative.

Table 3-5 Summary of potential soil impacts for the Evaluated Project (PER Section 6.2) and Proposed Amendment

Pollution from spills of fuel and other substances (insignificant impact)	No change
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The comment relating to diesel fuel spills may well be valid, but the proponents fail to address the fact the nature of pollutants arising from the new project are NOT the same as the Centrex model. Any suggest that there is no change is a gross misrepresentation of the facts.

The Centrex model did not address the use of phosphine or methyl bromide nor the potential for grain dust explosion.

Spill of hematite ores and dust from the storage shed and ship loading, which may result in elevated levels of iron in the surrounding soils (insignificant impact)	No longer applicable / No impact – iron ore excluded from Proposed Amendment
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It is noted the deletion of haematite dust from the site, but what of the significant increase in particulate emissions from diesel transport and fugitive grain dust impacts over the life of the project?

3.2.3 Mitigation and management carried forward by the Proposed Amendment

Private access to Rogers Beach maintained. Noting that this is assumed to be provided by the gazetted public roadway to the west of the subject land. (underlining added)

There appears to be an inconsistency with respect to access to Rogers Beach. Clarification is sought rather than assumptions made. It is understood access from the gazetted roadway would require access through private property.

Table 3-8 Summary of potential groundwater impacts for the Evaluated Project (PER Section 6.4) and Proposed Amendment

Migration of chemicals and hydrocarbons to groundwater due to spills or leakage due to the storage and use of chemicals on-site including fuels, oils, greases and solvents.	No change.
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As previously mentioned, hydrocarbons (diesel etc) is dealt with in both scenarios. However, a major difference in the project is the use of phosphine (and its source chemicals) and methyl bromide together with laboratory wastes (not defined). No change is not considered appropriate.

3.4.3 Mitigation and management carried forward by the Proposed Amendment

A well construction permit will be sought if the bore is to be drilled more than 2.5 m below ground level.

Use of saline water will be limited to the construction phase and will be contained within the site boundary. Use of groundwater will avoid retained areas of native vegetation.

What is not described is whether or not the bore can sustain the declared daily requirement. What contingency exists if this proposition fails?

3.5 Air Quality

Air emissions for the Proposed Amendment were identified as likely to differ from the Evaluated Project

The language of 'likely to differ' is the first acknowledgement of the difference in the two projects, but only 'likely'. As mentioned on a number of occasions in this response, grain dust and its characteristics (physical, biological and medical) are significantly different to the claimed 'inert' characteristics of iron ore dust (although the literature would suggest otherwise).

The dispersion regime, it is suggested, would differ significantly due to differing densities. As such, on site meteorological data is critical to establishing such dispersion patterns in order to establish the associated risks be they human or environmental.

Exposure data relevant to PM10 and PM2.5 as established under State Legislation is the starting point. These requirements do not appear to be included in the discussion/summary provided herein.

WorkSafe Australia Exposure Standards (16 December 2019) for grain dust is reported as :-

<u>Standard Name</u>	<u>CAS No</u>	<u>TWA (ppm)</u>	<u>TWA (mg/m³)</u>	<u>STEL (ppm)</u>	<u>STEL (mg/m³)</u>	<u>Notes</u>
<u>Grain dust (oats, wheat, barley)</u>	0		4			

Reference to a NSW EPA standard would suggest either SA State regulations are not established or are not favourable to the discussion.

Full disclosure of the health and safety aspects of prolonged exposure to grain dust is required in order to evaluate impacts for workers and the public at large as a consequence of fugitive dust emanating from the facility.

Air quality may also be impacted upon by methyl bromide (bromomethane) or phosphine exposure.

WorkSafe exposure information for the aforementioned is presented below.

7803-51-2	<u>phosphine</u>	<i>Flammable gas – category 1 Gasses under pressure Acute toxicity – category 2 Skin corrosion – category 1B Hazardous to the aquatic environment (acute) – category 1</i>				EU
<u>Standard Name</u>	<u>CAS No</u>	<u>TWA (ppm)</u>	<u>TWA (mg/m³)</u>	<u>STEL (ppm)</u>	<u>STEL (mg/m³)</u>	<u>Notes</u>
<u>Grain dust (oats, wheat, barley)</u>	0		4			

74-83-9	<u>bromomethane</u>	<i>Gasses under pressure Germ cell mutagenicity – category 2 Acute toxicity – category 3 Acute toxicity – category 3 Eye irritation – category 2 Specific target organ toxicity (single exposure) – category 3 Skin irritation – category 2 Hazardous to the ozone layer – category 1 Specific target organ toxicity (repeated exposure) – category 2 Hazardous to the aquatic environment (acute) – category 1</i>			
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WorkSafe Australia 16 December 2019

Table 3-11 Summary of dust emission rates for the Proposed Amendment (gm/sec)

Table 3-12: Summary of Evaluated Project (Centrex, 2011) total grain handling dust emissions (gm/sec)

We are now presented with data of dust emissions in gm/sec whereas previously dust concentrations for exposure purposes were either ppm or micrograms/cubic metre.

What is the relationship between gm/sec and exposure concentrations and the corresponding health impacts?

It would appear that fugitive dust emissions are substantially more than the Centrex model. The question being, is the impact substantially more than previously determined and are the mitigation measures appropriate to meet the 'assumed' increase both at the human and environmental interfaces.

3.5.2 Amended Impact Assessment Summary for Air Quality

Is it that the conditions chosen for the purpose of this application were those most favourable to the 'best' outcome, ie the lowest fugitive dust impact.

This points to the fact that on-site weather data is critical to these types of 'assessments'.

Again, the use of NSW EPA standards would suggest that either SA does not have such standards, or the choice of standard may advantage the results in favour of the proponent.

However, it is recorded in WorkSafe data (hazard database page 60) the EPA exposure standard is 4ugm/m3 as opposed to the NSW value.

What 'standardised' data is the public to accept when the application provides differing values?

The modelling indicates:(pp60)

In all cases the modelling demonstrates the standard being exceeded.

The conclusion being that fugitive dust is a real issue with the proposal and that the mitigation program proposed, is ineffectual.

The health and environmental impacts raised remain a significant concern.

Refer also to previous comment pertaining to fugitive dust deposits in the marine environment on a dodge tide.

Annual average dust deposition (g/m²/month)

Under maximum proposed operations during harvest (6 am to 10 pm), the results predict conformance with the 8 µg/m³ NSW EPA criterion at all sensitive receptor sites. However, the result at SR#1 of 3.95 µg/m³ is very close to the criterion (refer to Figure 3-6).

There seems to be some confusion with respect to deposition rates of gm/m2/month with a predicted conformance with 8ug/m3 (NSW EPA 'standard,). The deposition rate appears to be not credible.

Table 3-13 Summary of potential air quality impacts for the Evaluated Project (PER Section 6.5) and Proposed Amendment

Operations	
Dust emissions associated with the transport and handling of materials. <i>Modelling demonstrated PM10 and PM2.5 concentrations complied with the assessment criteria.</i>	Similar level of effect. Modelling has demonstrated that the site can achieve compliance with project air quality criteria. It is noted that under certain wind conditions (low wind conditions in the evening hours, typically between 6 pm and 10 pm, and when blowing from the south of the site towards SR#1), there may be a requirement to reduce the intensity of grain in-loading operations between 6pm and 10pm during harvest.

The modelling illustrated fugitive dust exceeded compliance.

Given no site specific meteorological data is available, the dispersion plots provided are speculative and potentially misleading.

The dispersion of fugitive dust is assumed, given that no specific site weather data has been obtained by the proponents.

The statement of the impact on SR#1 with a southerly may well be correct, but it is well known that the northerly winds (NW and NE) and easterly winds also frequent the environment. The impact upon properties on Lipson Cove Road may well be impacted to a much greater extent than assumed.

Products of combustion from fuel use in vehicles and mobile plant. <i>Qualitative assessment determined emissions from diesel fuel generators rarely exceed assessment criteria 1 km from sensitive receptors in areas with low background.</i>	No change. The Proposed Amendment has a smaller power demand than the Evaluated Project.
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As indicated on numerous occasions in this response, the modus operandi of the two proposals are significantly different. It is acknowledged that the start up for the Centrex model was predicated on road transport of ore from Wilgerup, BUT the longer term strategy was bringing on line ore via slurry from Koppio (project Fusion). The comparison therefore must be qualified.

For the proposal under review, road transport is the main (only) form of transport to be considered in the short and long term. Diesel emissions therefore will be significant in the longer term.

Given the fact that the proponents intend to use Lipson Cove Road and that the vehicular estimated daily use will be more than 1000, the majority of which are diesel powered, the conclusion of no change lacks credibility. It may well be less emissions generated from the generators but not so for the operations of the site per se.

The 'no change' conclusion is not sustainable.

The dispersion of such emissions appears not to be identified.

These differences are highlighted in Table 3-10, and have been included in the revised Air Quality Assessment

It is understood no air quality measurements (monitoring) have been undertaken on properties on Lipson Cove Road.

3.5.3 Mitigation and management carried forward by the Proposed Amendment

A meteorological station at the site will be installed .

As indicated, the problem with the application is the lack of on-site meteorological data to verify claims made. The proponents should be required to have installed such a station pre-application in order to provide accurate site data and not rely upon assumptions/supposition using data generated some 70km to the South. There appears to be no base line data for the specific site before any construction started.

3.6 Noise

Table 3-14 Operational and Traffic Noise Assessment Criteria for Port Spencer

It suggested as fact that noise attributed to vehicles travelling on Lipson Cove Road will significantly increase over the period of operation (6am to 10pm) and outside of these hours as transports arrive for an 'early start', especially if carting significant distances from the facility.

