

CAPE HARDY DEEP SEA PORT, INFRASTRUCTURE CORRIDOR AND EMPLOYEE VILLAGE – ENVIRONMENT PROTECTION AUTHORITY COMMENTS ON IRON ROAD LTD’S 2015 ENVIRONMENT IMPACT STATEMENT

EPA Comments

EPA comment #	Guideline reference	Chapter of EIS	Issue	Specialist	Key Comments and suggested response/solution	Category
4.1 Planning and environmental legislation and policies						
1	4.1.4	24.2.3	General	All	The EPA notes that noise has been considered in the draft Construction Environmental Management Plan (CEMP) but air quality and noise are not referenced in Section 24.2.3 of the EIS. The EPA considers that an air quality and a noise management strategy should be included in any CEMP and Operational Environmental Management Plan (OEMP).	A
4.3 Environmental Issues						
Coastal and Marine						
2.1	4.3.1	Section 14	Marine	SG	While Iron Road Ltd (IR) has undertaken a multi criteria analysis to choose the site with the most appropriate combination of factors, the proposed site will still result in a significant amount of benthic habitat loss. The EIS states that there will be a potential loss of 17 ha of seagrass. IR have not shown on a map the areas considered to be potentially impacted but state that the seagrass density is sparse (<5 % density). The EPA has interrogated the map provided and suggests that this is actually 5-15% in density while there is also an area of medium cover that is likely to be impacted (Fig 14-3). The same section suggests that almost 250 ha of macroalgal rocky reef will be potentially impacted. This is a significant area of habitat loss which will only be off-set to some extent by creation of new habitat with the dumping of rock for the Module Off-loading Facility (MOF).	A
2.2					IR has undertaken adequate surveys but does not propose to quantify the amount of habitat lost or impacted due to the development. IR have proposed Native Vegetation Clearance for this loss and have mentioned significant environmental benefit (SEB) offsets for the loss. Refer to EPA comment 12.1 for more comments about this issue.	B
2.3					The EIS does not describe the method of construction for the MOF. This is not currently covered in the draft Construction Environmental Management Plan (CEMP) but the construction method should minimise impacts on benthic habitats. It should also be noted that running heavy machinery through the intertidal and subtidal habitats is not seen as best practice.	A
2.4					The EIS states that there will be permanent changes to the sedimentation and hydrodynamics of the marine environment due to the construction of the MOF and jetty. These changes include a change of “less than 1% around the MOF”. However, it is unclear where the boundaries to this statement have been considered and whether they include the bay directly to the west of the MOF as the changes to the sedimentation in this region appear more significant than 1% based on the two figures supplied. More detail is needed explaining these changes, particularly to the sedimentation of the bay located directly west of the MOF and an assessment of the annual changes to the sedimentation. The EIS states that the seagrasses in this area should be able to naturally accrete this increase in sediment but has not outlined the location of the habitats impacted. There has also been no consideration given to impacts on the macroalgal reef habitats, particularly as they are far more susceptible to sedimentation. The EPA considers the permanent changes to adjacent habitats warrants a low to medium risk rating and monitoring to assess changes. These issues should be addressed in the Response document.	A
2.5					EIS still mistakenly states that common dolphins have higher metal levels probably due to their coastal habitat and prey. However, this should be ‘bottlenose dolphins’, not ‘common dolphins’.	C
3	4.3.6	Section 14	Marine Air Quality	SG	There is low likelihood of marine ecological impact from iron dust but there may be aesthetic impacts, however there are very few human ‘sensitive receivers’ nearby. The EPA considers that the dust mitigation from the overall proposal is of a high standard and therefore acceptable.	C

EPA comment #	Guideline reference	Chapter of EIS	Issue	Specialist	Key Comments and suggested response/solution	Category
4	4.3.7	Section 14	Marine	SG, TI	Although there are currently no active aquaculture licences in the Port Neill Aquaculture Zone, the proposed development must not inhibit future potential development of aquaculture in this area from an access or environmental perspective. There does not appear to be any significant issues that may impact aquaculture development in the Port Neil aquaculture zone. However, the EIS only addresses impacts to aquaculture associated with access and not water pollution. The latter issue should be addressed in the Response document.	B
5	4.3.8	Section 14	Marine	SG	The invasive marine species (IMS) monitoring proposed should be consistent with BiosecuritySA or federal monitoring programs so that it dove tails into existing programs and the information is publicly available.	A
6	4.3.9	Appendix Q	Marine	SG	Appendix Q states that in areas of deeper water the sediment becomes increasingly fine, and is expected to be more easily suspended in the water column. Propeller wash and vessel scour from tug movements during operation are expected to have medium impacts on the nearshore. This increases the likelihood of impacts to the additional 14 ha of seagrass and 240 ha of macroalgal reef that was highlighted as potentially impacted due to operation of the facility. Given IR are not proposing to monitor the loss of habitats in the region, the significant environment benefit (SEB) of the full extent of potentially impacted habitats (including reef – Table 14-5) should be committed proportional to the ‘ecosystem services’ to be lost, rather than default value of rehabilitation based on terrestrial vegetation. This should be defined in the Response Document in consultation with DEWNR and EPA).	A
Geology and Soils						
Water Supply						
8.1	4.3.33	Section 15, 16	Stormwater Groundwater	TC	Groundwater is considered suitable for stock up to salinity of 13,000 mg/L, not 5,000mg/L as stated in page 3-13. This requires a minor edit.	C
8.2					A spring fed creek is briefly discussed on page 19-12 and is identified as a key environmental value. Despite this being a ‘key environmental value’ this spring fed creek is not discussed in the groundwater chapter (Chapter 16), nor is it considered in the risk assessments (if appropriate). This should be rectified.	B
8.3					Section 16.3.3 on page 16-7 discusses the Quaternary Aquifers. The EIS states the tertiary clay provides a ‘barrier’. This is incorrect. The correct statement should include words to the effect that the tertiary clay ensures a low degree of connectivity between the two aquifers.	C
8.4					Section 16.3.4 on page 16-11 discusses ‘ecosystems dependent on the subsurface presence of groundwater’ however it is unclear if the area around the rail unloading facility has been considered in the assessment. This should be made clear.	B
8.5					Monitoring for groundwater quality is not detailed in the Construction Environmental Management Plan (Table 3-6) or Operational Environmental Management Plan (Table 2-6). Further detail on this is required in IR’s Response document.	A
8.7					Groundwater dependent ecosystems (e.g. springs/soaks and downstream watercourses) should be listed as an environmental value in the OEMP (App BB, s.2.3.2, page 9).	A
Air Quality and Noise						
9	4.3.39	Section 12	Noise	MB, JS	The EIS shows that Scenario 2 (Table 12-12, p.p.12-20 & 12-21) would comply with the Environment Protection (Noise) Policy 2007 in relation to construction noise and that, with the right management of construction activities, compliance is possible.	C
10	4.3.40	Section 12	Noise	JS	The rail noise section in the EIS is comprehensive. The predicted noise levels used within the model have been confirmed and found to be reasonable. As long as suitable regular maintenance is undertaken to ensure that the rail activity does not produce annoying noise characteristics, rail noise levels should be able to meet the noise criteria contained in the EPA’s Rail Noise Guidelines.	C

