

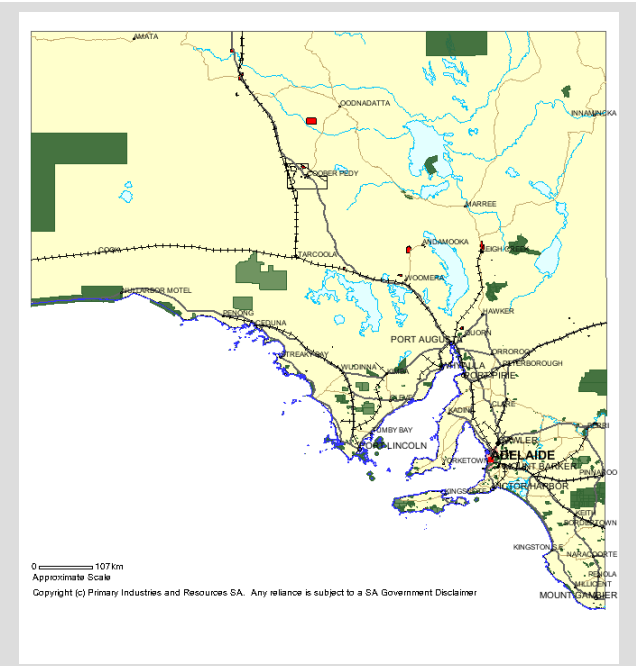


Mount Gee, Arkaroola Wilderness Sanctuary in late afternoon light – image courtesy Tim Baier

**Bill Doyle – Seeking a Balance submission**

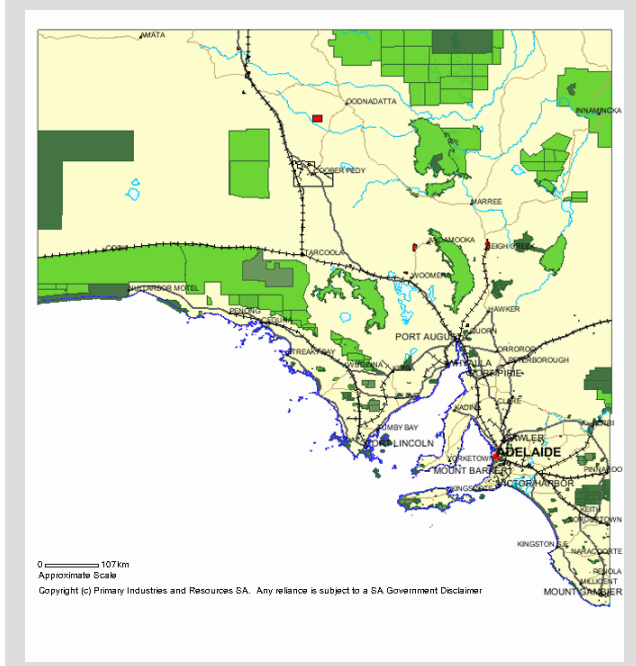
**January 2010**

**SEEKING A BALANCE – THE MISSING MAPS!**



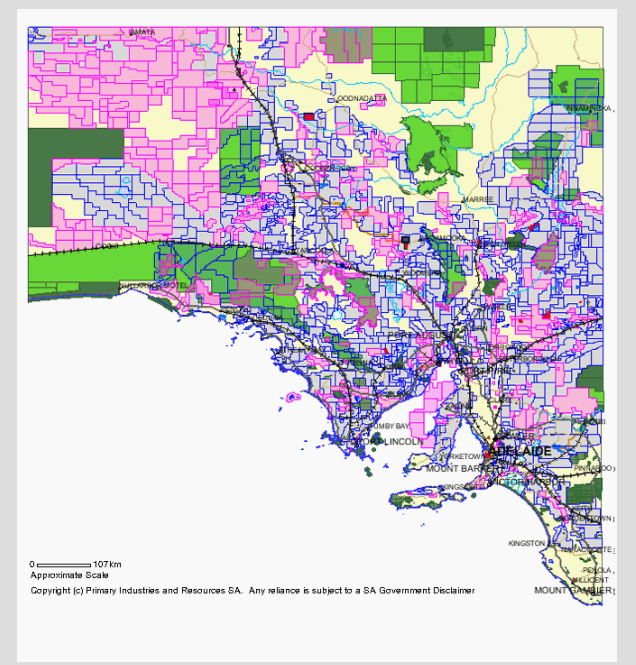
South Australia, showing those areas from which the Mining industry is excluded – dark green for single-proclamation parks and wilderness protection areas, red for 'Areas Excluded' from the Mining Act.

(The proposed new Nullarbor WPA will add an area roughly double the size of the existing Nullarbor National Park single-proclamation section shown here lower-left. It's proclamation will take the area of the state in no-mining-access reserves to just over 6%)

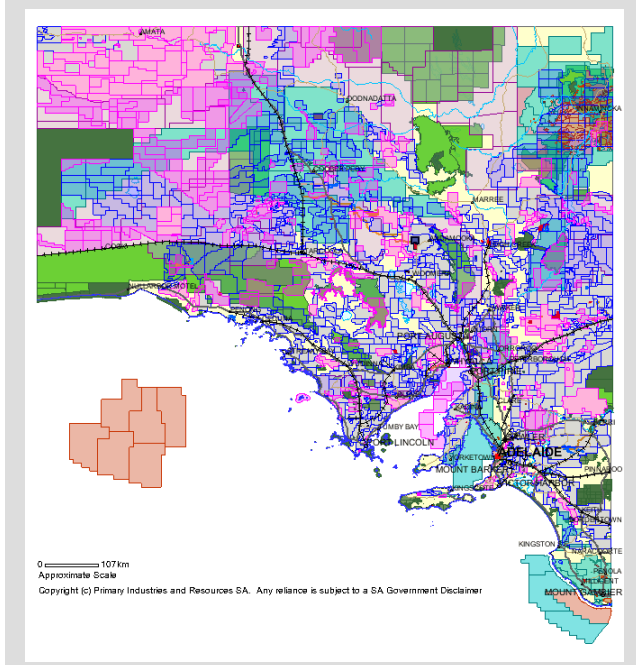


South Australia, as previous, with the addition in light green of the jointly-proclaimed reserves that are accessible by the mining industry .