It is noted that the modelling has not included any data being obtained from receptors on Lipson Cove Road. It is known that at least one resident has not been consulted about or requested to install noise detection devices on the property.

Given the 'anticipated traffic load', the issue of audible noise AND infrasound generated by the machinery needs to be quantified and mitigated.

It is noted that EPA and District Council of Tumby Bay noise level requirements do not appear to have been considered.

Table 3-15 Comparison of assumptions regarding noise emission sources during construction (15-minute period)

The relevance of the (15 minute period) is questioned.

Heavy vehicle access road traffic movements	280 road train movements per day (140 hematite trucks and 140 for grain)	429 heavy vehicles per day (peak day) 262 vehicles per day assuming uniform distribution during harvest.
Light vehicle access road traffic movements	30 passenger vehicle movements per day (Refer to Appendix G of the PER)	120 passenger vehicle movements per day (two-way movements with allowance for shift changeover)

(a) the Centrex model was devoid of data relating to grain movements as Free Eyre had withdrawn from the project. Comparisons between the two are irrelevant.

(b) Traffic movements per day amount to 429 (peak heavy) plus 120 light plus undeclared normal road users (farmers, locals, tourist, caravans etc). Later estimates appear to be around 1000+

What is the real noise level impacting upon the residence on Lipson Cove Road, given this level of traffic?

The reality of a 100k/hr speed limit needs to be critically examined in order to ensure public safety.

The use of exhaust brakes needs to be included in any noise assessment undertaken.

Table 3-17 Predicted road traffic noise levels on Lipson Cove Road

Scenario	Descriptor	Criteria (dB(A))	Predicted road traffic noise levels (Leq, dB(A))		
			Dwelling 7	Dwelling 8	Dwelling 4
Day (7am to 10 pm)	Leq, 15 hr	50	47	43	48
Night (10pm to 7am)	Leq, 9 hr	42	37	33	38

The operative word being predicted noise level based upon what evidence to sustain such a prediction as there have been no sensors placed at the three properties on Lipson Cove Road to establish a baseline, let alone a base for prediction. The levels for Rogers Beach and Lipson Cove tourist site are not recorded.

3.6.2.3 Summary of Effects

Table 3-18 identifies the potential impacts of noise emissions considered for the Evaluated Project and highlights differences in impact due to the Proposed Amendment. **Table 3-18 Summary of potential noise impacts for the Evaluated Project (PER Section 6.6) and Proposed Amendment**

Evaluated Project Impact	Proposed Amendment Impact
Construction	
Noise emissions from project construction impacting nearby noise sensitive receptors. <i>Short-term adverse noise and vibration impacts. Reasonable and practicable noise measures identified through a Construction Noise and Vibration Management Plan.</i>	No change.
Operations	
Noise emissions from site operations impacting nearby noise sensitive receptors. <i>Night-time noise criterion exceeded at one residence with no acoustic treatment in</i>	Similar level of effect. The Proposed Amendment will be designed and operated to meet the relevant noise criteria from the Environment Protection (Noise) Policy.

place. Upon application of acoustic treatments, modelling demonstrated compliance with acoustic treatments,	
Traffic	
Noise emissions from operational traffic impacting nearby noise sensitive receptors. Predicted noise levels indicated exceedance of criteria at one residential dwelling along Swaffers Road. Acoustics treatments proposed at the dwelling.	Similar level of effect. Modelling indicated compliance with the criteria for all receptors on Lipson Cove Road, with no requirement for acoustic treatment.

Given the anticipated 980 (+local traffic) traffic movements past the three residences on Lipson Road, 7 days per week, any suggestion that there is no change in the impact is not sustainable, especially when no scientific data has been collected to verify the assumed levels of noise (and vibration) generated at the residences on Lipson Cove Road let alone at the tourist sites.

3.7 Traffic

Grain – up to 430 HVs per day (assumes a peak receives day of up to 30,000 tonne) (i.e. peak of 860 in and out vehicle movements per day)

Staff – during harvest season up to 60 passenger vehicles per day (assumes 1 passenger vehicle per staff, and two shifts per day) (i.e. peak of 120 in and out vehicle movements per day)

The declared road usage varies according to what section of the application one is reading.

This declared road usage reinforces considerable public safety concerns for users of Lipson Cove Road, especially tourists (with caravans)

3.7.2 Amended Impact Assessment Summary for Traffic

Port Spencer is expected to remove a proportion of the forecast traffic congestion from Port Lincoln (in conjunction with Lucky Bay

(a) 2019-2020 harvest traffic to Pt Lincoln has reportedly NOT been an issue due to adopted management strategies.

(b) Reference to Lucky Bay should also include the fact that a reported 900000 t of grain was delivered to the Lock facility destined for Lucky Bay. Does not this reduce the expected grain target for Pt Spencer and hence its ultimate viability?

Table 3-20 Summary of potential traffic impacts for the Evaluated Project (PER Section 6.7) and Proposed Amendment

Construction vehicle access has the potential to impede local traffic or cause congestion. No capacity impacts anticipated to the Lincoln Highway or Lipson Cove Road.	Similar level of effect. The TIA identified that from a traffic capacity viewpoint, the peak construction traffic impact of the proposal is considered to be minimal. With total daily traffic volumes of up to 204 trips per day on Lipson Cove Road and up to 1,088 trips per day on Lincoln Highway during construction, the adjoining access roads will continue to operate at Level of Service (LOS) "A" (i.e. uncongested) with construction traffic. The OD vehicles will operate under pilot and may be pulled over when necessary to minimise traffic delay
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The conclusions lack credibility given on the one hand a proposal has no effect and on the other, some 204 trips on the Lipson Cove Road as being declared 'similar' when the Centrex model used Swaffers Road, not Lipson Cove Road.. Is this correct or should the number be in the order of 408?

The proponents need to appreciate that Lipson Cove Road provides transport routes for the legal movement of farm machinery from one property to another as well as tourist traffic. It is suggested that the choice of the word 'uncongested' requires revision when traffic is confronted by farm machinery taking up the whole of the roadway.

The ability for OD vehicles to pull over on Lipson Cove Road is limited unless the proponents intend to reconstruct the road prior to commencement of any work to ensure all road users safe passage.

Redirection of heavy vehicle traffic to Lipson Cove Road will result in an increased impact for approximately 8 weeks of the year during peak harvest times. However, based on the estimated increase in freight volumes converging to Lincoln Highway and Lipson Cove Road of up to 980 total two-way movements at the Lincoln Highway / Lipson Cove Road intersection (or up to 860 two-way CV movements) per day during the seasonal peak .

- (a) The issue to be considered is the impact upon the road network as a result of harvest, not just the peak, noting that harvest can run over a greater period than 'estimated 8 weeks'.*
- (b) the estimated traffic associated with the facility is but one user of Lipson Cove Road. What is a realistic traffic count for the roadway over the period October through February?*
- (c) there appears to be a variety of figures used to indicate traffic usage on Lipson Cove Road. It is suggested that a more accurate assessment be provided following an actual road use survey (both Lincoln Highway and the Cove Road).*

Impact not specifically compared as grain deliveries were not assessed. However, it is acknowledged that the nature of effects will change due to the seasonal delivery of grain and absence of a specified haul route. In addition, Port Spencer is expected to remove a proportion of the forecast traffic congestion from Port Lincoln (in conjunction with Lucky Bay) by offering an alternate grain receivals site and an alternate export port for the Eyre Peninsula, which would disperse the traffic impact on the existing road freight network due to the closure of the railway line (i.e. reduce the freight volumes to Port Lincoln).

This is a critical point...Grain deliveries not assessed, to which can be added the withdrawal of Free Eyre from the Centrex model leading to the conclusion that all issues related to grain in the 'evaluated project' can be dismissed as irrelevant.

The aforementioned statement also alludes to the fact that the expected catchment area is not serviced by a specific haul road, rather a network of Local Government roads (in the main).

The assumption that Pt Spencer will alleviate traffic congestion in Pt Lincoln arising from the demise of the rail, appears to be speculation in light of the reality of the situation experienced during the 2019-2020 harvest period in Pt Lincoln, and especially in light of the reported 900000 t of grain delivered to the Lock facility destined for Lucky Bay.

The assumptions made appear to be without foundation.

The site is proposed to operate with separate entry and exit access points from Lipson Cove Road, with provision for heavy vehicle queuing areas (waiting bays) on-site.

As mentioned earlier, experience would suggest that transports will queue outside of the facility (ie on Lipson Cove Road) awaiting early morning entry, noting the limited waiting bay area. The impact upon local traffic therefore being greater with more congestion.

It is noted that junction and road upgrades will be required for the Proposed Amendment

Significant safety concerns for vehicles on Lipson Cove Road have been raised in this response. It is assumed that should approval be granted, the proponents will rebuild Lipson Cove Road removing the obvious hazards prior to the commence of on-site work.

3.8 Waste and Materials

Table 3-21 Comparison of expected types of waste to be generated.

The document is silent on the fate of chemical wastes arising from operations.

Table 3-22 Summary of potential waste impacts for the Evaluated Project (PER Section 6.8) and Proposed Amendment

Generation of waste and materials and consumption of resources from site operations. <i>Strategies identified for the project to 'avoid and reduce waste' and 'to maximise the value of our resources'.</i>	No change
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Refer to the comment above. Resources for planned activities are significantly different. As such the waste stream is also different (diesel and lubricants aside).