EPA comment #	Guideline reference	Chapter of EIS	Issue	Specialist	Key Comments and suggested response/solution	Category
11.1	4.3.41	Section 10	Air Quality	DL, PS,	The EPA notes that there is a commitment by IR to undertake moisture monitoring, the application of water through spray systems and the use of veneering agents if required. However, when such measures would be undertaken is not detailed. The EPA considers this should form part of the CEMP and OEMP and should be addressed in the Response document.	A
11.2					Table 10-8 and 10-9 (page 10-14) present a series of emission rate numbers without any detail on how they were derived or a reference. The EPA asks for this to be clarified in the Response document.	B
11.3					There has been no decision in South Australia regarding sulphur levels in shipping fuel. Despite this, the EPA still questions what fuel quality is being considered in the Table 10-11 that derives an SO ₂ level of 0.0111kg/kWhr, and whether it is likely to be a realistic emission rate. The EPA notes this factor is taken from the NPI Emission Estimation Technique Manual, but that appears to be based on US EPA data. The EPA would like IR to confirm what sulphur in fuel level is this based on, and is that realistic for this project?	B
11.4						
11.5					The monitoring section in Table 10-15 states that the purpose of the monitoring program is to confirm compliance with air quality criteria, and that it is proposed that monitoring be undertaken to allow for the implementation and/or application of reactive mitigation if leading indicators are exceeded. The EPA considers that a period of monitoring 'beyond compliance' checking should be confirmed by IR. Any amendments or updates to the proposed monitoring program should be undertaken in consultation with the EPA.	A
Management and Monitoring						
12.1	4.3.42	Section 14; Appendix AA	Marine	SG	. The EIS does state that proposals are being considered with Eyre Peninsula Natural Resources Management Board and Nature Foundation (in terms of SEB) but there is no commitment and no statements about whether they will cover the extent of the direct clearance or the potential disturbance. As outlined in EPA comment 6, in lieu of habitat monitoring to assess area impacted, the full disturbance area should be used for both seagrass and reef.	B
12.2					The Construction Environmental Management Plan (CEMP) does have various strategies for minimisation of impacts. However, some aspects do not have detail on methods for monitoring or frequency, hold and alarm criteria etc., particularly for turbidity monitoring.	A
12.3					Piling marine animal observer monitoring needs to be consistent between table 14-8 and page 14-41, particularly as there are differences between noise monitoring protocols between piling and Module Off-loading Facility (MOF) within table 14-8.	
12.4					The final CEMP should have a high level of detail (hold and alarm criteria, frequency and location of sampling) and should be prepared to the reasonable satisfaction of the Minister for Planning in consultation with the EPA (and BiosecuritySA for invasive marine species) prior to construction commencing.	C
13	4.3.45	Section 10	Air Quality	DL, PS	The monitoring section in Table 10-15 states that the purpose of the monitoring program is to confirm compliance with air quality criteria for the project, and that monitoring would be undertaken to allow for the implementation and/or application of reactive mitigation if leading indicators are exceeded. The EPA considers that a period of monitoring beyond compliance checking should be confirmed by IR. Any amendments or updates to the proposed monitoring program should be undertaken in consultation with the EPA.	A
4.5 Transport and Access						
Risk/Hazard Management						
14	4.7.2	Section 17	Site contamination	Tn Coll	The EIS provides a basic site history to identify potential sources of site contamination within the areas of the proposed Central Eyre Iron Project (CEIP) infrastructure. Whilst the presence of existing site contamination has not been confirmed anywhere within the	A

