



Environmental Protection Authority

EPA REFERRAL
FORM

PROPONENT

Referral of a Proposal by the Proponent to the Environmental Protection Authority under Section 38(1) of the *Environmental Protection Act 1986*.

PURPOSE OF THIS FORM

Section 38(1) of the *Environmental Protection Act 1986* (EP Act) provides that where a development proposal is likely to have a significant effect on the environment, a proponent may refer the proposal to the Environmental Protection Authority (EPA) for a decision on whether or not it requires assessment under the EP Act. This form sets out the information requirements for the referral of a proposal by a proponent.

Proponents are encouraged to familiarise themselves with the EPA's *General Guide on Referral of Proposals* [see Environmental Impact Assessment/Referral of Proposals and Schemes] before completing this form.

A referral under section 38(1) of the EP Act by a proponent to the EPA must be made on this form. A request to the EPA for a declaration under section 39B (derived proposal) must be made on this form. This form will be treated as a referral provided all information required by Part A has been included and all information requested by Part B has been provided to the extent that it is pertinent to the proposal being referred. Referral documents are to be submitted in two formats – hard copy and electronic copy. The electronic copy of the referral will be provided for public comment for a period of 7 days, prior to the EPA making its decision on whether or not to assess the proposal.

CHECKLIST

Before you submit this form, please check that you have:

	Yes	No
Completed all the questions in Part A (essential).	✓	
Completed all applicable questions in Part B.	✓	
Included Attachment 1 – location maps.	✓	
Included Attachment 2 – additional document(s) the proponent wishes to provide (if applicable).	✓	
Included Attachment 3 – confidential information (if applicable).		✓
Enclosed an electronic copy of all referral information, including spatial data and contextual mapping but excluding confidential information.	✓	

Following a review of the information presented in this form, please consider the following question (a response is optional).

Do you consider the proposal requires formal environmental impact assessment?

☒ Yes

☐ No

☐ Not sure

If yes, what level of assessment?

☐ Assessment on Proponent Information


☒ Public Environmental Review

Polaris considers that the proposal requires formal environmental impact assessment at the level of "Public Environmental Review" as it meets at least one of the criteria listed in Clause 10.2.1 of the *Environmental Impact Assessment Administrative Procedures 2012*.

Further detail on the rationale for a PER level of assessment is provided in the supporting document (Attachment 2).

PROPONENT DECLARATION (to be completed by the proponent)

I, **Sean Gregory** (*full name*) declare that I am authorised on behalf of **Polaris Metals Pty Ltd** (being the person responsible for the proposal) to submit this form and further declare that the information contained in this form is true and not misleading.

Signature 	Name (print) Sean Gregory
Position – General Manager (Technical Services)	Company – Mineral Resources Limited
Date – 16 May 2014	

PART A - PROPONENT AND PROPOSAL INFORMATION

(All fields of Part A must be completed for this document to be treated as a referral)

1 PROPONENT AND PROPOSAL INFORMATION

1.1 Proponent

Name	Polaris Metals Pty Ltd
Joint Venture parties (if applicable)	Not applicable
Australian Company Number (if applicable)	Not applicable
Postal Address (where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or of the principal office in the State)	1 Sleat Road Applecross WA 6153
Key proponent contact for the proposal: <ul style="list-style-type: none">• name• address• phone• email	David Temple-Smith Senior Environmental Advisor Mineral Resources Limited 1 Sleat Road Applecross WA 6153 P: 08 9329 3700 david.temple-smith@mineralresources.com.au
Consultant for the proposal (if applicable): <ul style="list-style-type: none">• name• address• phone• email	Not applicable

1.2 Proposal

Title	J5 and Bungalbin East Iron Ore Project
Description	<p>This proposal is to construct and operate two iron ore mines, haul roads and mine infrastructure in the Yilgarn area of Western Australia, 100 kilometres north of Southern Cross.</p> <p>Mining operations comprise open-cut mining from two pits with ore haulage 50km to existing facilities at Polaris' Carina Mine operation that include: ore haulage on the Carina haul road, dry crushing and screening of ore in preparation for export and loading of ore trains at the Mt Walton rail siding on the Trans-Australia railway.</p> <p>The proposal seeks to recover an estimated 65-115 million tonnes of iron ore. An estimated 26 and 160 million tonnes of waste rock will be excavated over the life of the J5 and Bungalbin East mines, respectively. This material will be deposited adjacent to the pits.</p>

	<p>At Bungalbin East, Polaris has identified that commencement of mining at one end of the deposit will allow a void to be created to backfill waste rock from the remainder of the pit. It is estimated that up to 45 million tonnes of waste rock could be backfilled by implementing this mining sequence.</p> <p>A total of 30km of bitumen-sealed haul road will be constructed to connect the J5 and Bungalbin East mine operations to the proposed J4 haul road. The J4 haul road is currently being assessed by the EPA, with construction expected to commence in early 2015.</p> <p>Infrastructure and support facilities for each mine include the run-of-mine (ROM) pad, site offices, workshop, laydown area, explosive magazine, bore field, wastewater treatment plant, reverse osmosis plant, power supply, fuel storage, hazardous materials storage area and landfill.</p> <p>An accommodation village will support the operations, and is to be constructed at the junction of the proposed J4, J5 and Bungalbin East haul roads (and not within the conservation estate). The accommodation village does not form part of this proposal.</p> <p>Construction is scheduled to commence in Q4 2016.</p> <p>Refer to Attachment 1 for a location map and indicative mine and infrastructure layouts.</p>
Extent (area) of proposed ground disturbance.	The indicative area of land clearing required for all aspects of the proposal is 720 hectares, based on concept designs only. It is expected that proposed mine and infrastructure plans will be optimised during detailed design and in response to stakeholder and community consultation to be undertaken as part of the EIA process.
Timeframe in which the activity or development is proposed to occur (including start and finish dates where applicable).	Construction of the J5 and Bungalbin East project is scheduled to commence in Q4 2016.
Details of any staging of the proposal.	No staging of the proposal
Is the proposal a strategic proposal?	No
Is the proponent requesting a declaration that the proposal is a derived proposal?	No