3.9 Terrestrial Ecology

Table 3-23 Comparison of assumptions and inputs for assessment of potential terrestrial ecology impacts

Fauna values	No significant native fauna species. Concentration of fauna species in areas of the site that native vegetation remains.	No change
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Is it that listed species are not significant? The proposed site is part of an habitat, with the development invading the habitat, not the other way around, as it would appear.

Table 3-23 Comparison of assumptions and inputs for assessment of potential terrestrial ecology impacts

3.01 ha on the site and localised trimming along Lipson Cove Road to improve sight lines.

It is suggested that re-alignment of the roadway, including widening should be features of the rebuilding of Lipson Cove Road, should approval be forth-coming.

Table 3-24 Summary of potential terrestrial ecology impacts for the Evaluated Project (PER Section 6.9) and Proposed Amendment

Impacts to rare and/or threatened species and communities <i>No impacts anticipated.</i>	No change.
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No change. No species of conservation significance present

It is noted that the proponents have not undertaken any work to verify the EPBC application in relation to listed species in the environment related to this development.

Nor does it appear that verification work as to the impact of the proposed development upon listed species on Lipson Island noting the deficiencies of the previous PER.

Impacts to terrestrial flora and fauna due to dust, noise and light. Assessed to be of low significance. Due to: the distance of the project from Lipson Island; the potential for species to move away from the site; lack of significant fauna habitat; noise and air modelling has shown significant impacts outside project footprint are unlikely. <i>Potential impacts of construction generated dust on vegetation limited due to effects of wind and rain and absence of rare and/or threatened species. Potential impacts to birds breeding on Lipson Island from construction noise (including blasting) not expected due to distance of Lipson Island from the project area and outcomes of noise modelling. Potential for light overflow from construction to impact Lipson Island not expected due to distance and topography.</i>	No Change
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It is known that a number of species nest on the beaches in the immediate environs of the proposal. The assumptions that noise, blasting, extraneous light and other activities would not have an impact appear to be just that, assumptions..

It is understood that no noise monitoring has been undertaken on Lipson Island to assess the impact of noise travelling over the sea or through the seawater.

Dispersion patterns for dust are unsubstantiated, given no on-site weather station.

The assumption of no rare or threatened species on the Island further suggests the groundwork has not been undertaken, noting that the Island is the most northerly nesting ground of the little penguin.

No monitoring receptors appear to have been placed on the Island, Lipson Cove or Rogers Beach in order to determine a baseline and thence indicative impacts.

Altered habitat and landscape functioning from the construction of the public access road and the conveyor and jetty infrastructure due to altered overland surface flows. <i>Potential for the jetty structure to subtly alter wave and wind movements that drive the dynamics of Rogers Beach vegetation community and habitat</i>	No change – primarily due to the altered hydrodynamics expected at Rogers Beach which may affect Rogers Beach vegetation community and habitat and potential.
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The Centrex model alluded to the potential for the man-made structures to have an effect upon wave and wind movements that drive the dynamics of Rogers Beach. The assumption of no change, despite the construction of a 240m groyne, as documented, is not credible.

Impacts to rare and/or threatened species and communities <i>No impacts anticipated</i> which was subsequently assessed and approved as a controlled action and subject to conditions.	No change. Peninsula Ports is currently seeking to transfer the EPBC Act Approval and will undertake the project in accordance with the conditions of approval
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Transfer of EPBC approval effected November 2019 without amendment, despite the significant changes proposed.

Direct mortality of individuals due to increased traffic movements along Swaffers Road.	Altered effect – the potential for impact would occur along Lipson Cove Road.
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The proponents agree that the Lipson Cove Road would lead to direct mortality of individuals. It is suggested that the mortality rate would be greater than that suggested for the Centrex model by virtue of the very significant increase in heavy vehicular traffic (around 1000 movements per day) competing with local traffic and tourists.

Impacts to terrestrial flora and fauna due to dust, noise and light. <i>Assessed to be insignificant.</i>	No change.
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The proposal is concerned with the impact of grain dust identified to be of greater concentration and dispersion than that of inert iron ore dust. Yet the assessment is one of 'no change', a position that is not substantiated. Fugitive grain dust upon sea water and a dodge tide is a recipe for a blue algal bloom, not considered in the assessment.

3.10 Lipson Cove

Table 3-25 Comparison of assumptions and inputs for assessment of Lipson Island impacts

Sediment transport	The sediment transport assessment demonstrated that suspended material in the marine environment is unlikely to reach Lipson Island.	No change. The sediment transport assessment predicted that changes in hydrodynamics, waves and consequently the sediment transport regime, decrease with distance from the development and are expected to be negligible around Lipson Cove and Lipson Island.
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The definition of sediment transportation is interpreted to mean suspended matter. The source of the suspended material is assumed to come from marine construction ie the groyne and wharf as well as surface deposition of fugitive dust from land based construction and ultimately, grain dust. Grain dust's physical properties are substantially different to that of iron ore and hence migration either on the surface or in suspension would be significantly different, but apparently not assessed as such.

It is assumed that changes in wave patterns etc attributed to the groyne and weather influences will have no expected impacts upon the Island. The science to substantiate these claims in the absence of an on-site weather station and lack of local observations would suggest the 'modelling' may well be flawed. The lack of consideration of the impact of a dodge tide also adds to significant environmental concerns, not being addressed.

Noise sources	Pile drilling, driving and general construction	Significant reduction in pile driving and drilling due to reduction from 184 to 18 piles. Underwater noise associated with rock dumping to construct the causeway is considered to be at a relatively low level and does not have characteristics like piling that could significantly affect fauna. Overall
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		earthworks volumes, drilling and blasting equal or lesser than the Evaluated Project.
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It is acknowledged that the change in construction might reduce some noise, but the assumption of noise associated with rock dumping is 'considered to be low', lacks credibility in absentia of scientific data supporting the claim. This is a Controlled project under the EPBC Act. The question whether the proposed construction technique, not advised in the application of transfer, meets the assessment criteria of the original application requires a formal answer.

The assumption that the 'overall blasting program' is the same as the Centrex model is debatable.

Siltation and turbidity controls	Pile fabric filtering would be used around each pile.	No change
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Whilst this is true for piling activities, the issue remains questionable for the construction of the groyne.

Noise sources	Mainly mechanical sources. Noise levels at Lipson Cove predicted to be less than 33 dB(A)	Mainly mechanical sources and truck movements. Noise levels at Lipson Cove predicted to be less than 41 dB(A)
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(a) the extent of blasting has not been quantified, therefore the impact upon the Island remains unknown.

(b) the suggested 1000+ vehicle movements is assumed to have limited impact, despite the amphitheatre nature of the environment. It is assumed that baseline noise monitoring has been undertaken on the Island (in the 2 days of the previous assessment) and or that noise monitoring will be implemented on the Island from the commencement of site works in order to verify any impact.

Table 3-26 Summary of potential noise impacts for the Evaluated Project (PER Section 6.10) and Proposed Amendment

Siltation and turbidity pollution of Lipson Island marine	No change.
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Refer earlier comment.

Impacts to wildlife through exposure to dust containing metals.	No potential for impact due to the removal of iron ore from the project scope
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The issue is not the removal of iron ore dust, but the impact of grain dust on the environment.

There has been no reference to the potential impact of two toxic substances now introduce into the project being phosphine (and its precursors) and methyl bromide (bromomethane).

3.11 Marine Ecology

3.11.2 Amended Impact Assessment Summary for Marine Ecology

Construction of the causeway will adopt accepted mitigations for minimising turbidity effects as detailed in Section 3.11.2.1. Any effects of sedimentation will be short term and localised.

The assumption being that any colloidal suspension created by the proposed action will dissipate rapidly, which may well not be the case. The impact of dodge tides is not addressed.

The construction of a causeway for the Proposed Amendment provides a significant economic saving compared to a full jetty structure,

It has been disclosed elsewhere in the application that the construction of the groyne will save about \$10M Perhaps a better way of spending the \$10M would be to revert to jetty complex as per the original proposition, with a corresponding decrease in marine environmental impacts.

There is also a suggestion that should sediment build up be experienced, then sand pumping will be employed. The question being, at what cost over the life of the project? The issue being from where does the sediment come? The only place the sand/sediment build up can come from is the south and nearest beach is Lipson Cove.

Is the construction of the groyne false economy, given the issues identified?

3.11.2.1 Water Quality Effects due to Construction of the Causeway

The level of effect associated with piling will be significantly reduced.

The problem being is that the respondent has already indicated that piling will be undertaken without the use of sediment sleeves as indicated in the original project. The effectiveness of the suggested screening provisions is the issue, compounded by the fact that the area is subjected to periodic dredge tides.

3.11.2.2 Seagrass Wrack Accumulation on the Proposed Causeway

Seagrass wrack can also negatively impact beachside communities as a result of visual amenity and odour impacts as the wrack accumulates and subsequently degrades. However, due to the remote location of the proposed causeway (approximately 20 km from the nearest town centre) and subsequent low population of the surrounding area, direct impacts on the local community beach access or tourism are not predicted.

Whilst it is true the seagrass wrack may not be an issue for the nearest town centre, the fact remains both Lipson Cove and Rogers Beach are well known local and tourist destinations. Any change to the current environment is considered to be a change for the worst.

Under anoxic conditions, the main by-product of decomposition is carbon dioxide (CO₂), an odourless gas and under anoxic conditions, a range of gaseous by-products occur, including methane and hydrogen sulfide (H₂S) (Oldham et al. 2014).

It is reported that under the same conditions decomposition by-products can be carbon dioxide or hydrogen sulphide. The conclusions are not credible.