EPA comment #	Guideline reference	Chapter of EIS	Issue	Specialist	Key Comments and suggested response/solution	Category
					areas of the proposed CEIP infrastructure (as no intrusive investigations have been undertaken), a number of potential sources (not exclusively associated with agricultural practices) have been identified within the port site and the long-term employee village. The likelihood of disturbing existing site contamination was assessed as rare, however there is no associated assessment of the most likely locations of potential site contamination with regards to areas of the port site and long-term employee village subject to soil disturbance and stripping. The EIS also indicates that the consequences of encountering site contamination will be moderate and able to be remediated in the long-term. However, no information is provided to indicate how site contamination would be identified for subsequent remediation (given that most site contamination will not have any visual or olfactory impacts), or the risk to on-site workers from encountering site contamination during construction and operations. The EPA considers that further information/assessment is required to justify the conclusion that no control measures are required for the management of any existing site contamination.	
15.1 15.2	4.7.3	Section 17, Appendix AA	Site Contamination	Tn Coll	The EPA considers that management measures for site contamination should be reviewed once further information/assessment has been documented to justify/re-assess the associated risks (see EPA comment 14). A reference to the need for notification under S83A of the <i>Environment Protection Act 1993</i> should be specifically included as part of the reporting requirements for accidental releases from chemical/hydrocarbon storage (where appropriate).	A
16	4.7.4	Appendix AA	Marine	GH	MD-C8 & SL_011 refers to "National Maritime Oil Spill Contingency Management Plan 2011". This should be the "National Plan for Maritime Environmental Emergencies".	C
17	4.7.7		Marine Stormwater	TC	There is no detail in the EIS about the location and size of the stormwater sedimentation basins. Sedimentation basins need to be sized appropriately to ensure they have the capacity to capture all runoff from the Cape Hardy site. In addition, they should not be constructed within 500m of the high water mark. The Response document should confirm the size and location of stormwater sedimentation basins, along with identifying broader principles with Stormwater Management as part of any CEMMP	A
4.12 Effects on Infrastructure Requirements						
18	4.12.1	15.4.3	Wastewater	KP	Section 15.4.3 of the EIS refers to wastewater being directed to the DC Wudinna Community Wastewater Management Scheme. However, there is no detail on the existing capacity of the scheme to take this wastewater or if an upgrade is required. This should be clearly addressed in the Response document.	A
4.13 Construction and Operational Impacts						
19 19.1 19.2 19.3	4.13.1	Appendix AA	Air Quality Marine Noise Stormwater	All	The draft Construction Environmental Management Plan (CEMP) provides information regarding erosion and drainage management. However, it should be made clear if this information is applicable to both the Cape Hardy and Wudinna. Sedimentation basins are not mentioned in the draft CEMP and it is therefore assumed they will be constructed to only capture runoff post-construction. This is suitable provided sediment erosion is managed sufficiently in other ways. Sediment-laden runoff produced during the construction should not be allowed to reach the marine environment. The final CEMP should address such requirements. With regards to addressing potential marine environmental impacts the proposed CEMP has very little technical information regarding locations, frequency and criteria to be tested against. The final CEMP should have a high level of detail (hold and alarm criteria, frequency and location of sampling) and should be prepared to the reasonable satisfaction of the Minister for Planning in consultation with EPA (and Biosecurity SA for Invasive Marine Species) prior to construction. There are inconsistencies between the noise mitigation and control measures in 14: 40-41 and the statements in the draft CEMP (table 2-7). The final CEMP should reflect the procedures on page 14-41. These procedures should also be consistent for the jetty piling and the construction of the tug berth/Module Offloading Facility or any significant marine noise generating activity. This inconsistency should be rectified.	A A C A
20	4.13.6	5.3.2		GH	The EPA notes that section 5.3.2 of the EIS refers to the 'Environment Protection (Water Quality) Policy 1993'. This is a mistake which should have been the <i>Environment Protection (Water Quality) Policy 2003</i> . The proponent should also be aware that on 1 January 2016 the <i>Environment Protection (Water Quality) Policy 2015</i> will come in affect. Whilst the appropriate assessment tool for the IR EIS is the <i>Environment Protection (Water Quality) Policy 2003</i> , IR should be mindful that they will be required to ensure compliance with the <i>Environment Protection (Water Quality) Policy 2015</i> after 1 January 2016.	C

DEWNR Comments

Coast and Marine

DEWNR comment	Guideline reference	Chapter of EIS	Issue	Specialist	Key comments and suggested response/solution	
1	4.3.1 4.3.2 4.3.4	Section 4.3.2	Marine infrastructure design specs are inconsistent throughout document		Chapter 4.3.2 states the proposed causeway/land reclamation is to be 200m in length. However , Appendix R, the Jacobs 'Cape Hardy Coastal Modelling Report' bases their hydrodynamic modelling on a 350m long causeway. Chapter 4, Fig 4-26, also indicates that it is 350m long. Presumably earthworks quantities, intertidal habitat clearance considerations etc are based on Jacob's figure of 350m long causeway and that 350m if the final design proposal? Response/solution: Iron Road to confirm design specification inputs.	B
2	4.3.1 4.3.2 4.3.4	Section 4.3.2	Marine Infrastructure design specifications are inconsistent throughout the document		The jetty and wharf length varies throughout the document. Chapter 4 describes them to be 900m and 400m long respectively. Whereas the Jacob's report (App R, 1.2) bases hydrodynamic modelling on a 600m jetty and 400m wharf. Response/solution: confirm design specifications align with modelling inputs.	B
3	4.3.1 4.3.2 4.3.4	Section 14.5.5	Coastal access is not described in detail DEWNR is unable to assess as insufficient information has been provided		Chapter14.5.5 States that the impacts of restricting public access to the coastal reserve are discussed in Chapter 22. No information detailing the impacts of restricting public access are located in Chapter 22 Response/solution: Iron Road to address impacts of restricting public access.	B

Ecology

4	4.3.19	Appendix P & Q Table 5.5	Changes to species listings since first publication of report		Several of the threatened species listed in the report have changed conservation status over the course of the project. Hooded Plover are under the EPBC Act. White –bellied Sea Eagle are no longer listed as Migratory Terrestrial (MT) under the EPBC Act. There are also references to these species and their rating in other locations of the documents Response Solution: Reflect current status of species.	C
6	4.3.30	Throughout EIS	Scientific evidence of anthropogenic disturbance to Dutton River		There is a statement on p15.10 of the EIS that the 'Driver River is considered to be in poor ecological condition due to human disturbance resulting in increased salinity and acidity' which is based on an EPA report from field studies completed in 2010. The author then goes on the state that 'these conditions are echoed for Dutton River and Byres Bay Creek'. It is acknowledged that these systems are likely degraded however there is no evidence provided to confirm that this is the case. Response/Solution: Iron Road to clarify source of information	B

			and Byres Bay Creek		
7		Section 13.4.1	Hambidge Wilderness Protection Area infrastructure corridor buffer	DEWNR supports the 35m buffer and inclusion of a 10m wide maintenance track; acknowledging that DEWNR's preferred option of a 500m buffer is difficult to implement. It is understood that final confirmation of the location of the railway centreline and power transmission line will not be available until the design phase of the project. Response/solution: DEWNR requests the opportunity to review the location of infrastructure directly adjacent to Hambidge WPA.	B
8	4.13	Section 5.6.3	Objectives do not identify environment as something that should not be adversely impacted.	Objective 5.6.3 currently reads "Ensure that human health and safety is not adversely affected". DEWNR strongly agrees with the objective and suggests that a complimentary objective be added in the Response Document to ensure that environment is not adversely affected.	B
10	4.7.8	Chapter 13	There is a risk of fire within Hambidge WPA as a result of operational rail activities.	The majority of Hambidge WPA burnt in the year 2000 resulting in the majority of the reserves Major Vegetation Sub-groups (MVS) being below the Threshold of Potential Concern 1 (TPC1) as described in DEWNR Fire Management Guidelines for Native Vegetation in SA. In the event of another fire occurring, long term negative impacts on the MVS are considered highly likely by DEWNR. Recent documented events have shown the impact a bushfire can have when a whole reserve is burnt in a single event, including the occurrence of local and State wide extinctions. Response/Solution: That the risk of fire and the potential impacts on Hambidge WPA are acknowledged.	A
11	4.3.12-4.3.17	Section 4.2.3 (Page 4-27)	Clearance in relation to the transmission line	This section states that in relation to transmission lines, only vegetation that infringes on the safety clearance areas under the transmission lines will be pruned or cleared. If trees will be subject to repeat and serve trimming or complete clearance, and this is likely to compromise their long term health, habitat value or viability, then such vegetation should be considered as part of the calculations for the SEB offset requirements. Response/solution: Further consideration of the impacts of pruning of vegetation under the transmission line. If it is assessed as potentially impacting the long term health of vegetation then it should be included in the determination of the SEB.	A
12	4.3.12-4.3.17	Section 13.2.1 (page 13-4)	Assessment of vegetation within the Infrastructure Corridor	This section states that not all patches of vegetation that will be impacted within the infrastructure corridor have been assessed on the ground. Rather, condition of the vegetation has been inferred from aerial imagery, associated records and the condition of nearby patches of vegetation. Response/solution: Describe the process to verify the condition of vegetation and the presence of rare or threatened species. This will ensure the SEB requirements are determined to be accurate and appropriate for the scale of the proposal.	A
13	4.3.12-4.3.17	Section 13.6.1 (page 13-83)	SEB Offset options	This section outlines the options being considered for SEB offsetting. Whilst the options identified within this section is largely supported as a means of providing an SEB offset, the following options are not supported; Contributing to local weed and pest control activities, Monitoring, research, weed and pest management inputs to regions. An SEB should generally be an area of land that is protected and managed for the establishment and growth of native vegetation. Activities such as monitoring, research and weed and pest control by themselves will not ensure an improvement in vegetation condition and/or extent and therefore will not offset the loss of vegetation from the clearance activities. Additionally, weed and pest control activities are	A