(The joint-proc remainder of the Nullarbor NP has now appeared – the Nullarbor WPA will claim this and take a section of the Regional Reserve directly above it. The WPA is substantial and welcome, but after it is proclaimed more than 71% of the state's reserves will still be mining accessible )



South Australia, as previous, with the addition of mineral exploration leases in blue, and mineral lease applications in pink. Note the substantial overlapping of the existing jointly-proclaimed reserve system.



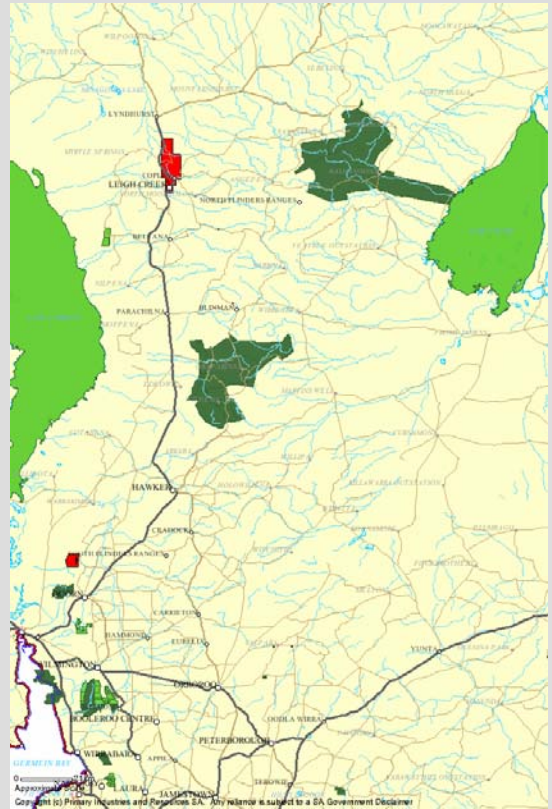
South Australia, as previous, with the further addition of the various petroleum production and exploration tenements

All maps extracted from PIRSA's excellent SARIG Geoserver January 2010

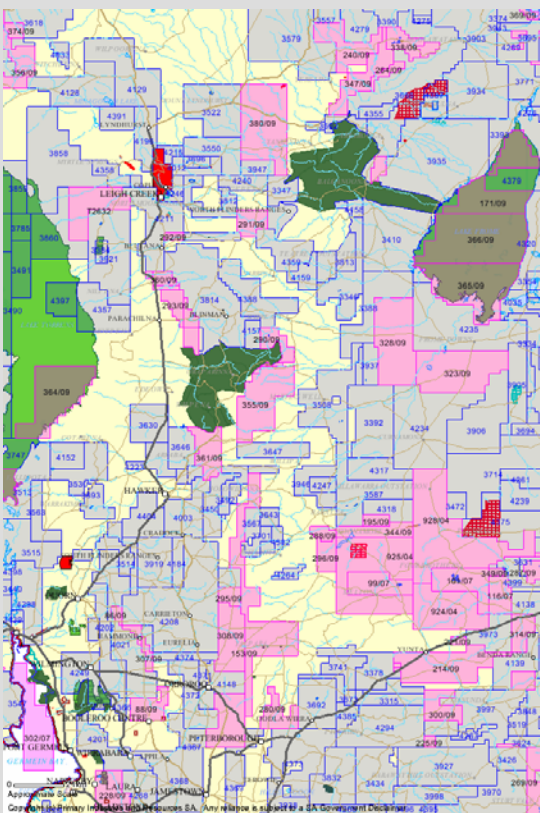
**SEEKING A BALANCE – THE MISSING MAPS! continued**



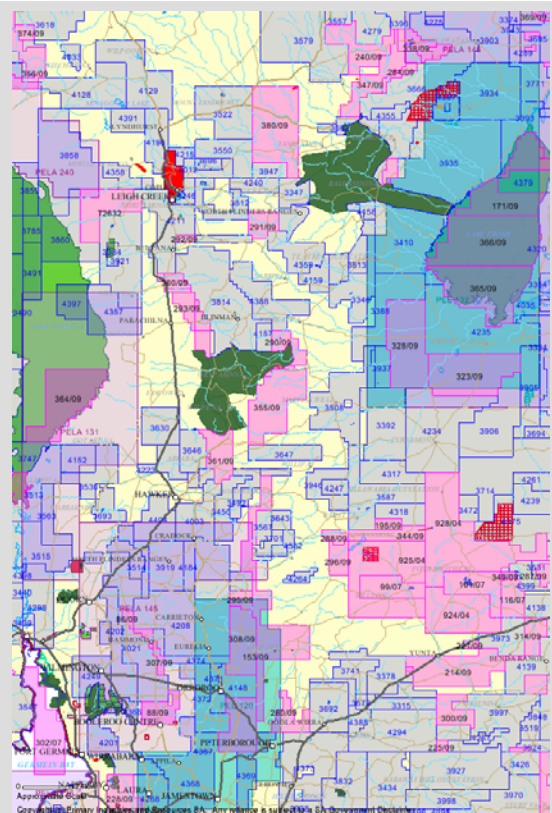
The Flinders Ranges district, showing those areas from which the Mining industry is excluded – dark green for single-proclamation parks, red for 'Areas Excluded from the Mining Act.' (The largest of these is a coal mine!)