3.11.2.3 Potential Seagrass Disturbance due to Altered Coastal Processes

Given that the project area is within a moderately high energy coastline area, it is likely that the existing habitat will absorb any additional input sediment movement. As such, the slight alteration in local hydrodynamic conditions and sediment transport at the project site is not considered likely to significantly affect adjacent seagrass beds. (underlining added)

The assumption ...'slight alteration in local hydrodynamic conditions'..., those being the result of the 240m groyne appears to be contrary to the observed results of the impacts of groynes constructed in moderately high energy coastline areas such as the Adelaide foreshore. As stated earlier, Tumby Bay's experience with groynes would support the premise that the applicant is underestimating the impact of such a structure, given the claim of a moderately high energy coastline.

The assumptions appear to be without substance.

3.11.2.4 Cumulative Loss of Seagrasses in the Spencer Gulf

The application is for the construction of a port at Lipson Cove and as such any loss of habitat as a consequence is a significant loss at the local level.

Comparison with the whole of Spencer Gulf is irrelevant to the argument.

Further, the loss of seagrass habitat may also impact upon the ecology of Lipson Island Marine CONSERVATION Park.

the presence of a solid causeway is likely to result in a greater level of habitat fragmentation than the previous trestle jetty design. Nevertheless, the significance of the habitat fragmentation is determined to be low in the context of the extent of the wider seagrass and algal habitats within the Spencer Gulf.

The problem is, the local community is not talking about the impact of the proposed port in the context of the whole of the waters of Spencer Gulf, it is concerned with the immediate impact, ie the impact upon Rogers Beach, Lipson Cove

and the Lipson Island Marine Conservation Park. The potential for a localised blue-green algae bloom has not been addressed.

Potential impacts on marine communities due to sedimentation

Similar level of effect. The construction of the proposed solid causeway is likely to result in a change in the nearshore sediment transport adjacent to the structure. A sediment transport and coastal processes modelling study (Appendix D) has indicated that the footprint of the Proposed Amendment will result in a broad level of sediment accretion (0.15 km² or 150,000 m²) on the southern side of the coastal infrastructure and erosion (0.08 km² or 80,000 m²) on the northern side..... While the change in sediment transport and coastal processes is likely to impact these nearshore benthic habitats, *the significance of these impacts are determined to be moderate in the context of the extent of the wider benthic habitats within the Spencer Gulf.* In addition, the modelling has demonstrated that any changes in the nearshore sediment transport regime are not expected to impact Lipson Cove and Lipson Island to the south of the proposed development

The proponents have now disclosed the extent of the sediment movement over the immediate marine environment to the development.

The assessment of the impact has been determined in the ..'context of the wider benthic habitats of Spencer Gulf'.. rather than that of the local environment one which the proponent had already declared as a 'moderately high energy coastline', one which is common knowledge to the local community who continually observe significant sediment (sand) movements across Lipson Cove and Rogers Beach.

This is akin to assuming the weather at Pt Lincoln airport (BoM station) is the same as that at Lipson Cove only the physical impact on the foreshore is more noticeable.

Incidental grain spillage to the marine environment. *The introduction of fine organic matter into the marine environment could result in: -Decreased dissolved oxygen as a consequence of increased decomposition by microorganisms. -Increased suspended particulates which reduce light penetration and can cause smothering of benthic species, and -Increased growth of aquatic plants due to increased nutrient inputs. Nuisance growth of aquatic plants can result in algal blooms and associated toxic effects. In addition, when the plants die, there is a reduction in dissolved oxygen concentrations as the plants decompose.*

No change. The overall risk of incidental grain spillage to the marine environment has not changed from the Evaluated Project. *It is noted that some of the initially proposed design measures (i.e. fully enclosed loading and unloading facilities) to mitigate for this risk will not be implemented;* nevertheless, this risk remains unlikely and should it occur, the impact would not be significant due to the fact the seabed at the jetty loading location is dominated by sandy substrates with sparse seagrass cover.

Grain spillage and grain dust impacts on the marine environment are of significant concern. The issues raised in the Centrex model are significant and yet appear to be dismissed by the proponent. Of additional concern is the impact on the environment (especially the marine environment) of wheat which has been chemically treated, especially in the knowledge that the two chemicals commonly used are both toxic in an aqueous environment.

Further, the mitigation strategy employed in the Centrex model in order to reduce fugitive grain dust emissions is to be discarded by the current proponent in favour of an open system in which fugitive dust emissions will be considerably higher with corresponding increases in environmental impacts.

The assessment ...the risk remains unlikely...the impact not significant.... is not consistent with previous assessments within the Centrex model.

It is strongly suggested that the environmental conclusions drawn by the proponent are not credible.

3.11.3 Mitigation and management carried forward by the Proposed Amendment

Emergency response planning in the event that a pest species is discovered.

Full disclosure of the plan and triggers to activate the plan should be included in the PER.

3.12.2 Amended Impact Assessment Summary for Coastal Environment Sediment

The model results for the Proposed Amendment **showed chronic accretion to the south-west of the development and erosion on the north east** that could be addressed by intermittent sand transfer from south to north dictated by a beach profile monitoring programme.

The observation that chronic accretion and erosion was an outcome of the construction of the groyne within a declared moderately high energy coastline supports the contention that there is significant sediment movement along the coast and that such south to north movement would have an impact on the Lipson Cove environs as well as Rogers Beach.

Such sediment flows are consistent with local observations of sand (sediment) movements at the Cove which have been commented upon earlier in this response.

3.12.3 Mitigation and management carried forward by the Proposed Amendment

Annual monitoring of sand transfer from the southern to the northern side of the structure to ensure the coastal environment is protected (noting that in this relatively benign environment, sand transfer is likely to be required infrequently).

As raised earlier in this response, the scenario presented here is identical to that experienced on the Adelaide beaches where sand movement is constant and significant resulting in the current programs of replenishment at a significant cost.

It is apparent that the proponent is downplaying the impact of sediment movement and the potential environmental impacts together with the minimizing of remedial action and its associated costs.

Clearly more scientific data collection is required to more accurately assess the impact of constructing the groyne.

3.13 Heritage and Native Title

Table 3-31 Summary of potential heritage and Native Title impacts for the Evaluated Project and Proposed Amendment

Disturbance to historic shipwreck site. <i>No impacts anticipated. The wreck of the Three Sisters is located on the beach at Lipson Cove, over 1 km south of the project area.</i>	No change.
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Given the declaration of a moderately high energy coastline with significant sediment movements from the south to the north, there has been no discussion of the potential impact of the proposal of beach erosion at Lipson Cove with the consequential exposure of the historic wreck.

Sediment transfer can occur over significant distance (certainly over 1km) as demonstrated by the Adelaide beaches scenario.

Clearly greater emphasis needs to be directed towards sediment movements at Lipson Cove as a consequence of the planned activity.

It is understood that Native Title is extinguished by free-holding property. However, some of the land in question is Crown Land and Native Title is not extinguished.

It is assumed, therefore that suitable agreements have been entered into with the appropriate Aboriginal Title Holders and that said agreements will be disclosed in the Response Document.

3.14.2 Amended Impact Assessment Summary for Visual Aesthetics

The visual impact of the proposed change in use from that which has already been approved would be negligible too low for most viewers.

The assumption lacks credibility for the local community.

3.15 Socio-Economics

The economic viability of the Proposed Amendment is also independent of the simultaneous development of mining projects, mine life and ore prices.

But highly dependent upon access to product and competition from existing facilities at Pt Lincoln and Lucky Bay and potentially at Cape Hardy

3.15.1 Comparison of Key Inputs and Assumptions

Peak construction workforce of approximately 150 people. Construction expected to occur over an 18-month period. The accommodation workforce would be accommodated locally (e.g. rental housing, tourist accommodation, etc).

Access corridor from the Lincoln Highway via Lipson Cove Road

The catchment area for grain to be transported to site would extend across the central Eyre Peninsula region. Haulage route from Lincoln Highway via Lipson Cove Road

(a) As already raised, accommodation for the anticipated workforce is speculative and would suggest FIFO employees.

(b) Access is via Lipson Cove Road and reliance upon all Local Government roadways being licensed for heavy vehicles. Assumes Lipson Cove Road upgrade but at who's cost?

(c) Expects catchment area to be whole of Central Eyre Peninsula, ignoring current services provided by Viterra and Lucky Bay consortia.

(d) No haulage route expenses, but transfer of road maintenance costs to local ratepayers of State Government.

Table 3-35 Summary of **potential visual impacts** for the Evaluated Project and Proposed Amendment

Title is irrelevant to issues contained in table.

The provision of local employment and training opportunities through the construction phase may also provide opportunities for young people to remain in the primary study area rather than moving away for employment

The problem being the use of the word 'local training', noting that the nearest accredited training is in Pt Lincoln and then Whyalla. Furthermore. the jobs would be seasonal, not necessarily full time, long term. A full workforce management plan would assist in determining whether there is any overall benefit (employment wise) to be gained by the project.

Altered effect as no construction village is expected to be required. It is likely that demand for accommodation for the construction workforce would generally be in towns closest to the project, for example Tumby Bay and Port Neill, although it is possible that some construction workers may choose to commute further and live in a larger centre such as Port Lincoln.

Previously, the proponents claimed employees would be transported to the site by bus.

The statement also leaves the option open for FIFO workforce.

Is there sufficient accommodation places in the community to house the planned workforce?