				<p>generally a legislative requirement under the NRM Act and therefore this is unlikely to meet the requirements of additionality. Regardless of the option chosen to provide the SEB offset, it must be located within the same region as the impact. The region is taken as being the NRM Region.</p> <p>Response/solution: SEB offset options are further developed to ensure they will effectively offset the impacts on native vegetation and ensure the offset will be delivered in the Eyre Peninsula NRM Region.</p>	
14	4.3.4-4.3.7	Section 11.1.2	Inclusion of South Australia's Climate Change Strategy	<p>The EIS was published prior to release of South Australia's Climate Change Strategy; however it would be of benefit to include a reference to it in documents that are still in draft format such as CEMP and OEMP.</p> <p>Response/solution: Iron Road to acknowledge the Climate Change Strategy in the CEMP and OEMP, and consider implementing actions that align with the strategy.</p>	B
15	16.3.1	Chapter 15	Byrnes Bay Creek is not mentioned in the hydrology description in the groundwater chapter but is mentioned in the surface water chapter	<p>Hydrology resources in surface water and ground water chapters should be consistent.</p> <p>Response/solution: Provide a new hydrology description to include Byrnes Bay Creek.</p>	C
16	4.3.30	Chapter 15	Description of hydrological systems along the infrastructure corridor north of Cleve is required.	<p>Figure 15-2 shows the proposed transmission line crossing at least two creek catchments and drainage lines for example Yadnarie Creek and Sheoak Creek. These hydrological systems are not considered in terms of the infrastructure corridor north of Cleve and potential impacts associated with construction and operation. Baseline hydrology should be established for all areas within the infrastructure corridor</p> <p>Response/Solution: Describe baseline hydrological systems in the infrastructure corridor to the north of Cleve, including potential impacts as a result of construction.</p> <p>It is recommended that site scale maps showing surface water features and the location of infrastructure are also incorporated into the Response Document</p>	B
					B
					C
19	4.3.30 4.3.33	Chapter 16 App U	Not all relevant groundwater supporting documents have been provided in	<p>In section 1.1 of Appendix U, it has been stated that Appendix U should be read in conjunction with 3 other documents. Only one of the documents has been provided in the EIS submission (Appendix V).</p> <p>References GWS 2014b and GWS 2013 were not included in the final documentation.</p> <p>Response/solution: All groundwater reports specific to the project are provided to assist with determining impacts.</p>	B

			the EIS			
20	4.3.32	Chapter 16	The distance between the predicted drawdown impacts and Musgrave PWA is greater than 40 km.		. The drawdown contours presented in figure 16-6 is approximately 30 km from the PWA boundary, not 40 as stated in the text. Even considering the base case modelling scenario as per figure 9 of Appendix U, the 1m drawdown contour is within 40 km of the PWA boundary. Response/solution: Further clarification on this matter is requested.	B
21	4.3.30-4.3.33	Chapter 16 Section 16.3.3	Referencing incorrect		GWS2014a is referenced for the description of Jurassic sediments in the Poldra Trough; however no description is provided in GWS2014a. Response/ solution: Update referencing.	C
22	4.3.30-4.3.33	Chapter 26 Section 16.3.3	No regional description provided for Tertiary sediments		No regional description was provided for the Tertiary sediments that extend regionally from the mine site to the Kielpa Borefield and to the Musgrave PWA. Response/solution: Provide regional description, including a comment on the risk to connectivity between the borefield and the Musgrave PWA.	B
23	4.4.30-4.3.33	Chapter 16 Section 16.3.3	Further information regarding hydrogeology of the Port.		No comment has been provided on the hydrogeology of the fractured rock aquifers at the port facility. Response/solution: To be addressed in the response documentation.	B
24	4.3.30-4.3.33	Chapter 16 Section 16.5.2	Referencing not provided		Information regarding numerical modelling of the groundwater recovery is not in the reference cited. Response/ solution: Correct reference to be provided.	C
25	4.3.30-4.3.33	Chapter 16 Section 16.5.3	Potential impact to Groundwater Dependent Ecosystem's (GDE's)		Potential impact to GDE's has not been addressed for the operation of the wells along the infrastructure corridor, during the construction phase. Response solution: Describe the process IRD intends to undertake to consider impact on any GDE's during operation	B
26	4.4.30-4.3.33	Chapter 16 Section 16.5.4	Potential impacts to subsurface GDE's		Subsurface GDE's have been identified in the Cape Hardy region, within the port facility parcel which should be addressed within the EIS. A spring fed creek is discussed in Chapter 19 but is not further described in the groundwater section of the EIS. Response/solution: Further information regarding subsurface GDE's and the spring fed creek is requested.	B

