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T02885



Juergen & Venetta Leib

Freeling SA 5372

Ph: [redacted]

February 4, 2014

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

Dear Mr Howe

Re: Kara Resources Mining Lease MC4322

We would like to add a few points to the objections regarding Kara Resources mining lease application.

The area listed for this lease is right in the middle of what is known as "the golden triangle", a fail safe area for crops in South Australia, and as such it should be kept this way. Australia has lost too much arable land to housing estates, industrial parks and the like.

1. Australia has minimal suitable land for cropping and animal husbandry.
2. Locals have fought tooth and nail to keep this area as agricultural land.
3. Townships have been given perimeters so as not to encroach on these lands.
4. Roads in the vicinity are not capable of carrying the extra heavy traffic.

As 40 year landowners of our home and property, we crop, have animals and also operate a purpose built bed and breakfast, Tranquility Retreat, due as the name suggests to the quiet rural location. Our all weather road is via Kuhlmann Road which exits onto the Daveyston Road opposite Old Kapunda Road. This area is on a slight bend and care needs to be taken to enter. With all the large traffic movement this will become a dangerous junction.

At the end of harvest season, due to extra trucks carting grain, these roads are in need of repair. With trucks six days a week, all year round, roads are going to need major overhauls.

Attached is a copy of letter of objection which we vehemently support.

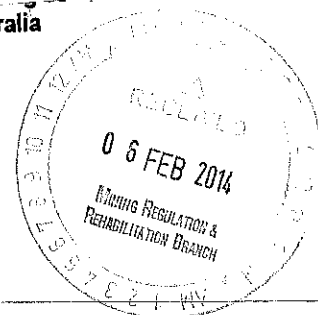
Yours sincerely

Two handwritten signatures in black ink. The first signature is on the left and the second is on the right, both appearing to be cursive and stylized.

Venetta & Juergen Leib

Name: Juergen & Venetta Leib
Address: South Australia

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,

We object to the proposed Mining Lease as an unnecessary impact on our continued use and peaceful enjoyment of the area. It will create economic loss, hardship and inconvenience for the area.

Specifically, these concerns are detailed below.

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, even though they are only a few hundred metres outside of the zone used by Kara for contact.
 - vi. Residents from the towns of Greenock and Freeling were not included in the consultation process by Kara Resources even though they will be affected by the mine.
 - e) The decision making process for this proposal is flawed because the State government has a conflict of interest as being the final arbiter of approving the mine while also standing to substantially benefit from the royalties received from the mining operations.
 - i. Such vested interest is clearly contradictory to the views and needs of the local community

- ii. Royalties garnered by the State Government apply to any proposed mine site by Kara Resources irrespective of location, hence this mine in particular will have no greater benefit to the state than if the same mine was located in any other area
- f) On Page 10 section 1.1 it states Nain is 1.2km west from the closest boundary
 - i. This is incorrect as Nain is actually east of the boundary
- g) On page 10 section 1.5 it states "The region is generally dusty in the summer months due to the surrounding unsealed roads, cropped and grazed paddocks as is common to any region in South Australia."
 - i. This is false and has not been the experience of local residents as the 'no till' farming methodology is utilised which greatly reduces the dust produced through the cropping process
 - ii. In addition, the level of natural dust generated in this area is slight compared to the amount normally generated by mining operations
 - iii. This has been corroborated by neighbouring property owners to the other mine owned by the parent company at McLaren Vale
 - iv. In fact, they maintain that although the lease holder committed to dust suppression, the adjoining owners are still inundated with dust
- h) 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
 - iii. This will be a large mine if it proceeds
- i) On page 15, 2.2.3 it states "trucks loads will vary and will be based on sales for Private, State and local Government projects."
 - i. We ask the State Government to clarify that sales from this quarry do not represent a conflict of interest in the approval process, and
 - ii. That no special deal has been pre-negotiated with the lease holder for supply of discounted product
- j) On Page 22 In section 2.9.4 *Visual Screening and Site Security*, it states "the nearest neighbour (361 Old Kapunda Road) is over 1km away from the starting point to the west where they are well hidden by a natural hill and farm vegetation... There will be no requirements for visual screening for some time as the operations are located in a secluded part of the property"
 - i. This farm is actually within a kilometre from the western point of stage 1, and the natural hill that is mentioned as hiding the mine is actually the hill that will be mined hence there is no visual screen
 - ii. The property at 193 Nain Rd , the property at 202 Nain road, and the Nain church, and all have uninterrupted views of the mine site and are not mentioned in the Visual Analysis Report on Nearest Residents at all
 - iii. The mine will be a visual blight on the uninterrupted vista of the plains, one of the key reasons residents have purchased property in the area in the first place
- k) 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
- l) 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

