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SUBMISSION

**TO: THE EXECUTIVE DIRECTOR
DEPARTMENT OF CONSERVATION AND LAND MANAGEMENT**

**COMMENTING ON THE DRAFT REVIEW
OF THE DEPARTMENT'S**

**MANAGEMENT STRATEGIES
FOR THE SOUTH-WEST FORESTS
OF WESTERN AUSTRALIA
FEBRUARY 1992**

**FROM: WORSLEY ALUMINA PTY LTD
COLLIE WA
APRIL 1992**

INTRODUCTION

Worsley Alumina Pty Ltd is the manager of a bauxite mine, overland conveyor system, alumina refinery and gold mine in the south-west of Western Australia.

The Company directly employs over 1 050 persons and indirectly supports the employment of as many as 4 000 other persons within the wider community.

The establishment and on-going operation of the bauxite/alumina project was provided for by a State Development Agreement - the Alumina Refinery (Worsley) Agreement - which, amongst other things, provides for the bauxite mining lease, conveyor system and refinery site. The project received environmental approval in 1980 after public review of the ERMP.

The gold mine was developed on leases granted under the Mining Act 1978 pursuant to special provisions of the Worsley State Agreement.

The area studied in the Department of Conservation and Land Management's (CALM's) "Management Strategies for the South-West Forests of Western Australia - a Review - February 1992" (the "Management Strategy") includes forests in the western half of the bauxite mining lease, (encompassing current bauxite mining operations) and forest surrounding the conveyor system and refinery site and adjacent to the gold mine.

A number of the areas proposed for reservation as Conservation Parks, Nature Reserves or National Parks are part of the bauxite mining lease. Some of those areas are known to contain bauxite.

Worsley Alumina Pty Ltd (WAPL) vigorously opposes the reclassification of any forest area until we have had the opportunity to carry-out a detailed investigation of its bauxite potential. This procedure has been followed in the past in co-operation with the State with positive results.

AREAS OF INTEREST TO WAPL

The attached maps show:

- . the outer boundary of ML 258SA;
- . the conveyor corridor;
- . the refinery lease area; and
- . the gold mine leases

superimposed on sections of Maps 3 and 4 from the Management Strategy.

Also shown on the maps are those parts of proposed conservation reserves which have been agreed to be relinquished from ML 258SA over time by the Worsley Joint Venturers or which were never part of the mining lease. Areas of proposed reserves agreed to be relinquished for competing mining tenements are also shown.

Those areas are tabulated below.

**AREAS OF PROPOSED CONSERVATION RESERVES
EXCLUDED OR RELINQUISHED FROM ML 258SA**

Proposed Reserve	Area Excluded from ML 258SA km ²	Area Agreed to be Relinquished from ML 258SA km ²		Date when Relinquishment was Agreed
		*		
Boyagarring	15	-	-	-
Muja	17	17	15	Dec 1986
Goonac	1	51	8	Dec 1986
Stene	-	33	-	Dec 1986
Wandering	38	43	-	Sep 1988
Lupton	61	31	-	Sep 1988
				Feb 1991
Gunapin	-	130	9	Nov 1989
Sullivan	45	63	-	Nov 1989
Berrelaking	-	-	7	-
Camballan	-	-	62	-
Wilga	1	-	-	-
North Lupton	5	-	-	-
Total	183	368	101	652 km ²

* Areas agreed for relinquishment as "competing tenements".

The areas now proposed for reservation which the Worsley Joint Venturers have **NOT** agreed to relinquish from ML 258SA are:

As Conservation Parks

Gibbs	61 km ²
Marradong	9 km ²
Duncan	9 km ²
Gyngoorda	34 km ²
Russell	59 km ²
Camballan	23 km ²

As Nature Reserves

North Lupton	1 km ²
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TOTAL 196 km²

The areas relinquished by the Worsley Joint Venturers to date were generally based on boundaries as shown in "The Darling System - System 6 Part II : Recommendations for Specific Localities". Adjustments to those boundaries proposed by the 1987 Regional Management Plans and retained or added-to in the 1992 Management Strategy will necessitate further detailed review of affected areas by WAPL. They include:

Additions to National Parks

Stene	13 km ²
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Additions to Conservation Parks

Muja	3 km ²
Sullivan	31 km ²
Gunapin	9 km ²
Berrelaking	1 km ²

Additions to Nature Reserves

Haddleton	4 km ²
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TOTAL	61 km²
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The section of the Lane-Poole "5(g) CALM Act Reserve" south of the Murray River appears to make appropriate provision for the Worsley project overland conveyor by excluding the corridor from the proposed reserve.

AREAS OF CONCERN TO WAPL

WAPL strongly believes that voluntary excision from ML 258SA must precede any re-classification to Nature Reserve, Conservation Park or National Park of any part of our Mining Lease.