The Flinders Ranges district, as previous, with the addition of jointly-proclaimed reserves, including Ediacara, Mount Brown and a large chunk of Mount Remarkable

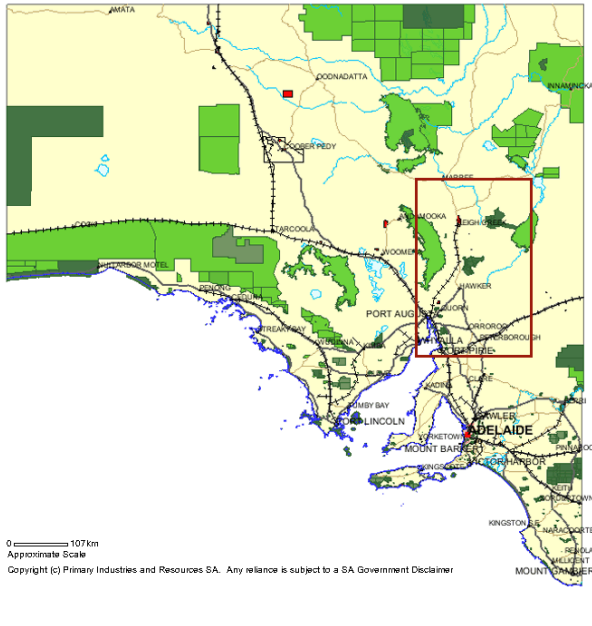


The Flinders Ranges district, as previous, with the addition of exploration leases (ELs) and EL applications and red crosshatched production tenements



The Flinders Ranges district, as previous, with the addition of petroleum tenements

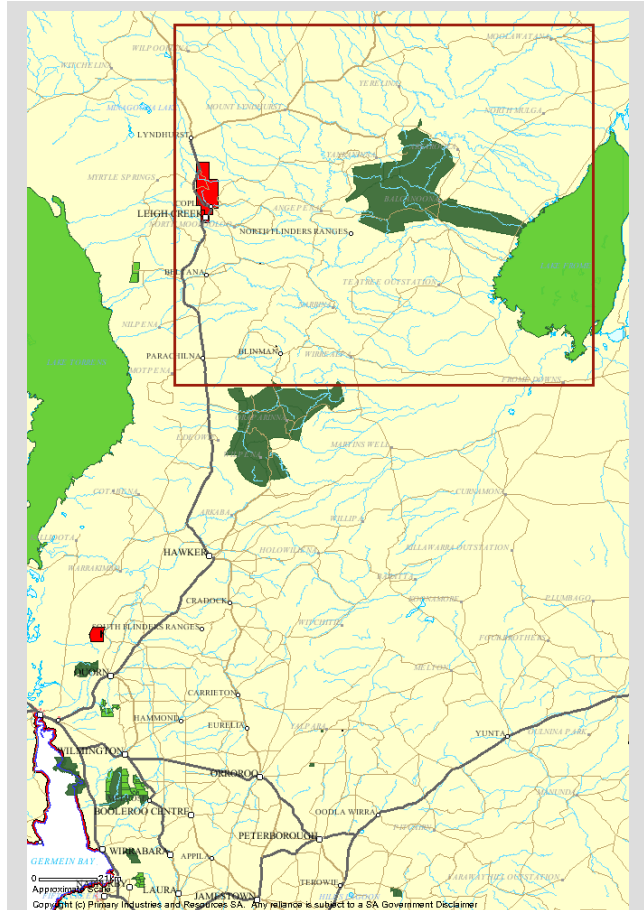
**SEEKING A BALANCE – THE MISSING MAPS! continued**



Zooming in on Seeking a Balance – I have omitted tenement details to make the maps legible

ABOVE South Australia + all reserves with the Flinders Ranges district map area indicated

RIGHT: Flinders ranges area with + all reserves with Seeking a Balance northern Flinders mapping area indicated (see below)



RIGHT: Seeking a Balance northern Flinders mapping area with the proposed Management Zones mapping area inset.

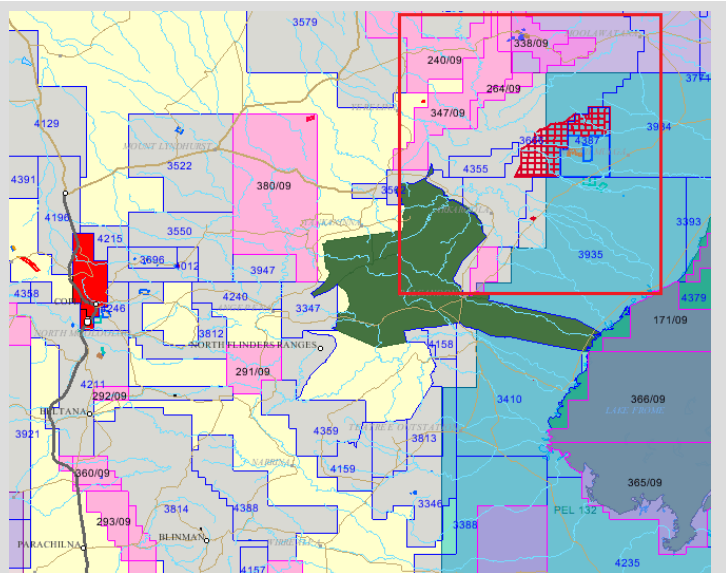
Additionally, all current mineral and petroleum leases / tenements are visible.

The large red 'Area Excluded from the Mining Act' at left is the Leigh Creek Coalfield.