m) 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 19 residences in the immediate vicinity.
- v. The town of Daveyston which is 2.06 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 were they 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.
 - iii. This will impact on our quite enjoyment of the area
 - iv. Plant On page 19 section 2.7.1 Fixed plant "There is no requirement for fixed or permanent plant at the operation at this stage."
 - v. Please clarify at what stage will this change and who will be the independent monitor to ensure this plant will not contravene promises and commitments made by Kara Resources?
 - vi. In their proposal Kara Resources discussed erecting a maintenance workshop/shed and constructing a concrete fuel containment area. Are these not considered as permanent structures?
- b. Groundwater
 - i. Please clarify what steps have been taken to ensure there is no interference to underground aquifers
 - ii. We contend that blasting vibration will cause the collapse of underground aquifers and streams
- 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. The risk matrix in the report indicates that it has a minor effect and a cat 3 unlikely medium likelihood
 - iii. We contend that the risk matrix in the report should indicate extreme effects and a category 5 high likelihood
 - iv. Please provide current traffic statistics to quantify the term 'medium increase' as it relates to Nain Road between the mine site and the town of Greenock
 - v. Please also provide the same measurements to the other outbound road corridors and we contend that the old Kapunda road would have an average 20-30 vehicles per day at the present time and that is to increase to 160 plus per day if the mine proceeds.
 - vi. 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 of traffic
- The reason residents purchased property in the area is BECAUSE the road use is limited and the area is quiet and peaceful
- We contend that on their upper range of production tonnage per day of 2000 tonne carted out by 30 tonne payload trucks would equal 66.7 full loads going out every day.
- This is 133 in and out truck movements per day
- Plus support vehicles and workers personal vehicles
- With existing movement and adding this traffic, we would estimate this would add up to 160 plus movements on the road
- This is more than a 500 per cent increase
- vii. The bitumen section on Nain Rd at Nain has been paid for by the owners adjoining the road – it was not paid for by public funds
- viii. Please clarify what controls will be placed on the mine operators to eliminate any additional traffic along Nain Rd
- ix. Please clarify how any breaches can be rectified by Kara resources and what enforcement measures, compensation and penalties are to be taken should traffic exceed agreed levels
- x. 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
- xi. Farmers along the old Kapunda and Daveyston roads frequently move sheep and farming equipment along these corridors.
 - Farmers will incur serious inconvenience, safety risk and hardship in managing stock with an increase in trucks barrelling down the road.
 - We contend that farmers will need to install new stock yards, loading ramps and paved areas to enable them to load their stock on to livestock transport instead of moving them along the road as previously is the case
 - We contend that farmers will need to employ/hire experienced people and vehicles to safely move their farm vehicles along these roads whereas with low traffic volumes this is not the case
 - Kara Resources needs to be fully responsible for all of these costs that will be forced onto farmers if this mine proceeds
 - Kara mines needs to be responsible for paying for signage at all intersections and upgrades of all roads and these costs not be imposed as a cost on ratepayers
 - We contend that all roads used for access for the proposed mine should be fully bitumised and that Kara Resources be fully responsible for all costs for this and all future maintenance costs including all costs associated with any road realignments and drainage issues
- xii. We contend that the risk matrix should read extreme effect and virtually certain/high
- d. Section 4.4 weeds and pests Page 28
 - i. Context: “The prevention of spread or introduction of declared weeds, pests or plant pathogens into the operations area is important to maintain the current level of condition of the land. The weeds likely to exist on the land are those which are generally brought in by stock and machinery....