"Marradong" has been the subject of detailed review and a joint submission by the Department of State Development (DSD), CALM and WAPL to the relevant Ministers. The original reason for CALM's consideration of Marradong for reservation was shown by detailed field work to have little foundation. The work revealed that the area of the Coolakin and Michibin vegetation units is only 10% of that predicted by broad-scale regional mapping. It has been agreed that Marradong will not be re-classified from "Timber Reserve".

WAPL is currently testing and reviewing the "Duncan" and "Gyngoorda" areas, but they are bauxitic - at least in part - and may be important to our long-term development. "Russell" is known to be well bauxitised and it is likely that the extension to "Sullivan" is also. "Gibbs" is a new proposal and is known to be bauxitic at least in part.

The extensions to "Muja", "Goonac" and "Stene" (beyond the System 6 boundaries) require detailed consideration and probably require field work. We request confirmation from CALM that it wishes us to review these additional areas in detail.

There are no areas of proposed reservation in which WAPL is proposing to mine within the next 10 years.

WAPL'S RECOMMENDATIONS

WAPL supports the progressive assessment of areas within its sphere of activity and, where appropriate, excision from ML 258SA and subsequent reservation for conservation values. We are happy to continue to work with CALM towards the goal of ultimately assessing all such areas proposed in the 1992 Management Strategy. WAPL recommends that CALM and WAPL jointly discuss the priorities for a programme to assess the conservation and bauxite values of each of the areas. We believe that it will take 5 - 10 years at least to complete this work.

"Marradong" has already been fully reviewed, and the Management Strategy proposal to reclassify it from Timber Reserve to Conservation Park must be deleted. Some other areas will not be able to be agreed for relinquishment from ML 258SA.

WAPL strongly recommends that, based on the Marradong experience, no reservation of any area of Mining Lease 258SA should be proceeded with until it has been established that the "conservation" values are there and that they are pre-eminent over other values. The same recommendation should probably also be applied to other areas outside our area of interest. Broad-brush data (soil or vegetation types or geological data) cannot be relied on when finalising areas to be reserved or not be reserved.

Alternative approaches to achieving conservation objectives should be considered. The Marradong study showed that the small areas of target vegetation complexes would not be jeopardised by the mining of bauxite pods. In some areas it may be appropriate for mining and rehabilitation to precede reservation with mine planning and general environmental management being influenced by a future conservation use and with rehabilitation directed at specific vegetation types.