<p>If so, provide the following information on the strategic assessment within which the referred proposal was identified:</p> <ul style="list-style-type: none"> • title of the strategic assessment; and • Ministerial Statement number. 	
<p>Please indicate whether, and in what way, the proposal is related to other proposals in the region.</p>	<p>This proposal is not specifically related to other proposals elsewhere in the region; however it will share common infrastructure such as haul roads.</p> <p>Ore will be processed and exported via existing facilities at the Mt Walton rail siding on the Trans-Australia Railway and the Port of Fremantle at Kwinana.</p>
<p>Does the proponent own the land on which the proposal is to be established? If not, what other arrangements have been established to access the land?</p>	<p>Polaris holds mining tenure for the mine area at J5, and has applied for a combination of mining tenure at Bungalbin East.</p> <p>Linear infrastructure such as haul roads will be located on mining tenure for which Polaris will be the licence holder.</p>
<p>What is the current land use on the property, and the extent (area in hectares) of the property?</p>	<p>The proposal is primarily situated on land used for mineral exploration and nature conservation.</p>

1.3 Location

<p>Name of the Shire in which the proposal is located.</p>	<p>Shire of Yilgarn</p>
<p>For urban areas:</p> <ul style="list-style-type: none"> • street address; • lot number; • suburb; and • nearest road intersection. 	<p>Not applicable</p>
<p>For remote localities:</p> <ul style="list-style-type: none"> • nearest town; and • distance and direction from that town to the proposal site. 	<p>The nearest towns to the proposal are Koolyanobbing (50km south) and Southern Cross (100km south).</p>
<p>Electronic copy of spatial data - GIS or CAD, geo-referenced and conforming to the following parameters:</p> <ul style="list-style-type: none"> • GIS: polygons representing all activities and named; • CAD: simple closed polygons representing all activities and named; • datum: GDA94; 	<p>Enclosed?: Yes</p>

<ul style="list-style-type: none"> • projection: Geographic (latitude/longitude) or Map Grid of Australia (MGA); • format: Arcview shapefile, Arcinfo coverages, Microstation or AutoCAD. 	
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1.4 Confidential Information

Does the proponent wish to request the EPA to allow any part of the referral information to be treated as confidential?	No
If yes, is confidential information attached as a separate document in hard copy?	Not applicable

1.5 Government Approvals

Is rezoning of any land required before the proposal can be implemented? If yes, please provide details.		No	
Is approval required from any Commonwealth or State Government agency or Local Authority for any part of the proposal? If yes, please complete the table below.		Yes	
Agency/Authority	Approval required	Application lodged Yes / No	Agency/Local Authority contact(s) for proposal
Department of the Environment (Cth)	Referral of action – EPBC Act 1999	No	To be advised
Department of Mines and Petroleum	Mining Proposal – Mining Act	No	To be advised
Department of Environmental Regulation	Works Approval and License – Part V EP Act	No	To be advised
Department of Water	License to construct and operate bores	No	To be advised
Department of Aboriginal Affairs	Consent to disturb Aboriginal heritage	No	To be advised

PART B - ENVIRONMENTAL IMPACTS AND PROPOSED MANAGEMENT

2. ENVIRONMENTAL IMPACTS

Describe the impacts of the proposal on the following elements of the environment, by answering the questions contained in Sections 2.1-2.11:

- 2.1 flora and vegetation;
- 2.2 fauna;
- 2.3 rivers, creeks, wetlands and estuaries;
- 2.4 significant areas and/ or land features;
- 2.5 coastal zone areas;
- 2.6 marine areas and biota;
- 2.7 water supply and drainage catchments;
- 2.8 pollution;
- 2.9 greenhouse gas emissions;
- 2.10 contamination; and
- 2.11 social surroundings.

These features should be shown on the site plan, where appropriate.

For all information, please indicate:

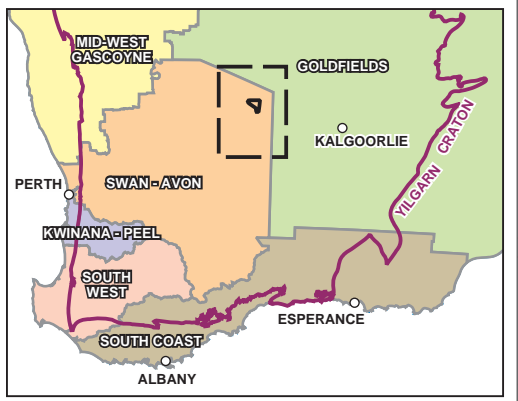
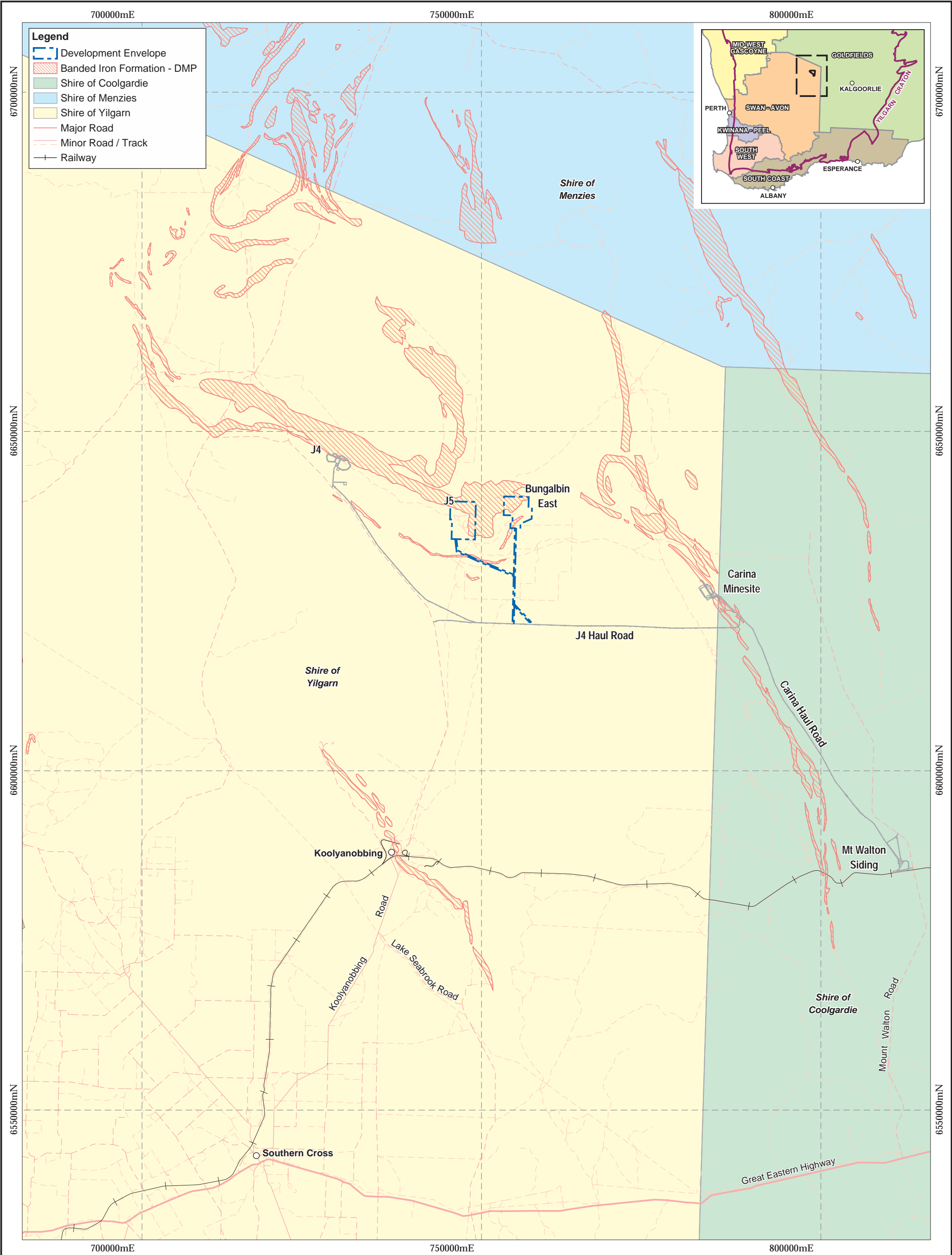
- (a) the source of the information; and
- (b) the currency of the information.