- ii. Criteria: Survey/Inspection results of site will demonstrate weeds or pathogens at the site are at a level or below surrounding pasture levels
 - iii. Control Strategies: Enforcement of good housekeeping to eliminate unnecessary disturbance"
 - iv. The risk matrix indicate that it is a minor effect and has a cat 2 rare low likelihood of consequences.
 - v. The natural process of weeds emerging from the disturbed soil is a certainty when the top soil is placed in bunds similar to the weed and rubbish infested bund on the east side of their mine at McLaren Vale as per the following images
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- vi. Artichoke thistles are a serious problem in the Nain area as well as Horehound , Sow thistles Marsh mallow, Skeleton weed and Spiny pallenis
 - These seeds can be easily carried by winds to nearby properties.
 - Weed infestation will have a major effect on crop quality and it will cause economic loss and inconvenience for the locals in eradicating them.
- vii. The following photo of the weed infested entrance site at McLaren Vale clearly indicates operations are not conducted in a manner which minimises the spread of weeds and pathogens and unreliable maintenance of the site.

1. The first part of the document is a list of the names of the persons who have been appointed to the various positions of the Board of Directors of the Corporation.



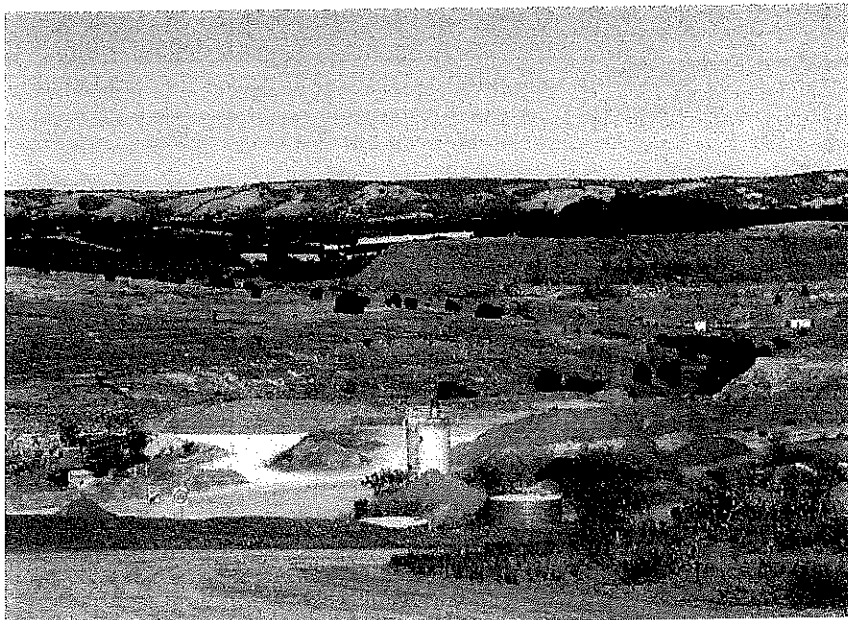
- viii. As the report is full of inconsistencies, we do not accept further self assessment by Kara of weed management
- ix. We ask for more details to be provided on how weeds are to be managed and what controls and penalties will be policed and enforced should Kara be in breach of the agreed management program and the weed infestation contradicts their own criteria
- x. We contend that the risk matrix should be major effects and virtually certain/high
- e. 4.5 Page 29 Re-vegetation
 - i. Context: "Topsoil is a critical factor in re-vegetation and its value lies in its structural properties, micro organisms and seed store. It is therefore important to retain any topsoil/sub-layers on site for rehabilitation. Without correct retention and storage of soils there is a risk of rehabilitation being ineffective. Reserve soils in bunding for short term periods only as not to sterilize the soil biology."
 - ii. The risk matrix indicates a negligible likelihood and a cat 2 rare low effect
 - iii. We contend that there will be considerable damage to soil structure due to sun wind and rain.
 - iv. Optimum growth factors occur when the pH of the materials is within the range 5.5 to 8.5.
 - v. The current range is 8.
 - vi. Dust from the mine has the potential to increase the alkalinity of the soil to a pH of 9. It can also increase the magnesium levels in the soil. This will decrease productivity of the soil in the rehabilitation stage
 - vii. Please clarify the proposed type of vegetation cover
 - viii. Please quantify a short term period that does not sterilize the soil
 - ix. We contend that it is major effects and likely/high
- f. 4.8 Protection of third party property
 - i. Context: The prevention and spread of fire will be important in this rural landscape. The risk matrix likelihood of a fire being initiated at the quarry is low as most of the activities are restricted to cleared and open cut mine areas. Impacts will be negligible as the surrounding lands are cropped.
 - ii. The risk matrix indicates a negligible likelihood and a cat 2 rare low effect.