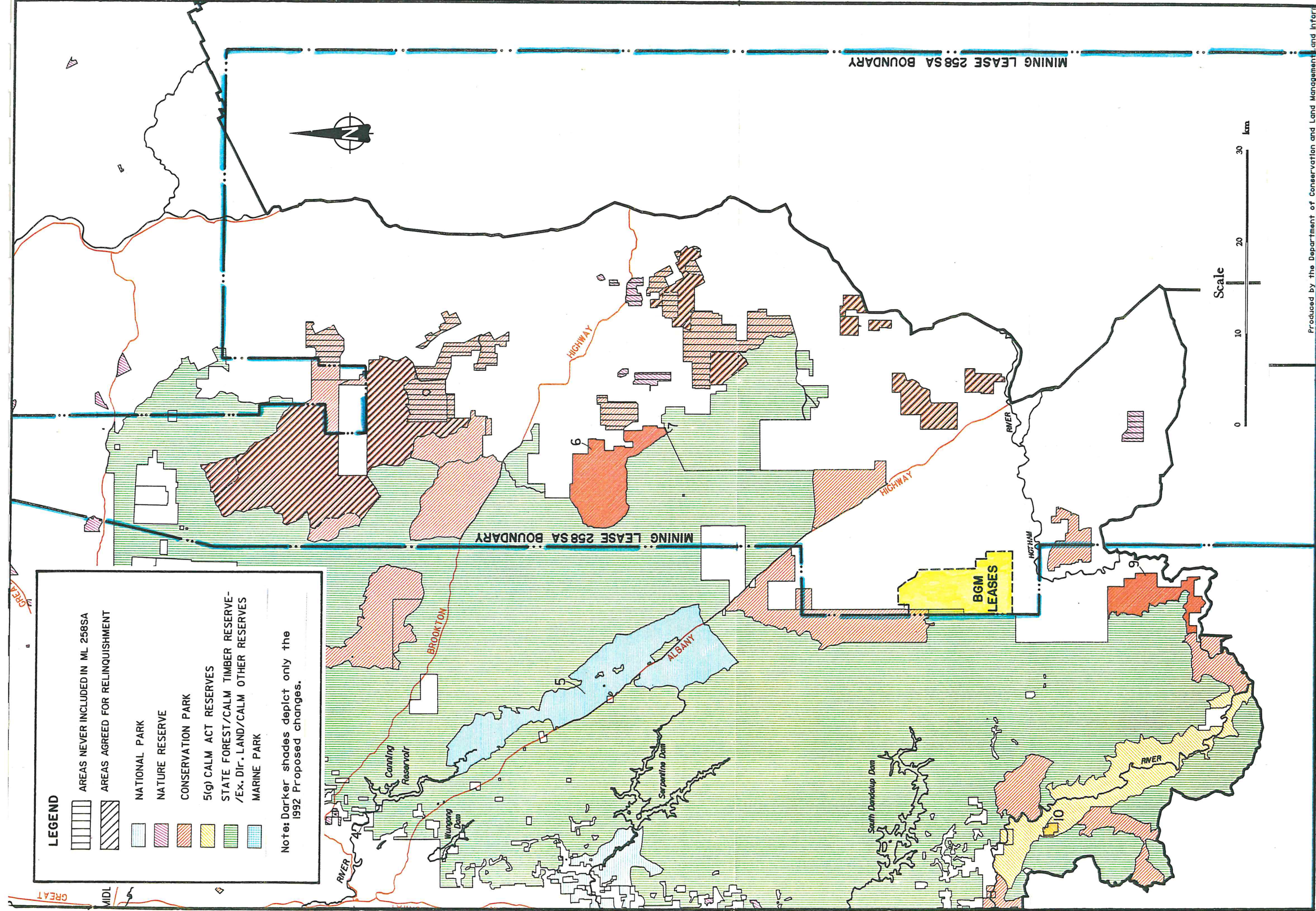


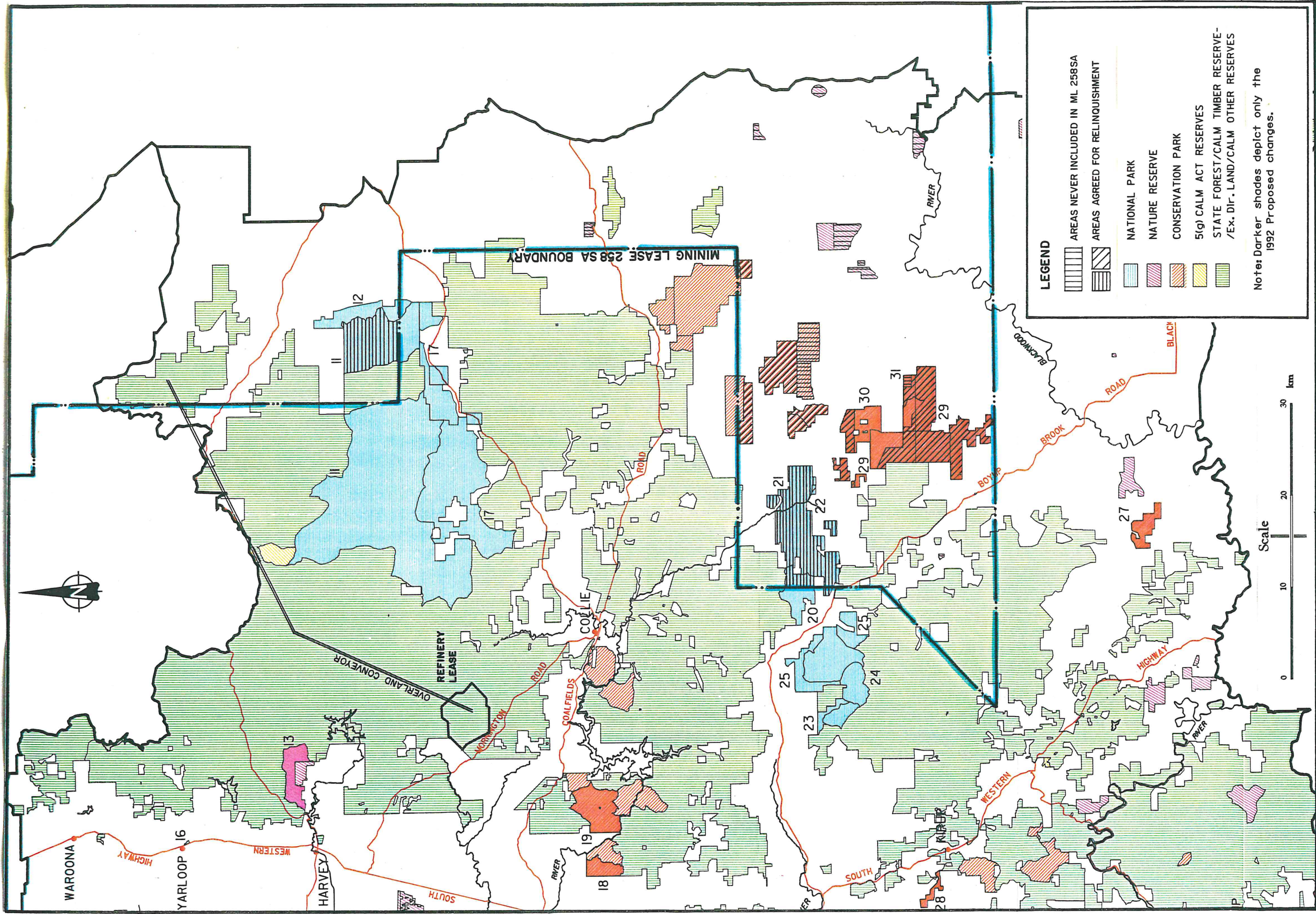
R A HINDE
MINE MANAGER

LEGEND

	AREAS NEVER INCLUDED IN ML 258SA
	AREAS AGREED FOR RELINQUISHMENT
	NATIONAL PARK
	NATURE RESERVE
	CONSERVATION PARK
	5(g) CALM ACT RESERVES
	STATE FOREST/CALM TIMBER RESERVE- /Ex. Dir. LAND/CALM OTHER RESERVES
	MARINE PARK

Note: Darker shades depict only the 1992 Proposed changes.





APPENDIX

GENERAL MATTERS

(A) Resource Security

Adoption of the key strategy of multiple-use forest management has enabled CALM to provide a degree of resource security to the logging industry through its regional and issue plans.

WAPL believes that this is an important concept which should be extended to mining.

In particular, no recommendation to create conservation reserves over any mining lease areas should be put forward in a public document without prior consultation with the lease holder and relevant State Departments other than CALM.

(B) Industry View

WAPL will be a contributor to and supporter of the Chamber of Mines and Energy's submission on behalf of the industry generally.

A willingness by WAPL to not object to an area being reserved does not in any way imply that the wider industry is in a position to agree to the specific area.

(C) Text References to the Mining Industry

A number of references to the mining industry are, in our view, unnecessarily negative in the way they are couched.

WAPL believe that an even-handed treatment of all forest users in the Management Strategy is essential to foster balanced decision-making and planning in the multiple-use environment.

The Draft Review would have benefited considerably from mining industry involvement with relevant sections of the text prior to publication.

It is also our view that a strategy which, when published, has support from landowners or lease holders, will be more constructive and acceptable in the public domain.

(D) Text Amendments

The following points include apparent errors or inconsistencies in the Management Strategy and highlight sections which are considered unnecessarily negative towards the mining industry.

- . "Minerals" are relegated towards the end of the list of "values desired by the community" on page S2, leaving an impression of relative unimportance. The subject should also be given earlier treatment in Chapters 4 and 8.

