

Mr Richard Hook  
Project Manager  
Works Approval EPA

4<sup>th</sup> August 2015

Dear Richard,

Re Iluka Resources Douglas Mine Site works approval process.

I am a local farmer, member of the Balmoral Development Association, ex councillor and Mayor of the Southern Grampian shire. I was heavily involved with ensuring the Mineral Separation Plant was located in Hamilton and followed closely the Environmental Effects Statement that was approved before mining commenced in our local area. This EES followed best practice at the time of co-mingling the radioactive waste product back into the mine void ensuring that there was very little increase in the overall concentration of radioactive material in any one position. As a result we recognised that there was little or no added risk to the local community or the environment if all safety measures were adhered to.

It was a great surprise to myself and the community at large when the practice of co-mingling radioactive waste material back into the mine where it came from was changed by ministerial decree to just dumping all the waste product in the one pit. This we saw as a major change of practice that should have at least gone through a full public consultation phase before being implemented. The dumping of waste has been taking place for years now and the first opportunity the community at large has had to understand what risks may be associated with this change of practice was on Thursday 23<sup>rd</sup> August at the Kanagulk Hall.

The Open-house joint information session was a positive initiative by Iluka and the agencies concerned. After many questions to many different agencies and consultants on the day it would be good to have an overall discussion and summing up of the all the information presented.

After reflection on the open day and re-reading reports I still have a number of questions.

1. The Hydrogeology report by Jacobs concludes that the underground aquifer flows in a North-westerly direction to McGlashin Swamp and on to White lake. The schematic diagram Figure 3-2 demonstrates this quite clearly reinforcing this theory nicely. The figure however is fundamentally flawed on a number of accounts.
  - a. The Glenelg river appears to be higher than White Lake when in reality it is some 20 to 30 meters lower.
  - b. Pit 23 appears to be holding water when it is known to be quite porous and was dug deeper than the original ore body into the Basal clay layer.

- c. The vertical elevation scale is much larger than the horizontal scale giving the impression that the topography is quite steep when clearly it is not.
2. The bore closest to pit 23 on the NW side has quite fresh water with no impurities with the conclusion drawn that nothing is being leached from pit 23, but possibly this water is coming from pit 22 as it is recognised that there is a perched aquifer fed from the fresh water dam or local run off. The water from pit 23 is disappearing so rapidly it may be through a fracture in the basement rock and ending up who knows where. SKM in their report of 2004 recommended continued monitoring of underground water to the west and south at discharge points (springs). Some monitoring may have been done to the west, but I haven't seen the results and the only monitoring to the south was some 6km downstream in the Glenelg where with the environmental flows should have diluted the results completely.
3. Iluka have estimated the amount of "other material" that they need to bury in pit 23 being mainly concrete and steel and dust filter bags at 22,000 tonnes +/- 30% and yet section 3.1.2 which is specified in the permit estimates other material at 50,000 tonnes +/- 30%. At a facility that is open 24/7 who ensures that this clause is adhered to.
4. Ships from around the world are employed to transport Heavy Mineral Concentrate from the port of Thevenard near Ceduna to Portland where it is unloaded and trucked to the Hamilton MSP. The waste is then buried in pit 23 at Douglas. Who ensures that the ships arriving at Thevenard are clean before being loaded?

All these questions raise doubts as to the safety of this dump site to our local environment which people are trying to ensure is sustainable for future generations. It would be foolish for us not to minimise the risks to people and the environment, by not rigorously testing all potential hazards.

The huge monetary gains of a mining operation should not cloud our judgement if it puts at risk our environment now or anytime in the future.

Regards