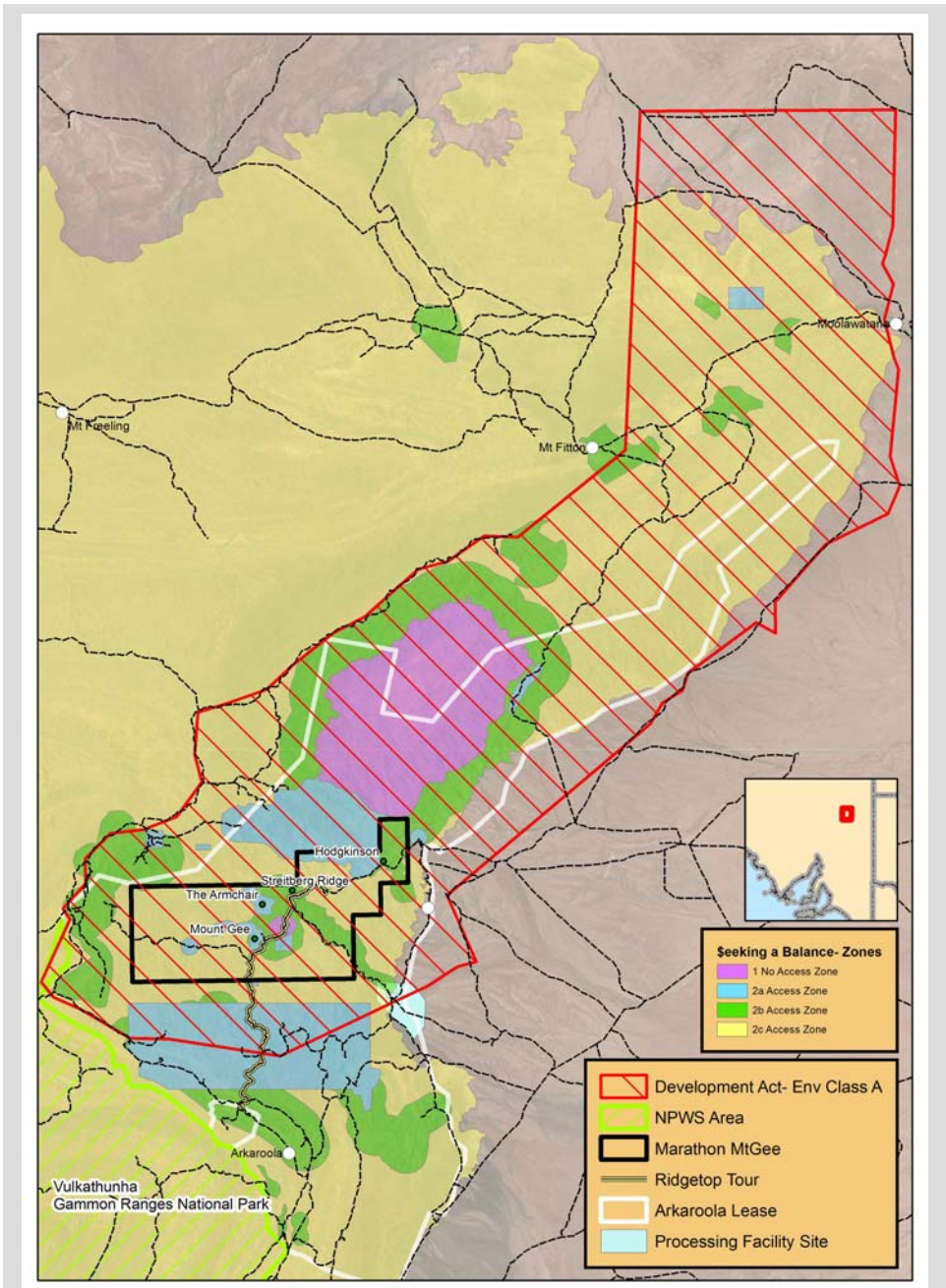
The red cross-hatches at right are Beverley production tenements.

The Arkaroola Wilderness Sanctuary does not show up on SARIG's database

All maps extracted from PIRSA's excellent SARIG Geoserver January 2010 – interpolations on this page my own.



**SEEKING A BALANCE – THE MISSING MAPS! continued**



The Environmental Class A Zone created by the Development Act, Seeking a Balance (SaB) zoning, the Arkaroola Wilderness Sanctuary, and Marathon Resources' Exploration Lease 4355. (Map courtesy Matt Turner and The Wilderness Society.)

Note that the bulk of the Class A Zone is consigned to Access Zone 3 - 'standard exploration and mining access' – an apparent far cry from its strict provisions and difficult to reconcile with the claim that Seeking a Balance is increasing protections for the area!

The outer boundary created by all of SaB's zones defines the area that it identifies as being 'elevated above the surrounding plains.' (Mostly delineated here by the edge of the mustard-yellow area with a short stretch of green.)

I am calling for the proper protection for all of this 'elevated' area where it lies within the Arkaroola Sanctuary boundary and the Class A Zone boundary – this amounts to about 100 000 hectares, or 0.1% of the state.

## WHY THE MISSING MAPS?

I do not feel that the overall context of the mining industry's access to wild areas in South Australia was covered at all adequately in Seeking a Balance and I believe that this was a very significant oversight.

I have included the preceding maps accordingly.

Without such an overview I fail to see that the public can be expected to develop an informed opinion as to whether the mining industry should feel entitled to avail itself of the relatively small area of remnant high-quality wild country in the northern Flinders in the first place.

By zeroing in on such a small section of the state without regard to this 'bigger picture' – as Seeking a Balance does - how can anyone form a reasonable impression of how much of an impediment to the mining industry as a whole its exclusion from this small area would actually be?

And how can we claim to 'Seek a Balance' in the context of a situation which is so dramatically unbalanced that its friends are hiding the car keys and starting to wonder if they should call someone?!

Even allowing for the proclamation of the newly announced Nullarbor WPA – hooray! incidentally; a very positive move - just over 6% of the area of the State is secure in no-mining-access reserves (overall reserves comprise some 21% of the state.) As you can see above, 'Areas Excluded from the Mining Act' are not extensive – and are, in any case, often mines or already defined reserves! – leaving the industry with, even estimating conservatively, about 92% of the state to work with. Estimating conservatively again, that's about 90 million hectares.

(Of course, there are other moderate checks; there is the 71% by area of reserves that allow 'restricted' mining access – again a post Nullarbor WPA figure – and various other 'restricted access' zonings. But, looking at the tenement maps, it certainly does not appear that mining's style is really being significantly cramped! Wouldn't the government be the first to tell us that this state was actually experiencing a mining and exploration boom?)