- iii. Fire is a major concern in this area over the summer period, however it can be initiated on the outer perimeter of the mine from machinery or lightning strikes which the area is prone to.
- iv. It is a naive claim in the report that impacts of fire will be negligible as cropped land or stubble can burn and spread just as readily as other fires when strong winds and high temperatures prevail.
- v. The CFS statistics for the Greenock 2012 -2013 clearly show a high percentage of fire fighting time was on grain/crops, grass and stubble fire. (see appendix C)
- vi. It is well documented that the devastating fire on the Eyre peninsula in 2005 consisted of a vast amount of stubble on cropping land.
- vii. We contend that the risk matrix should read major effects, likely/high
- g. 4.9 Visual amenity
 - i. Outcomes: "NO negative visual impacts on the landscape from mining operations
 - ii. Context: The reduction of visual impacts from operations is paramount to a successful term of tenure. As the area is used for farming there is no public amenity that would be affected by the operation. Eventually the excavation will be hidden within the hill and not be visible. Stockpiles will be low profile with overburden in mounds around the open area and perimeter near by the operations."
 - iii. The risk matrix indicates a negligible likelihood and a cat 2 rare low effect
 - iv. The property at 193 Nain Rd , the property at 202 Nain road, and the Nain church, many other properties and many Freeling properties all have uninterrupted views of the mine site at all times.
 - v. The Nain Church is a public amenity which is used regularly and has an elevated view of the mining site at all times.
 - vi. There will be significant negative visual impacts from mining operations, again in direct contradiction to the stated outcomes in the report
 - vii. The report contends that mounds are grassed to reduce erosion and blend with surrounding landscape.
 - viii. Please identify the species of grass that will be used that will blend with the landscape and when and how is this to be sown and how it is to be managed to avoid the scorched earth landscape as shown around the McLaren Vale mine (see also Weeds section)
 - ix. Screening
 - o Mining activities will need to be monitored annually to ensure that only minimal impacts are created over the rural landscape. Impacts are defined as changes to the existing scenic values.
 - o The mine and so called 'screening' bund will create a significant impact on the rural landscape.
 - o We have concerns for Kara self assessment and management of this impact as they have demonstrated a clear tendency to overstate the benefits and understate the risks through the body of the report
 - o In addition, many Nain properties look down on the mine, please provide a section detail from the mine to our property demonstrating the height of the bund required to fully conceal the mine from view.
 - x. We contend that the risk matrix should be extreme effects, virtually certain/high
- h. On Page 34 Section 4.10 Noise
 - i. The report states "The activities will be no greater than that which emanates from surrounding farming and road traffic activities. The noise created from quarrying is miniscule compared to regional levels generated by farmland and public use of roads".
 - ii. The risk matrix indicates a negligible likelihood and a cat 2 rare low effect
 - iii. Please provide documented evidence for the premise that quarrying noise levels are miniscule to those generated by farming and public use of roads? 'Noise levels over 85db require ear

muffs thus the projected noise level of close to 110Db will be damaging to residents in the area and negate the claim that it is 'miniscule'

- iv. Our experience is that noise from farmland and roads is occasional traffic and seasonal farm vehicles.
 - v. In addition, the mine is at the base of what is a natural amphitheatre created by the hill up to Nain and the Nain church
 - vi. In addition, Freeling is down the hill from the mine with no natural barrier to lessen the noise
 - vii. To suggest that the noise of trucks, machinery and crushing operations will not be a cause of constant annoyance to nearby residents is ridiculous.
 - viii. This is a quiet rural area and any increase in traffic noise is unacceptable and this increase applies for both trucks and light vehicles
 - ix. The noise of intermittent farming operations consist of tractors running at constant revs unlike the up and down revs of mining dump trucks and loaders as they carry out mine operations
 - x. This mine will be crushing hard rock with generators, with machine noise, with the sound of hard rock crushing and screening will create a constant grinding and crunching mass of noise which is an unacceptable invasion into our peace and amenity
 - xi. Noise pollution 6 days a week from 6 am in the morning to 5:30 pm will create a huge inconvenience and detriment to the community.
 - xii. If the mine were to proceed, please show cause why operations should not commence after 8.00 am and cease by 4:30pm with no operations on weekends and public holidays
 - xiii. Given the rural setting the noise of operations and delivery trucks will travel greater distances and as outlined above
 - xiv. An agreed noise level in DBs needs to be agreed, established and independently monitored before any works are approved on the site
 - xv. Please clarify how any breaches can be rectified by Kara resources and what enforcement measures, compensation and penalties are to be applied should noise exceed agreed level
 - xvi. We contend that the risk matrix should read extreme effects and virtually certain/high
- i. 4.11 dust pg. 35
- i. "The dust created from quarrying is negligible compared to regional dust generated by farmland and public use of road .The site is a tiny dot on the landscape with respect to regional dust generation.
 - ii. Maintain record of any complaints. If complaints are not resolved the operator will conduct dust monitoring to demonstrate emissions comply with EPA policy requirements."
 - iii. Please provide evidence of the actual amount of seasonal regional dust generated by farmland and public use of roads in this particular area for scientific comparison
 - iv. As stated above, our experience is that dust generated in this area from normal farming

