



## **PUBLIC SUBMISSIONS FOR GREAT WHITE KAOLIN PROJECT**

01. **McEVOY**, Jason
02. **McEVOY**, Clint
03. **LYNCH**, Paul
04. **DICKSON**, Ken
05. **CAREY**, Shaun & Patrea
06. Granted extension but unsubmitted
07. **STEWART**, Donald & Ingrid – Streaky Bay Motel
08. **EWER**, Karina – DC of Streaky Bay
09. **TOMNEY**, Clint – Inkster Community/ 10a personal
10. **McCALL**, Stuart & **HONG** Lisa
11. **LANGE**, Alan
12. **GILMORE**, Trevor
13. **HULL**, Geoff & Bronwyn
14. **GRIFFITH**, Tony – Wudinna Hotel/Motel
15. **McEVOY**, Kain
16. **CAREY**, Ray, Ellen, Matthew, Mary & Damian
17. **WALTERS**, Greg – Peninsula Ports

**From:** [REDACTED]  
**To:** [DEM:Mining Reg Rehab](#)  
**Subject:** RE: Letter of support for the Great White Kaolin Mine Project  
**Date:** Wednesday, 21 April 2021 1:29:57 PM

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I am the owner of West Coast Welding based in Streaky Bay, and I strongly support the Great White Kaolin project.

Our workforce consists of 5 local employees. With a portion of our workforce engaged in the mining sector, we are reliant on the continued success of the mining sector and projects.

We believe that approval of this project will not only provide a significant long term benefit to regional towns within the Eyre Peninsula.

Kind Regards

Jason McEvoy

[REDACTED]

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**From:** Clint McEvoy | West Coast Ag [REDACTED]  
**Sent:** Friday, 23 April 2021 10:29 AM  
**To:** DEM:Mining Reg Rehab  
**Subject:** Great Southern Kaolin Mine

In response to the proposed mining project by Andromeda Metals/ Great Southern Kaolin Pty Ltd.

I own and operate an agricultural supply business in the district located in Streaky Bay and cover areas as far west as Penong and as far south east as Poochera, Minnipa and Elliston.

After attending a drop in day regarding the project I was excited about the proposed project and am of the impression that it will be great for our towns and district, especially the township of Poochera which has been struggling now for sometime as a lot of old railway towns have.

The potential for employment and other families potentially moving to the district is great and has others in the community excited.

I spent sometime perusing the posters outlining the mining operation and what is to be put in place to counteract any environmental issues and have no objection to anything proposed.

Some of our clients from the immediate area have spoken with me regarding the project and all seem to be supportive of the project however the concerns they raised are as follows:

- Water usage and if it will effect the flow rates they have currently to keep water up to their stock during summer months.
- The road and if it will handle to increase in truck traffic.
- The proximity of the mine to a land owners home.

I understand their concerns especially the one regarding the stock water but believe that once the operation is underway these issues if they arise can and will be addressed in a short time frame.

From my point of view the project is a must for our community and region and we should welcome the operation to the district.

Regards.....

Clint McEvoy  
**WEST COAST AG**



[www.westcoastag.com.au](http://www.westcoastag.com.au)

**Nutrien**  
West Coast Ag

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**From:** Nylor Park [REDACTED]  
**Sent:** Monday, 26 April 2021 6:42 PM  
**To:** DEM:Mining Reg Rehab  
**Subject:** Regarding Mining Proposal MC 4510

Thank you for the short period to review the documents and provide a submission on the above.

My main concerns are:

#### **Road surfaces and safety**

**Dirt Roads:** I do not feel that the impact of a massive increase in traffic for mining purposes on local dirt roads has been appropriately determined. Driving a Road Train at harvest time creates a lot of dust which I don't feel had been appropriately considered in this proposal. A larger number of trucks will cause blowholes to appear in roads to compound safety concerns. My concern is someone could be killed if this is not appropriately considered so its important I raise this so its not on my conscience should this eventuate. I would like a response on how this has been considered and what might be done in the future to minimise this risk. Are there any penalties should a crash occur on dirt roads due to the mining operations and if so what are they? In my opinion the roads need to be converted to bitumen to minimise this risk.

**Intersections:** Another issue regarding road safety is the two main highway intersections, the intersection to the Streaky Bay Road and also the intersection at Poochera meeting the Eyre Highway. I would like a response on how this has been considered and what might be done in the future to minimise this risk. Some things that need to be considered here are road widening and pull off areas, improved visibility, increased signage and perhaps a review of speed limits. Are there any penalties should a crash occur at a major intersection due to the mining operations and if so what are they?

#### **School Bus**

How does the company intend to ensure that the safety of the school bus is not compromised? What monitoring and documentation is intended to be recorded? As documented by Andromeda, heavt vehicles are not intended to travel during school bus hours. In my view this needs to be monitored and documented on a daily basis to ensure this intention is adhered too. Additionally, light vehicles should also have a definitive travel pathway and avoid school bus hours if possible.

#### **Water**

**Above Ground:** Given the large water usage, how can farmers downstream be assured that water supply will not be negatively impacted given water is a critical resource for farming linked with livestock and crop sprayng. I would like a response on how this specific issue has been considered and what can be done to ensure that this risk does not eventuate. Should it eventuate, does that mean mining usage will be appropriately reduced back to a level such that existing users are not impacted? I am extremely concerned with the high water usage and potential flow on impacts. I am seeking assurance for the benefit of the community that should water become an issue then mining needs to be adjusted accordingly. Water usage and impacts on water supply need to be therefore consistently recorded and reported.

**Below Ground:** As some farm locations is reliant on underground rather than above ground water, how can farmers be assured that underground water supply will not be negatively impacted for example the use of explosives could cause water to actually disappear. I would like a response on how this specific issue has been considered and what

can be done to ensure that this risk does not eventuate. Should it eventuate, how do farmers get appropriately compensated?

**Dust impact on Grain quality**

Has any assessment been done regarding the potential contamination of grain due to dust associated with the mine?

Cheers

Paul Lynch

## 004 - PUBLIC SUBMISSION

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**From:** KI & CM Dickson [REDACTED]  
**Sent:** Monday, 26 April 2021 2:17 PM  
**To:** DEM:Mining Reg Rehab  
**Subject:** Great White Kaolin Project - Poochera Andromeda Submission  
**Attachments:** Great White Andromeda Submission.docx

26 April 2021

Business Support Officer  
Mining Regulation Branch  
Department for Energy and Mining

I would like to make a comment on the proposal for the Great White Kaolin Project at Poochera (MC 4510) Ref T-FILE #2020000765

I have lived and worked in the Poochera and Streaky Bay district all of my life on the family farm at Cungena until moving to Streaky Bay after selling the farm in 2011.

I've taken an interest in the Kaolin site at Chandada since it has taken shape over the years, I attended an information day at the site a few years ago when it was being explored. Through my employment, I have had some involvement on site at the project over the last couple of years. From my observations, Andromeda have been very respectful, accommodating, and approachable to the local landholders, business' and communities and very environmentally respectful.

Having lived, owned and farmed in the district all my life, I think Andromeda have adequately described the existing environment as far as is relevant for the proposed operation.

From what I have witnessed and experienced through the contact I've had with Andromeda personnel and work I have done on site, and information provided by Andromeda, I think all potential impacts on the environment that may arise from the proposed operations have been adequately identified.

I have confidence that Andromeda are committed to working to their utmost ability to do everything in their control to make all the proposed environmental outcomes happen, based on all the information provided and from my experience working on site with Andromeda personnel.

Based on information provided I'm confident that all proposed mitigation measures are practical and the desired outcomes are very likely to be achieved.

All the measurement criteria provided by Andromeda seems to indicate that all the proposed outcomes can be achieved.

Having known the farming families involved with the project, I hope that they can have input to the project and that all parties can have an amicable relationship that is fair to all concerned, so that all can work together for the benefit of the local community, Eyre Peninsular and South Australia. I have confidence in the Great White Kaolin Project at Poochera.

Yours faithfully

Ken Dickson

Streaky Bay SA 5680

**From:** Shaun Carey [REDACTED]  
**Sent:** Thursday, 13 May 2021 8:53 PM  
**To:** DEM:Mining Reg Rehab  
**Cc:** Lock, Erik (DEM)  
**Subject:** Carey Submission Great White Kaolin Project  
**Attachments:** SG & PE Carey MP Submission.docx

To whom it may concern,  
Attached is our submission in relation to the Great White Kaolin Project Mining Proposal. Due by COB Friday 14th May.

Regards  
Shaun & Patrea Carey  
[REDACTED]

# SG & PE CAREY Pty Ltd SUBMISSION

## Andromeda Metals Great White Kaolin Project Mining Proposal

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### Introduction

We are Shaun and Patrea Carey, along with our three children and father Bill Carey reside work and farm in the Inkster district. We are third generation farmers (raising the fourth), who have the privilege of working the land previous generations of our family have established for the intention of farming. We choose to farm for the love of the land, lifestyle and pride of our family. As farmers we do not condone the use of productive agricultural land for mining and certainly do not choose mining for our land. Over the past few years the ongoing exploration of our land and now mining proposal has been a constant interruption to our lives and business in turn causing much stress and anxiety.

As a current landholder, business and neighbour directly impacted by Andromeda Metal's proposal to mine within our productive agricultural land, we have a number of serious concerns regarding the Great White Kaolin Project Mining Proposal.

Our major concerns are;

- Roads dust, traffic, safety and maintenance
- Dust roads, visual, safety, livestock, residual on crops
- Noise affects on lifestyle and livestock
- Water wastage, impact to existing customers pressure and stock water
- Visual Aesthetics – what will we see from house and neighbouring paddocks
- Blasting – frequency, noise, potential impact to infrastructure

We have thoroughly studied the Mining Proposal and identified many issues and subsequent questions in relation to our concerns around the development, these are outlined below.

Issue	MP Ref.	Page	Comment
Potential Acid Mine Drainage	2.5.1	39	Exactly how much Potential Acid Forming (PAF) material is there within the site and how will it be managed to ensure there no risk, from potential Acid Mine Drainage, to surrounding land?

Water runoff & Erosion	2.7	50, 51	The potential mine site sits above our cropping land bordering to the east and significant stockpiles of soil and overburden are planned along our boundary. What strategies is Andromeda proposing to mitigate the potential of water runoff and subsequent erosion of lower lying areas especially our neighboring paddocks, due to the increased elevation caused by their stockpiles?
Presence of West Coast Mint Bush	2.8.2	65	According to proposal a 2020 spring survey indicates there is no West-Coast Mintbush found in the vicinity of the area. The survey consisted of 3 transects greater than 3km. Given the proposed development area is only 410ha, how can this survey confidently exclude the possibility that there is Mint bush within the development area? We would suggest a more targeted search should have been conducted to ensure accuracy in the determination that there is none in the area, and therefore accuracy in defining the impact the mine site could have to the natural environment.
Lack of recognition of loss of cropping land to the landholder	2.12.4	88	The proposal states the development includes approximately 162ha of cropping land which has been owned and worked by the same family for approximately 100 years.  What percentage is 162ha of the landholder's total cropping area (rather than the entire EP)?  Not including more specific data is diminishing the impact the loss of cropping land will have on those family enterprises.
Dust Impacts not mentioned in relation to housing	2.13.1	93	What about dust impacts for sensitive receptors?
Incorrect– Proposal states there are no private pipelines within the proposes development	2.13.1	93	On our property within the boundary of the proposed development we currently have a pipeline, small tank and water trough. This is the only water source for stock in that entire paddock. This water source will have to be relocated to an alternative location within that paddock if Andromeda successfully acquires that portion of land.

No mention of vegetation heritage agreement areas	2.18	102-103	As shown in figure 2-37 there is a number of vegetation heritage agreements in close proximity to the mining lease. Will there be any impacts to these areas?
Hours of operation	3.1	106	Proposal states mining will be limited to day shift. What are the shift hours and operating days? Do these same hours and days apply to trucking out of materials prior to processing plant being in operation?
Diesel powered generators to be utilised	3.1.1	110	How many generators to be used? What are operating times? How much noise will be generated when in use?
Stage 1 supply of water through road tankers	3.1.1	110	How many? Has the Increase in road traffic been accounted for when considering impacts?
Potential impact on water supply to existing SA water customers	3.1.1	110	What measures will be put in place to ensure the already strained supply to existing customers is not impacted?  In the event that supply is impacted what strategies will be enacted to compensate for those impacts?
Water conservation and dust suppression	3.1.1	111	What strategies and products does the applicant plan to use for water conservation and dust suppression?  Why is paving the roads not a priority method given the amount of daily traffic expected, limited water resources available and average rainfall of the area?
Mining – operations machinery & blasting details	3.1.1	111	According to the proposal for the “ <i>majority</i> ” of mining no drill or blast is required. What quantifies majority?  Over the course of the mine life how often will drilling and blasting techniques be used (defining as no more than once a month is indistinct)?  Will a rock breaker be used?
Lack of detailed Rehabilitation plan	3.1.1	112	As the mine is refilled with topsoil how will the area be revegetated? What is planned species and density of planting?