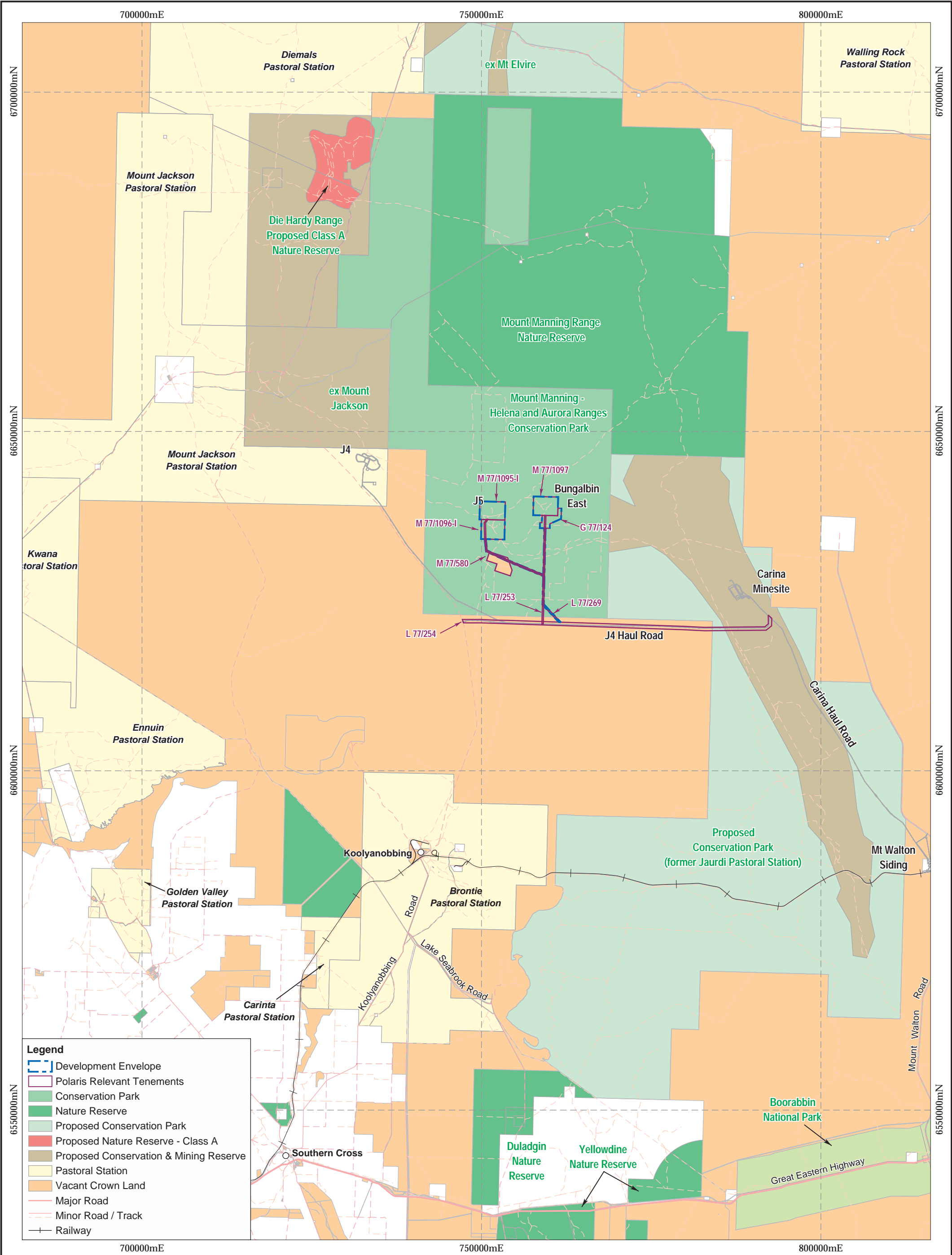
3. PROPOSED MANAGEMENT

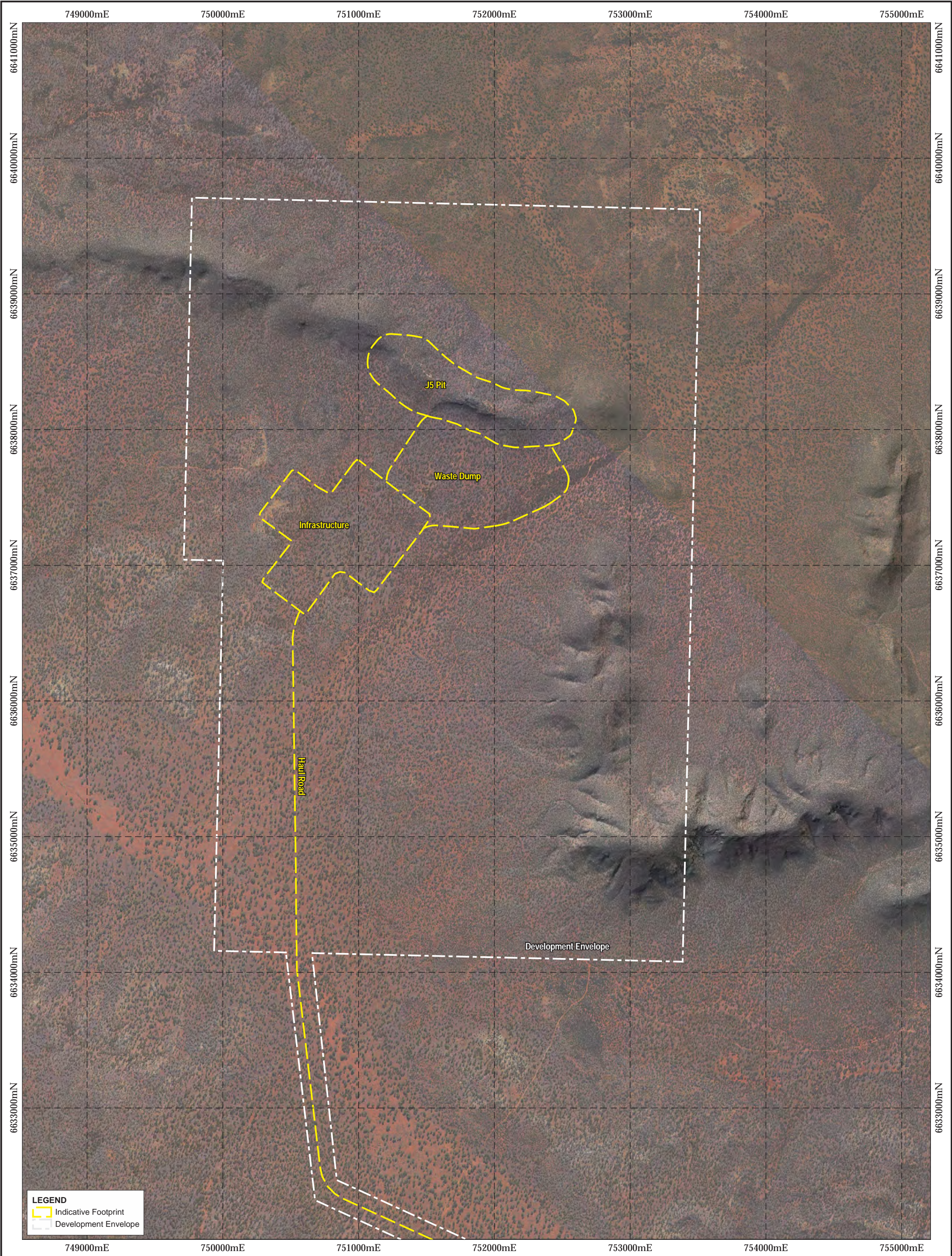
Polaris' response to Sections 2 and 3 of Part B of the EPA referral form is provided in Attachment 2.

ATTACHMENT 1 – FIGURES

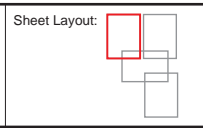
Figure 1 – Location
Figure 2 – Land tenure
Figure 3.1-3.4 - Proposal







Notes:
Infrastructure supplied by Polaris Metals Pty Ltd (May 2014)

