

Project Manager
Department of Water and Environment Regulation
Locked Bag 33
Cloisters Square
Western Australia 6850

Dear Sir/Madam,

RE: *Draft Burrup Rock Art Strategy*

As a major stakeholder with iron ore rail and port facilities, and solar salt processing operations within the Dampier Archipelago, we welcome the opportunity to provide comment on the draft strategy.

Rio Tinto recognises the significance of the Burrup (Murujuga) cultural heritage. Rio Tinto has previously been involved with the Burrup Rock Art Technical Working Group (BRATWG) and has contributed \$148,000 to the WA Government for earlier rock art studies, outside any licence or approval requirements. Since this study, Rio Tinto has taken action to further reduce emission loads. This has primarily involved the closure of the diesel power plant at Parker Point and the construction of a gas fired power station near Karratha. Remaining emissions from locomotives are negligible, particularly since the change in diesel standard to low sulphur.

Rio Tinto note commentary on emissions from iron ore carriers and are of the view this is not a significant emission given prevailing wind direction and that only one carrier is in each terminal at any one time. In addition, based on international changes to the bunker oil fuel specification, Rio Tinto also will be adopting low sulphur bunker oil in iron ore carriers by 2020. *On this basis, Rio Tinto is of the view that it is not a significant source of emissions that could credibly impact on the Burrup rock art.*

On reviewing the draft strategy, we have the following specific concerns in relation to the structure and functions of the reference group.

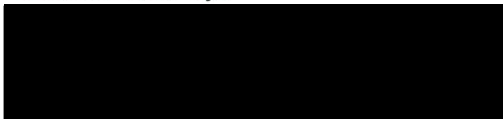
- Rio Tinto has communicated to Minister Dawson (letter 20/09/17) our wish to be included as a member of the proposed Burrup Rock Art Stakeholder Reference Group (reference group) as a stakeholder with significant expertise in the relevant subject matter. Considering the draft strategy relates to rock art and industrial emissions, the proposed composition of the reference group appear overly represented by government departments (p 19). The reference group would benefit from the inclusion of both industry representatives and technical experts. Specialists can assist in addressing the issues raised about previous studies. Participants in the earlier rock art studies should also be invited to be involved for the obvious benefits of continuity with that research.

- It is Rio Tinto's submission that the reference group should be given formal status to provide credibility and improve its effectiveness. The transparency and veracity of any investigation into protection of the rock art requires more of the reference group than restricting it to consultation and information sharing within the group and other stakeholders (p. 19).
- It is noted that under the section dealing with funding (s. 7.0 p. 15) it is recommended that prescribed premises located on the Burrup Peninsula and near surrounds provide reasonable annual funding as a requirement of a licence condition and based on emissions. Rio Tinto does not support any licence conditioning (or conditioning of any approvals) for the purpose of funding a Government initiative with limited consultation with those that are targeted. As noted above, Rio Tinto considers that its licensed prescribed premises are not a significant source of industrial emissions and therefore could not credibly pose a risk of impact to Burrup Rocks art. On this basis, and as Rio Tinto is not presently conditioned in respect of air quality emissions other than dust, Rio Tinto wishes to note that it would not seem appropriate for it to be included the group of prescribed premises subject to any such conditioning. Rio Tinto would be willing to provide access to the WA Government for monitoring should this be required however as Rio Tinto is not a significant emission source we are of the view that this would not be an efficient allocation of resources.

We appreciate the opportunity to discuss our concerns and potential participation in the reference group.

We look forward to engaging with you.

Yours sincerely,

A black rectangular box redacting the signature of Linda Dawson.

Linda Dawson
General Manager – Communities and Communications
Rio Tinto Iron Ore