Location of dewatered sand stockpile	3.1.1	112	<p>This stockpile is not indicated on figure 3-1 (pg108) Where is it to be located?</p> <p>What are the anticipated dimensions of this stockpile?</p> <p>What strategies will be used to prevent sand drift, especially during hot dry summers with strong northerlies?</p>
Local employment figures	3.2.4	125/126	<p>The proposal states at peak there will be 75 FTE on site per year including haulage. Given within the local district many businesses are struggling to find employees. Where are these proposed employees coming from?</p> <p>What "local" company has the capacity to supply the numbers of heavy vehicles required for haulage?</p>
Continued Exploration throughout the development	3.3.2	130	<p>Will we, as one of the current landholders of the proposed development, be subjected to interruptions of continued explorations on our remaining properties for the entire duration of the mine life and beyond?</p>
Location and size of stockpiles	3.4.5	138	<p>Figure 3.7 (pg135) fails to clearly indicate locations of the varying stockpiles. Where will the following stockpiles be located on site and what size will they be?</p> <ul style="list-style-type: none"> <li>~ Topsoil</li> <li>~ Subsoil</li> <li>~ Product stockpile to support processing</li> <li>~ Calcrete for road construction</li> <li>~ Silcrete for road ramp &amp; pit floor</li> </ul>
Size of overburden stockpile and potential erosion	3.4.5	139	<p><b>How</b> will AM ensure that such a large stockpile (18m high) will not cause any erosion and sediment loss from surface runoff and wind?</p> <p>Water movement through the stockpile is expected to be limited, how does this quantify?</p> <p>Does AM have rainfall data specific for the site?</p> <p>What is the average rainfall of the area?</p>
Rehabilitation of the Overburden stockpile	3.4.5	139	<p>Is the rehabilitation of the overburden stockpile ongoing during the mining operations or a post mining plan?</p>

			<p>Will the overburden remain post mine? If so at what size?</p> <p>How does a <b><i>“vegetative cover of grasses”</i></b> equate to the current natural environment?</p>
ROM stockpile	3.4.5	140	Does the noise assessment consider the ROM is 4m above ground level?
Frequency of explosives use	3.4.6	142	<p>What is the frequency of blasting? Is it monthly or quarterly? How many blasts in a single period?</p> <p>Will a <b><i>blast management procedure plan</i></b> be in place to describe what the operations need to do prior to, during and after blast? Will this be accessible for the immediate and neighbouring landowners? How much notice will the landowners receive prior to blasting?</p> <p>How will the impacts to infrastructure associated with blast vibrations be monitored?</p> <p>Will Andromeda undertake assessment of local infrastructure specifically homes and sheds, to determine a baseline prior to implementation of any blasting and subsequent monitoring?</p> <p>A large concern to us is the potential structural damage over time to our very solid 50 year old double brick home located approximately 3.5km away and also the 2 older but very well maintained stone homes within closer proximity. How can we ensure that the mining company is held accountable if damage does occur as a result of blasting operations?</p>
Mine Dewatering – collecting of water during high rainfall events for use in dust suppression	3.4.8	147	<p>On page 139 it was suggested that the site received <b><i>“limited rainfall”</i></b> therefore no erosion from stockpiles, yet now the proposal is stating that during <b><i>“high rainfall”</i></b> events water will be collected and stored. Each point is contradicting the other.</p> <p>How will the collected water be stored?</p> <p>Has a collection sump been factored into the footprint?</p> <p>How much water is needed for dust suppression on site?</p>

Lack of detail in Rehabilitation operations	3.4.9	149	<p>A safety bund may be established around the area where the pit was, what will this look like? How big will it be? Will it be vegetated?</p> <p>The closure post mine has not been adequately described raising many questions.</p> <p>Will there be a pit void remaining?</p> <p>What proportion of site will be returned to native vegetation?</p> <p>What, if any, is returned to pasture and/or usable arable land?</p> <p>Is there a detailed rehabilitation plan in conjunction with this mining proposal?</p>
Operating hours on site	3.4.10	150	<p>What are the processing operating hours?</p> <p>Does mining activities, day shift Monday to Saturday, include haulage of product prior to processing plant becoming operational?</p> <p>Is there a safeguard to ensure mining activities cannot ever be extended to 24hrs 7 days a week once processing begins on site?</p>
Processing plant operation times	3.5.2	151	<p>The plant will operate continuously with assumed operation of 8000 hours per year at 91.3% utilisation. What will occur during the remaining 8.7% of the year?</p> <p>What noise is associated with the operation of processing plant?</p>
Process water management	3.5.4	157	<p>It has been stated previously that mining will not occur below the water table and there will be no dewatering so what is the source of the groundwater that may be recovered?</p>
Rehabilitation strategies	3.5.8	160	<p>Why has a detailed rehabilitation plan not been included with the mining proposal?</p> <p>Proposal states that further treatment will be determined in the lead up to closure based on <b><i>“economics, best practice and technology”</i></b>, what does economics have to do with rehabilitation? How will the mining company be held accountable to rehabilitate the site as close as possible to the natural landscape? Who determines that rehabilitation is done to an acceptable level?</p>

Disposal of salt from processing	3.6.2	160	How does <i>“some salt”</i> being returned with sand to the pit quantify? Will this salt pose a risk to salinity levels in surrounding soils? How will Andromeda ensure salt does not affect soil quality of neighbouring cropping land?
Access roads remaining unsealed	3.7.1	163	<p>Given the amount of traffic the mine site with generate on a daily basis, especially with haulage of product predicted to be 24 trucks per day in the first stage, <b><i>how can Andromeda justify not sealing the roads?</i></b></p> <p>~ How will the roads be maintained to an appropriate standard for public access?</p> <p>~ How can Andromeda guarantee the safety of other road users sharing the road with such a large number of vehicles daily?</p> <p>~ How regular would patrol grading and re-sheeting occur?</p> <p>~ Who would be undertaking this works? Current road maintenance is undertaken by the Streaky Bay District council. We strongly feel this extra works should not be added to their existing road maintenance program given the below par condition many of the district’s unsealed roads are kept in due to lack of resources.</p> <p>~ Does the proposal take into consideration that grading and re-sheeting also poses significant interruption to road users?</p>
Use of diesel generators	3.7.3	164	What capacity of generator is needed to power the site? Has noise assessment been considered in relation to generator use?
Supply of water for stage One of project	3.7.3	165	<p>What size road tanker will be used to transport water? How many per day?</p> <p>Has this additional road use been taken into consideration when assessing impacts to other non-mining road users?</p> <p>What will the 50kL water be used for? Is this purely dust suppression, if so given the amount of traffic anticipated on unsealed roads is this really an adequate amount of water?</p> <p>We also question the suitability of wasting such a precious resource especially given the water</p>

			<p>supply to properties in the surrounding district is limited and often not meeting demand during summer months.</p> <p>How will Andromeda ensure that water supply and pressure to existing SA Water customers will NOT be impacted? What consequences will ensue if supply is negatively affected?</p>
Closure of water pipeline at end of mining	3.7.4	166/171	<p>The applicant suggests they are open to considering landholder off takes from the water pipeline to be installed within the proposed MPL if it was requested and to be of benefit.</p> <p>If landholders were able to sure up their supply by tapping into the pipeline what happens to that agreement and infrastructure upon mine closure?</p> <p>Would it not be more economical for SA water to take over ownership of the pipeline for use by existing customers rather than be removed as suggested?</p>
Lack of visual screening	3.7.5	171	<p>What about screening of entire site?</p> <p>What bunds and plantings are suggested to soften the visual amenity to the neighbouring land?</p> <p>Will there be planting along mine site boundary especially northern, southern and western boundaries?</p>
Water run-off onto lower lying area	3.7.8	173	<p>As the property that lies to the south of the development and a significantly lower lying area we are concerned with the potential run off and erosion from the mine site.</p> <p>What strategies will be used along boundaries to ensure neighbours do not experience excessive water runoff and consequent erosion from the site?</p>
Perceived minimised disturbance to agricultural land	3.8.1	174	<p><b><i>“The proposed development has been designed in consultation with landowners and has included stipulations to minimise disturbance of, and direct impact to, agricultural land where possible”</i></b></p> <p>How do you define “consultation”?</p>

			<p>What stipulations and strategies are being used to minimise impacts to agricultural land?</p> <p>In our opinion continually changing the mine site plan and expanding the site into arable land unbeknownst to the land holder does not constitute consultation and minimising impact to agricultural land.</p>
Mine site at completion	3.9.1	179	<p>Will pit be backfilled as previously indicated?</p> <p>Why not? How big will remaining stockpiles be?</p> <p>Where and what size will bund be?</p> <p>Is there a clear rehabilitation plan?</p>
Post closure pit	3.9.1	180	<p>What is the purpose of the post closure pit as shown in figure 3-27?</p> <p>The location of this pit appears to be on land that we currently own. In all our “consultations” with AM we were never made aware, prior to reading the mining proposal, that there would be an open pit remaining post mine closure. Our understanding was that the mine would be backfilled and returned as close as possible to the natural landscape.</p>
Appropriate level of stakeholder engagement	5.3.1	204	<p>Surrounding land holders were not sent any communication about the mining proposal and submission period from Andromeda until the immediate landholders subsequently alerted them and Andromeda.</p>
Drop in day attendance	5.4.1	211	<p>In the attendance data of drop in days, what relevance does gender have?</p>
Stakeholder benefits & issues register	5.5.4	216 - 223	<p>Many of the questions raised by stakeholders are not adequately addressed by the applicant in their response.</p>
Outcome development	5.6	224-228	<p>Some of the community comments do not accurately reflect the views of key stakeholders.</p> <p>The applicant has provided no response to many of the community comments on the outcomes developed.</p>
Compliance in traffic control and management	8.3.2	257	<p>What accountability will be provided to ensure the strategies listed in table 8-1 are adhered too?</p>

<p>Road safety assurance with such high number of traffic predicted</p>	<p>8.4.2</p>	<p>260</p>	<p>Table 8-2 indicates a high number of daily traffic predicted to be using an otherwise low traffic road (Poochera – Port Kenny Road) how will safety and access be assured for other road users especially with the road remaining unsealed?</p> <p>With the largest traffic numbers to be in the first 18 months why has the applicant not prioritised sealing the road?</p> <p>Previous indications by the applicant to the landowners (us) was that majority of the work force would be bused from Streaky Bay to and from the mine site eliminating the need for so much light vehicle traffic. Is this no longer being considered? If not where on the mine site will the employees (75 people) be parking their vehicles?</p>
<p>Heavy Vehicle movements and local school bus route</p>	<p>8.4.2</p>	<p>261</p>	<p>How accountable will the applicant be to continue to uphold their commitment to avoid haulage traffic at the same time as our local school bus service travels along Poochera – Port Kenny road?</p>
<p>Frequency of heavy vehicle movements especially on the unsealed Poochera – Port Kenny road</p>	<p>8.4.2</p>	<p>262</p>	<p>The applicant states <b><i>“a minor increase in truck frequencies may be experienced on lower volume roadways (Poochera- Port Kenny Road) where estimated frequency is one HV every 10 minutes.”</i></b></p> <p>We travel on the Poochera- Pt Kenny road at least twice a week at various daylight hours, very rarely encountering any other traffic travelling in either direction. How can 1 heavy vehicle every 10 minutes during daytime be considered a <b><i>“minor increase”</i></b> in traffic?</p> <p>The proposed development is estimated to increase total of HV by less than 1%, given the applicant does not know which Port (Thevenard, Whyalla or Lucky Bay) it will be trucking to, how was this figure calculated?</p> <p>The calculation of increased total of HV by less than 1% is grossly inadequate in relation to the planned traffic Poochera – Port Kenny road. This road is not designed to sustain such an amount of daily traffic.</p>

<p>Outcomes and measurement criteria – adverse impacts to agricultural productivity for third party land users</p>	<p>9.5</p>	<p>290 2<sup>nd</sup> row</p>	<p>The draft outcome measurement criteria states “<i>annual dust deposition on a representative number of adjoining properties does not exceed 4g/m2/month and no more than 2g/m2/month above background.</i>”</p> <p>~ What is this figure based on?</p> <p>~ What is the current environmental standard?</p> <p>~ What is the baseline figure for the site pre – mine?</p> <p>~ What measures are in place if these figures are exceeded?</p> <p>As an adjoining landholder who will be immediately impacted by any increasing in dust, especially being the neighbour on the southern boundary to the site, we are very concerned about the lack of detail in the applicant’s commitment to dust mitigation. We are concerned about the negative impacts dust may have on our grazing stock and cropping program, which is immeasurable until we actually experience farming next to a mine.</p>
<p>Lack of design measures to minimise impacts to air quality</p>	<p>12.3.1</p>	<p>313</p>	<p>Will there be dust monitors at sensitive receptors?</p> <p>Does the applicant intend to use stabilised stockpiles to buffer impacts to sensitive receptors (dust, noise &amp; light spill)?</p> <p>What considerations being made for high wind days, as wind speeds are not constant for 365 days a year?</p>
<p>Inconsistencies in information provided under emissions sources and characteristics of the proposed development (Table 12-4)</p>	<p>12.4.1</p>	<p>317 - 319</p>	<p>Under operating hours product dispatch is listed as “<b>24 hour, 7 days</b>” however page 262 states heavy vehicle frequency in a 12 hour period, indicating haulage of materials will only occur during 12 hour day shift.</p> <p>Will heavy vehicle traffic to port be 12 hours or 24 hours? If it is 24 hours why has that not been clearly stated anywhere? Has it been considered in relation to impacts to sensitive receptors (i.e. noise and dust)?</p> <p>It is indicated blasting frequency “<b>Quarterly if required.</b>” Yet under 3.4-6 use of explosives</p>

			(pg142) the applicant states that blasting is <b><i>“expected to occur no more than monthly.”</i></b> Which is it monthly or quarterly? Why does the assessment of maximum 24 hour impacts assume blasting is every day of the year?
Mobile crushing plant	12.4.1	319	Has this been considered in noise assessment?
Residential receptors	12.4.4	323,324	Why have residential receptors not been organised in order of distance from development?
Inaccuracy of figure 12-2 – commercial receptors	12.4.4	325	This figure fails to recognise that the majority of landholders surrounding the development run stock and therefore utilise their scrub and vegetated areas for grazing.
Overview of potential impact	12.4.7	336-338	<p>Is the generalization of impacts as <b><i>“minimal”</i></b> <b><i>“low”</i></b> and <b><i>“minor”</i></b> accurately depicting the situation for R1 considering that is only <b>800m</b> from the site which is three times closer than R2?</p> <p>It our view that the location of R1 in such close proximity severely increases the impact to them compared to all of the other residential receptors, therefore the impacts to R1 need far more specific in their representation.</p> <p>The proposal states <b><i>“The consequence of change is considered to be minor, as there could be a local short term and minor surpasses of air quality standards and is expected to remain as low impact.”</i></b> How can dust generation from mine operations and processing 24hrs a day, 7 days a week for 26 years be considered short term and low impact?</p>
Impacts and Risks	12.4.10	338,339	How can a value that is only just compliant be given a <b><i>minimum level impact</i></b> and be <b><i>low level risk</i></b> ? A risk assessment is supposed to be based on a <b>worst case scenario</b> , which is R1.
Improper justification of impacts and risks to residences	12.4.11	339	The applicant states no further controls are necessary, yet what controls have been presented other than water trucks? The applicant has not genuinely committed to providing relief for the residence at R1. Why have alternative buffering methods not been considered?