The Arkaroola Wilderness Sanctuary (according to Marathon Resources' EPBC referral) occupies 58 800 hectares, or about 0.06% of the state.

If we consult the map on page 5 we see the both the Sanctuary and northern section of the Environmental Class A zone created by the Development Plan for the Flinders Ranges. Here the Class A Zone occupies about 105 000 Hectares as derived from shape mapping – that's just over 0.1% of the state.

Of course, the Class A Zone and the Arkaroola Wilderness Sanctuary overlap, and I'll concede that those portions of the Class A zone outside the area Seeking a Balance identifies as 'elevated from the surrounding plains' are not actually protecting the character of the Ranges as was intended. This is a legitimate refining of this boundary.

So all up the 'elevated' area lying within the combined Class A Zone and Wilderness Sanctuary boundaries that I'll be arguing deserves full protection occupies approximately 100 000 hectares, and 0.1%, of the state.

This area contains rugged landforms that are unique in SA, and the mountainous area of the Arkaroola Sanctuary in particular is known to be of global geological significance. Not only is terrain of this kind not widely replicated here, it is not widely distributed elsewhere in the country. Combine that with a relatively low-impact pastoral history and the Sanctuary and adjacent northern ranges become a rare biological jewel indeed.

This is *exactly* the type of region that should be preserved for posterity, surely? This is an observation that has been made many times regarding this area, and a situation the Spriggs – ironically one of the state's premier mining families – had good reason to believe they had brought about.

How many more finds like the ancient reef found in Arkaroola in 2008 - perhaps containing the oldest animals identified to date - still await us? That is, if the area is properly preserved, of course! No wonder great South Australians like Sir Douglas Mawson and Sir Mark Oliphant wished to see the area properly preserved.

No-one could deny that advocating the full conservation of the region is a legitimate position. And yet Seeking a Balance ignores this, instead presenting the public with a *fait accompli*, effectively telling them 'the area will be divided between conservation and mining, let's be reasonable and discuss how this is going to happen'.

This is a technique straight out of 'Unfair Strategies in Argument 101'!

(Of course, we also get all the usual reassuring blandishments about 'preserving the unique values of the landscape', but it's blatantly obvious that this is best done by prohibiting any intrusive and damaging exploitation!)

I do not accept that Arkaroola and the northern Flinders can be placed into this spatial and historical vacuum in order to magically transform them into a 'level playing field' peopled by 'stakeholders' of supposedly equal power who will now achieve meaningful compromises. Looking at the state or regional situation starkly indicated by these maps I see absolutely no reason for conservation to compromise here in the northern Flinders at all!

I do not accept that the mining industry is entitled to avail itself of the few remaining genuinely wild landscapes of the region, and suggest that those laws that currently permit them to do so are an embarrassing hangover from a 'frontier' era best left well behind. Surely any truly environmentally-minded government should be seeking to eliminate these anachronisms, not reinforce them?

I am also surprised and disappointed that there is not a stronger 'progressive' segment of the mining industry willing to publicly renounce such claims. It is easy enough to claim to be green if you're not called on to make any sacrifices!

Given the scope of the industry's reach across the state, and the relatively small size of even the 'inferred' deposit in Arkaroola when considering the Uranium industry nationally, the 'sacrifice' in this case is hardly devastatingly large – the Olympic Dam deposit (the world's largest) is more than an order of magnitude larger, for a start! Only a small percentage of the state's resources, let alone the nation's, is in question.

I'm sure other submissions by those much more qualified than myself to comment on the actual scale, quality and accessibility of the resource will touch on this issue in more depth, but the 31 000 tonnes Marathon proposes is the size of the deposit in Arkaroola is hardly a huge chunk of Australia's economically recoverable 1.1 million tonnes, 77% of which is located in SA (Geoscience Australia's December 2008 figures.)

**Where was the public debate that granted the right to proceed in carving up the region in this manner without first determining if mining should even be permitted?**

## **A CLASS A CONFUSION**

There's a very large elephant in the living room of Seeking a Balance. How can one 'balance' the Environmental Class A Zone provisions of the Development Plan for the Flinders Ranges that will supposedly still exist with proposed access zoning that leaves most of the area open to the standard practices allowed by the mining regulations? (See Map page 5).

The tension between 'standard mining access' and Class A's extremely high level of restriction is irreconcilable!

For a start, in all but the Zone 1 areas Seeking a Balance proposes to allow the installation of mining 'infrastructure' which Class A expressly forbids. (Yet we are to believe that the new plan *increases* levels of protection?)

And why were the extremely limiting conditions of the Class A Zone – mining only 'in the national interest' of a deposit of 'paramount importance' and if 'no similar deposit is available' nearby (it's called Beverley!) - not discussed in the document? This is another very grave omission.

It seems apparent that the main purpose of this section of the Development Plan wasn't just to 'protect the landscape from damage by mining operations' in some mild, nondescript way – this is the exact wording used in Seeking a Balance. No; to that end it sought to exclude it altogether except in the most limited set of circumstances!

Furthermore, in order to protect the character of the ranges the Plan effectively limits 'infrastructure' development to walker's huts and rainwater tanks. Yet Seeking a Balance proposes the creation of mining 'infrastructure' in all but the most highly protected zone. It's to be allowed in Zones 2 and 3; even, quite remarkably, in Zone 2a where no high-impact exploration activities (such as drilling) are to be allowed!

**Remarkably, nowhere does the document attempt to define this 'infrastructure'.**

But if one takes Marathon Resources' EPBC Referral as a guide to what the industry might wish to see, even allowing that all the major processing facilities should still be sited on the adjacent plains as Marathon proposed and not creep up into the ranges (I see nothing in Seeking a Balance that states that they can't, however, so let's

just hope it's too impractical!) we're looking at quite a list. A large access tunnel (decline/incline); ventilation drives, raises and fans and their associated access and maintenance tracks; all-weather-access trucking routes substantial enough to allow the hauling of ore to the processing facility; electricity supply; and even perhaps conveyors and slurry pipelines, another proposal put forward to shift the ore to the processing plant.

