

Northern Flinders Ranges Management Plan

“Seeking a Balance – Conservation and resource use in the Northern Flinders Ranges”

A Response by Flinders Mines Ltd

General Concerns

The way in which this draft document was released is considered defective because there was a:

- *Lack of Consultation with ALL Stakeholders.* Whilst a narrow field of stakeholders have had a chance to have their say representation of important groups including indigenous people, the mining industry and unions is noticeable by its absence
- *Lack of Explanation* of the need for such draconian measures. As stated in the document [“Government already places strict controls and regulatory controls on mineral and energy exploration”](#). The need to increase these controls is not explained.

In this document it is stated that final policy document “will take account of the submissions received”. This process, in fairness to ALL stakeholders, needs to be far more transparent than the production of the draft document.

The proposal is creating sovereign risk. The arbitrariness of the proposed actions and the uncertainty created by the legitimate concern by the mining industry that this is just the start of a process that will effectively rule out large portions of the state for exploration risks creating a negative impact on investment in this state. The mining industry is a highly important contributor to the wealth of this state and needs assurance that this is not “the thin end of the wedge”.

There is a lack of explanation of the legal ramifications of the proposal. Which Acts are involved?

Specific Concerns

- Whilst a meeting held at PIRSA on 9th December clarified some issues we believe there is still a lack of transparency regarding how the conclusions in the document were reached. Specifically, answers have to be provided to the following issues.
 - **Biodiversity Values.** The lack of attendance of any DEH representatives at the meeting meant that no information was provided regarding on how this map was produced. As no explanation is offered on the meaning of the term “biodiversity values” the maps are meaningless. This information should have been provided in good time for companies to be able to respond.
 - **Landscape Quality.** It was not clearly outlined in either the draft document or at the meeting who the respondents of the survey were ie it is unclear whether they were unbiased parties. However, a brief reading of the report determined that [“over 700 invitations \[to complete the landscape survey\] were emailed to hundreds of addresses including many tour operators, stations and businesses in the Flinders Ranges”](#). No mention of other stakeholders was mentioned. Thus, the survey was already biased towards anti-mining interests. Furthermore, later [“a notice was sent out across part of the Public Service inviting participation in the Flinders Ranges Survey”](#). In the interests of transparency, the notice inviting Public Service participation should be released. On page 8 of Lothian’s report he notes that after the first round of invitations

380 people had completed the survey. After the second round 3549 people had participated ie approximately 90% of the responses were from the State Public Service. Should it transpire that the branch of the Public Service involved was the DEH, the survey is fatally flawed and meaningless both from a statistical and ethical standpoint.

- **Mineral Prospectivity, Mineral Occurrences and Mines.** The draft document provides no information regarding how this map was derived. This information was requested at the meeting and sometime later Report Book 2009/19 was released. The limited amount of time available for submissions to be completed does not allow a thorough review of this document.
- **Proposed Management Zones.** The draft document does not provide any information on how the map showing these proposed zones were determined. A correlation does seem to exist with the maps of landscape quality and diversity but the correlation of areas of high prospectivity with proposed management zones is ignored.
- The relationship between Environmental Class Zones (as defined by Planning SA) and Access Zones (as defined in “Seeking a Balance”) was not clearly described.

Environmental Class Zone	Access Zone
A	1
B	2A
	2B
Not an Environmental Class Zone	3

Is this the correct relationship? Does this proposal mean that the Environmental Class A and B Zones are invalid in the Northern Flinders Ranges?

- The creation of Access Zone 2A is a means of banning exploration and mining without actually doing so. No serious explorer is going to spend money on aerial surveys with only just walk-in access and rock and soil sampling only allowed under (undefined) stringent conditions if there is no possibility of continuing on to higher impact activities if encouraging results are obtained.
- No sane mining company could possibly proceed to lodge a mining lease application based on the exploration proposed to be allowed in Access Zone 2A. In other words mining is effectively banned in Access Zone 2A under these proposals.
- The mining industry needs clear assurances that “[standard exploration and mining access](#)” on Access Zone 3 will indeed be allowed, and that proximity to Class 2A and 2B zones will not create buffer zones hindering such activity.

Conclusion

The draft document lacks credibility to such a degree that it needs to be disregarded and the process should begin again. This time, all stakeholders should be involved and all aspects of the process must be completely transparent and open to scrutiny.