Proposed measurement criteria of draft outcomes (Table 12-17)	12.5	340	<p>What are 4g and 2g values based on?</p> <p>Why has the applicant not considered that 24hr PM10 particulate concentrations should be based on R1 as the closest receptor, if R1 is compliant then all other receptors will be?</p>
Lack of impact reduction to closest receptors	12.6	342	<p>Yes “only” two of the ten receptors are within 3kms of the site but what is the applicant doing to reduce the impacts to those two closest receptors?</p> <p>That there is only two does not mean the applicant can neglect to provide adequate strategies to mitigate impacts. After all those families and residences have been there for a long time and will continue to be long after the life of the proposed development.</p>
Noise	13.3.2	346	<p>Does the applicant have noise management procedures?</p> <p>How will they ensure compliance?</p>
Noise impacts	13.4	347	<p>The existing environment is “Quiet”, how does this quantify to the figures in table 13.6 (pg 351)? How many decibels is “Quiet”?</p>
Predicted construction noise and impacts of	13.4.1	350	<p>What noise will be generated by;</p> <p>~ Mobile crusher for road construction?</p> <p>~ Drilling and Blasting?</p> <p>What accountability is there if the construction activities exceed noise limits?</p>
Operations noise levels	13.4.2	358	<p>Does modeling take into account that the ROM will be elevated 4m above ground?</p> <p>What noise buffering strategies will be used?</p> <p>Can not exceeding be considered “minor impact” especially to R1?</p>
Noise findings and conclusion generalised	13.6	366	<p>How is noise exceedance acceptable just because there is only one receptor within a km?</p> <p>Is there a noise management plan and procedure?</p>
Inaccurate statement	14.1	368	<p>The applicant states “NO” concerns regarding soil and land quality were raised during stakeholder engagement.</p>

			We as immediate landholders have raised concerns about dust, erosion and contamination.
Strategies to mitigate soil degradation	14.4	380	Will the applicant conduct regular soil testing in, around and adjacent to site to ensure no deterioration of soil quality occurs in neighbouring land?
Accuracy of viewpoints	15.2	385-389	None of the images recognise the elevation of R5 and R6 and the south easterly direction these receptors face, given these factors both receptors will have visibility of certain aspects of the mine from the homes.
Control measures to visual amenity	15.3.1	390	Where will screening bunds be located? What will be used to construct them? How big will they be and how much will they screen of the site? Where are the permanent stockpiles located? How will they be vegetated?
Visual amenity to community as result of the development	15.4.2	392	The applicant states visual amenity within a 3km radius will be impacted. This statement fails to recognise that although we (R5 and R6) are 3.5km away from the development due to our elevation and orientation we will have a greater visual impact from our home than R2 at 2.8km away.
Visual amenity for local residents	15.4.3	393	As stated above due to the elevation of our home and south eastern orientation some aspects of the development will be in our line of sight.  It is stated the maximum height will be 10 metres yet it was previously stated that overburden will be up to 18 metres high.  Viewpoint 4 (plate 15-4) is depicted as representing our receptors. However this photograph is taken from the road side and does not consider that our home is 200metres from the road and at higher elevation (approx 131m) therefore not accurate depiction of the viewpoint. Being largely blocked by topography and vegetation does not mean we will not be impacted visually by the development.

## Conclusion

As we have outlined, upon reviewing this Mining Proposal, we have found in many areas a lack of detail and a great number of contradictions throughout.

The applicant has generalised a vast number of the issues and impacts which we find completely unacceptable given they are very real and valid concerns. If this development is approved we will be forced to tolerate all of these impacts on a daily basis consequently affecting the way in which we operate our agricultural business.

Whilst we appreciate the opportunity to complete a submission in response to this Mining Proposal we have found it to be an extremely time consuming and arduous task.

We trust that you will take all of our issues and questions into consideration when reviewing the Great White Kaolin Project Mining Proposal.

Regards,

*Shaun and Patrea Carey*

██

██

006 – GRANTED EXTENSION BUT  
UNSUBMITTED

**From:** Ingrid Stewart <[REDACTED]>  
**Sent:** Tuesday, 27 April 2021 7:39 PM  
**To:** DEM:Mining Reg Rehab

To whom it may concern,

As a small business owner in Streaky Bay, we support the Great White Kaolin Project - Poochera mining proposal by Andromeda Metals.

We have been to their drop-in day in Streaky Bay and found it very informative. They explained verbally and with poster diagrams the mining process they are going to use; environmental impacts and how they plan to deal with any should they arise; the economic opportunities for the local area; and their site closure plan when finished.

We think Andromeda Metals White Kaolin mining has the potential to bring great benefits to Streaky Bay and the surrounding areas. Not only employing local people at the mining site, but also patronising local businesses.

Yours Sincerely

Donald and Ingrid Stewart

Owner/Managers

**STREAKY BAY MOTEL & VILLAS**

[REDACTED]  
[www.streakybaymotelandvillas.com.au](http://www.streakybaymotelandvillas.com.au)

## 008 PUBLIC SUBMISSION

**From:** [Karina Ewer](#)  
**To:** [DEM:Mining\\_Req\\_Rehab](#)  
**Subject:** District Council of Streaky Bay - Submission - Andromeda Mining Lease Application and Miscellaneous Purposes Licence  
**Date:** Tuesday, 27 April 2021 5:41:03 PM  
**Attachments:** [image001.jpg](#)  
[image002.png](#)  
[Andromeda Metals.pdf](#)  
**Importance:** High

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To Whom it May Concern

Please find attached the submission from the District Council of Streaky Bay.

I apologise for it being ½ hour late. My plane was delayed and things really did not go to plan today.

Please contact me if you have any questions.

Please also let me know if you need anything further from me, or if this submission will not be accepted.

*Regards*

*Karina Ewer* MBA, MCMR, MAHRI **Chief Executive Officer**

P.08 8626 1001 • F.08 8626 1196 • [REDACTED]

W. [www.streakybay.sa.gov.au](http://www.streakybay.sa.gov.au)

PO Box 179 STREAKY BAY SA 5680

***'Out beyond the ideas of wrongdoing and rightdoing there is a field. I'll meet you there. When the soul lies down in that grass the world is too full to talk about.'*** — Rumi (ancient Persian Poet)



*Streaky Tourism Email Signature*





Andromeda Metals

Great White Kaolin Project – Poochera  
(MC 4510)

District Council of Streaky Bay Submission

At the District Council of Streaky Bay's (Council) April Ordinary Meeting, Council determined as follows:

**Council Resolution**

107/21

Moved: Mayor Barber, Seconded: Cr McGowan

That Council, having considered Report No 8.04, Title: Andromeda Metals – Mining Lease and Miscellaneous Purposes Licences - Submission, dated: 21 April 2021 and its role under Section 6, 7 and 8 of the Local Government Act 1999 endorse the Chief Executive Officer to provide a submission to the Department of Energy and Mining requesting Andromeda Metals:

- provide regular (at least monthly) air quality testing and reporting during the first year of the operation at the Great White Kaolin Project site a Poochera to Council and the regulator; and
- should the air quality level reach 100ppm (poor or more), that the road be bituminised immediately; and
- bituminise the Poochera Port Kenny Road immediately before operation in any rate.
- present all of the concerns raised by the Inkster community including; school bus safety, air quality measurements and water usage.

**CARRIED**

During the meeting, Council heard concerns from the community and as per the motion above, determined to include the concerns of these groups in the submission below. Copies of those presentations are provided at Appendix 1.

## Engagement

Andromeda Metals and Great White Kaolin Project personnel have always engaged well with Council and we are grateful for their continued consultation. We were very concerned however to hear that although the Careys (the owners of the property in question) had been actively engaged in consultation and negotiation, the other nine people affected surrounding the perimeter of the mine and the upgrade of the road have not yet heard from Andromeda Metals.

*Council requests, the Inkster Community have the opportunity to engage with Andromeda Metals prior to the granting of the Mining Lease or Miscellaneous Purposes Licenses in order for them to fully understand the project and its impacts on their community.*

## Environmental Impact – Mine Site

Council have a number of concerns regarding the impacts on the Careys regarding the proximity of the mine to their private house in particular. The house will be within 800m of the mine boundary when at its closest operating site. Concern therefore surrounds the impact explosives use will have on both the structure of the Careys home and the noise pollution it will cause. There is little doubt blasting will exceed decibel limits at least during blasting times.

## Noise

*Council requests monitoring of noise levels to ensure noise is never louder than required decibel limits, including during blasting.*

Council can find no evidence in the documents provided specifying how noise management will be achieved.

*Council also therefore request that explosive use be restricted times to be negotiated directly with the Careys as they will need to consider not only themselves and their continued quality of life, but the impacts such noises might have on their stock.*

As Matthew and Mary Carey are the closest to the mine site, hourly monitoring is requested over the period of the first year to ensure this family is not subject to unsatisfactory levels of noise pollution. Measures to mitigate and reduce noise interaction with the surrounding environment should be included in the document.

As Damian Shaun and Patrea Carey's house is within 2.8kms of the mine site, less regular noise testing may be appropriate but should be recorded at minimum during blasting times and during peak operation hours. The same might be expected for Ray and Ellen Carey and William (Bill) Carey who also live approximately 2.8km from the mine site on Parla Peak Road.

It should be noted this area is sparsely populated with low to no noise from road or other normal civilisation considerations. Noise therefore will travel long distances, particularly during night time hours and during the cooler winter months as there is no infrastructure or significant tree growth areas to mitigate or soften the noise produced by the mine's activity.

## Dust

The environment in which the Careys' farm is located is an arid area. Dust during high wind days is a common occurrence, however is not a continuous phenomenon. The dust produced from a working mine such as this however will be considerably, and consistently, more than is currently experienced.

*Council therefore feels air quality testing of both Carey properties will be imperative to ensure the dust they are experiencing neither contains harmful substances, nor exceeds the recommended 100ppm environmental safety standards. Again, it is felt the testing of the Carey property closest to the mine be effectively continuous to ensure trend data is also available during all operations.*

## Vibration

It is well known explosive use will cause ground vibration. The blasting in the area will be through limestone, which is known to fissure and crack particularly along fault lines.

*Council request some consideration to the possible damage that may occur to the Carey farm houses as a direct result of blasting so near their properties (800m and 2.8km respectively).* This risk does not appear to be addressed in the documentation offered and the Careys state they have not been given written assurances as to any ways in which such damage might be claimed from Andromeda Metals and what will and will not constitute structural and foundation damage. Council do not believe any insurance cover currently held by the Careys will cover them for this type of damage.

## Environmental Impact – Road

Council has considered both the Haul Out Road and the Poochera Port Kenny Road in the information provided below.

The primary concern Council has relates directly to water use in an area where water is a scarcity and even from the Todd line will cause issues for locals (discussed later in this document).

It should be noted there are very few roads on the Eyre Peninsula rated to allow an A Triple Road Train as described in the application. This submission assumes Andromeda intend to use the tandem drive, tri-axle, tri-dolly set up to allow for the highest haulage capacity of this class of vehicle (123tonne GVM / GCM). Kalari Transport are the only company to run larger vehicles in the area (quad trucks weighing up to 180tonnes GCM) from Ceduna to Iluka Mine and to Thevenard. They do so only under special licence and under significant restrictions to the numbers of truck movements per day. These trucks are required to operate one and one half hour between each movement to allow for traffic flow and run 24 hours a day. To put it in perspective, that operational restriction allows for 14 truck movements per 24 hour period.