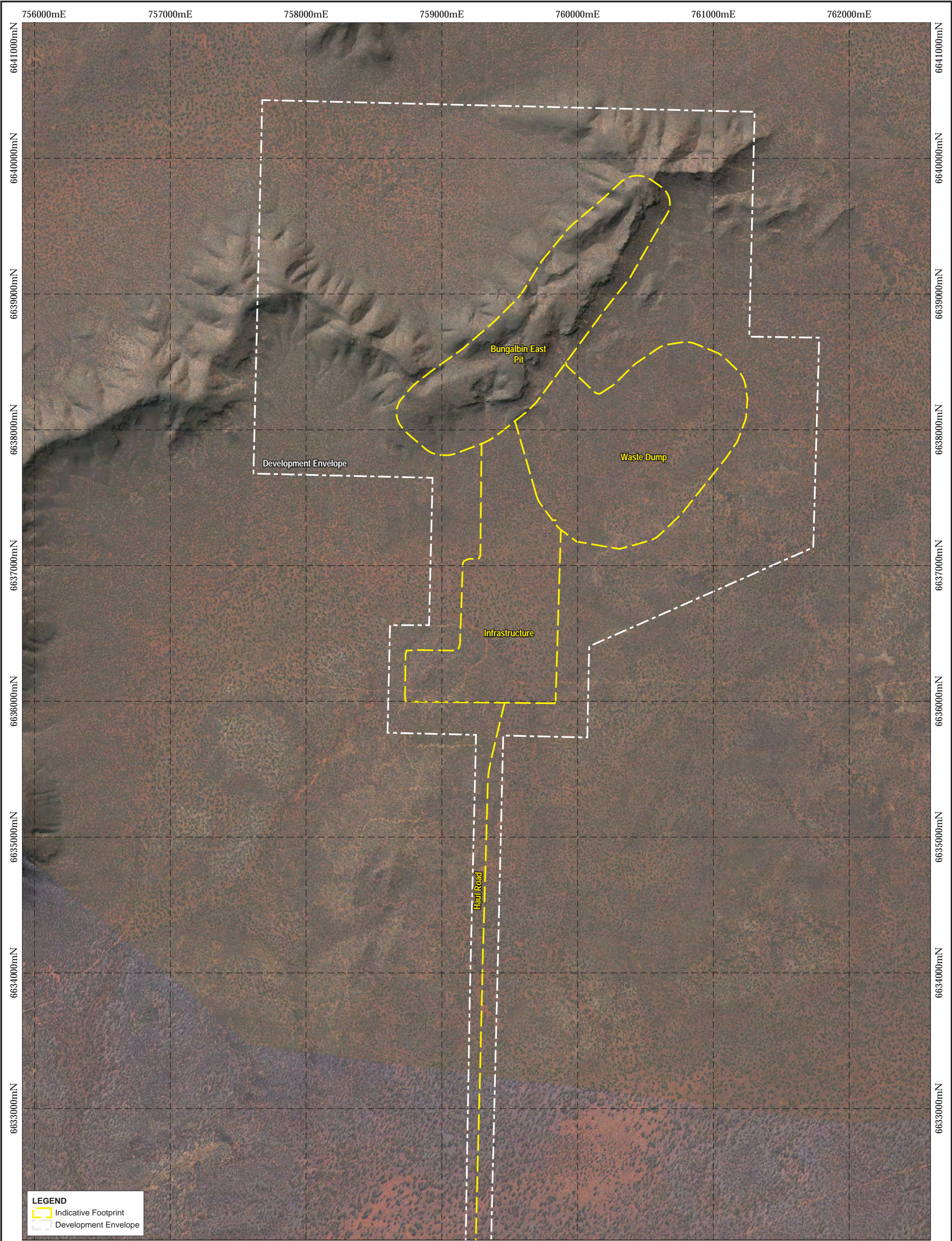


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Scale 1:25,000
MGA94 (Zone 50)
CAD Ref: g2190_J5_BC_Ref_CD_103_01.dgn
Date: May 2014 | Rev: B | A3

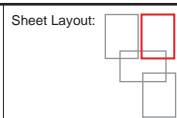
POLARIS
METALS PTY LTD
Author: D. Temple-Smith
Drawn: CAD Resources - Tel: (08) 9246 3242

J5 Mine & Haul Road
Proposal
Sheet 1 of 4

Figure:
3.1



Notes:
Infrastructure supplied by Polaris Metals Pty Ltd (May 2014)



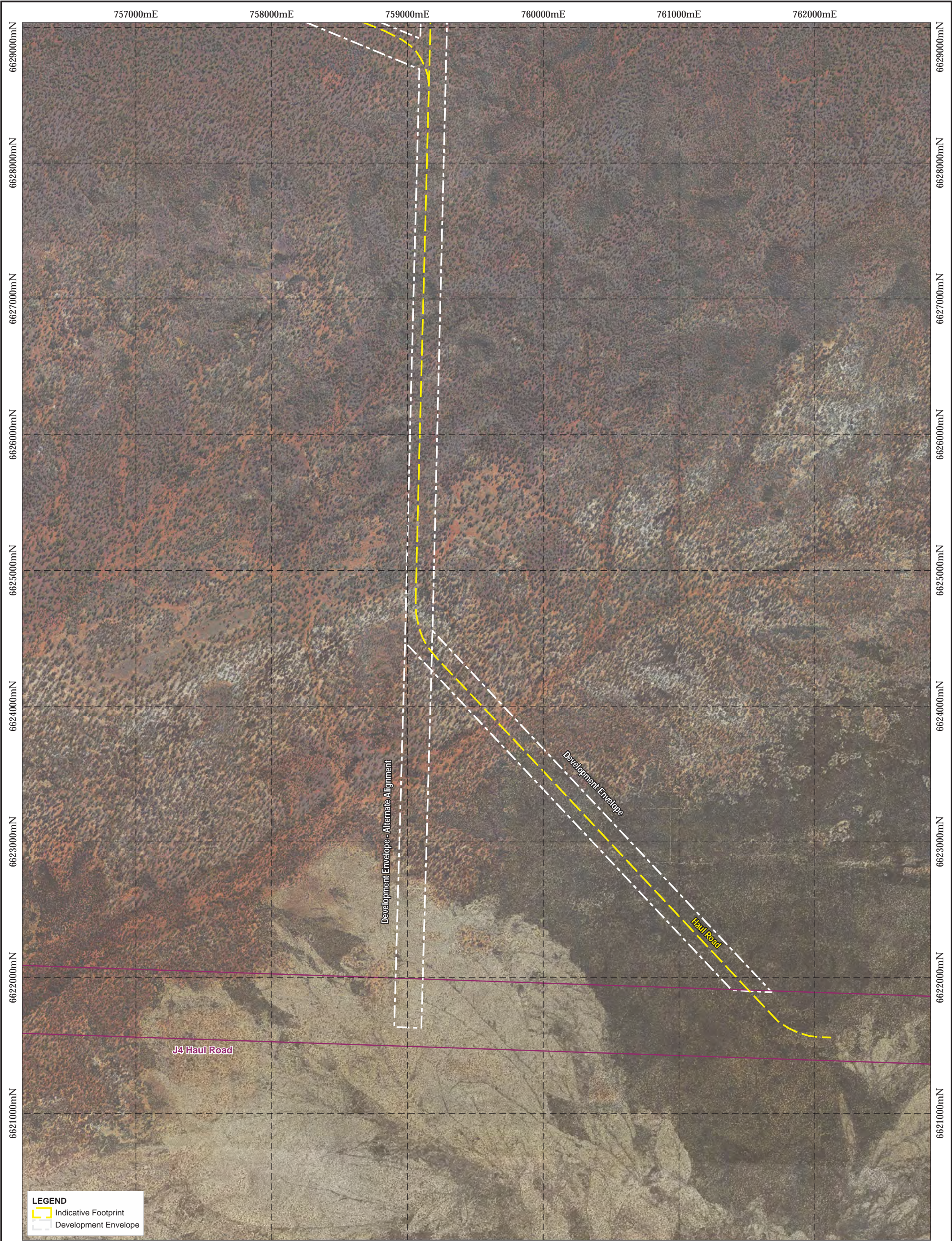
0 250 500m
Scale 1:25,000
MGA94 (Zone 50)
CAD Ref: g2190_J6_BE_Ref_CD_103_02.dgn
Date: May 2014 | Rev: B | A3