- . Unnecessary reference is made on page S3 to the area cleared annually for mining, given that the summary provides no such figures for areas harvested annually for wood production.
- . The benefits of "generation of employment" and "downstream processing" attributed to wood products on page S3 are similarly provided by the mineral industry, which should also be highlighted in the summary.
- . Map 1 shows Marradong, Saddleback and Quindanning as "Wandoo". The vegetation in those areas (generally upslope) would probably be better classified as "Jarrah". The surrounding but now predominantly cleared valley systems were certainly "Wandoo".
- . On page 4 it is almost certainly erroneously implied that mining is second to agriculture as a cause of "permanent forest loss". The section also endeavours to dismiss the timber industry as a nil contributor to permanent forest loss, ignoring the need for road and rail access and mills and timber industry townsites to support that industry.
- . The heading "Bauxite Mining" (p28) should be "Bauxite Mining and Rehabilitation".
- . The statement that "currently mining operates within the high rainfall zone (>1 100 mm annual rainfall)" (p28) neglects WAPL's operations in the intermediate rainfall zone.
- . The heading "Forest Harvesting and Regeneration" on p29 should be large type to denote a new section.
- . The section on Bauxite Mining (p91-92) emphasises the impacts of mining, which is not the purpose of Chapter 4 - "Social Requirements from the Forest". Table 12 should properly be included in Chapter 2 "Forest Ecological Processes and Factors Affecting Them".

The "Minerals" section in Chapter 4 would be discussed more appropriately under such headings as "Historical Account of Mineral Production" and "Current Mineral Demand Prediction", mirroring the treatment of Timber Production in that chapter.

- . With regard to the proposed classification of the Gibbs block, there is inconsistency between Map 3, Table 14 and Table 16.
- . On Map 4, it appears that the proposed Haddleton Nature Reserve has been extended after 1987 but is not colour-coded as such. Nor is the addition referenced in the tables.