Andromeda's own figures would suggest one truck movement every ten minutes during daylight hours (with restrictions in place during school bus times). Very real concerns therefore exist surrounding road safety and the ability of roads to support this type of usage.

Council does not believe haul to Lucky Bay or Whyalla is possible as it will require much further distances and with the number of truck movements indicated, significant risk to road users utilising the same routes. The widening of the Eyre Highway to Port Augusta will not allow for the number of trucks, that will be moving at no more than 80kms per hour, to be overtaken by faster moving traffic in a safe manner. Council would strongly suggest Lucky Bay and Whyalla are not practical, particularly during harvest when both ports are already at capacity receiving grain. Increasing traffic in those areas will only serve to increase the problems sometime experienced with wait times and scheduling.

## Dust

Council notes with great concern that Andromeda Metals intends to only upgrade the Poochera Port Kenny Road to allow type 2 Heavy Vehicles however, the road is to remain unsealed. They have indicated they will use water to suppress the dust. Whilst this will assist, it does not address the amount of water that will therefore be irresponsibly wasted in an area where water is all but inaccessible to the average farmer. Nor does the document invest time to explain how the water will be applied, particularly between truck movements as this will in essence be more truck movements than have been accounted for.

To adequately suppress the dust that will be caused by the number of Type 2 Vehicles expected on this road, Andromeda Metals will more than likely be required to apply water to the road surface after almost every truck movement (1 truck every 10 minutes). Council cannot support the waste of such a precious resource in this way and has grave concerns regards safety of the vehicles as, in Council's long experience, damp or wet unsealed roads in this area are extremely slippery. Type 2 Heavy Vehicles are prone to slippage, particularly if the ground underneath them is wet, and more when they are fully laden. For these reasons, Council does not support the provision of an unsealed road as a fit for purpose solution to the transport needs of Andromeda Metals.

The number of vehicles alone on this unsealed road will dramatically increase the dust from the base line this area currently experiences. *Council therefore requests Andromeda Metals conduct air quality testing and provide monthly reports to the community and land holders adjacent to the Poochera Port Kenny Road for the entire period the road remains unsealed. There should also be a guarantee that should dust levels exceed the 100ppm at any time of operation, the road will be sealed immediately as a priority and in consultation with those affected by this work.*

*Council strongly request the Poochera Port Kenny Road and Haul Out Road be bituminised prior to the commencement of mining. Council do however understand that there may be an engineering requirement to adequately compact the road base and would be willing to assist with negotiations to find a middle ground should that also be effective.*

Council cannot support the intention to not seal the road at any point. It is felt this is not a viable nor acceptable outcome for the Inkster Community, nor for Council. Council would also like to note that during the life of the mine, Council will not be responsible for the maintenance of the section of the Port Kenny Road, subject to the Type 2 Heavy Vehicle movements required by Andromeda Metals to undertake the mining of Kaolin for the life of the mining operation.

## Safety

During the April Ordinary meeting, those attending to voice their concerns discussed the matter of the school bus that would need to share the area. Andromeda Metals have said that they will not allow movements of trucks during school bus hours and Council sincerely hope that this will be the case, however remain concerned it will become impractical due to the number of movements required to meet production requirements. Council are not clear as to any strategies for ensuring this requirement is met and remains in place for the life of the mine.

Further, the area is a farming area and farming equipment is regularly moved along the route in question, much of that equipment is oversized but does not require permitting. The Inkster farmers are very concerned regarding how the interaction between their wide and oversized vehicles and the Type 2 Heavy Vehicles will be managed. Neither vehicle will be significantly able to “give way” to the other and it is envisaged this will disrupt both farming and mining operations if not addressed prior to mine construction and commencement. The Inkster community have strongly suggested increased collaboration is required with Andromeda Metals to ensure these matters are actually dealt with and not mentioned superficially without sufficient solutions agreed to.

## Duplication of Water Line to Site

Finally, Andromeda Metals are working with SA Water to duplicate the water service line from the Todd Trunk Line, along the Streaky Bay Highway and then branching off to the Great White Kaolin Project site.

Council has made Andromeda aware of our concerns regards this plan as Council has for many years advocated for increased access to water supply to no avail. The line that services Streaky Bay is neither large enough or able to hold the pressures required to deliver sufficient supply to the area. Those SA Water Customers serviced by the Streaky Bay line in the Poochera area have noticed significant reduction in access to that water as Streak Bay has grown. The water supply to Streaky Bay is now at capacity and no further connections are permitted by SA Water so those houses currently being built in Streaky Bay have to rely on rain water\* or water that is trucked onto their sites.

Concerns are raised that the increase of requirement from the Todd Line (through the duplication of the line to the mine site) will further reduce the pressure for customers already having issues with service. Response to this matter has not been adequately answered by either SA Water, nor Andromeda Mines to the effect that they will guarantee farmers in the area will not be adversely affected by the implementation of this extra supply to the Andromeda site.

\* it should be noted rain fall in the area averages approximately 300mm per year.

## Conclusion

Council and the community are very excited by the prospect of attracting new employment to the region and do want the mine to succeed. We do not however wish to compromise the needs of our community as far as their health and welfare are concerned and feel the concerns raised are valid and still require addressing.

It is Council's contention therefore that the following matters require addressing prior to the issuing of either the Mining Lease or the Miscellaneous Purposes Licenses.

1. Andromeda Metals must respond to the concerns raised by the Careys regarding their proximity to the mine site, including noise, dust and structural damage.
2. Andromeda Metals must take responsibility for air quality and noise testing to ensure farmers affected by the operations (those on the Careys' farms, those adjacent to the perimeter of those farms and those adjacent to the Poochera Port Kenny Road) are taken at least daily during operational and high use times. These tests should be made public to ensure transparency of operation.
3. Consultation regarding the bituminising of the Poochera Port Kenny Road and Haul Out Road should be facilitated between the Council and Inkster community with a view to reaching a satisfactory outcome for all parties. Consultation regarding this matter is seen as an extremely high priority for this community.
4. Water cannot be wasted in this area. There simply is not enough water to support wastage of the type described. An alternate option may be discussed during the consultation noted above.
5. Both Andromeda Metals and SA Water need to assure water users in the area that their access and pressures will not be affected by the duplication of the line through to the Great White Kaolin Project site.

## Submission of Matthew Carey

District Council of Streaky Bay

21<sup>st</sup> April 2021

Andromeda

Great White Kaolin Project

Matthew Carey

Major land holder affected

### Introduction:

I'm here today to speak about the Mining Proposal and Miscellaneous Purposes Licence application for the Great White Kaolin Project.

I'm representing my family including: parents, Ray and Ellen, bother Damian and wife, Mary. The proposed mine lease is approx.  $\frac{3}{4}$  on our land and the remainder is on our neighbours / cousins land, Shaun and Patrea Carey.

We have farmed here for 95 years. The mine will have an economic impact on our business, create a noise nuisance for our two residences and nearby neighbours as well as stock, and the dust will impact the visual amenity for our homes and adjoining land.

The mine will take up 270 hectares of our land. This land isn't easy to replace. This is some of the best land on our property.

As the closest impacted residences to the mine at 800m and 2.8kms, we are very concerned of the impact it will have on our lives. We feel the dust and noise studies haven't come to any substance to give us clarity of what it will be like to live close to this mine. This includes dust collecting on our roof/gutters, dust affecting adjoining paddocks including crops and stock. We would love to stay living in our house and district but there is no guarantee.

On a number of occasions in meetings they have said they would be doing bitumen along Port Kenny Road to the mine entrance. In the LMA there is nothing mentioned about this. We would like some feedback from council in regard to what they were told about road sealing?

The page I have given you represents the houses impacted by dust and noise. Seven of these receptors to the mine are currently occupied. The dust and noise will obviously change the environment we live in. The dust particles includes silica and nitrous dioxide. The health impacts of dust created by the mine have not been explained to us.

They will be using explosives for Blasting this may have an unknown impact on our buildings and livestock. Their blasting documentation is inconsistent in details on frequency (from every day to every 3 months). The impact of blasting to underground water is unknown.

Andromeda has indicated a lot of local employment opportunities from the mine development but from reading the proposal, the machinery requirements and mine operation details, it seems the indication of local jobs (76) is very optimistic. A lot of the employment will be for truck driers and we see these positions being taken up by contractors who will live elsewhere.

## Submission of Matthew Carey

We have no assurances that the mine will be limited to only this parcel of land. As this mine has developed so has the size of land they wish to acquire and there is no guarantee further land acquisitions will not be required in the future.

The mine is wanting SA Water to provide up to 10L/second for stage 2. This is 864000 L per day. The impact of this one current line users pressure is a little vague and so is the impact of Streaky Bay town water.

Water and Roads concerns will effect the rate payers of the area.

The time taken up by the mine is exhaustive and takes away focus of what we want to do .... Farming!

We have been left extremely disappointed that neighbouring landowners were not notified of the MLA being lodged and it was left up to us to advise our neighbours. Andromeda Metals only contacted these neighbours after we contacted the Department of Mining to voice our concerns.

One two occasions over the last fortnight we have met with neighbours and nearby land holders to inform and discuss questions in regards to our major concerns of dust, noise, road use and water and the impact it will have on the community. We are fully supportive of our communities concerns.

We are also fully aware that some community members will support the mine proposal. If the proposal is approved and the mine is built and goes ahead, we also hope it will benefit the community with jobs and other opportunities.

Thank you for listening. I am happy to answer any questions you may have.

## Submission of Clint Tomney

### **Mayor – Elected Members – Council Staff**

Thank you for the opportunity to present to you the Inkster community's views on Andromeda's Great White Kaolin Project Mining Proposal.

The Inkster community group has met on two occasions since the notification of the mining proposal.

The group can see some benefits to the community if the project was to progress forward. However some issues have been identified in the mining proposal to be of concern.

Mining company Andromeda has identified nine immediate landholders affected by their mining proposal. The level of engagement is listed as high for this group of Key Stakeholders. Excluding mine landholders, the level of engagement has been very close to zero since early October 2020.

This group was informed that a mining proposal had been lodged by the mine landholder. The community agrees that this is totally misrepresented in the mining proposal documents. Support was given that Andromeda's conduct has been unacceptable.

We have a number of concerns regarding Andromeda's conduct toward mine landholders and the Inkster community.

The groups strongest feelings were towards making sure mine landholders were adequately compensated.

The mining proposal has identified several local issues that are of great importance to the community.

### **Roads**

All indicated haul routes include the Poochera/Pt Kenny Rd. At no stage does the proposal indicate that the above mentioned road be sealed.

Some facts the proposal includes are

- Up to 8333 vehicle trips per year
- Use of A-triple or Quad heavy vehicles
- Stage two night HV movement
- This is a school bus route, that will in the future use the Poochera/Pt Kenny Rd 9 kilometres past the end of the haul road.
- Proposal states that no HV movements during school bus times.
- Up to one HV movement every 10 minutes during daylight hours minus 2 hours for school bus closure. Equals on HV movement every 7 minutes.

The groups concerns include

- Failure to comply with School bus exemption
- Dust
- Slow moving vehicles (60 to 70 km/hr)

## Submission of Clint Tomney

- All weather capability
- Extended road closures for maintenance
- Farmer oversize machinery transport
- Harvest HV traffic

The group feels very strongly that the District Council should support that haul routs should be seals, including widening of the shoulder on the Streaky Bay Road to Poochera. This should be non-negotiable to the approval of the mine application.

If the road is not sealed the community would not feel safe using this council road. Concerns were also raised about the use of council funds to upkeep the gravel road.

### Water

All local landholders area connected to SA Water mains supply.

With the neighbouring landholder to the mine using underground water also.

Andromeda's water requirement for stage two of mining is listed at 10 litres/sec.

Throughout the proposal SA Water's language differs I their commitment to fulfil Andromeda's requirement. SA Water also seem unsure of the impact on existing customers.

In different parts of the document SA Water state both that:

- Andromeda's proposal should only have a minor impact on supply and pressures in the region
- Water supply would be subject to ensure water supply pressures existing customers is not impacted

Several local landholders have very recently invested in water infrastructure to improve their livestock carrying capacity as well as for crop spraying.

The group would like a little more commitment from SA Water to confirm that their current supply and pressure will be unaffected.

Groundwater consultants Aldam Geoscience have modelled groundwater beneath the project and advised the extraction (for dust suppression) **is not likely to affect local ground water users.** This language is of great concern. Within four kilometres of the mine, groundwater has been used for stock water and crop spraying since he mid 1950's. The landholders stock watering system is dependent on the windmill and solar pump.

Groundwater concerns include

- Dropping of water level
- Supply
- Salinity increase

## Submission of Clint Tomney

### Dust

General mining operations together with an overburden pile of 18 metres high will creast dust issues for the community and the environment.

Andromeda has committed to undertake air quality monitoring by measuring and monitoring dust around the perimeter of project as required.

Dust will not only effect the perimeter of the mine area.

The community feels strongly that the current proposal for dust monitoring is inadequate. Support was gained for expanded dust monitoring programme to include a greater diameter.

Overall concerns for the company to control dust were apparent within the group.

The farming community is based on

- Wool production
- Pasture for feed
- Growing and spraying of crops

The ability to produce cereal grains and livestock at current levels should continue.