27	4.3.30-4.3.33	Appendix U Section 16.5.4	Reliability of information regarding a groundwater divide.	<p>The occurrence of a groundwater divide is referred to only in the groundwater summary. The reference cited is 35 years old with no up to date information provided.</p> <p>Response/solution: Further information regarding which aquifer the groundwater divide occurs within and whether it is still present today to be provided.</p>	B
28	4.3.30-4.3.33	Appendix U Section 3.3.1 Figure 7 Chapter 16 Section 16.3.4	Consistency in groundwater user data	<p>The number of existing groundwater users presented in Figure 7 Appendix appears less than the number of water wells in the CEIP study area.</p> <p>Response/solution: Clarification is sought as to whether all existing users have been accounted for in the assessment. In addition further information is requested as to the risk to changes in water quality for those users (with recorded fresher quality groundwater) who fall within the predicted drawdown impact area of the Kielpa Borefield.</p>	B
29	4.3.30-4.3.33	Appendix U Table 7	Consistency in operational life of Kielpa Borefield	<p>There are variations to the duration of drawdown data for the Kielpa Borefield. Table 7 in Appendix U notes a period of 25 years while Table E1 in Appendix V notes a life of 20 years. After 20 years of operation the total drawdown ranges from 78% to 92% (average 87.5%) of available drawdown. Accounting for an extra 5 years may exceed the available drawdown.</p> <p>Response/solution: Iron Road to clarify what the likely drawdown figures, drawdown extent and the post operation recovery time after 25 years of operation would be? These factors should also be considered during sensitivity analysis of the groundwater model</p>	A
30	4.3.30-4.3.33	Appendix U Figure 9	No fig 9 provided	<p>Figure 9 is referenced to Appendix V, however figure is not present in appendix</p> <p>Response/solution: Figure 9 to be provided</p>	C
31	4.3.30-4.3.33	Appendix V	Modelling review	<p>Response/solution: Recovery modelling to be extended to provide an indication of how long it will take for groundwater resources to recover.</p>	A
32	4.3.30-4.3.33	Appendix V	Modelling review	<p>Sensitivity analysis as presented in Appendix U shows the 1m drawdown contour near the boundary or extending into the park areas</p> <p>Response/solution: Further information is requested regarding potential impacts to Hambidge and Hincks WPA</p>	A
33	4.3.30-4.3.33	Appendix V	Modelling review	<p>Information regarding the water budget used for the groundwater model for operational and closure stages to be provided.</p>	B

35	4.3.30-4.3.33	Appendix V	Modelling review		Figures provided in Table E1 indicate the aquifer will be in unconfined conditions. Further information is required as to why this has not been documented or accounted for in the model.	B
36	4.3.30-4.3.33	Appendix V	Modelling review		Further information regarding conceptualisation of groundwater conditions of the borefield area, in particular; the existence of the tertiary clay confining layer, which is not evident in cross sections for Appendix V, to be provided. In addition further information regarding the presence of a quaternary aquifer is requested.	B
37	4.4.30-4.3.33	Appendix V	Modelling review		Additional information regarding the cone of depression and its possible extent following cessation of pumping to be provided.	B
38	4.3.32	Section 2.6.6 Appendix Q	Incorrect guideline reference		The text in section 2.6.6 references 'State Environment Protection Policy Groundwater of Victoria' Response/solution: Water quality and beneficial use of groundwater is presented as per guidelines relevant to South Australia.	B
39	Chapter 1	4.3.30-4.3.33	Figure 1-1 does not align with information provided		Information presented in this figure does not align with the latest information stated in Section 1.2. Response/solution: Update Fig 1-1 to align with current information	c
40		Section 3.3, Page 3-13	Consistency of information		Section 3.3 notes that salinity greater than 5000mg/L is unsuitable for stock which does not support the information provided in Table 4, Appendix U. Response/solution: further clarification to be provided	C
41	4.3.30-4.3.33	Table 4-3	Class of PVC to be used for construction of Kielpa wellfield		The EIS notes that construction wells will be constructed with Class 12 PVC. Response/Solution: Due to the depth of the wells it is recommended a higher class of PVC is used. In addition all wells are to be constructed in accordance with minimum construction requirements for water bores in Australia.	B
42	4.3.30-4.3.33	Chapter 7	Further information required on groundwater at the Port facility and infrastructure corridor		Chapter 7 describes the physical environment however no information is provided in relation to the occurrence of groundwater at the Port facility or within the proposed infrastructure corridor. Response/solution: Further information to be provided on the occurrence of groundwater at the Port facility and within the proposed infrastructure corridor.	B

DPTI comments

No	EIS ref	Guideline Ref	Summary issue	Key comments and suggested response/solution	Category
1	Chapter 4 Project description Section 4.3 Page 4-29 and Page 4- 38		Port Design Description and Marine description	<p>In general, DPTI is supportive of the marine infrastructure identified in the report. Meetings have been held with Iron Road, and DPTI understands that the applicant is fully aware of its obligations to obtain agreement from the Minister for Transport and Infrastructure before occupying his land</p> <p>Response/solution: The proponent should note that there will is a requirement to enter into a Ports Operating Agreement with the Minister for Transport under the <i>Harbors and Navigation Act 1993</i>. It is likely that Iron Road will be subject to the <i>Maritime Services (Access) Act 2000</i> allowing for third party access.</p> <p>With respect to navigational safety, the applicant is encouraged to consult with DPTI, Principal Navigation Specialist , Mr Gordon Panton (Ph 8360 0027/mob 0488 105 230) to discuss and develop appropriate strategies for navigational safety, notice to mariners, etc.</p>	A
2	Chapter 4Project description Section 4.2.1 Page 4-16		Railway line	<p>In September 2015 DPTI released a <i>Railway Crossing Policy</i> (refer https://www.adelaidemetro.com.au/content/download/391045/2084685/version/1/file/Railway-Crossing-Policy.pdf) identifying the following principle: <i>Principle 2 – New railway crossings on roads classified as Rural Arterial, or on roads with a designated function of Major Traffic Route or Freight Route shall be grade separated.</i></p> <p>On this basis, DPTI does not support the proposed activation of the level crossing of the Birdseye Highway. This is provided in the context that the Birdseye Highway is classified as a Rural Arterial road, and a designated Freight Route.</p> <p>For noting - The policy also identifies the need for written consent to be obtained from road and rail infrastructure managers, and that an Interface Agreement be prepared.</p> <p>Response/solution: DPTI considers that the crossing of the Birdseye Highway should be grade separated. This would accord with policy, recently formalised as <i>Railway Crossing Policy</i> (refer https://www.adelaidemetro.com.au/content/download/391045/2084685/version/1/file/Railway-Crossing-Policy.pdf).</p> <p>Variation to the policy can be considered by the Rail Commissioner or the Commissioner of Highways through the provision of information such as economic justification, assessment of safety, implications of traffic management, and other key assessments.</p> <p>With regards to the other level crossings identified in <i>Table 4-1- Proposed Railway Line Road Crossings and Road Diversions</i> (Chapter 4, page 4-19), DPTI's considers that active control should be utilised as a minimum treatment where an at-grade crossing is unavoidable to provide an acceptable level of safety for the travelling public.</p> <p>For noting - Written consent should be obtained from the relevant road manager for all new railway crossings. Interface Agreements between the relevant road and rail infrastructure managers must also be prepared in accordance with the <i>Rail Safety National Law (South Australia) Act 2012</i>.</p>	B
3	Chapter 5 Statutory Framework Section 5.3.4 Other State		Railways (Operations and Access) Act 1997 Rail Network subject to	<p>The Objective given for "Railways (Operations and Access) Act 1997 is: "To provide for the operation of railways and access to railway services on fair commercial terms."</p> <p>Response/solution: This Statement should be amended as follows: "The rail network is subject to third party access in accordance with (the Act) to provide access to railway services on fair commercial terms."</p>	C