Potential impacts on nature-based and recreation-based tourism activities due to changes in visual and environmental amenity during construction are expected to be similar to the Evaluated Project

The assumption of 'similar' impacts to the Centrex model is unfortunate, given the significant differences between both projects and especially in the context of significant differences in the environmental impacts (fugitive dust, noise and traffic being three principle components that would deter tourism and local visits to the area).

Similar level of effect. Construction impacts have the potential to impact on community values relating to such things as scenic amenity, natural environment, local amenity and health and safety.

The Proposed Amendment proposes to use Lipson Cove Road for construction haulage. An increase in haulage vehicles using Lipson Cove Road has potential to impact on local amenity and perceptions of road safety for residents of rural

properties at Lipson Cove Road and other road users (e.g. visitors to Lipson Cove campsite). Refer to Section 3.7 for assessment of traffic impacts.

The conclusions offered above are realistic. Construction will have an impact on community values. Further, it is no perception that road safety issues of Lipson Cove Road and the intersection with Lincoln Highway, given the stated traffic usage of 1000+ vehicle movements per day, are of significant concern, with a high to very high probability of mortality occurring. This is foreseeable, and yet the public are being asked to support the project!

There is expected to be capacity in the tourist accommodation to accommodate the relatively small workforce. As such, potential impacts on temporary visitor accommodation or local rental housing during operation are generally expected to be negligible.

The problem being the operational period coincides with peak tourism periods therefore the 'assumption' of availability of accommodation in tourist parks requires verification. The alternative being?

the scale of benefits for local business and industry from the operation of the port would generally be reduced given the **smaller scale of operations**

Is it that the community cost benefit analysis for the project is actually in the negative? Smaller project; unknown access to grain over the whole of Eyre Peninsula (as expected); negative environmental impacts; unknown impact of competition (Pt Lincoln, Lucky Bay, Cape Hardy, Thevenard); negative impact upon local government precincts due to road maintenance with significantly increased heavy vehicle access required and potentially significant impact on tourism (Lipson Cove and Rogers Beach).

It is noted that the Proposed Amendment **will have positive impacts on grain producers within the Eyre Peninsula** by removing double handling of grain (through the provision of on-site storage), reducing haulage distances and subsequent transport costs

The inference being that Pt Spencer would serve the whole of Eyre Peninsula, a suggestion that has no financial credibility or recognition of transport costs across the Peninsula having regard to distances to be travelled.

Impacts to local tourism
The operation of the Project was expected to have minimal effect on the tourism industry and associated activities for Port Neill and Tumby Bay. Separate accommodation for Project workers would minimise impacts on established tourist accommodation in the towns. The Lipson Cove campsite, to the south of the Project, would continue to operate and access to Rogers Beach, to the north, would be maintained.

Similar level of effect. Overall, the Proposed Amendment is expected to have minimal impact on tourism activities in centres such as Tumby Bay and Port Neill. While the Lipson Cove campsite would continue to operate, the presence of port infrastructure may impact on the use and enjoyment of the campsite for some people.

The assumptions made are contradictory. There will be an impact (the extent has not been determined) on tourist accommodation in the two towns for port workers (as previously described), noting that the operational period of the port coincides with peak tourism periods.

There is a differing opinion about the impact of noise, traffic, light spillage and fugitive dust impacting upon persons who choose to holiday at Lipson Cove (or Rogers Beach) which was chosen for its ease of access (very limited traffic) and quiet (peaceful) environs.

It is suggested the impact will be considerable.

<p>Social infrastructure <i>Impacts on local services such as medical facilities, the police and other emergency services were assessed as minor.</i></p>	<p>Similar level of effect. Similar to the Evaluated Project, potential impacts of the Proposed Amendment on local services such as medical and emergency facilities are expected to be minor, given the relatively small workforce</p>
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As previously mention, it is assumed the proponents will have on-site emergency service capabilities (medical suite and fire fighting capacity) given that response time from Tumby Bay would be in the vicinity of 30 minutes (or so).

It is noted that a fire in this vicinity has the potential to spread rapidly dependent upon the fuel load (crops) in adjacent farm paddocks. The first response capacity needs to take this eventuality into consideration.

The Proposed Amendment proposes to use Lipson Cove Road for access to the port. An increase in haulage vehicles using Lipson Cove Road has potential to impact on local amenity and perceptions of road safety for residents of rural properties at Lipson Cove Road and other road users (e.g. visitors to Lipson Cove campsite). Refer to Section 3.7 for assessment of traffic impacts. Overall, these impacts would be less than the Evaluated Project given the shorter operating period and the reduced number of haulage vehicles with the removal of the mining related vehicles

As stated earlier in this response comparisons between the two projects need to take into consideration the development of the Centrex proposal over time, especially the bringing on line of Project Fusion and the methodology of transporting ore from the Koppio Hills via slurry pipeline.

The statement that the projects are similar fails to take a long term view and misrepresents the situation. The traffic issues for the current proposal will be in existence for the life of the project which is a substantial variation to the Centrex model.

Impacts to traffic due to haulage of ore and grain

As mentioned earlier in this response, Free Eyre withdrew from the project following a financial review of costs. The eventual construction and operation of Pt Spencer under the Centrex model was for the export of iron ore ONLY. Initially ore was to be hauled (via a designated haul road, Kinnaird Road) to the port. As indicated at the rate of 140 movements per day. The project was also predicated upon the bringing on line ore from Project Fusion (and other locations) via slurry pipeline not road transport.

Regional network – similar level of effect

The claim of a similar regional network is not credible, even more-so given that the proposed model intends to use local road networks (in the main LGA roads) as 'haulage roads' to service the facility at presumably no cost to the proponent.

The claimed impact upon regional roads such as Lincoln Highway to be similar to the Centrex model is difficult to comprehend when the number of vehicles exiting/entering Lipson Cove Road would be in the order of 1000+ rather than 140 as identified in the Centrex PER.

Regional traffic benefits due to the location of the port

The claim of benefits to Pt Lincoln traffic appear to be without foundation, given the experience of traffic management over the 2019-2020 harvest period.

4. Risk Assessment and Mitigation

8. All plant equipment and machinery entering and leaving the site should be clean and pest/soil/weed free .

Bio-security is a critical issue for the local farming community, especially those along Lipson Cove Road.

Whilst the above risk indicator deals with plant, equipment and machinery, it fails to mention the problem of weed transfer via the road transports entering and leaving the facility.. The use of the word 'should' is of concern. A better choice would have been 'will'. Such a position implies the acceptance of responsibility for bio-security matters on the part of the proponent.

11. Lipson Island. It is known that the previous environmental study pertaining to Lipson Island and its environs was undertaken over a two day period of time. Comment has already been provided to this effect.

However, it is apparent that the proponents fail to acknowledge the importance of the Lipson Island Marine Conservation Park and it's environs for what it is.

The extent of the Marine Park and the intersection of its boundaries with that proposed for the port's exclusion zone need to be identified.

The listed species known to frequent the Park have been previously identified, but apparently ignored by the current proponent.

The recommendation of the earlier consultant engaged to undertake the study clearly articulated the limitations of the study and provided guidance forward, again apparently ignored.

The impact of grain dust to the extent identified upon the marine and terrestrial life on the Island is not considered.

The impact of methyl bromide or phosphine on the marine environment is not assessed.

12. It is noted that 'some blasting may be required' in the construction of the Centrex model. Such is not the case for the current application, where significant blasting will be required in order to acquire sufficient materials for the groyne and other uses (gravel) in the construction phase. An issue not mentioned previously is the 'management of Radon' released as a consequence of the blasting process.

Noise and vibration as a consequence of the blasting activity is expected to be significant with impacts upon Lipson Island and the surrounding environs, including the properties of Lipson Cove Road.

14	Marine Fauna (Jetty)	There were no threatened or endangered marine species identified during marine survey
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That being the case, why was an EPBC application required with the outcome being, controlled development arising from the fact the area is frequented by Southern Right Whales, a listed species.

Clearly whales are not considered a risk item in this analysis.

15. Marine pest (exotic species) pose a risk to the pristine waters of this area and especially to the adjacent Marine Conservation Park. It would be appropriate to have had developed the management plan for inclusion in this application and thence subject to public scrutiny.

16. Coastal Processes: It is noted that the proponent considers there is a 'moderate' risk to the local environment, a position apparently supported by the document Appendix C. Appendix C raises the 'groyne effect' which this response has raised, but the extent of the effect appears to have been derived from:-

"In situ data and numerical modelling confirm that the sediment transport regime along this section of the coast in Spencer Gulf is predominantly to the north. This means that a solid structure across shore out to beyond the depth of closure (likely <7-8 m in this benign environment) will capture sand on its' southern side and prevent it moving northward up coast. This is a coastal system with a dominant unidirectional sediment transport regime the structure will act like a groyne, with the known impacts of accretion on the southern side and erosion on the northern side (the 'groyne-effect')."

none of which is disclosed in the Report.

It is noteworthy that the Report identifies the effect at the Cove site is similar to that experienced on the Adelaide Beaches.

It is also noteworthy that a monitoring plan be put in place prior to work commencing as outlined in Table 1 and Figure 2 of the Report. (Beach Monitoring and Management for Port Spencer, eCoast Marine Consulting and Research, 30 October 2019)

It is understood no consultants have visited the area in question to undertake data verification or to acquire additional data.

17. Traffic: 'Extreme'. This response has highlight the significant concerns of using Lipson Cove Road as the assess point for the proposal. The risk assessment of 'extreme' appears to be appropriate, but needs qualification to include the very high probability of mortality (foreseeable) due to high traffic flows expected on 20metre wide corridor with a 7.5metre carriage way. The road contains no passing lane capacity, nor any potential for widening as both sides of the roadway are private property, noting s78 of the Development Act (compulsory acquisition) does not apply for private developers.