Personally, my first trip to Iluka was during construction. During the induction it was presented similar to the Application – spraying for dust suppressants on the overburden pile. However my last trip, two years ago, the induction simply stated winds above X – it is a total dust goggle day.

The community would like the councils support for the above mentioned concerns to be included in their submission to the mining proposal. Due 29the April 2021

I will try to answer any questions you may have to the best of my knowledge.

Thank you for your time.

Clint Tomney



for the Inkster Community

**From:** Clint Tomney [REDACTED]  
**Sent:** Tuesday, 27 April 2021 7:47 PM  
**To:** DEM:Mining Reg Rehab  
**Subject:** Andromeda Great White Kaolin Project  
**Attachments:** mine submission final.docx

## **RE: ANDROMEDA GREAT WHITE KAOLIN PROJECT**

I am writing this personally as the adjoining landholder as well as the spokesperson for the Inkster community group.

The group can see some benefits to the community if the project was to progress forward. However some issues have been identified in the mining proposal to be of concern.

Mining company Andromeda has identified nine immediate landholders affected by their mining proposal. The level of engagement is listed as high for this group of Key Stakeholders. Excluding mine landholders, the level of engagement has been very close to zero since early October 2020.

This group was informed that a mining proposal had been lodged by the mine landholder. The community agrees that this is totally misrepresented in the mining proposal documents. Support was given that Andromeda's conduct has been unacceptable.

We have a number of concerns regarding Andromeda's conduct towards mine landholders and the Inkster community.

The groups strongest feelings were towards making sure mine landholders were adequately compensated.

The mining proposal has identified several local issues that are of great importance to the community.

### **Roads**

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Some facts the proposal includes are

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- Up to one HV movement every 10 minutes during daylight hours, minus 2 hours for school bus closure. Equals one HV movement every 7 minutes.

The groups concerns include

- Failure to comply with School bus exemption
- Dust
- Slow moving vehicles (60 to 70 k/h)
- All weather capability
- Extended road closures for maintenance
- Farmer oversize machinery transport.
- Harvest HV traffic

The group feels very strongly that the haul route should be sealed, including widening of the shoulder on the Streaky Bay Road to Poochera. This should be non-negotiable to the approval of the mine application.

If the road is not sealed the community would not feel safe using this council road. Concerns were also raised about the use of council funds to upkeep the gravel road.

## Water

All local landholders are connected to SA Water mains supply. With the neighbouring landholder to the mine using underground water also.

Andromeda's water requirement for stage two of mining is listed at 10 litres/sec.

Throughout the proposal SA Water's language differs in their commitment to fulfil Andromeda's requirement. SA Water also seem unsure of the impact on existing customers.

In different parts of the document SA Water state both that;

- Andromeda's proposal should only have a minor impact on supply and pressures in the region.
- Water supply would be subject to ensure water supply pressures existing customers is not impacted.

Several local landholders have very recently invested in water infrastructure to improve their livestock carrying capacity as well as for crop spraying.

The group would like a little more commitment from SA Water to confirm that their current supply and pressure will be unaffected.

Groundwater consultants Aldam Geoscience have modelled groundwater beneath the project and advised the extraction (for dust suppression) **is not likely to affect local ground water users**. This language is of great concern. Within four kilometres of the mine, groundwater has been used for stock water and crop spraying since the mid 1950's. The landholders stock watering system is dependent on the windmill and solar pump.

Groundwater concerns include

- Dropping of water level
- Supply
- Salinity increase

## Dust

General mining operations together with an overburden pile of 18 metres high will create dust issues for the community and the environment.

Andromeda has committed to undertake air quality monitoring by measuring and monitoring dust around the perimeter of project as required.

Dust will not only effect the perimeter of the mine area.

The community feels strongly that the current proposal for dust monitoring is inadequate. Support was gained for an expanded dust monitoring programme to include a greater diameter.

Overall concerns for the company to control dust were apparent within the group.

The farming community is based on

- wool production
- lamb and mutton production
- pasture growth for feed
- growing and spraying of crops.

The ability to produce cereal grains, wool and livestock at current levels should continue.

Thank you for the opportunity to reply to this application. As it currently stands, there are several areas which are unacceptable and need to be altered to suit the community who will be directly affected by Andromeda operating the Great White Kaolin Project.

Yours Sincerely

Clint Tomney

Tootla Well





From : Stuart McCall  
12 AB- Smith Road  
Streaky Bay 5680

22<sup>nd</sup> April 2021

[REDACTED]  
Phone : [REDACTED]  
[REDACTED]

To: Business Support Officer  
Dept. For Energy and Mining

Dear Sir/ Madam,

I am writing in support of the application for the Great White Kaolin Project by Andromeda Metals Limited. My partner Lisa Hong and I are residents of Streaky Bay my partner being the Pharmacist here.

We are both excited by the opportunities this project would create for the businesses and residents of Streaky Bay. The increased trade for local businesses and job opportunities for locals would give our township a much needed boost as well as the added flow on effect to infrastructure and population growth.

May we exhort you to give Andromedas application a positive review and outcome.

Yours Sincerely

  
Stuart McCall and Lisa Hong

Business Support Officer  
Mining regulation Branch  
Department of Energy and Mining  
GPO Box 320  
Adelaide SA 5001

Alan Lange



Dear Sir/Madam,

I am writing to you as a resident of the Streaky Bay township, in support of the Great White Kaolin Project Mining Lease.

I believe that the Andromeda Metals Kaolin project at Careys Well is a must for the growth of the Streaky Bay Township & the surrounding districts, for employment opportunities & financial well being for the town.

The up & coming generation will require work & livelihood within the town as the farming industry continues to struggle due the lack of rainfall we receive each year.

The town also needs new industry to be able to make improvements within the community in the future. A successful mining operation would support this.

Andromeda Metals have put forward a great display of the project, a well laid out plan for mining & the rehabilitation of the mine site.

We believe that this mine will put the West Coast on a World Map with the Tourism & financial benefits that will flow.

I Thank all the team for their great work & look to the State Government to also see the positive benefits of getting behind a project such as this for the West Coast township of Streaky Bay.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Alan Lange'.

Alan Lange

**From:** sharon [REDACTED]  
**Sent:** Wednesday, 28 April 2021 11:42 AM  
**To:** DEM:Mining Reg Rehab  
**Subject:** Submission Great White Kaolin Project  
**Attachments:** SUBMISSION.docx

Sent from [Mail](#) for Windows 10

**SUBMISSION**

Ref: T-FILE # 2020/000765

Great White Kaolin Project – Poochera

Attn : Business Support Officer, Mining Regulation Branch

As a former Councillor with the District Council of Streaky Bay for many years, I have followed the progress of the Great White Kaolin Project between Poochera and Streaky Bay with interest.

While testing at the mine site in recent years, Andromeda has progressed the project using Streaky Bay premises, and supporting local businesses where possible.

This project is exciting for both the Streaky Bay and Poochera districts for the following reasons.

- It will create local employment:
  - \*An opportunity for local trucking companies.
  - \*Opportunities for Contractors and Businesses.
  - \*Exciting prospect for a new multi commodity Deep Sea Port on Eyre Peninsula.
  - \*A tourist attraction of the future.

I also believe that the possibility of value adding on the raw product on site has merit.

My personal view is that Andromeda has the support of local Government, and a large majority of the residents in the area.

I would like to think that a condition of the lease should be that local people and businesses receive priority for jobs on site, where possible.

Thank you for the opportunity to express my personal support for this project.

Yours faithfully

Trevor Gilmore

[REDACTED]

[REDACTED]

[REDACTED]



**From:** Tegan Hull [REDACTED]  
**Sent:** Wednesday, 28 April 2021 8:08 PM  
**To:** DEM:Mining Reg Rehab  
**Subject:** Andromeda Great White Kaolin Project submission  
**Attachments:** Hull Family Submission.docx

Sent from [Mail](#) for Windows 10

## Andromeda Great White Kaolin Mine Submission

28/4/2021

To whom it may concern,

As a family with young children, living in a community with a small amount of people and a small amount of traffic, a mine in the area brings promise and also emotions of concern. We believe that the proposed mine at Careys Well site could be a mine that is prosperous for all involved, IF THE MINE IS MANAGED WITH A SAFE, THOUGHTFUL, TRANSPARENT AND CONSIDERED APPROACH.

We as a family believe that whilst Andromeda have investigated the short term and long-term impacts on the local area and local community, some studies they have undertaken have baffled us that have local knowledge. E.g. The number of trucks increasing on the Poochera-Port Kenny road from a current 2-3 on a day during any day other than seeding and harvest period, to a staggering one every 10 minutes, and claiming an overall increase of <1%. This same road is used every morning and afternoon by a local school bus. Another example is the water usage; it is noticed by farmers that when stock drink in late evening and early morning that the pressure of water in the SA Water infrastructure drops dramatically, thus the allocation of 10litres/second would have dramatic impacts on not only the local community but would be very likely to affect the township of Streaky Bay and abroad.

Terms that we see for this mine to go ahead for the community to be safe and productive as it is today;

- Bituminise the Poochera-Port Kenny Road from Streaky Bay Road as far south as Tootla Road.
- Liaise with Streaky Bay Council for the widening of the shoulders where school busses use the existing bitumen road along the Streaky Bay to Poochera Road.
- Dust suppression on all other roads/roadways that are in use.
- Usage of the roads during school bus periods is not allowed, this must also be monitored.
- If a primary producer's vehicle is on the road and a vehicle must give way, it be the mining vehicle that is to give way.
- Spring/Summer/Autumn/Winter monitoring of pressure/flow of the SA water infrastructure in the local area be monitored prior to the mine being connected to the line.

If any of these cannot be carried out, our family believes that the project could damage the local community and we could not be in favour of the mine going ahead.

Other issues that are of concern are the daily running of farms; often livestock are mustered down roadways in pursuit of another paddock for feed. We have not seen any information about the safety for stock on roads used by haulage trucks etc. Could we please see some information on how these circumstances would be handled? Another issue would be large seeders and sprayers sharing the road with such big heavy trucks, as well as the number of "farmers" trucks that would be on the same road at harvest time.

We also have concerns for the users of the Eyre Highway, the highway is a very busy road with numerous types of vehicles doing predominately one speed. What speed would the haulage trucks using the highway be capable of by law?

We would encourage the management of this project to be very transparent and conscientious in the preparation of entering the agreement with the landholders and the immediately neighbouring properties as this would hold the relationship with the mine and community strong into the future.

Regards,

Geoff and Bronwyn Hull

Leroy and Kelsey Hull

Rohan and Tegan Hull

Please send any replies to [REDACTED]

**From:** Tony Griffin [REDACTED]  
**Sent:** Wednesday, 28 April 2021 7:25 PM  
**To:** DEM:Mining Reg Rehab  
**Subject:** Andromeda Metals - Great White-Kaolin Project / Letter of support

To whom it may concern,

We are the Lease Holders of the Wudinna Hotel Motel and wish offer support for the Great White-Kaolin Project which is located approximately 70km east of the Wudinna township.

As the farming methods improve land holdings are becoming larger and it is important to subsidise economic stability with alternative projects such as the Great-White proposal on the Eyre Peninsula.

Whilst recognising the impact on individual farmers; I feel that we need to support these type of projects to maintain hospitals, general service facilities, sporting clubs and strengthen local business operators.

Kind Regards,

Tony Griffin  
Managing Director



15-17 Burton Terrace, Wudinna SA 5652  
[wudinnahotelmotel.com.au](http://wudinnahotelmotel.com.au)

**From:** Kaine McEvoy [REDACTED]  
**Sent:** Thursday, 29 April 2021 4:16 PM  
**To:** DEM:Mining Reg Rehab  
**Subject:** T-FILE # 2020/000765 Great White Kaolin Project - Poochera (MC 4510) Submission  
**Attachments:** MC4510.pdf

To whom it may concern,

Please find attached our submission with respect to the above project.

Kind regards,  
**Kaine McEvoy | Operations Manager**  
**McEvoy Transport**  
Mob: [REDACTED]  
Ph: [REDACTED]  
E: [REDACTED]  
W: [www.mcevoytransport.com.au](http://www.mcevoytransport.com.au)

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# McEVOY

## TRANSPORT

*"We Care For Upper Eyre"*

**Adelaide Depot & Head Office**  
6-18 Railway Tce  
DRY CREEK SA 5094  
PH: 08 8260 5700 FAX: 08 8260 2251  
ABN: 54 570 034 754

23<sup>rd</sup> April 2021

Mining Regulation Branch  
Department for Energy and Mining  
GPO Box 320  
Adelaide SA 5001

To whom it may concern,

**Re : T-FILE # 2020/000765** Great White Kaolin Project - Poochera (MC 4510)

We write in support of the above mining proposal.

McEvoy Transport is a family owned freight and logistics business operating between Adelaide and its depots in Ceduna & Streaky Bay on the West Coast. We have strong community ties in the towns impacted by the proposed mine (Streaky Bay and Poochera) as we service local businesses and families in these areas and surrounds. We are also strong supporters of local community groups and sporting organisations through sponsorship and donations.

We advise that have been a part of the consultation process for this project having had direct contact with the Applicant, as well as through attendance at the "drop-in" days. As a local business we have registered our interest in supply chain opportunities and as an existing supplier of services to the Applicant, we are hopeful that there will be an economic benefit to our organisation.