POLARIS
METALS PTY LTD
Author: D. Temple-Smith
Drawn: CAD Resources - Tel: (08) 9246 3242

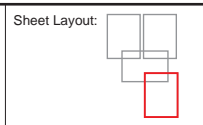
Bungalbin East Mine & Haul Road
Proposal
Sheet 2 of 4

Figure:
3.2





Notes:
Infrastructure supplied by Polaris Metals Pty Ltd (May 2014)



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Scale 1:25,000
MGA94 (Zone 50)
CAD Ref: g2190_J5_BE_Ref_CD_103_04.dgn
Date: May 2014 | Rev: C | A3

POLARIS
METALS PTY LTD
Author: D. Temple-Smith
Drawn: CAD Resources - Tel: (08) 9246 3242

J5 & Bungalbin East Haul Road
Proposal
Sheet 4 of 4

Figure:
3.4

ATTACHMENT 2 – SUPPORTING DOCUMENT

J5 and Bungalbin East Iron Ore Project: Towards an assessment of proposed mining



J5 and Bungalbin East Iron Ore Project

TOWARDS AN ENVIRONMENTAL ASSESSMENT OF PROPOSED MINING

May 2014


Revision Number	Issue Date	Prepared By	Approved By	GM Signature
A	15/05/2014	DTS	SG	
O	16/05/2014	DTS	SG	

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1. ENVIRONMENTAL ASSESSMENT

Polaris Metals (Polaris) wishes to implement the J5 and Bungalbin East project in the central Yilgarn of Western Australia comprising mining of iron ore and development of related infrastructure. Polaris considers that formal environmental impact assessment is necessary to properly understand the environmental significance of the project.

The Company has referred the project to the Environmental Protection Authority (EPA) for a decision on the appropriate level of environmental impact assessment for the project. Guidance as to the appropriate level of assessment may be found in Environmental Impact Assessment Administrative Procedures 2012. These Procedures state that the EPA applies a PER level to proposals that meet any one of the following criteria:

- the proposal is of regional and/or State-wide significance;
- the proposal has several key environmental factors or issues, some of which are complex or of a strategic nature;
- substantial and detailed assessment of the proposal is required to determine whether, and if so, how the environmental issues could be managed; or
- the level of public concern about the likely effect of the proposal, if implemented, on the environment, warrants a public review period.

1.1. Yilgarn Iron Ore

Polaris is a wholly-owned subsidiary of MRL and a developing iron ore producer with a portfolio of assets across banded iron formation (BIF) ranges in the Yilgarn. These assets include an operational iron ore mine at Carina as well as known deposits at Chameleon, Carina Extended, J4, J5 and Bungalbin East.

MRL is seeking approval for the development of a new mine at J4 in the Jackson Range (already the subject of a separate EPA assessment). Polaris requires the development of J5 and Bungalbin East to sustain long term growth in the Yilgarn by increasing the overall life of its operations from 5 years to 15-20 years. These projects have the potential to create a positive environmental, social and economic legacy, delivering benefits radiating beyond the region.

1.2. Environmental stewardship

Polaris is environmentally responsible. It is committed to best practice environmental management to achieve outcomes superior to minimum requirements at law.

Polaris has demonstrated success in the Yilgarn with its Carina mine operation and ongoing exploration activities elsewhere in the region. The Company aspires to continually improve its environmental management practices in collaboration with key stakeholders, the local community and subject matter experts.

Polaris acknowledges the well-documented environmental and biodiversity values of BIF ranges in the Yilgarn, and the importance of these ranges to the EPA and the community. The Company also acknowledges the WA Government's policy for development and conservation of the Mt Manning area.

In support of these documented values Polaris is committed to environmental excellence in project development and ensures that all its projects are suitably resourced with environmental professionals to administer environmental conditions and commitments. Polaris always investigates opportunities to avoid, minimise and rectify potential impacts during the Environmental Impact Assessment (EIA) process and in implementing its projects.

In this way Polaris intends to define a project that will achieve an appropriate balance between conservation and mining through environmentally sustainable development.

1.3. Environmental impact assessment

Polaris is well-placed to undertake a rigorous assessment of its J5 and Bungalbin East mine and infrastructure projects. A Public Environmental Review (PER) process is essential for this project as there is insufficient information at this stage with which to conclude that its potential impacts are environmentally acceptable, or otherwise.