The expectation of sealing the surface will 'solve the problem' is clearly very high risk in itself, the risk being high probability (foreseeable) head on collisions (at speeds of 100km/h) given the use rate envisaged.

19. The actual location of the Three Sisters Wreck is on the shoreline of Lipson Cove just north of the old jetty remains. Due to the high sediment movement experienced, the wreck is periodically exposed and then recovered. Sediment (sand) movements are significant, but apparently not recognised in the context of the development of the port and its associated groyne which is acknowledged would have an impact on sand movements in the area.

21 Lipson Island Conservation Park is located 1.5 km south from the Project jetty and includes a small informal camping area.

What is needed is an accurate map in which all the key items are accurately located thereby the reader can have confidence in any 'distance from' reference provided by the proponent. A point in case is 'Lipson Cove being 1.5km from the jetty complex', yet another reference indicated a distance of 1km. A starting point would be an accurate boundary of the Marine Park and an accurate location of the proposed exclusion zone for the Port both to scale on the 'map'.

The 'small informal camping area' has had some improvements made by Council since the original PER was drafted. Further, the area is currently the subject of a development plan sponsored by RDAWEP and with DC of Tumby Bay for consideration.

25. *Chemical pollution is an issue being both land based as a result of land activities and marine based as outlined.*

What is not addressed is the issue of methyl bromide (bromomethane) or phosphine (and its precursors) in the marine environment, noting both are highly toxic in an aqueous environment.

26. Collision with whales: *The probability of ship/mammal collision exists, given the migratory path of the whales. Reference to shipping being excluded from the marine parks is irrelevant. Reference to 25 does not discuss the collision issue. What therefore is the risk aversion plan for this eventuality?*

The is an issue with 'management of the situation' in the presence of Southern Right Whales and the requirements of the EPBC approval. It has not been recognised that, if a 24/7 work regime is employed, how does the proponent deal with the sighting of whales in the dark and thence the cessation of activity, as required, take place?

21 February 2020

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Dear Minister

Peninsula Ports – Public Environmental Report (PER) Amendment- Submission by Regional Development Australia Whyalla and Eyre Peninsula Inc.

On behalf of (RDAWEP) I respectfully lodge for your consideration the following submission in response to the release of the amendment to the Public Environmental Report (PER) by Peninsula Ports Pty Ltd for a grain port proposed to be developed adjacent to Lipson Cove Conservation Park, Lipson Cove-Rogers Beach, District Council of Tumby Bay, to be known as Port Spencer.

A prudent test applied by credible planning organisations managing these processes is to ask, 'would the changes give a reasonable person grounds that were not there in the original proposal plans for raising an objection?' In terms for whether an Environmental Impact Statement needs to be re-advertised with further particulars relating to the change, it is not relevant whether or not the objection would be upheld but rather, new matter(s) that give rise to a competent objection.

Using this test as a lens for consideration of the amended PER Port Spencer, RDAWEP can only conclude that there are more than enough major changes to require an Environmental Impact Statement (EIS) to be re-advertised with further information and evidence to be provided.

Regional Development Australia Whyalla and Eyre Peninsula (RDAWEP)

Regional Development Australia is an Australian Government initiative established to encourage partnership between all levels of government and industry to enhance the growth and development of Australia's regional communities.

RDAWEP is the peak body driving the expansion and growth of economic activity across Eyre Peninsula and is supported through a cooperative arrangement with the state and federal governments, and the eleven local member councils of the Eyre Peninsula Local Government Association (EPLGA).

The Board of RDAWEP is comprised of high-profile local people representing business, industry, education, local government, finance, natural resources and the community – local people developing local solutions to local issues.

The RDAWEP region comprises approximately 235,000km² of land in the far west of South Australia, covering about 23% of the State land mass. The region encompasses Eyre Peninsula from the City of Whyalla to the District Council of Ceduna; as well as to the Western Australian border and the Maralinga Tjarutja Lands north of the Trans Australian Railway Line.

Exports form the basis of the region's economy and it is reliant upon access to ports along a coastline that encompasses greater than a third of South Australia's entire coastline.

Major Constraint to Economic Growth

If current geographic patterns of settlement continue, most future populations will reside in major capital cities, while regional areas at best will experience only modest levels of growth and at worst continue to decline. These patterns reflect global trends towards increasing urbanisation and employment growth in city-based service industries. Eyre Peninsula's population declined again in 2018 by -0.42% to an estimated resident population of 57,823 with an average unemployment rate of between 1.3% (Kimba) and 12.4% (Whyalla).

There has been significant consolidation in agricultural interest in recent decades and the sector has suffered economic impacts associated with drought and disease. Investment in mining and associated manufacturing has been impacted by volatility in global conditions, uncompetitive export infrastructure and high input costs. The value of the region's exports declined from \$4.1Bn in 2013/2014 to \$2.1Bn in 2018. (*National Institute of Economic and Industry Research (NIEIR), 2018*)

Eyre Peninsula lacks many processing and economic diversification opportunities that exist in other regions where cost efficient pathways to domestic and international markets exist via road and rail to Port Adelaide and beyond, including access to container trade. This factor heavily influenced the region's evolution to and reliance on bulk commodity exports and has constrained the region's population growth.

Due to the region's remoteness and lack of contemporarily appropriate infrastructure it also faces a continual challenge to attract and retain a professional and skilled workforce. Many of the projects in the region's investment pipeline have been inhibited by a lack of a skilled and sustainable workforce.

Eyre Peninsula is at, or perhaps has passed a tipping point where the decline in population across several of its productive districts is negatively impacting the whole of the regions ability to attract and retain an adequately skilled workforce in every industry and service sector. **For this export region to again become and remain globally competitive this long-term trend needs to be urgently reversed. RDAWEP offers to arrange for the Minister a comprehensive briefing on this context if required. This context is critical to the economic assessment of essential infrastructure provision to the region including this amended PER.** However, there is no adequate context or economic analysis provided in the original or amended PER that can be relied upon by the Minister or others for determining an economic case for Port Spencer.

Economic Development and Population Growth

Diversification of the region's economic base is critical to the sustainability of the region. RDAWEP is collaborating with industry and the three tiers of government to exploit the regions competitive advantages to diversify the economy including leveraging low carbon energy generation to grow a smart manufacturing and industrial base, value adding to the regions primary industries and resources.

This can only happen with the provision of a multi-use, multi-user deep seaport as a critical component to forming a nationally significant transport intermodal hub connected to national rail and road links. It must also have ample landside capacity for the establishment of cross industry processing facilities inclusive of and not limited to energy generation and storage, agriculture processing and mineral processing (graphite, iron ore, kaolin etc). Sheep Hill/Port Spencer offers none of the above critical requirements and is physically and location wise incapable of doing so.

The already approved (major development approval given 3 May 2017) and Australian Government supported port project at Cape Hardy (\$25 million awarded by the Australian Government to support the Cape Hardy development; listed on Infrastructure Australia's Priority List), specifically addresses and meets all these requirements and is located less than 8km north of Lipson Cove. Preliminary agreements already exist for the diverse industry use of several hundred hectares of land at Cape Hardy as outlined above.



The premise forming a part of RDAWEP's consideration for new infrastructure coincides with (DPTI) Infrastructure South Australia's (ISA) worthy planning principles espoused in its twenty (20) year plan discussion paper under section "*Cross-sectoral considerations: a systems approach*" and quoted in part as follows;

- *"Infrastructure sharing can also reduce the amount of investment needed to address a problem or realise an opportunity and helps ensure that infrastructure is developed at the optimal scale. For example, schools could function after-hours as community hubs, and the grain and mining industries could collaborate on identifying and developing new multi-user bulk port facilities. An oft-cited example of a forgone opportunity to share infrastructure is the parallel railways built in the Pilbara region of Western Australia to link iron ore mines with Port Hedland."*

A multi-use, multi-user, deep seaport is integral to the region's economic and social future. Port Spencer does not address this region's most fundamental economic and social issue and poses an unnecessary risk to the region's future by ignoring the above fundamental needs and principles.

Further basic and important planning principles quoted in the DPTI ISA document with relevance to this project that must be considered include the following;

- *"With the freight task anticipated to increase, a continuing trend to bigger and more productive freight vehicles and a 24/7 operating environment, it is critical that this freight connectivity is supported by the right investments and protected by the encroachment of incompatible land uses."*

Port Spencer impacts, and if the project proceeds, will be impacted in turn by the clearly incompatible and immediately adjacent land-uses. Rogers Beach to the north and Lipson Cove to the south of the site has been collectively used for coastal conservation, recreation, camping and fishing across generations of local residents and visitors. The site or sites have significant social, economic and environmental values that will at best be substantially devalued and at worst destroyed quite unnecessarily when instead the port should be located at the approved and community supported site of Cape Hardy.

It is one thing to state maintenance of access to Rogers Beach (note that access to this site needs clarification because the access described in the amendment is ambiguous) and Lipson Cove, but the acknowledged change to visual, sound, dust and heavy traffic (land - approximately 50,000 heavy truck movements per annum based on 1,000,000 tonnes per annum, and sea with assorted shipping, tugs and service vessels) poses a substantive imposition by this project across the landscape, coastline and seascape.

Social and environmental value for this site was well evidenced by the emergence of the 'Save Lipson Cove' community group during the original Centrex application in 2012 or prior with a reported membership of 350 to 400 people (see - <https://www.facebook.com/groups/121905344487520/>).