McEvoy Transport has operated on the West Coast since 1990 and the McEvoy family has witnessed the economic benefits that large scale projects like this can bring to the local communities through increased employment, increased spending with local businesses and investment into local infrastructure. During our long standing relationship with the mining company Iluka Resources, the town of Ceduna and its local businesses have been beneficiaries of the economic benefits discussed.

We have every confidence that there will be similar benefits accruing to Streaky Bay and Poochera, should this mining proposal be granted. Accordingly, we are pleased to support this proposal.

Yours Sincerely,



**KAINE MCEVOY**  
OPERATIONS MANAGER

---

**Ceduna Depot**  
82 McKenzie Street CEDUNA SA 5690  
PH: 08 8625 3334 FAX: 08 8625 3387  
ceduna@mcevoytransport.com.au

**Streaky Bay Depot**  
25 Jubilee Rd STREAKY BAY SA 5680  
PH: 08 8626 1602 FAX: 08 8626 1211  
streakybay@mcevoytransport.com.au

**From:** Carey Bros [REDACTED]  
**Sent:** Thursday, 13 May 2021 12:58 PM  
**To:** DEM:Mining Reg Rehab; Carey Bros  
**Subject:** Submission Carey Brothers Great White Kaolin Project T-FILE # 2020/000765  
**Attachments:** Submission Carey Brothers Great White Kaolin Project MC4510 T FILE 2020 000765.pdf

To whom it may concern.

RE: T-FILE #2020/000765

Please find our submission attached.

If required, further details can be obtained from [REDACTED]

Yours sincerely,

Ray & Ellen Carey  
Matthew & Mary Carey  
Damian Carey

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Carey Bros Family Trust  
RA Carey & Sons Pty Ltd

[REDACTED]  
[REDACTED]  
[REDACTED]

Business Support Officer  
Mining Regulation Branch  
Department for Energy and Mining  
GPO Box 320  
Adelaide SA 5001  
Email: DEM.MiningRegRehab@sa.gov.au

13<sup>th</sup> May 2021

Reference T-FILE#2020/000765

Dear Sir,

**RE: Comment on Great White Kaolin Project Mining Proposal and Miscellaneous Purposes Licence Management Plans**

We would like to provide comment on the Great White Kaolin Project Mining Proposal and Miscellaneous Purposes Licence Management Plans (the proposal), which has been released for public comment by the proponent, Andromeda Industrial Minerals Pty Ltd.

We are a 3rd generation farming family, producing livestock and crops and contributing to the agricultural industry for over 95 years.

We have a deep connection to our property, which includes land currently proposed for the Great White Kaolin Project (the proposal).

Our homes, farming land and livestock will be greatly impacted by the proposal, which will have a negative effect on our economic viability and the environment in which we live.

Our two areas of largest concern relate to impacts associated with the generation of dust and noise by the proposal. These concerns are described below:

**Dust**

As one of the immediate land owners, we have continually expressed concern to Andromeda about the impact of dust from the mine on crops and pasture that will closely border the proposed mine site and road network. Quality Assurance is a big part of agriculture with livestock (meat and wool) and grain becoming highly regulated.

It is expected that dust emissions will be higher than current levels, and given we represent the closest ('R1' and 'R2') sensitive receptors, we have strong concerns about dust impacts on our health and homes.

It is disappointing that, where the proponent has addressed the dust emissions, it has been somewhat dismissive of the impacts on the locals that currently enjoy living and working in a rural setting. The

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management options developed to protect the health and wellbeing of the local communities seem superficial, non-specific and generic.

The proposal has not reassured us that dust will not be an impact on the homes and health of the local community, or that the proposed mitigation will genuinely attempt to reduce dust impacts from the project.

Given that we represent the R1 sensitive receptor, within 800m from the development, we want to see prepared (and have an opportunity to comment on a draft) a Dust Management Plan with specific measurable objectives and targets that can be monitored and tracked against threshold values. If threshold values are exceeded, this will trigger another series of contingency actions, which will also be specified in the management plan.

As R1, we would like to have access to this data in real time, and be able to track dust levels (against background) and compliance against Management Plan objectives.

Control measures that were used to develop the dust modelling, which resulted in compliance with criteria, must be incorporated into the Management Plan. Table 13 of Appendix F (Northstar Air Quality 2020) details the emission control factors that (we assume – please confirm) have been used in the dust modelling presented in the Mining Proposal. These control factors (as a minimum) must be implemented (not ‘as required’) and written into actions of the Dust Management Plan. For example, as per NPI (2012), as cited in Appendix F, topsoil removal and handling controls are based on soil that is naturally or artificially wet (Table 4 of NPI 2012). Table 13 also refers to Katestone (2011), and as such control measures cited from this document must be prescribed. Table 95 of Katestone (2011) states that 50% control (effectiveness) will be achieved through water sprays on ROM Pad and ROM bin. Given these references are cited in the Mining Proposal, it is expected that they will be adhered to in the Management Plan.

## Noise

We are not satisfied with the rationale to use Part 4 of the Noise EPP relevant criteria, which is based on an average of the indicative noise factors for the source and receivers. This doesn’t take into account the rural setting of the proposal area and the nature of the development. This is not an area that we have technical expertise in and we would appreciate some independent advice on this.

We believe that relevant criteria should be based on Part 5 of the Noise EPP, which is based on the following thresholds for sensitive receivers in a ‘Rural Living’ land use category:

- 47 dB(A) during the day, 7 am to 10 pm
- 40 dB(A) at night, 10 pm to 7 am

We feel that the use of Part 4 criteria is disingenuous to the impact assessment process, as set out under the Guidelines for use of the Environment Protection (Noise) Policy 2007. By using Part 4 criteria, there is an increase in 10 dB(A) for day (57 dB) and night (50 dB) values, which allows the model as presented in the Mining Proposal to be compliant. This subsequently reduces the perceived risk, minimises the potential impact and negates the need for costly noise mitigation requirements.

Regardless of Part 4 or Part 5 criteria, the proposed exceeds construction noise limits and as such requires more mitigations to reduce the risk. All reasonable and practicable measures must be undertaken to minimise noise due to construction activities (Resonate 2020, Appendix L)

As with the dust mitigation, there has been no genuine consideration of noise mitigation measures from the proposal area when developing the model. No noise barriers have been considered, the mine plan has only

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considered the use of topsoil stockpiles (which should be no more than 2m) between R1 and the mine pit. No large overburden stockpiles have been considered in the design to act as a noise buffer for R1. No offer to install noise barriers at the house (R1), including noise reduction/sound proof windows.

Indecently, the only offer to date has been an offer to purchase the land and an offer for improvements to the residence (R1) or towards construction / purchase a home at a new location, done in bad faith without consideration of what the family would prefer. As land and homeowners, we did not appreciate being offered money to purchase our land during the public review period. Not only does this not align with the proponents Community Engagement Policy 'to build and sustain relationships with stakeholders that are meaningful and respectful', it was considered inadequate compensation for the loss of productive land and a family home that is over 85 years old.

As with dust, we want to see prepared (and have an opportunity to comment on a draft) a Noise Management Plan with specific measurable objectives and targets that can be monitored and tracked against threshold values. If threshold values are exceeded, this will trigger another series of contingency actions, which will also be specified in the management plan. The management plan must also include baseline monitoring of conditions prior to development and blasting, including on the structure of R1 (85-year-old family home), in order that the structure be compared against these baselines post development and post blasting.

Appendix L of the Mining Proposal (Resonate 2020) state that given that mobile plant operations have the potential to exceed night-time criterion, it is expected that noise monitors will be installed at sensitive receptors to monitor levels at their residence. Resonate (2020) (Appendix L) also state that if the landowners consider the noise levels to be in exceedance with current regulations, an independent review be undertaken at the expense of the proponent. We agree with this recommendation and will expect this in the Noise Management Plan.

Appendix L (Resonate 2020) recommend that construction activity be limited from Monday to Saturdays (excluding public holidays), from 7 am to 7 pm and that all reasonable and practicable measures must be undertaken to minimise noise due to construction activities. This is another recommendation for the Management Plan.

It is not clear from the Mining Proposal or Appendix L if rock breaker equipment is to be used (not listed) and if so, has this extremely noisy machinery been factored into the model. Given it has already been used on site it is assumed that it will be required during development. If a rock breaker is not factored into the model, this needs to be reexamined.

It is also not clear from the Mining Proposal or Appendix L what topographic conditions are used in the model. For example, the Mining Proposal states that the ROM will be located 4 m above the current position. Has this, and other land surface changes been factored into the noise model.

Finally, Figure 8 of the Appendix L (Resonate 2020) shows a contradictory layout to that of the Mining Proposal. The 'soil stockpile' layer in Appendix L is the 'overburden' layer in the Mining Proposal – and vice versa. We would like confirmation on the correct layout at the mine. Presumably, the soil stockpiles are smaller and less likely to buffer noise impacts compared to overburden stockpiles. We would like to confirm the true overburden and soil locations and how this compares to what was used in the noise model.

### **Other comments**

As a landowner, we currently operate livestock over all our property. The two main paddocks affected by the proposed mine have significant grazing value as well as abundant shelter for sheep during adverse weather conditions.

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No other paddocks on our home property have the equivalent shelter for livestock. If this land is unavailable, it will significantly affect our livestock operation. Our sheep (ewes) lamb in late winter and having this shelter is very important during this time. Losing it will be a big loss to our farming enterprise.

Our sheep feedlot is located within 400m of the proposed mine. What measures will Andromeda implement to ensure the health and safety of our livestock in regards to dust, noise, especially blasting, to eliminate the impact on our feedlot?

Andromeda representatives have always advised us the Poochera Port Kenny Road would be bitumen. It was only from reading through the MLA that it was discovered that there are no plans for bitumen. We do not think this is acceptable for the safety of the community for this amount of heavy traffic of a public unsealed road.

The community is always concerned about water security. Landholders nearby only get just enough pipeline water (SA Water) because of lack of flow. Andromeda need to provide more information on SA Water supplies at Poochera so undue pressure is not placed on the Eyre Peninsula and local water network.

The approval of the proposed development will affect our lifestyle significantly. We hope to live at R1 residence for years to come. Andromeda representatives have also advised they would prefer us not to live here. Background noise is nearly non-existent at R1 presently. Living with a mining operation 24 hours per day, 7 days a week for 26 years will change the environment we have come to know and love. The noise, vibration and dust generated by the proposed development will be life changing for us.

Over the last 18 months the mine boundary has increased considerably with no consideration to us as landowners. We have felt let down by Andromeda with the mine lease footprint moving more to the north and west than we were advised. Even now during the MLA submission period, Andromeda have distributed an ASX media release advising current exploration drilling will potentially extend mineralization to the north of the deposit. This is very concerning to us as more agricultural land could be at risk and again our farms economic viability into question.

A summary of other comments from throughout the document are presented in the table below.

### **Conclusion**

The issues summarised in this letter and Table 1 should be addressed. If required, further details can be obtained from [REDACTED]

Yours sincerely,

Ray & Ellen Carey  
Matthew & Mary Carey  
Damian Carey

**Table 1. Summary of comments from Great White Kaolin Project Mining Proposal**

The page numbers below relate to the hard copy version provided by Andromeda (not the online version).

Section	Sub heading	Page	Mining Proposal text	Comment
2 Existing Environment	2.5.2 Acid Forming Material	39	The samples were classified as either potential acid forming (PAF), non-acid forming (NAF), NAF-acid consuming material (ACM) or uncertain (UC).	Not clear from document how much PAF has been estimated in the waste (volumes) and how it will be managed to ensure there are no risk to the surrounding land from potential Acid Mine Drainage.
	2.5.3 Voids	42	It is unknown if the fill has bridged over rubbish previously dumped down the abandoned well.	As the landholder, we are unaware of any rubbish being dumped down this well in the past.
	2.8.2 West coast mintbush spring survey	65	Three transects, each greater than 3 km, were surveyed for West Coast Mintbush.	One transect isn't sufficient to confirm the presence of species of conservation significance. A targeted survey consisting of closer transects (10 – 50m depending on terrain and vegetation density) across all areas considered likely or possible to contain habitat if more appropriate. This approach would more accurately confirm the presence of West Coast Mintbush or other conservation significant flora.
	2.12.4 Land Use	88	Includes approximately 162 ha of cropping land, approximately 0.013% of the cropping area within the Eyre Peninsula region	The proposed development represents 6% of productive farming land for the land owner.
	2.12.4 Land use	88	Consultation with landowners and the DCSB have not revealed any plans for future land use changes by other parties.	We as landowners, we did not appreciate being offered money to purchase our land during the public review period.  Not only did this action not align with your community engagement policy 'to build and sustain relationships with stakeholders that are meaningful and respectful', it was considered inadequate compensation for the loss of productive land and a family home over 85 years old.
	2.13.1 Housing	93	The location of sensitive receptors is detailed in Section 2.16 Noise.	This refers to Section 2.16 Noise but does not refer to Dust impacts for sensitive receptors for housing.
	2.18 Proximity to conservation areas	102	There are no conservation areas located within or within proximity to the proposed development.	Is there any impact to nearby /bordering vegetation heritage agreement areas (as shown in Fig 2-37)?  The vegetation heritage agreement areas border mine site and road.
3 Description of proposed development	3.1 General Description	106	24-hour, seven days per week basis.	Other parts of the document refer to 6 day working week – please confirm the proposed hours per mining stage (Construction, Stage 1, Stage 2).  Recommendations in Noise and air quality reports aren't modelled on 7 days (please confirm).

