

Mr Mark Howe,
Business Services Support Officer
Mining Regulation and Rehabilitation Branch,
DMITRE

Dear Mr Howe
Mining Lease Proposal MC 4322 Kara Resources
Dolomite mine, Nain Road, Nain (between Greenock and Freeling)

I was surprised to read on p23 of this proposal that the owners of most of the land involved 'agreed to full operations on the land' - Janet Nitschke and her son Matthew are quoted in a substantial article in the 'Leader' p3 Nov 27, 2013 as strongly opposed to it, primarily because of potential dust problems for crops in the surrounding land, and hence their chaff mill operations.

I also have concerns about the dust likely to be created from the removal of soil and subsoil and mounding it on the perimeter, from blasting, crushing and grading operations on site and from truck movement along the unsealed road from the Nain mine site to the Daveyston-Freeling sealed road, and from any loads that are not enclosed or completely covered. At present there are very minor and rare dust incidents in the area – my guess is that average vehicle movements on those sections of Nain Road and Old Kapunda Road are less than 3 per day, with the worst problems likely to occur with harvest and hay carting. This proposal expects 10 to 20 extra traffic movements every day except Sunday and public holidays, and I suspect these are likely to travel faster and raise more dust than present traffic.

I suggest the Nain Road/Old Kapunda road be sealed and maintained (and the junction with Daveyston Road remodelled) at the cost of Kara. If you are not prepared to require bitumen, then I believe the road should be upgraded to rubble base and gravel by Kara, without finer particles, and maintained and if necessary watered by Kara when dust problems emerge.

The mine land itself is no longer native habitat, but the Nain Range does have mobs of kangaroos (I have seen up to 20 in a mob), and I believe these range from about Daveyston through the Nain Hills to Kapunda and across to Tarlee. They are often on roads in the area around dawn and dusk, and since operating hours will include both for some parts of the year, I think the proposed cartage route should have kangaroo signs at Kara's expense. I also think Kara should be required to tell its staff and contractors to use the proposed cartage route, rather than going back through Nain and Greenock.

There is plenty of native vegetation in the Nain Range, including examples of rare ecosystems such as peppermint box grassy woodland, and although it is not set aside as a conservation area, Light Council does recognise in its Development Plan the importance of retaining the vegetation in these Hills. It is home to a range of wildlife including kangaroos and echidnas, birds snakes and lizards etc. The plants and animals are already under stress from weed and feral animals, chemical drift, farm machinery, noise and more development and population. I think every effort needs to be made to minimise additional stress.

I note the various precautions suggested in the proposal – watering on site, piling soil, subsoil and overburden near the perimeter, grassing the soil mounds asap, precautions against fuel leaks, limiting noise on site to EPA recommendations (100?? or 110?dB), warning neighbours of blasting times, stormwater management, and preventing weed movements in with trucks and equipment.. All of these seem sensible.

Kara seems to suggest work will not start immediately after approval of the lease, if granted. I think this would a good opportunity to require planting of local native trees and shrubs around the whole of the mining lease now, especially on the eastern and southern boundaries of the proposed mine site. This would need negotiation with the Nitschkes on their land. The plants should provide further noise and dust reduction by the time the mine begins, as well as carbon capture/offsets, wildlife corridors and possibly some visual screening of the site and overburden mounds.

Although there are no receptors on the mine side of Nain Range at present, the National Broadband Network has held preliminary talks with several landowners about the possibility of towers in the Nain Hills. I do not know whether they might be affected by this mine if it operates.

So I am not opposed to the mine, but I do think the conditions imposed need to be tougher than proposed.

Yours faithfully
Chris Anderson