The findings of the 2007 Strategic Review of the Conservation and Resource Values of Banded Iron Formations of the Yilgarn Craton (BIF Strategic Review) and contemporary published research are based on data that is more than a decade old in some cases, and limited in terms of its overall extent. These findings need to be reviewed in light of the extensive and ongoing biological assessments undertaken by Polaris and others across Yilgarn Craton BIF ranges. The review will add substantially to the knowledge of environmental and biodiversity values of these BIF ranges.

The EIA process is an appropriate means for reviewing all the biological information and assessing the environmental significance of the project in a transparent and publically accountable manner. To facilitate this process, Polaris intends to initiate an independent peer review panel to review and test the EIA findings prior to assessment by the EPA.

Polaris is mindful of EPA and community concerns regarding development of BIF ranges and wishes to reassure stakeholders and the community that it is committed to contributing towards a balance between development and conservation of these areas. Polaris' goal is to undertake the EIA process in a way that delivers a range of environmental and other benefits for the community.

1.4. Stakeholder and community engagement

Polaris intends to work closely with the community and other stakeholders during the EIA process to ensure the project delivers environmental benefits as well as social and economic benefits. Consultation is a key element of EIA and all stakeholders will be provided the opportunity to comment on the project throughout the process.

1.5. Key environmental considerations

The EIA process provides a formal and well established public forum for identifying environmental issues, assessing the significance of impacts and considering management strategies for the project. The potential environmental issues associated with the project may include:

- flora and vegetation
- landforms
- subterranean fauna
- terrestrial environmental quality
- terrestrial fauna
- hydrological processes
- inland waters environmental quality
- amenity
- heritage
- offsets
- rehabilitation and closure

2. ENVIRONMENTAL FACTORS AND IMPACTS

The project lies within the Mount Manning-Helena-Aurora Ranges Conservation Park (MMHARCP), which includes several ranges associated with a geological formation known as banded iron formation (BIF) - the most well-known of these ranges is the Helena and Aurora Range. BIF ranges are found throughout Western Australia's Midwest and Goldfields regions.

In the Goldfields region, BIF ranges are typically associated with elevated landforms that include the Windarling, Jackson, Die Hardy, Helena and Aurora, Mt Manning, Finnerty and Koolyanobbing Ranges.

The BIF landform within the MMHARCP includes the Helena and Aurora Range as well numerous other hills and ranges having a combined strike length of about 132 km. The BIF landform unit represents a relatively small proportion of the combined area of all landform units in the HARCP, yet it has comparatively diverse environmental values due to its contrasting topography, geology, soils and vegetation.

2.1. Flora and vegetation

Baseline flora and vegetation surveys have been undertaken over the relevant tenements as well as the surrounding landscape. The surveys are consistent with the Recommended Interim Protocol for Flora Surveys of Banded Ironstone Formations of the Yilgarn Craton (CALM 2005). This enables consistency of survey methods and data across all areas, and Polaris is currently integrating this data to compile a comprehensive dataset.

Polaris is also working with Curtin University on biodiversity research that aims to increase the value and effectiveness of biodiversity data across the Southern Cross biogeographic sub-region. The research involves predictive modelling of assemblage distributions, which has been shown to be valuable in the integration of biodiversity data to land-use planning and management. This important research is ongoing and is intended to be integrated to the EIA process.

Studies to date have identified the occurrence of several threatened and priority flora species and two priority ecological communities. The threatened and priority species that are likely to be affected by the project are:

- *Tetratheca aphylla* subsp. *aphylla* (T)
- *Leucopogon spectabilis* (T)
- *Lepidosperma Bungalbin* ((P1)
- *Acacia adinophylla* (P1)
- *Acacia* sp. *Bungalbin Hill* (P1)
- *Grevillea georgeana* (P3)
- *Hibbertia lepidocalyx* subsp. *tuberculata* (P3)
- *Lepidosperma ferricola* (P3)
- *Mirbelia ferricola* (P3)
- *Neurachne annularis* (P3)
- *Spartothamnella* sp. *Helena & Aurora Range* (P3)
- *Stenanthemum newbeyi* (P3)
- *Banksia arborea* (P4)
- *Eucalyptus formanii* (P4)
- *Grevillea erectiloba* (P4)

The Priority Ecological Community that will be affected by the project is the 'Helena and Aurora Ranges vegetation complexes' PEC (P1).

Direct and indirect impacts to flora and vegetation will occur primarily during the construction phase of the project. An estimated 720 hectares of land will be cleared; however this area is subject to further mine planning, detailed design of mine pits and infrastructure, and subsequent changes to these designs arising from stakeholder and community engagement.

The extent and significance of direct, indirect and cumulative impacts to flora, vegetation and ecological communities will be confirmed through EIA of the project.

2.2. Fauna

Baseline vertebrate and invertebrate Short-range Endemic (SRE) fauna surveys have been undertaken by Polaris over all tenements relevant to the project. These surveys are consistent with relevant EPA guidance statements. Documentation of these baseline surveys is being finalised.

Surveys for subterranean fauna have not been undertaken due to a lack of exploration drill holes from which samples could be collected. Subterranean fauna will be surveyed in the event that a drill program is approved (not part of this project). Within the broader region, only a single stygobitic species has been recorded, and none were recorded at J4 in a recent survey undertaken by Polaris.

Studies to date have identified several conservation significant vertebrate and invertebrate fauna species that may be affected by the project, as well as several SRE species. These species include:

- Malleefowl (*Leipoa ocellata*)(VU, S1)
- Rainbow Bee-eater (*Merops ornatus*)(M, S3)
- Fork-tailed Swift (*Apus pacificus*)(M, S3)
- Major Mitchell's Cockatoo (*Lophochroa leadbeateri*)(S4)
- Peregrine Falcon (*Falco peregrinus*)(S4)
- Shy Heathwren (*Hylacola cauta whitlocki*)(P4)
- Crested Bellbird (*Oreoica gutturalis gutturalis*)(P4)
- Tree-stem trapdoor spider (*Aganippe castellum*)(P4)

Potential impacts to fauna include loss of habitat arising from land clearing and to a lesser extent vehicle collisions and introduction of feral species that may predate and/or compete with native fauna for resources.