	Legislation and Table 5-3 Other Relevant State Legislation		third party access.		
4	Chapter 18 Section 18.4 Page 18-13 to Page 18-15 and Table 18-5 Level Crossing Detailed Design Commitment		Design Modifications to Protect the Transport Network	<p>The proponent proposes to install passive level crossings at 17 locations, with activation only if sight distance requirements described in AS1742.7 cannot be met.</p> <p>The proponent also refers to traffic volumes exceeding the “trigger threshold” as a warrant for activation (pg 18-14). DPTI does not consider a trigger exists.</p> <p>DPTI considers that active controls be utilised as a minimum treatment where an at-grade crossing is unavoidable.</p> <p>DPTI also considers that stacking distance must be considered as part of the design considerations as this is a critical consideration in crossing location.</p> <p>Response/solution: DPTI’s considers that active control should be utilised as a minimum treatment where an at-grade crossing is unavoidable to provide an acceptable level of safety for the travelling public.</p> <p>DPTI also considers that stacking distance must be considered as part of the design considerations as this is a critical consideration in crossing location.</p>	B
5	Chapter 18 Section 18.5.9 Page 18-31		Rail Movements and Traffic Delays at Level Crossings	<p>EIS Section 18.5.9: Table 5.9 of the accompanying Transport Impact Assessment states that maximum delay for road traffic on the Birdseye Highway will be 100 seconds, however this doesn’t seem to include the delay caused by the active crossing being activated “when an approaching train is 4km away, based on the requirements of AS1742.7” as stated in Section 4.6.2 in the EIS (page 4-60, last paragraph).</p> <p>At a train speed of 80 km/hr the active crossing will be activated three minutes before the train crosses Birdseye Highway and a 1.3km long train will complete the crossing in about 61 seconds, for a total delay of over four minutes. The comment on activation would also be better reflected as a time rather than distance.</p> <p>Response/solution: DPTI’s position is that a grade separation should be provided on the Birdseye Highway. DPTI considers that Section 18.5.9 Table 5.9 of the accompanying Transport Impact Assessment underestimates the maximum delay for road traffic on the Birdseye Highway, stated to be 100 seconds.</p> <p>This doesn’t appear to include the delay caused by the active crossing being activated “when an approaching train is 4km away, based on the requirements of AS1742.7” as stated in Section 4.6.2 in the EIS (page 4-60, last paragraph). At a train speed of 80 km/hr the active crossing will be activated three minutes before the train crosses Birdseye Highway, and a 1.3km long train will complete the crossing in about 61 seconds, for a total delay of over four minutes.</p>	B
6.	Chapter 18 Section 18.7.3 Page 18-36 And Table 18-13		Summary of risks	<p>The following statement is made in the Summary of Risks: <i>“Additionally, it is noted that the risk of catastrophic consequences are present at railway and road crossings and along roads across Australia, and the risk assessment of a vehicle accident applied here is not sensitive to the additional traffic generated by the project (i.e. the same risk rating would still apply to public safety if the project did not occur).”</i></p> <p>The above paragraph doesn’t acknowledge that without the new CEIP railway there isn’t a residual risk of a road vehicle colliding with a CEIP train, therefore it isn’t legitimate to claim that the same risk rating would still apply at proposed level crossing locations if the CEIP project did not occur.</p> <p>Response/solution: The following statement is made in the Summary of Risks: <i>“Additionally, it is noted that the risk of catastrophic consequences are present at railway and road crossings and along roads across Australia, and the risk assessment of a vehicle accident applied here is not sensitive to the additional traffic generated by the project (i.e. the same risk rating would still apply to public safety if the project did not occur).”</i></p>	C