'Low impact' activities, would you say? Just what a local or international tourist would expect to see in the Arkaroola Wilderness Sanctuary?

(As to the sometimes-mooted 'gun-barrel decline' – a very long tunnel - coming from outside and under the Class A Zone; we'll come to that shortly.)

I have wondered how it was possible that in the week of Seeking a Balance's launch, on 30<sup>th</sup> October 2009 at The Wilderness Society's AGM and public forum where Minister Weatherill participated in a panel session, neither he nor his accompanying staff were aware of hyper-limiting clauses, such as these severe 'infrastructure' restrictions!

Nor were they aware that Marathon Resources had taken the Class A environmental restrictions seriously enough to propose tunneling in underground some 8+km to Mount Gee from their proposed processing zone to be sited on the eastern plains! (If these environmental restrictions are just 'guidelines' that need not to be taken too seriously – we'll come to that - one does wonder why any company would put forward such a proposal! See Marathon's ASX release of 17<sup>th</sup> September 2007 p3, for example. It certainly created some tensions in this one when the then CEO publicly priced this 'gun-barrel decline' at around \$500 million!)

Given that the creation of Seeking a Balance was a cooperative project undertaken by both Minister Holloway's and Minister Weatherill's departments – and that Paul Holloway is also the Planning Minister – this lack of knowledge of the details of Class A does seem extraordinary! As, again, is the document's lack of reference to them! I remind you that these are the single most important environmental management restrictions covering the area, and the source of the Spriggs's - and many others - believing that it was actually fully-protected.

As to the question of a giant decline tunneling in under the Class A Zone from the plains - a debatably economically viable, but certainly less environmentally intrusive option - it raises two questions.

One; if this can really all be done underground why is Seeking a Balance careful to create corridors – that is, transport corridors, not wildlife corridors – from the resource at Mount Gee and Mount Painter to the eastern plains and proposed processing zone (we'll assume here that a base to the west in Umberatana is unfeasible!).

Two; (and this may also be part of the answer to the above) even so, any large tunnel will require ventilator drives, exhaust fans, and all-weather maintenance access to these along its route, as well as drives for emergency access and egress (would these need to be large enough to involve vehicles?). Surely this hardly qualifies as a minimal impact on the surface environment, even though I agree that it is the least impact that could currently be expected from a mining operation?

It's worth mentioning here that the Class A Zone conditions expressly forbid the creation of new roads.

I also note that we haven't even considered the impact of the large processing facilities, tailings ponds, excess rock piles, and workforce that would be directly adjacent to it in a plan like Marathon's.

It is certainly convenient for those who believe there's some share-and-share-alike 'balance' to be sought in the northern Flinders that the actual extent of restrictions the Class A Zone has put in place was **not** published in Seeking a Balance. Let's run down why;

One; it's clear the Development Plan recognizes the need to take very strong measures to protect the landscape from the inherent damage of mining. And 'there is no such thing as a low-impact mine' to quote from the SA Mines and Energy Journal itself. Particularly not on the scale that's being proposed here.

Two; it's obvious that the Spriggs, and the public, were entitled to feel that the Sanctuary was fully protected by the Development Plan, since no currently-conceivable project could hope to attain the 'national interest / no similar resource' standard set if one accepts what it says at face value.

Three; Mr. Doyle is not necessarily a naïve soul unable to grasp 'sophisticated' political realities. Sadly, I'm well aware that all the protections afforded by the Class A Zone might be made to disappear at the mention of the magic words 'Major Project'. Paul Holloway has explicitly told Parliament he can choose to treat the provisions as 'guidelines' – hardly an inspiring word to describe something that's supposed to be standing up to the Mining Act! – and I have no doubt he wishes to do so. This is also the very term Seeking a Balance uses to refer to Class A

(apparently anyway; with the zoning and conditions page referring to 'planning guidelines' we're actually in territory about as well-defined as 'infrastructure'!) I'll touch on this issue again in my final proposal.

"Oh, well, sure, we had these neat-looking plans set up to fully protect the area; but then someone came along and convinced us there'd be a decent buck in whacking a mine in! That's 'national interest', isn't it?" Is this position one to be proud of, do you think? Likely to win votes, or endear anyone to posterity?

No, all round it's certainly easier if people generally don't really cotton on that the Class A Zone provisions were worded in such a way as to make to make a mine virtually impossible, and that some good-hearted people were even 'unsophisticated' enough to believe this meant it *was* impossible; but – aha! – it turned out the government had its fingers crossed all along!

**This is why I call on you to do the right thing – fully reinstate and enforce the *spirit* of the provisions of the Class A Zone that *should* effectively preclude mining within it. Permanently. No crossed fingers. No 'magic' outs. In order to protect the ranges fully, just as we had every right to believe they had been.**

### **WHERE'S THE WATER COMING FROM? OR IN THE DOCUMENT, FOR THAT MATTER?**

Marathon's EPBC Act referral anticipates their proposed project requiring 2 - 2.5 gigalitres (billion litres) annually. Even at the low estimate that's 5 and a half million litres per day every day! (That's more than 2 standard Olympic pools worth per day! In Arkaroola...) Or about 60 litres per second!

For comparison, according to figures published on their website Heathgate's ISL operation requires 300 litres per second - but water used in extraction is cycled through a 'closed' loop so (ignoring any 'excursion' issues) their actual extraction requirement from the local aquifer is stated as 20 000 litres per day.

That's 7.3 million litres a year - about what Marathon's proposal would require every 32 hours (even at the low end of their estimate – it's likely such a project would actually require something closer to Heathgate's operation's yearly extraction every day!)

Another 'put it in perspective' point to consider: the 17 pastoral bores in the Lake Frome district extract, again according to Heathgate's website, about 1 million litres per day combined. Pitch the projected water requirement midway between the low and high estimates and a Marathon-style project is looking for the equivalent of 100 such pastoral bores worth of water every day!