activity is rare as the no till method for cropping is utilised for adjoining and much of the local farmland as can be seen from the dust laden mine site at McLaren Vale below



- v. We also consider the term 'tiny dot' to be insulting to the real concerns of residents and disingenuous to the reality to say the least
- vi. If Mark Pickard or the other owners, managers and consultants for Kara Resources and affiliate companies had an 80 hectare mine over their back fence then we are confident they would not be referring to it as a 'tiny dot' on the landscape
- vii. Drinking water collected house rooves will now have a concentration and contamination of dolomite dust
- viii. Solar panels installed in the area will be significantly affected by the continual layering of dust from the mine, regardless of how much they are cleaned
- ix. This will have a direct impact on health and safety of residents as well as potentially increasing the failure rate of pumps
- x. The report states in 1.7 winds are generally from the south west.
- xi. It fails to mention that extremely strong winds come from the south west, west and north west, which will result in large volumes of dust blown over properties on a regular basis
- xii. There will be reduced visibility as a result of mining activity and variable wind velocity and direction
- xiii. Native flora and fauna and roadside vegetation will be heavily impacted and the rare indigenous eucalypt species on the Nain Hill are of particular concern as are the echidnas that have begun to breed in the Nain hills which has not been seen previously
- xiv. Can you please clarify the volumes of water expected to be used daily for dust suppression on mine, blasted heaps and haul roads and what is the program agreed to for dust suppression?
- xv. Also, please stipulate the levels of wind velocity and direction that is considered not suitable for mining operations
- xvi. An agreed airborne contaminant level needs to be established and independently monitored as dust and the polo-citrus dust suppressant that has been suggested for use are considered dangerous to many of the local residents
- xvii. Please clarify how any breaches can be rectified by Kara resources and what enforcement measures, compensation and penalties are to be taken should dust and airborne contaminants exceed agreed levels
- xviii. Self assessment by Kara on dust levels to demonstrate compliance with EPA policy requirements is not acceptable – any assessment must be independently undertaken
- xix. We contend that the risk matrix should read extreme effects and virtually certain/high
- j. 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 all stone houses, outbuildings, churches and graveyards as these are all 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 all property
 - viii. Agreement for Rectification of any damage will need to be at Kara Resources cost
 - ix. We contend that the risk matrix should read extreme effect and virtually certain/high
- k. 4.14 Rehabilitation on page 38

- i. Context: "The rehabilitation and returning the site back to a land use which is comparable and compatible with former landscape conditions is paramount. The land must be environmentally sustainable and similar to the prior regimes of activity; that is farming. This mining operation will lower the existing hill to a flatter area for cropping and grazing. The design of the new landscape is illustrated in the survey plans. "
- ii. The risk matrix indicates a negligible likelihood and a cat 3 unlikely low effect