Section	Sub heading	Page	Mining Proposal text	Comment
		108	Figure 3.1 	<p>This map includes outlines of soil stockpiles (circled in red) which have not been included on previous discussions. There is no description of how long these stockpiles will remain in place, how high they will be and if they genuinely offer any noise buffering properties. A better option might be to put the overburden here (instead of topsoil stockpiles) as it can be stockpiled higher and provide a better buffer (given soils stockpiles are generally no higher than 2m).</p> <p>Given this is the area that will buffer the noise, dust and visual amenity - there should be more thought into placing a bund along here from overburden or top-soil or a dense planting of trees and shrubs prior to implementation.</p>
	3.1.1 Summary of Alternatives considered – Mining	111	the overburden contains harder silcrete and calcrete which will require breaking.	Is a 'rock breaker' going to be required/used? These machines are extremely noisy and don't seem to be factored into the noise model (not on the list of equipment)
	3.1.1 Summary of Alternatives considered – Mining	111	Where this (silcrete and calcrete) cannot be ripped with a dozer, drill and blast will be utilized. This will not be a continuous activity and is anticipated to be no more than once a month.	This statement contradicts Table 12.4 (page 318) which lists blasting frequency during construction, Stage 1 and Stage 2 as "Quarterly, if required". How often will blasting occur? A Blast Management Plan will be required.
	12.4.1	318	Table 12.4	Table 12.4 lists the Volume of material of material to be removed per blast as between 3000t and 9000t. How will this impact the stone structures at R1?
	3.1.1 Summary of Alternatives considered - Rehabilitation	112	As the mine is refilled the topsoil will be replaced and the area revegetated.	Will the area be revegetated with native vegetation or will it be made available for cropping/pasture as the mine is backfilled – not clear.
	3.4.2 Open Pit	135	Fig 3.7. 	<p>There seems to be an open area (in between Pit 4 and exterior of Pit 15) but not clear what it's for – noise/ dust buffers?</p> <p>We have always requested less land be sterilized from agriculture.</p>
	3.4.5 ROM Stockpile	140	The ROM stockpile is included in the mining schedule and is approximately 75,000 tonnes. This stockpile will be approximately 4 m high.	Does the noise assessment / model take into account that the ROM will be 4m above current levels?

Section	Sub heading	Page	Mining Proposal text	Comment
	3.4.6 Use of explosives	142	Blasting will be undertaken as required and is expected to occur no more than monthly, although more likely on a quarterly basis and between 7am and 7pm weekdays.	Inconsistent messaging on the frequency of blasting.  Will a Blast Management Procedure Plan be developed that includes details on what the applicant needs to do prior, during and after a blast including how much notice to give landowners? Will this plan be available to landowners?  Also Blast Management Plan to include monitoring of impacts associated with blast vibrations, including infrastructure damage.  Ensure that vibrations are assessed. An assessment of local infrastructure (including houses) should be undertaken to determine a baseline prior to any implementation.  The blast monitoring may be included in the Blast Management Plan
	3.4.6	144	Figure 3.12	What does the soil stockpile represent? How high will they be? How will explosive Magazine site be built on soil pile
	3.4.7 Type of mining equipment	145	Table 3.13 -	Please confirm if a rock breaker be required? These are extremely noisy and should be factored into any noise modelling.
	3.4.8 Mine dewatering	147	Any collected water would be used for dust suppression onsite.	How and where will water be collected and stored – assuming water will not be required for dust suppression during rainfall events, and so water collected during these times will need to be stored for drier conditions. Has a water collection sump/tank etc. been factored into the disturbance footprint?
	3.4.9 Sequence of mining and rehab operations	149	The bund wall would be located around any remaining pit void and outside the area designated as being susceptible to wall collapse (DIR 1997).	Will there be a pit void remaining at closure?  The closure (post mine) environment has not been properly described.  It is not clear what proportion will be returned to native vegetation and what proportion will be returned to pasture.  A detailed rehab plan should be submitted
	3.5.2 Processing Plant	151	The plant will operate continuously with an assumed operating time of 8,000 hours per year for 91.3% utilisation.	Does this equate to 6 or 7 days? Should this be 6 – operating hours for all stages are inconsistent throughout the document.
	3.5.4 Process water management	157	A small amount of groundwater may be recovered from open pit dewatering and can be used for internal mine road dust suppression, but this water source cannot be relied upon.	This is confusing – is there going to be dewatering at the proposal area or not. Dewatering requires storage and or discharge, which has not been discussed.

Section	Sub heading	Page	Mining Proposal text	Comment
	3.6.2 Other processing wastes	160	Some salt will be returned with the damp sand into the pit. The processing water will be put through an RO plant to produce clean water for reuse in the process....  ... The RO reject water is expected to be of similar quality to the in-situ groundwater.	Some salt to be returned to the pit, how much is 'some' - is there any potential impacts from an increase in soil salinity of the site - impacts on future production  How much water will this equate to over the life of the mine. What is the estimated quality of the RO reject (salinity levels)?  What are the potential impacts of this water on the soil for dust suppression?
	3.7.3 Public services and utilities used by the operation	164	During Stage One construction and operation, power will be supplied by onsite diesel generators.	Power - have the gen sets been taken into account in the noise assessment?  Water –  Stage 1 – 50KL per day trucked in from Poochera  Stage 2 – Various different references as to water usage for Stage 2. Water for stage 2 will come through SA Water pipeline to site. Here it is stated that water usage will be 25m <sup>3</sup> / day for operation phase but on page 157, Figure 3.21 the number is 25.5m <sup>3</sup> / hour (or 7.1L/s). Which is correct?  Stage 2: “Upgrades to ensure any water supply or pressure to existing customers are not impacted.” Who will guarantee existing customers are not impacted? SA Water or Andromeda?  Is SA Water or Andromeda undertaking the infrastructure works to deliver water to the ML from the junction of Streaky Bay / Pt Kenny Road?  Figure 3.21 requires 7.1L/s SA Water Potable but elsewhere in the document (pages 110 & 170) reference 10L/s from SA Water. What will the 2.9L/s be used for if available from SA Water?  It is stated that Streaky Bay is currently experiencing impacts to their level of service in regards to water supply (volume and pressure). How will Andromeda taking 10L/s affect the supply and pressure into Streaky Bay?  The applicant states it is open to considering landholder offtakes from the proposed water pipeline. Would this be through SA Water or the applicant? If the applicant requires 10L/s from SA Water through the pipeline for mining operations, what excess of water (L/s) can landholders’ access?  If offtakes were considered and granted for landholders, what would happen to this water supply in the event of mine closure?

Section	Sub heading	Page	Mining Proposal text	Comment
	3.8.1 Description of vegetation clearance	174	Proposed development has been designed in consultation with landowners and has included stipulations to minimize the disturbance of and direct impact to agricultural land where possible.	Over the last 18 months the mine boundary has increased considerably with no consideration to us as landowners. We have felt let down by Andromeda with the mine lease footprint moving more to the north and west than we were advised. Even now during the MLA submission period, Andromeda have distributed an ASX media release advising current exploration drilling will potentially extend mineralization to the north of the deposit. This is very concerning to us as more agricultural land could be at risk and again our farms economic viability into question. (Ref: Andromeda ASX Announcement, 4 May 2021. Drilling underway at Great White Deposit)
	3.8.1 Description of vegetation clearance	175	Table 3-18	Please re check this table or be make clearer:  Column 3, title (% in proposed tenement area to be cleared) - the title doesn't make sense as not always referring to tenements  Column 4, row 1 (257) if its 100% in the previous column, then why is this not 308ha (or whatever the number is in the second column) instead of 257ha?  Column 2, row 1 (318) – should this value be 308?  Column 1, row 5 (Inkster IBRA...) - IBRA doesn't necessarily represent native vegetation – more of a region (the table is about native vegetation)  Column 3, row 5 (0.1%) not representing native vegetation – not clear how this value is derived  Column 4, row 5 (257) - how can amount to be cleared be 257ha if there is only 151 ha of native vegetation in the mining lease (77% of which is going to be disturbed). Confused.  Column 2, row 14 (0), Water pipeline - Cleared land - should there be some cleared areas in this calculation. Is the total clearing footprint just 6ha within a 78ha envelope?
	3.9.1 Description of mine site at completion	179	At the end of operations, it has been estimated that the pit would have been approximately 2 km long, 1.2 km wide and 40 m deep, without considering the impact of progressive backfilling of the cutbacks.	What are the dimensions (length, width and depth) of the mine void post closure? It is presented in Fig 3-27 and 3-28 but no values are provided. What is the final loss of farming land post mine?
	3.9.1	180	Figure 3.27	Post closure pit – what are the dimension of the post closure pit. Will this pit be treated with the same rehab requirements as other parts of mine backfilled?
	3.9.1	180	Figure 3-27 and 3-28	The B line in 3-27 doesn't quite match up with what is presented in the cross section of 3-28.
	3.10.2 Energy Sources	182	Table 3.20	LPG Power generation. On site LPG fuel storage capacity of 100,000 t (196,000 L) with usage of 20 t per day for stage 2 operation. Are these amounts correct – please confirm?
4 Legislative Framework	4.1.1 Mining Act	187	EL 6588 owned by Great Southern Kaolin Pty Ltd and EL 6426 owned by Minotaur Operations Pty Ltd	are EL's owned? (or 'lease held by'...)

Section	Sub heading	Page	Mining Proposal text	Comment
	4.1.2 Environment Protection Act	190	Table 4-1	Column 1, Activity type: Are other activities direct clearing of vegetation, generation of dust, noise and light spill (which impact local sensitive receptors) or are these listed activities just related to discharge and pollutant related activities?
5 Stakeholder Framework	5.5.4 Stakeholder benefits and issues register	216	Table 5.8 – Applicant response column	Row 1. Not clear how bunding will be used to buffer noise – yet to see this explained as a genuine mitigation measure. Row 3. Doesn't address the general operations - blasting is covered in the row below (row 4). Doesn't answer how noisy will the mine operation be?
		219	Table 5.8 – Mine closure. The Applicant has undertaken a conceptual mine closure plan.	Not clear what the final land use will be -suitable for farming, native vegetation - or both?
		220	Table 5.8 – Mine Design & Operation Permanent overburden stockpile located south-west of pit which will be revegetated to blend into the existing landscape.	The permanent overburden stockpile should be positioned west of the pit to buffer noise, dust and light spill from the R1 sensitive receptor less than 1km from the operation.
		222	Table 5.8 – Roads & Traffic Intend to establish a Good Neighbour Policy – to negotiate reduced trucking during school bus operation on the Poochera-Port Kenny Road	Reduced trucking? No commitment to zero trucking/haulage during this time? (avoid 1 bus route, twice a day for 5 days) What procedures and communications are going to be put in place and how will it be measured?
		223	Table 5.8 – Roads & Traffic Intend to establish a Good Neighbour Policy – to negotiate reduced trucking during school bus operation on the Poochera-Port Kenny Road	Roads and Traffic It's not clear what the haulage hours will be - are they also 7 days a week 24 hours? How many trucks a day will be using the road?
		223	Table 5.8 – Water (pt 5) During Stage One, water will be trucked in from Poochera – approximately 0.5 litres per second l/s (50 kL/day)	50KL water per day when a proposed 1600 tonnes would be moved out of the pit per day. Can Andromeda achieve satisfactory dust suppression, for the listed activities (stripping topsoil and overburden, loading, unloading, applying water to all haulage routes) with this amount of water? As a comparison, Stage 2 dust suppression is 9m3 per hour (Figure 3.21).
			Table 5.8 – Water (pt 7) Current estimated annual consumption (max), up to 260 MI/yr	260ML/Yr which is contradicted in section 3.10.3 which states the annual 290ML/yr. Please confirm and clear up inconsistencies in water use volumes (and in various other measurements/messaging – including work and operating hours etc.) it is hard to work out just how much water is required.
	5.6 Outcome development	224	After consultation with the community there was no variation to any proposed outcome statements.	suggests that no accommodation was made for community issues/concerns.

Section	Sub heading	Page	Mining Proposal text	Comment
		224	Table 5.9 Amenity visually softened to blend in with the surrounding landscape.	“Visually softened” cannot be quantified. Please provide details on planting density (i.e., 1000 stems per ha) and species to be used (mix of native trees and shrubs) and the thickness of the planting (i.e., 50m x 500m corridor).
		224	Table 5.9 Amenity The Tenement Holder must during construction, operation ensure no public nuisance impacts from light spill are generated by mining operations	Please provide details on what measures will be implemented to reduce light spill impacts and how this will be monitored to ensure that it is achieved. If there is a breach, what measures will be implemented to ensure that impacts can be reversed? Will each mine boundary have numerous dust monitors to account for different movement of dust offsite?
			Table 5.9 Amenity The Tenement Holder must during construction, operation and closure ensure that noise emanating from operations is in accordance with the current amenity as defined by the Environment Protection (Noise) Policy 2007 and the relevant land use zoning as defined by the Planning, Development	Again, how will this be achieved and monitored and if there is a breach, what measures will be implemented to ensure that impacts can be reversed (i.e., contingency)
		225	Table 5.9 Environment The Tenement Holder must, ensure that: o There is no contamination of land and soils either on or off the Land as a result of mining operations; and o No contamination of land and soils either on or off the Land post mine completion occurs as a result of mining operations.	As above all outcome statements need to prescriptive, and the measures prescribed need to be achievable and measurable.  For the points listed, how will it be achieved and what measures will be implemented to ensure impacts can be reversed?