				DPTI considers that this statement does not acknowledge that there is no risk at the proposed level crossing locations at this time, and hence the proposed level crossings will result in a risk of crashes occurring. DPTI considers that the above statement should be removed.	
7	Appendix M and Appendix N		Environmental Noise and Vibration Assessment – Infrastructure and Long Term Employee Village and Predicted Railway Noise Figures	Section 3.2 (page 9) refers to the <i>Environment Protection (Noise) Policy 2007 (SA)</i> , however there is no reference to the Guidelines for the Assessment of Noise from Rail infrastructure and the need to apply the Noise and Air Emissions – Overlay 3 from the Planning Policy Library in accordance with the Minister Specifications SA 78B. Response/solution: Section 3.2 (page 9) refers to the <i>Environment Protection (Noise) Policy 2007 (SA)</i> . The proponent should demonstrate that it is able to meet the <i>Environment Protection (Noise) Policy 2007</i> requirements	A
8	Appendix W TIA Section 1 Page 1		Introduction – Project Overview	The report presents findings from the transport impact assessment undertaken for the Central Eyre Iron Project (CEIP) and identifies the following: <ul style="list-style-type: none"> Scale and location of transport activities required to and from the proposed mine site and CEIP Infrastructure during the construction and operational phases of the mine Impacts on public roads and infrastructure within the study area (Eyre Peninsula south of Whyalla) from transport activities resulting from CEIP Any public infrastructure works or upgrades required to accommodate transport impacts resulting from the CEIP Prior to approval of the development, DPTI will be seeking to enter into an infrastructure agreement regarding the provision of upgrades required to State Government transport infrastructure. All infrastructure upgrade requirements will be at the proponents cost. Response/solution:	C
9	Appendix W TIA Section 3.2.4 Figure 3.7 Page 26 and Appendix W TIA Section 4.1.8 Page 42		Module Route Local Road Network	Figure 3.7 – Plan of module delivery route, depicts the proposed haul route for the transportation of Oversize Overmass (OSOM)modules and plant from the Port to the Proposed mine site. This is entirely on the existing public road network. A total of 144 Oversize/Overmass modules (the largest being up to 53m long, x 13m wide x 45m tall) will be moved at speeds varying between 1km/h and 40km/h and take between 1 and fourteen days to reach the mine site – requiring pullover sites at 12km intervals. This will impact on traffic management. The dimensions and mass proposed for the modules (up to 53m long x 13m wide x 45m tall, with a mass of up to 3000 tonnes) are well beyond any conventional OSOM loads. While some public roads are capable of catering for more conventional OSOM vehicles, vehicles of this scale would potentially have a significant impact upon the existing road asset, and require removal and replacement of roadside furniture. DPTI is also concerned that a ‘rolling road closure’ would be required to allow full use of the available road corridor, which would likely be unacceptable to the local community and industry given the very slow speed of these vehicles. A rolling closure could result in the effective closure of the road to the public for up to 12 hours, for an Oversize/Overmass modules travelling at 1 km/h. A rolling closure would have particularly severe implications during the grain carting season. Pullover bays will be required at 12km intervals to allow for the largest modules (53m -long x 13m wide x 45m tall) Response/solution: DPTI considers that the provision of a dedicated infrastructure corridor for the movement of oversize loads is required, and the Response Document must address this.	A
10	Appendix W		Vehicle types	Access for A-Triple Road Trains (which can carry up to 136t) is currently not available on the Eyre Peninsula. The EIS proposes to use	C

	TIA Section 4.1.3 Page 32			<p>vehicles approved under Performance Based Standards (PBS) to transport the same amount of load as the A-triple road trains. The highest PBS level of access available on the Eyre Peninsula is for PBS Level 3A vehicles which can only carry loads to a maximum of 110t.</p> <p>Response/solution: DPTI supports in principle the use of Performance Based Standards (PBS) vehicles, as indicated in Appendix W, Section 4.1.3. It should however be noted that the highest PBS level of access available on the Eyre Peninsula is for PBS Level 3A vehicles which can only carry loads to a maximum of 110t.</p> <p>Relevant approvals for the use of PBS vehicles will need to be sought through the National Heavy Vehicle Regulator.</p> <p>The proposed use of roads by Restricted Access Vehicles exceeding limitations under current gazetted routes during both the construction and operating stages will need to be considered as part of normal application processes through the National Heavy Vehicle Regulator.</p>	
11	Appendix W TIA Section 5.1.3 Page 60		Module Delivery Route Safety	<p>The following intersection upgrades will be required to accommodate turning circle room for a 12m by 52m long module transporter as shown in Figure 5-5 (page 61)</p> <ul style="list-style-type: none"> • North Coast Road/Port Neill Access Road • Port Neill Access Road/Lincoln Highway • Lincoln Highway/Balumbah-Kinnard Road • Birdseye Highway/Tod Highway • Tod Highway/Kimba Road <p>Response/solution: DPTI seeks advice as to the upgrading needs for the road network in the event that the transportation of OSOM modules/vehicles during the construction phase utilise the infrastructure corridor.</p>	B

PIRSA Comments

No	EIS ref	Guideline Ref	Summary issue	Key comments and suggested response/solution	Category
1			Broad acre agriculture	Issues relating to broad acre agriculture near the mine site, along the transport corridor to the port at Cape Hardy and at the port have been adequately addressed.	For noting
2			Fisheries and Aquaculture	From the EIS it would appear that consultation with the relevant fishing sectors (commercial and recreational) impacted by the port and shipping lanes activity, has not occurred.. PIRSA was of the understanding that the CEIP EIS would examine the potential impacts and benefits of the ongoing use of that infrastructure including, for example, increased shipping activity in Spencer Gulf. Impact for the fishing industry should differentiate between the recreational and commercial sectors and all commercial associations whose waters may be affected by the CEIP, including its shipping lanes where they cross fishing zones (for example Blue crab fishery, Spencer Gulf prawn fishery, marine scalefish fishery etc should be listed	B
			Biosecurity	<p>The marine biosecurity issues in relation to risks associated with bio fouling and ballast water exchange appear to be understood by the developer and a risk assessment has been conducted.</p> <p>Agree with the assessment of a 'high' residual risk in terms of potential to spread any introduced marine species from the port to elsewhere in the gulf.</p> <p>Agree with the recommendation that national guidelines for bio fouling management are allowed and guidelines/regulatory requirements for ballast water also be followed. Management of bio fouling and ballast water is being considered in a national review of marine pest biosecurity.</p> <p>Agree with the recommendation that national guidelines for bio fouling management are followed and guidelines/regulatory requirements for ballast water also be followed. Management of bio fouling and ballast water is being considered in a national review of marine pest biosecurity currently being undertaken by the regulatory requirements relation to vessel hygiene and movements, but nonetheless current best practice should be followed, as detailed on www.marinepests.gov.au.</p> <p>A key issue of concern in relation to the EIS document is the lack of any specific mention/plans to undertake monitoring in relation to marine pests.. This detail should be incorporated along with a pathway identified for ongoing monitoring of native</p>	B