Further evidence of the social, environmental and economic value of the site is provided by the location being identified in the ongoing 'Eyes on Eyre' project by tourism industry stakeholders including the Eyre Peninsula Natural Resource Management (EPNRM), Coastal Protection Board, Native Vegetation Council, EPLGA, District Council of Tumby Bay and RDAWEP as being the most highly valued camping and recreation location within the district outside of the two coastal townships of Tumby Bay and Port Neil.



The Eyes on Eyre Project addresses the types of negative impacts that can be caused to this environment by uncontrolled recreation and camping users. These impacts were referred to in some of the submissions made to the original Centex PER process and the Eyes on Eyre project is a collaborative way of redressing these issues positively. We respectfully request that the Minister be briefed by the Eyes on Eyre Project Group as part of his considerations for this process. RDAWEP or the EPNRM can facilitate the briefing.

The above observations are further supported by regular posts and comments supportive of the location as a camping and recreation area with high social and environmental values by the Love EP Facebook site and related media including the book, "101 Best Beaches in Australia".

It should be noted that positive comments and followings in the digital media relating to the sites current uses far exceed the level of positive comment displayed to Port Spencer news. This should not be mis-interpreted for a lack of care or interest in whether the port proposal proceeds or not and **we ask that further independent analysis to be undertaken regarding the social and environmental value of the collective site of Rogers Beach to Lipson Cove, including the subject site together with a comprehensive analysis of the likely impact on the current and future value of the visitor/tourism economy.** Employment comparisons should be central to this analysis together with consideration of the ability to retain and grow the advantages of the Lipson Cove-Rogers Beach tourism precinct and establish grain exports further up the coast, and out of sight, at Cape Hardy.

- *Improved integration across sectors and locations is a must, with the creation of precincts seen as key. These can form the basis for linkages between urban and regional infrastructure – vital for equitable access to markets and services*
- *How can we best plan and accommodate the infrastructure needed to create vibrant and economically productive precincts?"*

Free Eyre, Peninsula Ports and their consultants have undertaken what, in our view, has been very limited public consultation and have quite unapologetically declared that this will be a 'grain only port'. **Grain producers on Eyre Peninsula need other industries and the people and skills that they bring, to be able to have active healthy communities and service support adequate to sustain their farming business and family needs.**

Limiting the port to the export of a single commodity only, places a major constraint on the ability to diversify the regions (and South Australia's) economy, grow its population, grow GDP and expand its workforce.

Building a grain only single commodity port is a major change to the original PER in terms of economic impact to the region, including having significantly less employment growth and little to no benefit to other industry sectors.

Port infrastructure is used across multi-generations. Building a single commodity port blocks opportunity across sectors and generations. Building a single commodity port in this region can be best compared to provision of the NBN or mobile phone networks to grain producers only. Why limit opportunity for growth?

In our view, **it will delay the expansion of existing and future industries** and projects and eventually force duplication of infrastructure causing inefficiency and unnecessary costs, both in time and money. Rapidly evolving future industries that the region and the state have a natural competitive advantage in, but a limited window of opportunity in terms of economic cycles and timing, such as low carbon energy production being used to develop and export Hydrogen and Ammonia, can be lost to the State for all time.



Is the Minister prepared to jeopardise the States participation in and considerable economic benefits of emerging industries that will rely upon access to the States only approved multi-use, multi-user, deep seaport? *One report produced for us, "Opportunities for Australia from Hydrogen Exports" calculated that global demand for hydrogen exported from Australia could be over three million tonnes each year by 2040, which could be worth up to \$10 billion each year to the economy by that time. (Australia Renewable Energy Agency).* The State has used images of Cape Hardy within its South Australian Hydrogen Strategy; where else can you export hydrogen and ammonia from and why would you needlessly jeopardise the future viability of the State's only approved multi-use deep cape-size capable port?

Flawed Assessment of Alternative Ports

Grain is an important contributor to the region's exports. It is clearly a critical contributor to any current financial model required to fund the development and operation of ports capable of delivering an infrastructure platform to support the development of new industries, and the value adding of existing ones, including especially primary industries.

Under the Criteria: Economic Impact section of Table 1.2 Volume 1 of the amended PER, Cape Hardy is marked as "Not Suitable" for grain exports on the basis that *"the site does not provide suitable land (available to Peninsula Ports) for large scale grain accumulation within economic distance of the wharf for materials handling"* and *"Berth slots at the project would be limited due to proposed mining activity. The currently proposed development at Cape Hardy is not economic on a grain only basis"*.

The amended PER should not rely upon these statements. They should be thoroughly independently reviewed and tested by the Department and the Minister.

RDAWEP has viewed documents and financial modelling that indicate that Cape Hardy is economic on a grain only basis and has ample land suitable for grain storage. It is also aware of a letter of invitation from the owners of Cape Hardy to Free Eyre relating to its potential participation in grain accumulation and export at Cape Hardy.

The design of the jetty at Cape Hardy allows for grain berths at least to the scale of that offered by the amended design at Port Spencer and has additional berth space for cape-size vessels, the future requirement for regional exports. The economies of scale in terms of sharing costs of construction and operational services and availability such as tug services should be examined for potential savings to all parties during and after construction, including civil works for bunker and silo storage and internal and external roads, power, water etc. The potential cost saving/sharing around road access from the Lincoln Highway for both sites should be carefully considered by the Minister also in relation to points raised further down relating to road widths, trucking movements, tourism and safety.

Approving a single commodity (grain only) port, to be developed in an area of publicly acknowledged high social and environmental value and sensitivity and by so doing substantially compromise the State's ability to develop an already approved multi-use, multi-user port, in a location having far less environmental and social value and sensitivity that can provide the necessary platform for new industries, is totally contrary to the government's planning principles and interests and in our view would be wholly unsupportable from an economic, social and environmental basis.

The significant reduction in the size of the workforce as a result of this amendment is a major change to the original application and requires further study regarding cost, benefit and impacts. Critically the substantial change in the structure of the workforce to a far higher ratio of short-term seasonal employment further exacerbates the reliance on back packers and transients rather than permanent full-time positions that attract families and builds healthy vibrant communities. This significant change to the PER also requires further review and consideration.



Clearly the Lipson Cove to Rogers Beach area that includes Sheep Hill/Port Spencer and Lipson Island Conservation Park should be further developed as a Coastal Conservation, Camping and Recreation precinct to grow the tourism/visitor economy, consistent with the Eyes On Eyre Plan, the South Australian Regional Visitor Strategy, the RDAWEP Regional Plan and other relevant planning documents (that clearly refer to multi-commodity cape-size ports connected to national road and rail etc.), including the steering comments relevant to precinct development and integration referred to in the various quotes above.

I draw to your attention the previous submissions relevant to conservation, environment, visitation and recreational use lodged during the original PER process and implore DPTI to thoroughly review these against the new and significant changes.

Equally the industrial uses associated with export ports should be consolidated in a multi-use deep seaport precinct located well away from conflicting land uses whereby they can healthily co-exist without causing negative impact to each other.

Significant Change in Heavy Vehicle Movements

The negative impacts of ignoring a precinct-based approach and instead co-locating only some of these land uses is captured in the various volumes of the original and amended PER. Perhaps one of the most striking examples of unnecessary negative impact being the change in impact of heavy vehicle movements within the collective area of Lipson Cove to Rogers Beach and the connecting roads and Lipson Cove Road. I refer to, Table 3-1: Comparison between Evaluated Project and Proposed Amendment relevant to socio-economic assessment in Volume 3 (Jacobs).

Evaluated – 70 truck movements per day attributable to grain deliveries. Haulage route from Lincoln Highway following the alignment of Swaffers Road.

Proposed Amendment - The catchment area for grain to be transported to site would extend across the central Eyre Peninsula region. Haulage route from Lincoln Highway via Lipson Cove Road.

This is a major change that should require the approvals are withheld until a full traffic management, road design, costing and agreement for responsibility of costs are approved and guaranteed. This is a substantial component to the project in terms of CAPEX, OPEX and operational impact. The addition to overall project CAPEX does not appear to be well covered in Peninsula Ports capital raising documents nor in the amended PER. The District Council of Tumby Bay (DCTB) and its community must be protected from potentially 'inheriting' the burden of this cost in the event of project failure or partial failure and approval should not be granted until this matter is resolved to the satisfaction of the DCTB and its community.

Jacobs estimate 860 to 980 grain truck movements per day, a truck entering and exiting every two minutes and **an increase in excess of 12 times the original estimate in 2012**. This amount of grain would be required to be attracted to this port with or without the Eyre Peninsula rail network being in operation. The impact of this amount of heavy vehicle traffic on the peak visitation period of the tourism economy associated with this precinct will be quite disastrous and is at best very understated in the amended PER.

Significant Change - Property Acquisition

Lipson Cove Road is a 'one (1) Chain Road', a width incapable of being utilised safely for intense heavy vehicle movements and this issue is further exacerbated by the existing caravan and camping recreational vehicle use.

Acquisition of private properties along the length of Lipson Cove Road (approximately 6 kms) will be required.



This compares to the surveyed and gazetted 'four (4) chain Road' access to the approved multi-use Cape Hardy deep seaport. This is an additional reason to follow a best practice precinct-based planning approach separating heavy industry port uses and activities from the sensitive social and environmental environs of Lipson Cove-Rogers Beach and the growing visitor economy.

Significant Change - Cumulative Impact

This submission has primarily focussed on the substantial change to the original application of being a single commodity port and not a multi-commodity port. The original PER was completed way back in 2012.