- iii. When mining ceases there will be a large sized crater similar to the above at the McLaren Vale mine site
- iv. To suggest it is easier to farm than the existing hill is ridiculous
- v. Who is responsible for overseeing the rehabilitation and what are the consequences if the site is simply left abandoned or Kara Resources or any other responsible entity ceases to exist
- vi. We request an independent trust or similar secure fund be established by Kara Resources at their cost to enable the funding of full rehabilitation by Council to an agreed design
- vii. This fund will function regardless of whether or not Kara Resources or its affiliate or parent companies are still solvent when mining operations cease
- viii. Please provide detailed before, during and after drawings of the proposed landscaping and rehabilitation program
- ix. We request that this landscaping plan be part of the planning permit and be enforceable by the local Government
- x. Please provide a detailed Environmental Management plan
- xi. Please provide detailed drawings of the Environmental Mounds with gradients
- xii. We would argue that by the time stage 2 is completed the entire mine site would be impossible to rehabilitate and would remain an ugly eye sore and blight on the visual amenity on the area forever
- xiii. We contend that the risk matrix should read extreme effects and virtually certain/high
- 1. Other Environmental
 - i. Section 5.3 states 'Availability of a local materials source will reduce transport costs and thus also reduce the carbon footprint of the industry'.
 - ii. On what basis is this reduction measured and please provide quantifiable evidence of this reduction in carbon footprint

- iii. Is this reduction in transport costs and carbon footprint in comparison to the site at McLaren Vale or is there an alternative site in consideration, if so, where?
- iv. The claim of wishing to reduce the carbon footprint is a spurious claim as if this really was a key consideration of Kara Resources then their trucks could be converted to reduce carbon emissions
- v. Also, there are known dolomite reserves all the way into the outer suburbs of Adelaide so if this logic were genuine then the mine should be even closer to their main operations
- vi. The report also states: "The original environmental benefits will remain, with improved productivity for the landowner."
- vii. This does not take into consideration the loss of 90 years of no productivity due to the mine.
- viii. We ask that the operator clearly defines and explains exactly how the mine site will have improved productivity for the landowner

3. Social and Economic

- a. Section 5.1 states "This business venture and investment will make a huge social contribution to the district by incorporating other small and large business growth. This long term project will help provide new opportunities for employment and growth in this rural region."
 - i. This statement reads like a platitude and there is no material in the report to justify or even clarify let alone quantify what is a 'huge social contribution' On viewing other mining proposals by Landscape Profile the social, economic and community benefits are listed in virtually the same style of platitude without any supporting evidence. See Appendices A and B
 - ii. Please provide supporting economic evidence for this statement and document the specific local business growth that has been planned
 - iii. Please clarify if Kara resources intends to use local contractors for 'new opportunities in employment and growth' or if these opportunities will be usurped by related entities already engaged by the Kara Resources and their associated companies
- b. The report states: "Kara Resources, the operators, will receive positive financial benefit and sustainability for their company and employees, and will also ensure that the State's and local developments are cost effective. It is important to have the resources close to new construction and building projects rather than increasing the distance travelled. With Adelaide's future growth being indicated to the north of the CBD, this site will provide this ever expanding northern area with competitive products for the next 50 years and beyond."
 - i. Financial gain for Kara Resources is the entire motivation for the mine and we will not accept this at the expense of our quality of life, property values and livelihood.
 - ii. This mine will create economic loss, hardship and inconvenience for local residents.
 - iii. What does 'ensure that the States and Local developments are cost effective' mean?
 - iv. This sounds like Kara Resources will be giving some sort of market advantage to State and Local Government procurement in return for approving this mine – please clarify
 - v. "Other local construction businesses will prosper by this resource and in turn will employ more people."
 - vi. Please identify the specific type of LOCAL construction businesses that will prosper directly from this mine
 - vii. Kara Resources is part of the MSP Group. What safeguards will ensure that local construction businesses will benefit before other subsidiaries and out of town sub-contractors of the MSP group.
 - viii. Other larger contractors with current business across the group will be able to offer their services at a discount and this would clearly appear to disengage local business from any benefit the mine may propose to offer
 - ix. Therefore, please provide economic details of exactly how local businesses will prosper.

- x. On page 15 section 2.5.1 it states 'The workforce will consist of contractors and Kara Resources employees during operations. Normally 4 to 5 persons will be on site when active.
- xi. This statement is in direct contrast to the previous statement suggesting that local businesses will prosper and be employing more people
- c. The area around the mine and the mine site are part of an area that grows large amounts of hay for chaff production. This chaff is a highly value added product with the potential economic loss of over 2.5 million dollars as for the markets for this chaff are extremely sensitive to dust. Many other local businesses ie horse trainers, horse breeders, livestock producers, future horticultural projects are at high risk of not being able to operate if the proposed mine goes ahead.

