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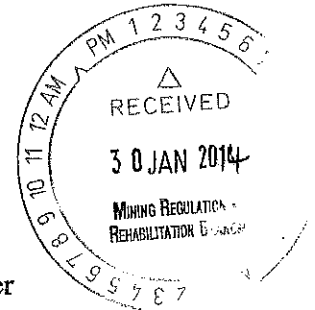
Jim & Velda Cawrse

Freeling SA 5372

Postal:

27th January 2014

Mark Howe
Business Support Services Officer
Mining Regulation and Rehabilitation Branch
DMITRE
GPO Box 1264
Adelaide SA 5001



Re: Kara Resources Mining Lease MC4322 - Letter of objection and request for further information

Dear Mr Howe,

Our property, being [redacted]
[redacted] Kapunda Road, will be adversely affected economically and from a work perspective if the above mining lease were to proceed as proposed in the Kara Resources proposal.

We submit our objections to the proposal on the following grounds:

1. False, Misleading and disingenuous Information and processes
 - a) The document prepared by David Keane ("the report") uses persuasive language techniques with constant use of words like 'negligible' to present a minimal impact of the mine without supporting evidence.
 - b) It also makes sweeping generalisations about the supposed positive benefits of the proposed mine to the community (eg: employment of staff and contractors) without supporting evidence.
 - c) The format, text and arguments made by David Keane mirror those of similar applications (See appendix A and B) that firm has made for other mines
 - i. There has clearly been minimal thought put into the application for this mine aside from changing the names and addresses from their standard document template
 - ii. This is lazy and irresponsible and calls into credit much of the contents put forward in his report
 - d) The consultation process was initially being held during November to January 2 until an extension was granted,
 - i. This is the busiest time of the year for the landholders with cropping
 - ii. This window of opportunity is disingenuous as is clearly set out to be unfair by limiting adequate time to respond adequately to the proposal.
 - iii. This is especially relevant as the company has held the property for a number of years and have clearly chosen this timeframe to suit their own ends without due consideration to adjoining landholders
 - iv. The information sent to us by Kara about the proposed mine is quite limited and lacking in detail compared to that on the DMITRE website
 - v. Residents from the town of Daveyston were not included in the consultation process by Kara Resources

- e) On page 10 section 1.1 it states Nain is 1.2km west from the closest boundary. This is incorrect as Nain is actually *east* of the boundary. Our property is 1.6km south of the proposed mine.
- f) On page 10 Section 1.5 it states the operation will be "A small to medium sized isolated quarry"
 - i. However on 2.7.2 page 20 it states that "this will be a medium sized quarry."
 - ii. We contend that a 48m deep quarry is neither small nor medium but is a huge hole/ravine that will never be fully reinstated.
- g) On page 23 of version 3 mining proposal lease No3 it states "The owners of the property Malcolm and Janet Nitschke have agreed to full operations over the land. No issues."
 - i. This is a false and misleading statement provided to a Governing Body
 - ii. An article in the Barossa leader on the 27th of November, page 3 clearly refutes this as does a letter from their lawyer Oliver Portway to which we have a copy
- h) On the same page it notes that NO contact has been made with the Council
 - i. This is false as there were Council meetings on both 1st and the 28th May 2013 to discuss the mining lease application – this would be impossible if there were truly 'No Contact'
 - ii. Also, the documentation pertaining to the mine is available for perusal at the Council offices
 - iii. From discussions with local councillors it is clear that Council has serious concerns regarding mining lease proposal hence this omission calls into question the credibility of both Kara Resources and the consultant engaged to prepare their reports
- i) Remote site
 - i. Page 26 Section 4.2 Traffic it also states "Fortunately this site is located in a remote area where public road use is limited".
 - ii. On page 33 Section 4.9 it states "This is a remote location"
 - iii. On Page 34 Section 4.10 Noise, it states ". Fortunately, this site is in a remote area and issues will be negligible."
 - iv. Describing this site as a remote area is deliberately misleading as there are 18 residences in the immediate vicinity.
 - v. The town of Daveyston which is 2.46 km away contains 20 households that were excluded from the consultation process.
 - vi. Given that it is proposed that noisy and polluting mine traffic will enter and exit the Sturt Highway next to Daveyston, we question why they were not included in the consultation process.