Since that date Cape Hardy has been approved as a multi-commodity port.

This amended PER should identify and address potential impacts to the region's economy, society and environment if both ports are built? Free Eyre and Peninsula Ports have submitted this PER amendment in the full knowledge of the approved Cape Hardy project but does not appear to address this issue at all, which is a standard DPTI assessment requirement - 'Cumulative Impacts'.

Significant Changes to Jetty Design and Construction

The most significant physical amendment to the design of the jetty is the addition of a large rock causeway protruding some two to three hundred metres into the Gulf. Has this change been reconciled with a review of the original submissions referencing conservation, environment, visitation and Lipson Island?

This protrusion will interrupt the natural sedimentary flow along the gulf and will also trap substantial amounts of seaweed. This will result in change. Some of this has been addressed in the report, but it worthy of further independent review based upon long term local observation, including reasonably regular weather and storm events that can quickly erode several metre meters of sand (up to 1.5m) and deposit it elsewhere. Will the causeway interrupt the usual pattern of these large sand movements and how will it impact Lipson Island Lipson Cove-Rogers Beach ecologically and environmentally? This type of event and the management of its consequences does not appear to be addressed in the amended PER. How will it impact Lipson Island, Lipson Cove-Rogers Beach?

By way of limited comparison, the Port Neil boat ramp has a relatively short causeway acting as a breakwater. It is partly built upon a naturally existing rock reef. The water depth is shallower than Port Spencer. However, as a small-scale comparison this may be a useful point of reference as there has been observable change to the sea floor within the bay that has in all probability also affected marine life and patterns of behaviour from a relatively minor breakwater intrusion.

The significant amendment of removing the 'T' section of the jetty designed for cape-size ship berth, approximately one kilometre offshore, removes the wind and wave barrier formed by ships that may have berthed on the 'T' section. Centrex was proposing to export less than two million tonnes of iron ore per annum in cape-size vessels capable of carrying in excess of 220,000 tonnes per ship which translates to the 'T' section being vacant for 80% of the time. This effect is reported to have a greater effect on sedimentary movement than the imposition of the rock causeway. This needs independent verification of impact.

Removal of the rock causeway and replacement with the modular jetty structure proposed for the rest of the jetty would overcome most of this change and should be reconsidered, particularly in terms of environmental impact and cost, and independent analysis of this modelling is requested.



Community Support

Volume 1 of the amendment to the PER refers to Stakeholder and Community Engagement activities and states that *"The project has received positive local government and stakeholder support"*.

RDAWEP is unaware of the project receiving positive local government support but is aware of positive local government support for a multi-use deep seaport at Cape Hardy made evident by the following resolution of the EPLGA – (extract from the minutes dated 27/02/2018).

***"019/18: Establishment of a Deep Sea Port at Cape Hardy
Moved: Mayor Johnson Seconded: Mayor Barber
That the EPLGA strongly supports the establishment of a deep seaport at Cape Hardy.
CARRIED"***

To reach this resolution each of the eleven Eyre Peninsula Councils have individually decided to support the Cape Hardy project following many consultation sessions between the proponent, the Councils and the EPLGA over the previous couple of years. Additionally, RDAWEP understands that the DCTB has sought to withdraw its previous support for the original Centrex Sheep Hill proposal (written request made by DCTB in 2017) in favour of stated support for the Cape Hardy project. Port Spencer is also not supported by the Tumbly Bay residents and Rate Payers Association.

RDAWEP, the EPLGA and the EPNRM all support the Cape Hardy project and not Port Spencer and are strong advocates of Cape Hardy to all levels of Government, industry and community. Cape Hardy and not Port Spencer is identified in regional planning documents as being integral to the region's future economy. These three groups comprise approximately **100 community and industry leaders** from across the region with strong ties to agriculture and agri-business whose organisations support Cape Hardy. None of these documents or points are referred to in the amended PER.

RDAWEP has not seen any evidence of the local government support claimed in the amended PER. There are certainly no resolutions provided as evidence, like the above example provided for Cape Hardy.

Additionally, there is no evidence of Federal Government support for Port Spencer. However, by comparison Cape Hardy is supported by High Priority Project Status on the Infrastructure Australia List and critically has the publicly stated support of the Federal Government (*including financial as announced by the Deputy Prime Minister in December 2019 - the Australian Government investment (\$25m) would support a multi-commodity deep-water port at Cape Hardy. 'This proposal will bring together agriculture, mining, green manufacturing, and Indigenous business into a multi-user, multi-commodity manufacturing and export hub in South Australia'*).

Further, RDAWEP has attended Port Spencer local consultation meetings and witnessed hostility being expressed towards the project far in excess of any visible support for the project and in most of these instances the hostility has been directed by grain growers that are shareholders of Free Eyre. **What level of support for Port Spencer has formally been sought and granted by the shareholders of Free Eyre?** How many of its shareholders formally approve of this project?

Considering the above, a question in need of an answer is, is there any or much credible level of support for this project outside of the Boards of Free Eyre and Peninsula Ports? RDAWEP understands that the level of financial support garnered from existing farmer shareholders of Free Eyre is extremely limited to date and that related meetings with growers have been very poorly attended.



Volume 1 continues with *“The proposed amendment is considered to be of significant strategic and economic value.....It offers potential economic and employment opportunities”* etc. As stated above amending the project from a multi-commodity to a single-commodity port is a substantial amendment that must be further analysed. This change has negative strategic value in a regional and state context.

In RDAWEP’s view this change poses a high risk of severely limiting investment into new industries, including value adding to primary industries such as food and mineral processing and manufacturing, energy production, fertiliser manufacturing and so forth. These are not idle comments. RDAWEP and in some cases, government agencies, are in active discussions with various credible organisations highly interested in pursuing these opportunities.

Significant Change – Decrease in job numbers

This change poses a high risk to hundreds of new jobs associated with the emerging industries and opportunities highlighted above. The decrease in job numbers and the change in the ratio of seasonal to full time positions as a result of this amendment illustrates this very point (removal of the ore jobs **reduces the operational workforce from 70 to between 10 to 30** for grain only with the majority being employed seasonally for about 8 weeks only). The amendment to a grain only seaport further consigns businesses and communities in the region to a tightening downward spiral associated with the decrease in population and workforce discussed above, except if the regional economics are strong enough to support the duplication of port infrastructure within a few kilometres of each other. In either instance the impacts, including cumulative impacts, need to be identified and measured in a full EIS.

Development Process

Centrex Metals received provisional development consent in December 2012 (Government Gazette dated 20 December 2012, p. 5629) with a two year time frame to substantially commence works at the site. Centrex applied for a further extension of time which was subsequently approved in December 2014 (Government Gazette dated 18 December 2014, p. 6779), with a date of 20 December 2016 to substantially commence works.

While the approval remains in place unless the Government cancels the authorisation, RDAWEP questions how a three-year gap between ‘expiry’ and PER variation is acceptable, particularly given the change in proponent, the change in industry and the significant change in proposed use.

Conclusion

The proposed amendments fundamentally change the original project so greatly that it is barely recognisable. It is essentially a new project. It has enough change and complexity to require the proper scrutiny and analysis of a full Environmental Impact Statement (EIS) as opposed to a PER.

This submission has highlighted that, where there is demand and opportunity for generational change in infrastructure provision, it must assist strategically in the reversal of population decline and workforce challenges, enable new industry development and not prevent it.

An analogy has been drawn of a single commodity port in the context of this region’s infrastructure needs as being akin to providing NBN and telecommunications services to grain growers only rather than to any industry that it can assist.

It misses the opportunity to optimise the development of shared infrastructure to enable essential economic diversification, associated widespread jobs growth, truly sustainable global competitiveness in primary industries and the ability to transform export industries from price takers to price makers.



RDAWEP is confident, based on the financial modelling that it has seen, that a grain export facility, supported by growers, that creates market competition within the status quo is warranted and can be viable. However, to provide one as a grain only facility and to pose high risk to a multi-commodity facility, transport intermodal and industrial hub, is unacceptable.

Clearly the circumstance of having two port projects within such close proximity to each other compromises every principle of best practice, planning and development. It presents the real risk of duplication in essential infrastructure (such as roads, power, water, telecommunications), increases capital and operational costs, compounds negative environmental impacts and significantly compromises the integrity and purpose of precinct-based development. Peninsula Ports CAPEX budget and potential OPEX, without the realisation of these types of efficiencies, and without detailed transport network and essential service costs draws into question the financial sustainability of this project.

The significant changes to the design and construction of the jetty and addition of the causeway require independent assessment that should be included in a full EIS.

This submission has questioned the real level of community support for this amended project and provided an example of what real Local and Federal Government support should look like.

The extent of change poses high risk to the future financial sustainability of the District Council of Tumby Bay from unplanned, un-costed and unbudgeted capital and ongoing operational works such as for roads. It also has high risk implications for road safety, particularly on Lipson Cove Road, and for visitation and quiet enjoyment of Lipson Cove, Lipson Island Conservation Park and Rogers Beach.

All Eyre Peninsula primary industries and producers urgently require the improved margins and new market opportunities that a multi-use deep seaport can potentially provide them. Regretfully this amendment provides for a grain only port which is materially different to the original proposal and should not be approved without full examination of the issues raised herein and satisfaction of the principles expressed.

RDAWEP recommends that Peninsula Ports be required to re-advertise a full Environmental Impact Statement providing further information and evidence relevant to all changes.

It must be noted that Port Spencer is not supported by RDAWEP.

Yours sincerely



Dion Dorward
Chief Executive Officer
Director Regional Development