The extent and significance of potential direct, indirect and cumulative impact to fauna will be confirmed through EIA of the project.

2.3. Rivers, creeks, wetlands and estuaries

Polaris has undertaken a surface water risk assessment of its operations, and intends to undertake detailed surface water studies to define flood flows and mitigation strategies.

Localised diversion of an ephemeral drainage line will be required at J5 to ensure surface water flow does not encroach on the operation. Crossing of other ephemeral drainage lines is likely to occur during construction of the haul roads.

Pit areas will be located upstream of ephemeral drainage lines and may have indirect impacts on these systems; however appropriate management strategies and actions will be developed during the EIA process.

The project will not result in the impoundment of a major river, creek, wetland or estuary. The EIA process will consider potential direct, indirect and cumulative impacts on ephemeral creeks and drainage lines.

2.4. Significant areas and/or land features

The project is located within the MMHARCP, an area reserved for the purpose of conservation but within which exploration and mining are permitted with the appropriate approvals.

The extent and significance of direct, indirect, and cumulative impacts to the land features of the MMHARCP will be considered during the EIA process i.e. the BIF range landforms.

2.5. Coastal zone

The project is not situated within 300 metres of a coastal area.

2.6. Marine areas and biota

The development will not impact an area of sensitive benthic communities, such as seagrasses, coral reefs or mangroves.

2.7. Water supply and drainage catchments

The project is situated in the Goldfields Groundwater Area as proclaimed under the *Rights in Water and Irrigation Act 1914*.

The project is not situated within an existing or proposed underground Water Supply and Pollution Control area, nor is it within a Public Drinking Water Supply Area.

The project will not require drainage of the land.

There is a water requirement for construction of the mines and haul roads, and for operation of the mines and accommodation camp. It is expected that there is sufficient groundwater available to meet these requirements.

A site/operation water balance will be developed as part of detailed design and presented during the EIA process. Approvals from the Department of Water will be required to construct bores and abstract groundwater.

2.8. Emissions

Discharge of emissions such as noise, vibration, gaseous emissions, dust, liquid effluent and solid waste will occur as part of implementation of the project.

Several aspects associated with the project are likely to trigger prescribed premise categories under the *Environmental Protection Regulations 1987*. The relevant categories include landfill and waste water treatment.

Noise and dust emissions will be generated by the project during construction and operation. These emissions will be managed in accordance with legislative requirements and Polaris' operational management plans and procedures. The area surrounding the project, while remote, is also subject to recreation uses associated with the MMHARCP. An assessment of potential noise and dust impacts to recreation values will be undertaken as part of the EIA.

Solid and liquid waste generated from the project will include domestic wastes (putrescible, cardboard and plastic waste), industrial waste (wood, metal, scrap tyres, rubber and synthetic materials and other inert/mixed industrial wastes) as well as chemical wastes (hydrocarbons, hydraulic fluids, oils, grease, hydrocarbon storage containers, used oily rags, medical waste, batteries and acids).

All solid and liquid waste will be managed in accordance with best practice and appropriate standards. Further discussion of waste streams and management will be undertaken as part of the EIA.

2.9. Greenhouse gas emissions (GGE)

The primary source of GGE will be from the consumption of diesel fuel associated with ore extraction, handling and transport. All emissions produced will be captured under the annual National Pollutants Inventory and National Greenhouse and Energy Reporting Scheme.

2.10. Contamination

Land use within the project area is predominately mineral exploration, nature conservation and recreation, none of which are considered to have a high risk of soil or groundwater contamination. There are no sites in the project area that are registered as a contaminated site under the *Contaminated Sites Act 2003*.

2.11. Social surroundings

Heritage surveys undertaken to date have recorded several sites across J5 and Bungalbin East. Further ethnographic and archaeological surveys are required to identify and document the significance of these sites.

Within the MMHARCP, the Helena and Aurora Range is a site of public interest as both a natural scenic feature and recreation area. A portion of this range will be affected by the project. There are no recreation facilities in the MMHARCP, and there is currently no endorsed management plan for any of the reserves or proposed reserves in the Mt Manning area.

Polaris is committed to protecting and enhancing the values of the MMHARCP to the greatest extent possible. The Company will continue to consult with the local community, relevant regulators and environmental groups. Potential impacts to recreation opportunities and management solutions will be developed and discussed as part of the EIA process.

3. PROPOSED MANAGEMENT OF ENVIRONMENTAL IMPACTS

Polaris takes responsibility for the protection and management of the environment relating to this project. The company regards the protection and management of the environment to be an important aspect of its operations and a necessary element of good corporate citizenship.

3.1. Principles of Environmental Protection

The assessment will have regard to the object of the *Environmental Protection Act 1986*, which is to protect the environment of the State of Western Australia having regard to the following principles:

- the precautionary principle
- the principle of intergenerational equity
- the principle of the conservation of biological diversity and ecological integrity
- principles relating to improved valuation, pricing and incentive mechanisms; and
- the principle of waste minimisation.

In addition Polaris is making every effort to ensure the project is consistent with the EPA's Position Statements, Assessment Guidelines, Guidance Statements, Details of consideration of relevant principles and EPA guidance will be presented as part of EIA documentation.

To reiterate the statement from the previous section, Polaris is committed to investigating opportunities to avoid, minimise and rectify impacts during the EIA process and in implementing the project.

3.2. Consultation

Stakeholders with an interest in the project include various government agencies, non-government organisations (NGOs) as well as the broader community of the Goldfields region. To date stakeholder consultation has been limited to briefings of government agencies such as OEPA, DMP and DPaW as well as NGOs such as the Wildflower Society, the Wilderness Society and the Helena Aurora Range Advocates. A full consultation program, inclusive of local community consultation will be undertaken during the EIA process. At this stage community consultation will focus on the Southern Cross area.