

Dr Ted Tyne
Director, Mineral Resources
Primary Industries & Resources SA
GPO Box 1671
Adelaide SA 5001

4th December 2009

Dear Dr Tyne,

I write with reference to the *Seeking a Balance* document and it's attempts to address the issues surrounding conservation and resource management within the Northern Flinders Ranges.

I am extremely disappointed to note that the bounds of this document's protection, albeit limited, falls almost entirely within the north-eastern corner of the Ranges & I believe that your own maps indicating landscape quality & biodiversity values contradict this limitation. There are areas of significant biodiversity value south of Nepabunna and north of Parachilna. These areas coincide with areas of high mineral deposits. Although within the Northern Flinders Ranges, these areas are not represented at all in the "Proposed Management Zones".

Furthermore, it appears that this plan affords less protection to the valuable ecological assets of the Northern Flinders Ranges than the existing Environmental Class A Zone. As you are no doubt aware, Class A has amongst it's objectives;

- The conservation of the natural character & environment of the area, and
- The protection of the landscape from damage by mining operations and exploring for new resources... Mining operations should not take place in the Environmental Class A Zone..."

Seeking a Balance has reduced this philosophy of conservation to two very small areas on an enormous landscape, areas that are already essentially inaccessible to mining.

Although within the north-eastern corner, Arkaroola has, in real terms, been offered very limited protection. *Seeking a Balance* is a beautiful document to look at. I note that in producing this document you have used images that represent the natural beauty of the region. I can only assume that this is because the area is well recognized as a world class conservation destination. Sillers lookout is one such image, and yet Sillers Lookout is afforded no protection within this Plan.

The Yellow-footed Rock-wallaby, another image used in this pretty document, relies on the preservation of nature corridors to exist, and yet this document would seek to potentially destroy such corridors. These corridors extend far beyond the northern & southern borders of the Vulkathunha-Gammon Ranges National Park.

Additionally, whilst stating that consideration has been given to “Endemic ecological communities and species” the majority of the endemic Spidery Wattle population falls within Access Zone 3; standard exploration and mining access. This is, quite simply, unacceptable.

Finally, any document that will provide such significant policy guidance in future mining exploration decisions should not be subject to such vagaries as “stringent”, “minimal” and “temporary”. What exactly does “Rock and soil sampling under stringent conditions” mean? How does one define “Minimal disturbance to flora and fauna”? How can one achieve “Temporary ground disturbing activities..”?

I believe that the basis for the assessment of protection in this region is seriously flawed, that significant consultation amongst *all* interested parties should be undertaken, and that a document should state much more specifically all compliance requirements, before any such “guidelines” are accepted.

Yours sincerely,