2. Environmental nuisance from this mine site eg:

- a. On page 10 Section 1.5 it also states "A small to medium sized isolated quarry pit will not pose significantly increased impact on the local area"
 - i. Please justify and quantify this assertion.
 - ii. From our perspective the mine will create a huge impact on the air quality, noise pollution and dust in the area.
- b. Groundwater
 - i. Please clarify what steps have been taken to ensure there is no interference to underground aquifers.
- c. Traffic
 - i. Section 4.2 of the report states "Fortunately this site is located in a remote area where public road use is limited. There will be a medium increase in road traffic once the quarry is developed"

- ii. In 2.9.3 page 21 the report states "It is likely that eventually 60-200 trucks per week will access the site".
 - This clearly allows for one way trips.
 - 400 trucks per week on return trips is a huge increase in traffic
- iii Please specify the type of road surface to be used at the Western end of Nain Rd that will reduce noise and vibration.
 - This section will require widening and effective storm water management as it is currently a dry weather road only.
 - The costs of any upgrade and maintenance needs to be covered by Kara Resources as these will be in effect private roads as they have sufficed the local farmers for over 100 years.
- iv Old Kapunda Road is substandard for any continuous use by heavy trucks. There are numerous sections of the road where there is little or no rubble remaining and becomes almost impassable during winter even with the limited use it currently has.
 - No mention is made in the proposal of this road being upgraded by either Kara Resources or Light Regional Council. This is totally unacceptable.
 - No mention is made in the proposal of this road being upgraded by either Kara Resources or Light Regional Council. This is totally unacceptable.
 - The intersection of Old Kapunda and Daveyston Roads is at a curve in the Daveyston Road and a small bridge is located here. Daveyston Road has become a busy thoroughfare for commuters especially at peak work/school times.
 - At least seven (7) farming businesses use Old Kapunda Road as an access to parts of their farming enterprise, ourselves included. This involves the movement of farm machinery (usually over width) along this route and the droving of stock from one paddock to another. These operations cannot be pre-planned or shifted to fit in with a time when there would be no vehicles such as mining trucks using this thoroughfare.
 - Farmers are at the mercy of climatic conditions so even the movement of animals along a road has to be done when the opportune time presents itself, not left until trucks are not using the road.
 - The proposal indicates up to 400 truck movements per week. Based on the hours indicated, this equates to 6 trucks per hour.
 - If Old Kapunda Road were bituminised this would serve to exacerbate the issues listed above.
 - Sealed roads lead to increased speed by all road users, locals as well.
 - The bevelling of the road makes it more difficult to move wide farming equipment especially when the verges of the road are not wide or flat enough.

d. 4.12 Blasting vibration

- i. The report states "Blasting is required and is distant from any receptor. Blasting will not pose a risk to the public, infrastructure or residences. Blasting will be conducted as per section 2.5.2 Use of explosives."
- ii. The risk matrix indicates a negligible likelihood and a cat 2 rare low effect

- iii. Please clarify the possible effect of blasting on the foundations and structure of our stone house and outbuildings as these are susceptible to damage
- iv. It states in section 2.3.2, 2nd dot point that blasting will occur once or twice a month as required.
- v. If the mine increases production what guarantee is there that this will not change to weekly or daily
- vi. What mechanisms will be put in place to ensure blasting is not increased?
- vii. At the minimum, Kara Resources must fund the completion of full and independent dilapidation reports on all structures on our property
- viii. Agreement for Rectification of any damage will need to be at Kara Resources cost
- ix. Our home is 1.6 kms from the site (as the crow flies). Most homes built pre 1900 have no raft foundations (as is the case with our home) and sit virtually on top of the ground. We are concerned that the continual vibration through the earth will eventually open up weakness in the earth structure. The vibration from blasting would reach our house and cause structural damage ie cracking of walls. One blast may not cause damage but our fear is that continual vibrating of the earth's crust will eventually reach to a greater distance, impacting on many old solid structures built in earlier times.

Yours faithfully



JD & VA Cawrse