4. Property Values

- a. According to local realstate agents there is a risk that property values will drop if the mine proceeds
- b. We will seek legal redress for compensation and costs should this mine be approved

5. Community Benefit

- a. The report states "It is noted that Kara Resources and McLaren Vale Quarries continue to build on existing relationships with community organisations throughout their geographical areas and are actively involved with groups such as football clubs and community groups in association with their existing operations"
- b. Please list the groups and quantify this active involvement
- c. Please also clarify how the detriment caused to local land owners and their livelihood will be offset by support to football clubs and other organisations that are not active in the Nain, Daveyston and Greenock Townships?
- d. Should supposed promised sponsorship have any relevance to a mining lease proposal?

Yours sincerely,



Rosedale Mining Lease application – Appendix A

http://www.pir.sa.gov.au/data/assets/pdf_file/0007/175489/Dolomite_Mining_Lease_Proposal.pdf

7. SOCIAL, ECONOMIC AND ENVIRONMENTAL BENEFITS

7.1 Social

Further Jennings Bros investment in the area will ensure a continued social contribution to the district by incorporating other small and large business growth. This project will continue to provide future opportunities for employment and growth in this rural region.

7.2 Economic

Jennings Bros, the operators/tenement holders, will receive positive financial benefit and sustainability for their company and employees, and will also ensure that the State's and local developments are cost effective. It is important to have the resources close to new construction and building projects rather than increasing the distance travelled.

Other local construction businesses will prosper by this new material source and in turn will employ more people. The State Government will receive royalties and fees from this increased business.

7.3 Environmental

Availability of a local materials source will reduce transport costs and thus also reduce the carbon footprint of the industry. The land will be reinstated to a form that is similar to which occurred prior to removal of the stone material, so the original environmental benefits and compatible situation will persist.

Bowmans Application – Appendix B

Prepared by Landscape Profile Pty Ltd

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6. Social, economic and environmental benefits

6.1.1 Social

The business venture and investment will make a social contribution to the district by incorporating other small and large business growth. This project will help provide new opportunities for employment and growth in this rural region.

6.1.2 Economic

Clay and Mineral Sales Pty Ltd, the operators, will receive positive financial benefit and sustainability for their company and employees, and will also ensure that the State's and local developments are cost effective. It is important to have the resources close to new construction and building projects rather than increasing the distance travelled.

Other local construction businesses will prosper by this new sand source and in turn will employ more people. The State Government and landowners will receive royalties from this new business.

6.1.3 Environmental

Availability of a local materials source will reduce transport costs and thus also reduce the carbon footprint of the industry.

The area will be reinstated to grazing land in a form that is similar to which occurred prior to sand mining. The original environmental benefits will remain or even have productivity improved when the sand is removed and improved

CFS Greenock Records – Appendix C

http://www.fire-brigade.asn.au/Station_Display.asp?Service_Code=SACFS&Station_Code=GRNK

Statistics for 2012-13 - 35 Responses

Accidental Operation Of Alarm, Human Activity Simulated Cond.	1	2.86%	9 Hrs	2.09%
Alarm System Suspected Malfunction	1	2.86%	3 Hrs	0.70%
Building Fire	2	5.71%	28 Hrs	6.50%
Building Fire - Content Only	1	2.86%	12 Hrs	2.78%
Did Not Arrive (Stop Call)	2	5.71%	4 Hrs	0.93%
Good Intent Call	1	2.86%	4 Hrs	0.93%
Grain / Crop Fire	1	2.86%	17 Hrs	3.94%
Grass Or Stubble Fire	7	20.00%	92 Hrs	21.35%
Investigation (Burnoff)	1	2.86%	7 Hrs	1.62%
Investigation (Smoke)	1	2.86%	3 Hrs	0.70%
Mobile Property / Vehicle	4	11.43%	17 Hrs	3.94%
Other (Outside Fire)	1	2.86%	12 Hrs	2.78%
Rubbish, Refuse Or Waste - Abandoned Outside	2	5.71%	8 Hrs	1.86%
Scrub And Grass Fire	4	11.43%	143 Hrs	33.18%
Vehicle Accident / No Injury	2	5.71%	11 Hrs	2.55%
Vehicle Accident Rescue	1	2.86%	N/A	
Vehicle Accident With Injuries	3	8.57%	61 Hrs	14.15%
Total Incidents for 2012-13	35		431 Hrs	

