

7<sup>th</sup> July 2008

The Director General  
Attention: Planning Officer  
Shark Bay Terrestrial Reserves and Proposed Additions Draft Management Plan  
Department of Environment and Conservation  
Locked Bag 104  
BENTLEY DELIVERY CENTRE WA 6983

Dear Mr McNamara,

**SUBMISSION: Draft Management Plan 2007 – “Shark Bay Terrestrial Reserves and Proposed Reserve Additions”**

Thank you for the opportunity of commenting on the above.

As you are aware, the Association of Mining and Exploration Companies (AMEC) is the national representative body for mineral exploration and mining companies.

AMEC members actively promote ecological sustainability and conservation of biodiversity. They firmly believe that a strong mining and exploration sector can co-exist with environmental protection where both are well managed and recognition given to the significant economic, social and environmental objectives of Western Australia.

In this respect, AMEC notes that the Shark Bay region was inscribed on the World Heritage List on 13 December 1991. This was on the basis of its ‘natural heritage’ values and that at the time of listing, the Shark Bay site satisfied all four of the World Heritage listing criteria. AMEC further notes that the Draft Management Plan - Shark Bay Terrestrial Reserves and Proposed Reserve Additions envisages an increase in the Department of Environment and Conservation managed terrestrial reserves in the Shark Bay area, from 122,000 hectares to 520,000 hectares.

Our review of the Draft Management Plan (DMP) has identified the following matters to raise with you:

**1 Approval and access issues relating to mining and mineral exploration**

Reference is made in the DMP (p. 202) to a number of environmental approval processes required in the granting of a mining lease or exploration activities within a national park or a Class A Reserve. In particular, the 2<sup>nd</sup> paragraph of p. 202 states that:

*“...applications that were lodged before February 2001 for access to national parks and nature reserves... are considered but there is no assumption for approval. If approved, they may be subject to the principle of ‘net conservation benefit’ which is achieved through the application of environmental offsets.”*

The statement that there is “no assumption for approval” while legally accurate, could create considerable uncertainty for companies which have been granted exploration licences prior to the February 2001 cut off date, but have not progressed to the ‘significant mineralisation’ stage.

An example is Gunson Resources Limited (Gunson) which has significant holdings in the proposed Zuytdorp Nature Reserve expansion area by virtue of exploration licence applications submitted in 1998. Gunson has incurred considerable expenditure to date, with one project being developed as a mine (refer DMP p. 204). The impact of the DMP on the exploration licences held by Gunson is unclear and AMEC recommends that the final management plan address the need for certainty and communication with Gunson, its shareholders and any other similar stakeholders.

AMEC's recommendation is given further weight in light of the longer term intention to convert the expanded Zuytdorp Nature Reserve expansion into a wilderness area (refer DMP p.42). If this were to occur, all mechanised transport will be prohibited (refer DMP p.41) in which case exploration and mining activities will be precluded from the area.

Furthermore, in the event a wilderness area is established, it is anticipated that 'buffer zones' could be introduced in the future. Gunson's proposed mining activities, which have Government environmental approval via the Environment Minister's Statement 723, come within several hundred metres of the expanded Zuytdorp Nature Reserve boundary, rendering an eastern buffer zone to the envisaged wilderness area impractical.

## **2. Suggested amendments to the DMP**

AMEC understands that Gunson itself has suggested amendments to the DMP as follows:

- (a) The current Zuytdorp Nature Reserve be upgraded to class A, and be expanded westwards, on the ex Tamala station area only, south of latitude 27°S, to the coastline to protect the Zuytdorp Cliffs.
- (b) The area of ex Tamala station north of latitude 27°S and the area of Nanga shown on Map 2 as Proposed Zuytdorp Nature Reserve be classified as a Conservation Park, preserving access for mineral exploration and mining, subject to investigation by the EPA.

AMEC supports these suggested amendments.

## **3. Factual amendments and clarification**

AMEC understands that Gunson has drawn attention to factual errors on page 204 (middle paragraph), page 205 – Figure 5, and page 206 – Table 22 of the DMP concerning the details of its exploration licence holdings in the area.

AMEC also understands that Gunson has previously set aside for conservation purposes a 4,400 hectare *conservation offset area* as part of its environmental approvals for development of the Amy Zone heavy mineral sand deposit immediately east of the World Heritage Property. This *offset area* is shown as Attachment 1 to the WA Environment Minister's Statement 723 in May 2006 and should be referred to in the Terrestrial Reserves Management Plan.

Thank you again for the opportunity of providing comment, and if you have any queries please do not hesitate to contact us.

Yours sincerely,

Dr Justin Walawski FCPA  
Chief Executive