				marine species health/diversity.	
			Regions	<p>Regions SA has reviewed the EIS and acknowledges that matters relevant to regional development is discussed in Chapter 22 headed 'social environment' Therefore, Regions SA's comments are limited to comments on this chapter. Chapter 22 covers information regarding the existing environment in the region, control measures (ie actions Iron road will take) to protect environmental values and an impact and risk assessment.</p> <p>Residential workforce VLDC workforce</p> <p>The messaging throughout the Chapter is based on the premise that a residential workforce is preferable to a Long Distance Commute (LDC) workforce for many reasons which are well documented and, for this reason, Iron Road will do what it can to encourage development of a residential workforce.</p> <p>RegionsSA's primary comment about the chapter is that, while the messaging of the Chapter revolves around this premise, many of the actions that are proposed to be taken by Iron Road do not appear in their current form to accord with this messaging and will in fact facilitate the establishment, and long –term encroachment, of an LDC workforce.</p> <p>The CEIP includes a proposed long-term accommodation village located near Wudinna. The EIS states that the accommodation village will consist of single persons' accommodation (single rooms with en suite bathroom), share living and dining facilities).</p> <p>. The Chapter makes the point that there are only 24 dwellings in Wudinna unoccupied and that it will be important to make land available for residential development. However, residential development is a long term proposition. The Chapter does not indicate if Iron Road itself will undertake this type of development.</p> <p>RegionsSA's view is that if Iron Road is to encourage development of a residential workforce that will integrate with, and contribute to the well-being of, the existing community (including paying council rates for services) then it could consider providing some (at least short term) family-friendly accommodation in the accommodation village. This would allow time for families to relocate, purchase land and build a home in the area.</p> <p>Transport Issues</p> <p>RegionsSA's view is that the EIS document could better address the issue of transport options for workers. . It would be useful if information could be provided identifying whether neighbouring townships have an airport, bus station/services or taxi service.</p> <p>It must be remembered that a significant proportion of the workforce may ultimately be Fly –In Fly –out workers. The EIS document does refer to a proposed bus service to transport workers from the accommodation village to the mine.</p> <p>Draw down of workers</p> <p>Separately to the above issue, Regions SA also notes that the risk of increased competition for workers as a result of the mine (ie draw down of workers from other industries thereby resulting in labour shortages in other industries) is high. Regions SA notes that Iron Road is proposing a number of actions and strategies to seek to address or manage this risk.</p> <p>Regions SA notes that liaison with the South Australian Government's Resources Infrastructure Taskforce and Eyre Peninsula Mining, Oil and Gas community Development Taskforce is one of these actions. .</p>	B

Renewal SA

No	EIS ref	Guideline Ref	Summary issue	Key comments and suggested response/solution	Category
1			Accommodation / housing requirements	Accommodation servicing the port will be a camp adjacent Cape Hardy Port to accommodate the fly-in fly-out (FIFO) and drive-in drive-out (DIDO) workforce. Accommodation servicing the mine is expected to be predominantly located in Wudinna, with the option also available to drive from other regional towns on Eyre Peninsula. A village at Wudinna has been proposed to accommodate the longer term operational workforce for the mine – some 550 personnel. In addition there is expected to be an increase in people supplying services and infrastructure, leading to an overall population growth of	B

				<p>between 25% and 100%. The Environmental Impact Statement assesses expected housing supply and demand across Eyre Peninsula towns. Low impact is expected in most towns, with the exception of Wudinna where the assessment indicates a high demand for housing during the gap between when mining starts and when the proposed village is built and ready for habitation. The proposed mitigation strategies show a lack of detail in regard to benchmarking existing and new housing stock in regard to housing affordability and diversity. This is relevant to both village construction phase, and for the ongoing growth of Wudinna. The mitigation strategies also lack methodology on how to assess and address issues relating to housing diversity or affordability.</p> <p>A 100% increase in population is a considerable increase, and will have a large impact on the current residents in Wudinna. Furthermore, until the new residential workforce accommodation is built (estimated Q2 in Year 2 of the project), it should be anticipated there will be a period of time at the front end of the project where housing will be in high demand in Wudinna. Existing lower and middle cost housing will be quickly picked up by mine workers on higher incomes, leaving a gap in the housing market for lower income households. The gap has the potential to lead to an increase in overall rental and house price costs as supply is not meeting demand.</p> <p>The State Government has an Affordable Housing Policy that is managed through the State Planning System to help Local Government, developers and the residential industry to ensure a diverse range of housing is built to accommodate a spectrum of households and household incomes.</p> <p>The Eyre and Western Regional Plan 2012 identifies affordable housing and cost of living and Objectives and Principles for Development. The Principles include:</p> <p>Principle 13.7 Provide at least 15 per cent affordable housing, including five per cent for high needs housing, in all new significant housing developments</p> <p>Principle 13.8 Encourage affordable housing through innovative products, funding arrangements and joint ventures between the not-for-profit and private sectors.</p> <p>The Wudinna Development Plan (in relation to affordable housing) the following under the Residential Development Chapter:</p> <p>Objective 5 Affordable housing provided in appropriate locations. PDC 4 Dwellings constituting affordable housing should be located to optimise access to shops, social services and facilities or public transport</p> <p>There is scope for the strategies outlined in the Wudinna EIS to ensure that the supply and demand for housing across a range of income types of measured and tracked, and that the existing planning system including local government is used to help address any gaps that may occur.</p> <p>The proponent should identify a methodology to benchmark and track affordable housing in Wudinna using existing affordable housing metrics to ensure that the current and future residents are not disadvantaged by broad-scale housing cost increases. A process for further work with Wudinna Council to ensure the existing planning framework for addressing affordable housing through Development Plans and the 15% Affordable Housing Policy is applied should also be identified.</p> <p>Under EIS Y – Social Impact Assessment, Table 4-7, Housing and Accommodation a methodology and ongoing monitoring arrangements are in place to appropriately respond to the following:</p> <p>The accommodation village planned as a flexible response to initial housing shortages, and in the longer term efforts are made to provide long-term and permanent worker accommodation within planned new residential development zones. Housing affordability indices are used as a benchmark and measuring tool to determine the effect of increased population</p>	
--	--	--	--	--	--

				<p>and greater income disparity on housing demand, especially in Wudinna.</p> <p>Current accepted measures for housing stress to determine the need to put in place measures to address housing affordability include:</p> <ul style="list-style-type: none"> a. Percentage of low income households (lowest 40% of incomes) paying more than 30% of their weekly gross household income on housing (mortgage or rent). b. Affordable housing price points for South Australia identifying acceptable home purchase, advertised by Notice in the Government Gazette. Rental limits are also available from Renewal SA, although these were not included in the most recent Gazette Notice. <p>Proposed Mitigation 20 (new text in bold)</p> <p>Collaborate with the Wudinna DC and South Australian Government in planning for new residential development, including the provision of at least 15% affordable housing (to meet State Government Criteria) and strategic infrastructure, to ensure housing demand does not out-strip supply.</p>	
--	--	--	--	--	--

Agency	
DPC – AAR	No additional comments
DECD	No additional comments
SA Health	No additional comments
Department of Treasury and Finance	No additional comments

)