Where on earth would this kind of volume of water come from? Sustainably?

The northern Flinders has been in drought for more than a decade. Our collective national mismanagement of water has reached a critical point where it is no longer possible to ignore it, and the issue has taken centre-stage in debates across the country. While arguably SA has suffered the most from this state of affairs, here we are, not even discussing the possibility we may be about to shoot ourselves in the foot again!

Why does this crucial issue of immense regional significance get no mention in Seeking a Balance? This is hardly some minor detail that can be tweaked later; this has the potential to have a serious and lasting impact on both the local and regional environment.



Mount Painter from the Ridgetop Track opposite Mount Gee – a scene typical of the often-parched grandeur of the northern Flinders landscape

## NO GREAT LOOKOUT FOR SILLER'S

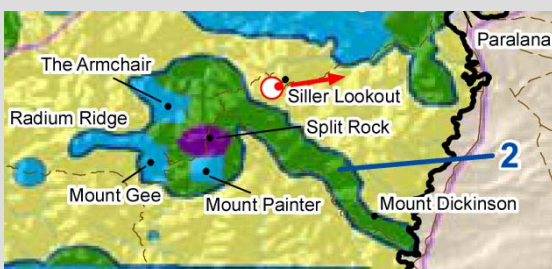


Siller's Lookout as seen in Seeking a Balance



Some places are just too precious to mine... Arkaroola Wilderness Sanctuary is one of them. Please Mr Rann, do not re-issue Marathon Resources' mining exploration lease.

Arkaroola's image of Siller's Lookout as seen in one of The Wilderness Society's newspaper advertisements



Siller's Lookout as seen in Seeking a Balance's Access Zone mapping – I have added a viewpoint indicator

**There's no more famous image of the Arkaroola Wilderness Sanctuary than the one at left. This view of Siller's Lookout, terminus of the outward-bound leg of the Ridgetop Tour (a party of which can be seen here on the summit) is known across Australia and the world. Few would argue that it's one of the iconic images of South Australian tourism, and Australian eco-tourism generally.**

We see the Lookout massif in the foreground, and the ranges on the southern flank of lower Yudnamutana Gorge rolling off to the plains and Lake Frome behind.

In fact, the version of the image at the top of this page is taken from the inside cover of 'Seeking a Balance.' (It is also rather old, as that particular type of troop carrier is no longer in use on the Ridgetop Tour and the public have not been able to wander around near the precipice like that for a good number of years!)

But more contemporary (and wider-angle) versions of this scene are used very widely – particularly the variant taken on behalf of the Sanctuary itself (left middle) that is used extensively in Tourism promotions - and has come to be known across the world.

Referring to 'Seeking a Balance', South Australia's Environment Minister Jay Weatherill told the ABC News on the 28th of October last year -

"I think what people need to rest assured about is that when they think about Arkaroola and they think about the iconic spots, the things that they have in their minds will be now [be] protected"

But in Seeking a Balance neither Minister's department has seen fit to grant any extra protection to Siller's Lookout, nor the bulk of the country that can be seen in the background in these iconic images!

In the plan this area is consigned (along with the bulk of the northern Flinders Region) to Access Zone 3 (see the map at left) – note that the lookout massif actually effectively blocks our view of the (more) protected northern side of the Yudnamutana gorge, and that most tourism promotions use the panoramic version of this photo showing even more unprotected landscape!

So the lookout is to be open to standard mineral exploration and mining access, with no approval required for either activity from the Department for the Environment. This is extremely difficult to reconcile with Minister Weatherill's quotation above.

## WILDLIFE CORRIDORS? UM, SADLY NO...

I will also note that while we're looking at this last map it becomes obvious that running a broad protected band through Siller's from Yudnamutana Gorge to the Armchair / Mount Painter region presented the government with a palpable opportunity to create a biological linkage corridor of the type that is central to land management policy elsewhere in the state.

This band could then have run on to the southern 'protected' block near the Arkaroola Village – again, consistent with strategies extolled elsewhere in the state, and across Australia.

But what we see instead is yellow – Access Zone 3 – bands running out to the plains from the resource identified around Mount Gee and Mount Painter.

Accordingly my theory that Seeking a Balance is more concerned with creating transport corridors than it is with providing wildlife corridors is only reinforced!

If this is not the case I would appreciate an alternative explanation as to why the southern side of the East Painter Creek valley is apparently less worthy of conservation than the northern side!

And are we really to believe that it's just an amazing 'scientific' coincidence that both the east-west yellow 'standard mining access' bands running from above and below the Mount Gee / Mount Painter uranium resource have an eastern terminus adjacent to the area Marathon Resources has identified as the best location for a mineral processing facility? (See the Class A Zone etc. map on page 5)

Please do not misinterpret this comment as some simple call for creation of such a biological corridor – unless it's very broad indeed – the width of the Class A Zone - it will not fit the bill. I repeat that I wish to see the whole region afforded proper protection and mining access excluded completely. I am just identifying a few more examples of problems and contradictions in what is a remarkably flawed document.

## **TUNNELING IN**

Having boldly protected the ridgetops of Mount Gee, Radium Ridge, the Armchair and Mount Painter from direct mining access – I'm sure there'd be loud gnashing of teeth in any boardroom at the prospect of being forced *not* to dig down so many more metres vertically – Seeking a Balance saddles would-be miners with the perhaps onerous (but surprisingly convenient and economic) option of tunneling in from adjacent valleys in Access Zone 3 areas!

And aren't there a lot of them! Virtually surrounding the identified uranium resource! Amazing...

(Of course, if the Class A Zone provisions still exist, are still to be understood in terms of common English usage, and if the protection of the region has only been strengthened - as we're assured it has – direct-access tunneling is impossible! Funny, then, that it should all just happen to be arranged in this 'access-friendly' way...)

