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22 February 2018

Chief Executive Officer
Town of Port Hedland
PO Box 41
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Dear David

**TOWN OF PORT HEDLAND ORDINARY COUNCIL MEETING – AGENDA ITEM 11.2.1 – DWER REQUEST FOR
Re: COMMENT – ROY HILL INFRASTRUCTURE REQUEST FOR INCREASES IN PRODUCTION CAPACITY (28
FEBRUARY 2018)**

We refer to the above-mentioned agenda item and thank you for the Town's detailed consideration of the proposed expansion of our production capacity from 55mpta to 60mpta. We respectfully request officers amend their recommendation to be consistent with Option 2 within the agenda item. This would be consistent both with;

- the recommendation of Officers regarding the proposed increased capacity to export spodumene from the Utah Berth, considered in the same agenda item; and
- Officer's recommendation and subsequent Council resolution at its Ordinary Council meeting in 2017 regarding BHP's increase in export capacity from 270 mpta to 290 mpta.

Roy Hill Infrastructure (Roy Hill) supports the Town's position that the State Government must fastidiously reach a position on the outcomes of the Port Hedland Dust Taskforce report. These findings are vitally important for both the community and business, providing much greater clarity on the future regulatory environment for the Port of Port Hedland operations. Roy Hill values its positive relationship with the Town of Port Hedland and welcomes the opportunity to work collaboratively to promote the timely release of the final government report from the Department of Jobs, Science, Tourism and Innovation.

We strongly recommend that the Town however does not link the release of this report to the future economic development of the region. The application for Roy Hill's capacity increase should be considered on its own merits in relation the environmental outcomes which can be achieved. Roy Hill has and will continue to implement best practice measures to limit both noise and dust emissions from our operations on the broader community. As outlined in the Officer's report:

A review of the established environmental control strategies detailed in the application appears to align with accepted industry standard and should have considerable impact towards reducing any effects from the production increases to the surrounding sensitive receptors.

Comprehensive assessment against the provisions of the EP Act will be completed by the DWER and approval will only be granted if the strategies will enable the activities to meet emission control standards.

These comments are almost verbatim in the subsequent agenda item 11.2.1 consideration of the Pilbara Ports Authority application to increase production output at Utah Berth and used as the basis to recommend conditional support of the application in this instance:

A review of the proposed/established environmental control strategies detailed in the submission appear to align with accepted industry standard and should have considerably reducing effects from the production increases to the surrounding sensitive receptors.

Comprehensive assessment against the provisions of the EP Act will be completed by the DWER and approval will only be granted if the strategies will enable the activities to meet emission control standards.

Whilst the quantum of export volume and the material is different in each case, there is clear recognition that effective controls are in place to prevent impacts on any sensitive uses in each situation. In addition, it is highlighted that approval will only be granted by the regulatory authority where this is demonstrated, despite any such outcomes of the Department of Jobs, Science, Tourism and Innovation's consideration of the Dust Taskforce findings. Accordingly, we consider that the Officer should reconsider their recommendation to ensure consistency in support for the port capacity growth, enabling further investment in the region.

The current Officer's recommendation also appears to be inconsistent with the Town's adopted Strategic Community Plan objectives listed in the report:

<i>Strategic Community Plan Elements in the Officer Report</i>	<i>Consideration with respect to the application</i>
<i>Deliver and support programs, events, facilities and services which attract and retain residents to increase our permanent population</i>	Economic development is a key enabler of increased permanent population in Port Hedland. Increase throughput at the Port creates flow-on effect to the broader community for services, generating opportunities for employment in the community and a greater permanent population.
<i>Facilitate commercial, industry and town growth</i>	The Officers recommendation could lead to a delay of commercial industry and town growth by delaying or preventing expansion of port capacity. Supporting the application would however enable commercial, industry and port growth to occur subject to relevant environmental approvals.
<i>Work closely with businesses, government and industry groups to drive local employment and investment, encourage entrepreneurship and achieve sustainable economic growth</i>	Roy Hill has and continues to engage closely with the Town to provide information on our long investment operations which will ultimately lead to longer term economic growth for Port Hedland.
<i>Support sustainable development so that it does not compromise our unique environmental assets</i>	The proposed expansion incorporates rigorous best practice environmental management to protect the unique Port Hedland environment.
<i>Be a powerful voice and influential partner with Federal and State Governments and major industries for the development of Port Hedland</i>	Roy Hill welcomes the opportunity to work positively with the Town to achieve the timely release of the State Government's position on the Dust Taskforce report.

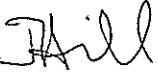
The resolution of the West End land use conflict through the Port Hedland Dust Taskforce and the proposed increase in capacity of the Roy Hill's operations are mutually exclusive in our view and should be considered as such by Officers. Our expansion will support economic development of the town and create longer term

employment opportunities. It is consistent with the Town's adopted strategic community plan. Management of emissions has been clearly addressed and Officers have acknowledged such measures would prevent impacts on sensitive receptors.

We therefore respectfully request Officers reconsideration of their recommendation to be Option 2, consistent with the recommendation for expansion at the Utah berth by the Pilbara ports Authority.

Should you have any further questions please do not hesitate to contact me directly.

Yours sincerely



Julian Hill
Head of External Affairs
Roy Hill