## **WE'VE ALREADY GIVEN YOU THIS BIT, SO...**

'Of interest is that the analysis has confirmed that many high landscape and environmental values are already protected within the Vulkathunha–Gammon Ranges National Park.' (Seeking a Balance page 4)

Great – as one of the significant players in shifting the bulk of the Gammon Ranges National Park to single proclamation status back when Iain Evans was Environment Minister and Manna Hill Resources wanted to mine the Weetootla Gorge I am pleased to hear it.

Arkaroola, however, is a markedly different landscape of jumbled craggy peaks – the contrast is dramatically obvious when you look back towards the smooth whaleback of the high main range of the Gammons from the summit of Freeling Heights (one of this country's most breathtaking viewpoints.)

Just as the Flinders Ranges National Park is a different landscape to the Gammons/Vulkathunha NP.

I'm sure no-one would try to suggest we could do without the Vulkathunha NP because the Flinders Ranges NP *already* protects 'many high landscape and environmental values'. And I'm confident no-one will suggest anything so silly in this case. But the use of the word 'already' in the sentence quoted above gives serious pause!...

## **AND THEN THERE'S ALL THE OTHER BITS**

I have travelled extensively in the northern Flinders, on foot, in vehicles, and by bicycle! This has strongly influenced my comments above.

However, not all the region is as well known to me as I'd like it to be. (When proper protections are put in place I may hope some day it will become so.) I cannot hope to comment first-hand on the zoning consignments of all the

various landscapes covered by Seeking a Balance because I haven't had the chance to complete my explorations yet.

For a start, there's a lot of high-range country running north-east beyond the Mawson Plateau we're being asked to believe merits no special protection. Yet, while I haven't travelled beyond the Plateau itself in the ranges, it looks magnificent from Freeling Heights - see the photo on the next page - and has always enticed me as I've driven past on the road to Moolawatana. It's on my list for further inspection. And the Development Plan identifies that this area possesses a unique character worth preserving, so I'm clearly not alone in appreciating it. That is why I am calling for its complete protection.

But beyond this I am also alarmed that such huge swathes of the northern and western 'low' hill country beyond the main range and outside of my proposed 'full-protection' area are consigned to 'standard access' Zone 3, and feel frustrated that I am effectively being asked to accept that they are not worthy of any great conservation effort.

You'll forgive me for not having enormous faith in the 'independent landscape assessment' that was conducted - there are rather a lot of complaints in those responses! - but having reviewed the assessment photos I can only see 4 taken in this 'low' region. Perhaps I missed a couple, but it's still not a lot of photos to work with - so I do wonder what 'in depth' criteria were actually used to assign them.

I have chosen my full-conservation boundary, and this area falls outside it. The point I'm making, however, is that, given that it's a document with an agenda I can't agree with, and all the other flaws outlined above, it's really rather difficult for me to take Seeking a Balance's word for it that there are so few areas that merit even the Zone 2b status. I trust scientific assessments of the area will continue, particularly if it becomes a focus for significant mining activity.

## MY PROPOSAL

**I call on you to - at the very least - consign all the 'elevated from the surrounding plains' area identified in Seeking a Balance that lies within the current Class A Zone boundary to a full protection - that is, mining excluded - status. And ask that you then assign this same status to the remaining similarly 'elevated' area of the Arkaroola Wilderness Sanctuary that lies outside the Class A Zone. (See map page 5)**

(I think the Spriggs have suffered enough, don't you?)

**This means, that where any of this land is not already assigned to Access Zone 1 it should be assigned a full protection level consistent with or exceeding the *spirit* of the existing Class A Zone provisions.**

This might at first be seen to resemble a Zone 2a with the restatement of Class A's mining threshold criteria and strict infrastructure restrictions, given that these planning regulations will supposedly still exist.

But, as discussed above, the pursuit of yet more uranium patently could never hope to meet the 'national interest / no alternative deposits available' criteria set by the existing Class A zone, and within its framework 'infrastructure' of the kind the mining industry requires was specifically ruled out. And yet here we are discussing a plan to pursue and allow both mining access and infrastructure with a very specific focus on the Mount Gee uranium deposit! And in the process the apparent protections of the Development Plan have been reduced to mere 'guidelines'!

So it would appear, sadly, that Class A may always be vulnerable to 'specialist' interpretations that the mere grasp of the English language would appear to preclude!

**So I must simply ask you to accept that there is no place for mining here, and to paint the ranges as I have identified them above purple - make it all Zone 1! The need for 'certainty' in the mining industry is often touted - what could be more certain than this?**

This proposal is certainly much more straightforward than Seeking a Balance's mosaic complexity of shaped layers involving a bewildering mix of departmental responsibilities and often blatantly contradictory regulations!

I am by no means opposed to genuine geological research continuing, as long as it doesn't lapse, like some terrestrial equivalent of Japan's whale 'research,' into mineral exploration by proxy!

**Please give the area the proper protection it deserves. We can afford it.**



Looking across the Mawson Plateau to the north-east from Freeling Heights – a magnificent view well worth preserving!

But – look along the chain of mountains into the distance; where do you think the protection should end?  
(Then refer to the Seeking a Balance / Class A Zone map page 5; Freeling Heights is located in Zone 1  
above the highest north-eastern corner of EL 4355)

#### **ON A POSITIVE NOTE: THE MAWSON PLATEAU**

As one of the relatively few South Australians who is lucky enough to have visited the Plateau on a couple of occasions I can only commend the 'purple splotch' of full protection granted to this true remote wilderness.

I am a botanist by trade; this is simply the most weed-free area I have encountered in my travels that have taken in every state of Australia!

Now it only remains to expand 'the purple', and by doing so to truly preserve this magnificent wild region as an integral, ageless landscape!

"The Rann Labor Government is committed to developing our natural resources but in some circumstances realistic compromises between development and heritage values cannot be reached despite everyone's best efforts.

Approval has been refused on the basis that heritage values... would not be adequately protected and preserved by the proposed mining operations."

Minister Holloway, announcing the extension of protection for the Mount Schank State Heritage Area in the South-East and the disallowing of proposed basalt quarrying operations, 29/09/09