Section	Sub heading	Page	Mining Proposal text	Comment
		226	Table 5.9 Impacts to agriculture	<p>As one of the immediate land owners, we have continually expressed concern to Andromeda about the impact of dust from the mine on crops and pasture that will closely border the proposed mine site and road network.</p> <p>Can Andromeda clarify what these impacts will be? Quality Assurance is a big part of agriculture with livestock (meat &amp; wool) and grain becoming highly regulated.</p> <p>As a landowner, we currently operate livestock over all our property. The two main paddocks affected by the proposed mine have significant grazing value as well as abundant shelter for sheep during adverse weather conditions.</p> <p>No other paddocks on our home property have the equivalent shelter for livestock. If this land is acquired, it will affect our livestock operation considerably. Our sheep (ewes) lamb in late winter and having this shelter is very important during this time. Losing it will be a big loss to our farming enterprise.</p> <p>Our sheep feedlot is located within 400m of the proposed mine. What measures will Andromeda implement to ensure the health and safety of our livestock in regards to dust, noise, especially blasting, to eliminate the impact on our feedlot?</p>
6. Impact and Risk Methodology	6.3.4 Mine life phase	235	<p>Impacts and risks are assessed based on their applicable mine life phase. This includes:</p> <ul style="list-style-type: none"> <li>• construction</li> <li>• operation</li> <li>• closure.</li> </ul>	What happens if the mine commences but doesn't persist - is there a care and maintenance phase?
8 Traffic	8.1 Stakeholder issues and concerns	255	the following issues and concerns were raised by attendees regarding traffic	Issue of Traffic dust impacts from vehicle movements within the mining area on adjoining land owners is not included in this list but has been raised numerous times with Andromeda.
	8.4.1 Pavement condition and wear	259	Impacts on pavement during construction, operation and closure are considered minor.	The extra traffic generated in particular on the unsealed road (Poochera to Port Kenny Rd) from mining traffic along with the existing vehicle movement will have more than a minor impact.
	8.4.2 Road safety	260	Table 8.2 (page 260)	Does the current traffic (every day and seasonal) along with the estimated traffic (light and heavy vehicle) generated by the proposed mine still fit within the capacities of the 2032 design horizon for urban and rural roads? (8.6 – Findings and conclusions)
	8.4.2 Road safety	262	<p>Frequency and timing of heavy vehicle movements</p> <p>However, a minor increase in truck frequencies may be experienced on lower volume roadways</p>	<p>In a 12-hour period with up to one HV every 10 minutes. Has a baseline traffic frequency been undertaken on this road?</p> <p>While you comment that the extra HV traffic would "increase total HV by less than 1%" is a generalization and not applicable to this unsealed Poochera Pt Kenny Road.</p>

Section	Sub heading	Page	Mining Proposal text	Comment
9 Flora, Fauna, Pests and native Vegetation	9	267	No EPBC Act listed species were identified in close proximity to the Proposed Development; however, Malleefowl could potentially occur in the general area.	What about <i>Caladenia tensa</i> (Inland Greencomb Spider orchid) and <i>Prostanthera calycina</i> (West Coast Mintbush) – aren't these MNES (under the EPBC Act) nearby and potentially within the development area.
	9.4.4 Discussion of impact and risk where there is no confirmed SPR linkage	285	Native vegetation impacted as a result of saline groundwater elevation due to seepage from deposited sand	What about the saline water applied to the site for dust suppression, as well as RO rejects and process water reject. What are the impacts to adjacent native (remnant remaining) vegetation as well as productive farming land?
	9.5 Proposed outcomes and criteria	287	Table 9-4 Column 4, 'Draft Leading Indicator Criteria'	Shouldn't all impacts have an indicator criterion - otherwise, how is the effectiveness of the proposed outcome and measurement criteria determined
			Table 9 4 Column 4, row 2 ('none required')	no disturbance to EPBC Act listed or NPW Act listed species?
			Table 9-4 Column 4, row 3 ('none required')	no injuries or deaths (measured using an incident register)?
		290	Table 9-4 Column 3, row 2 on page ('Annual dust deposition ..')	What is 4 g/m2/month based on? What is the 2g/m2/month exceedance based on. What are the current standards? What is baseline. What happens if Andromeda exceed this and what measures are in place?
11. Groundwater	11.3.5 Summary of impacts and risks	309	Table 11.3 Column 2, Impact event	Groundwater contamination (from hydrocarbons) is not fully discussed here. Another impact not discussed is the impact of discharging saline water on the surface soils (maybe a surface water issue perhaps...)
			Table 11.3 Column 4, Row 3 (GW 03)	As stated earlier, some PAF may present in later stages. Please provide estimated volumes if available.
		310	Table 11.3 Column 4, Row - GW 05 None identified due to no credible pathway	not clear what this statement means?
12. Air Quality	12.1 Stakeholder issues and concerns	312	Management of dust from mining activities including from overburden stockpiles.	Also dust from processing is a concern.
	12.1 Stakeholder issues and concerns	312	Dust impacts to human health	At R1 and R2 and most of the other receptors, rainwater plays a big part in supplying homes with drinking water. Will rainwater tanks be guaranteed to be clean of any harmful dust particles?

Section	Sub heading	Page	Mining Proposal text	Comment
	12.1 Stakeholder issues and concerns	312	Dust impacts to adjacent crops	Our family business relies on all the land it farms to be able to make a profit. Losing 270 ha of both cropping and grazing land will affect our viability going forward especially when we don't know the impacts of dust on land adjoining the proposed development.
	12.3.1 Design Measures	313	The following design measures will be incorporated to minimise impacts and risks to air quality as a result of the construction, operation and closure of the Proposed Development	Does this include having dust monitors at sensitive receptors with ongoing monitoring programmed.
			The following design measures will be incorporated to minimise impacts and risks to air quality as a result of the construction, operation and closure of the Proposed Development...	Other options include spraying stockpiles with stabilizer and using stockpiles and revegetation 'belts' to buffer potential amenity impacts (dust, noise, light spill)
	12.3.2	314	Table 12-1 Control and Management Strategies	Do Andromeda have contingencies plans for high wind days. What triggers dust suppression activities? Other options not considered may include, sensitive receptor site dust monitoring, quarterly window cleaning service
		314	Row 3 Use of water trucks and dust suppression agents, where appropriate, on unpaved roads or other exposed areas if required.	what does "where appropriate" mean - when dust levels or wind levels reach a particular level. These actions need to be measurable.

Section	Sub heading	Page	Mining Proposal text	Comment
		314	Row 5 Dust management plan,	<p>5th point - This should include dust management and monitoring plan.</p> <p>We want to see prepared (and have an opportunity to comment on a draft) a Dust Management Plan with specific measurable objectives and targets that can be monitored and tracked against threshold values.</p> <p>If threshold values are exceeded, this will trigger another series of contingency actions, which will also be specified in the management plan.</p> <p>As R1, we would like to have access to these data in real time, and be able to track dust levels (against background) and compliance against Management Plan objectives.</p> <p>Control measures that were used to develop the dust modelling, which resulted in compliance with criteria, must be incorporated into the Management Plan. Table 13 of Appendix F (Northstar Air Quality 2020) details the emission control factors that (we assume – please confirm) have been used in the dust modelling presented in the Mining Proposal. These control factors (as a minimum) must be implemented (not ‘as required’) and written into actions of the Dust Management Plan. For example, as per NPI (2012), as cited in Appendix F, topsoil removal and handling controls are based on soil that is naturally or artificially wet (Table 4 of NPI 2012). Table 13 also refers to Katestone (2011), and as such control measures cited from this document must be prescribed. Table 95 of Katestone (2011) states that 50% control (effectiveness) will be achieved through water sprays on ROM Pad and ROM bin. Given these references are cited in the Mining Proposal, it is expected that they will be adhered to in the Management Plan.</p>
	12.3.2	314	Table 12-2	First point - Activity: Should this include PROCESSING as well? All activities within the extraction area (pit) and processing area.
	12.4.1	318	Table 12.4	Table 12.4 lists the Volume of material of material to be removed per blast as between 3000t and 9000t. How will this impact the stone structures at R1?
	12.4.1	319		Listed equipment - Is one water cart going to be adequate to do all the things listed in Vol 5 Appendix k, page 54. Section 7- Air Quality Mitigation?
		322	Emissions from silica	Will the crystalline silica concentrations be monitored to ensure no human health implications once construction commences?
	12.4.6 Dust emissions from operations	331	Table 12.11 – Column heading Annual Average TSP Concentration (µg-m-3), Incremental impact	<p>R1 is almost 3 times higher than the nearest sensitive receptor (R2).</p> <p>No comment is made about this in the impact assessment.</p> <p>Such a significant increase in the incremental impact should not be categorized as a ‘minimal’ impact.</p>

Section	Sub heading	Page	Mining Proposal text	Comment
			Table 12.12 – Column heading Annual Average TSP Concentration ( $\mu\text{g}\cdot\text{m}^{-3}$ ), Incremental impact	R1 is almost 3 times higher than the nearest sensitive receptor (R2). No comment is made about this in the impact assessment. Such a significant increase in the incremental impact should not be categorized as a 'minimal' impact.
			Table 12.13 – Column heading Annual Average TSP Concentration ( $\mu\text{g}\cdot\text{m}^{-3}$ ), Incremental impact	R1 is almost 3 times higher than the nearest sensitive receptor (R2). No comment is made about this in the impact assessment. Such a significant increase in the incremental impact should not be categorized as a 'minimal' impact.
			Table 12.14 – Column heading Max 43hr PM10... ( $\mu\text{g}\cdot\text{m}^{-3}$ ), Incremental impact	R1 is almost 3 times higher than the nearest sensitive receptor (R2). No comment is made about this in the impact assessment. Such a significant increase in the incremental impact should not be categorized as a 'minimal' impact.
	12.4.7 Overview of potential impact	336	the impact of dust on agricultural production and public amenity (nuisance) is expected to be minimal, as contribution of dust is in the order of $0.1\text{ g m}^{-2}\cdot\text{month}^{-1}$ (2.5% of the proposed criterion).	This risk rating doesn't reflect the significant impact at R1, rather it is looking at the area more broadly. On average the sites are relatively low but R1 does not fit into this category based on the consequence tables described in the risk assessment. R1 risk management and mitigation needs to be treated separately as the incremental increase in dust to this site is much greater - to be fair. How will this impact be monitored and measured to ensure it is maintained at a 'minimal' level?
	12.4.7 Overview of potential impact	336	result in a low impact overall.	This Low impact value is not a true reflection of the impacts at R1 and is disingenuous to the family.
		338	as there could be a local short term and minor surpasses of air quality standards,	Dust generation from mine operations and processing 0.8km from a residence, 7 days a week, 24 hours a day for 26 years is not short term or minor. How can a value that is only just compliant be given a minimal level of impact and be a Low risk? From our understanding this risk assessment is supposed to be based on the worst case - which is R1. This risk value of Low is not a true reflection of the impacts at R1 and is disingenuous to the family. Genuine mitigation attempts are required to reduce the dust impacts for RI so that it really is a Low impact value.
			Table 12-16 Impact and risk summary: air quality	How can a value that is only just compliant be given a minimal level of impact and be a Low risk? From our understanding this risk assessment is supposed to be based on the worst case - which is R1. This risk value of Low is not a true reflection of the impacts at R1 and is disingenuous to the family.

Section	Sub heading	Page	Mining Proposal text	Comment
	12.4.11 Justification and acceptance of residual impact and risk	339	Risks have been reduced to low and cannot be reduced further as no further controls are considered to be proportionate to the expected level of risk.	Other than water trucks, no controls are presented at all.  Potential management actions have not been exhausted.  Relief for the residence at R1 through buffering with noise attenuating bunds (long-term stockpiles) and planting, implement a monitoring program to maintain low values.  This could also include introducing soil stabilizing spray to stockpiles, communication with local landowners during high wind days, house/ window cleaning service for close receptors etc.
	12.5 Proposed outcomes and criteria	340	Table 12-17	Many of the indicator criterion cells are blank. Is there a requirement for these to be populated?
		340	Table 12-17 Column 3, row 1  Annual dust deposition on a representative number of adjoining properties does not exceed 4 g/m <sup>2</sup> /month and no more than 2 g/m <sup>2</sup> /month above background.	It is not clear what the 4g and 2g values are based on
			Table 12-17 Column 3, row 3 Re: PM10 –	Shouldn't the closest receptor (R1) be used as the indicator. If R1 is compliant then all other sites should be compliant.
	12.6 Findings and Conclusions	342	The cumulative predicted dust impacts demonstrate compliance at all receptors surrounding the proposed mine, resulting in an expected minimal impact overall.	Does this mean that R1 is compliant at all times? Does minimal impact include R1 with a mine 800m away running 7 days a week, 24 hours a day for 26 years.  With 2 residences less than 3 km away, what are Andromeda proposing to do with these 2 closest receptors to reduce the impact?
13 Noise and Vibration	13.3.2 Control and management strategies	346	Table 13.1 "Blasting procedures will be developed..."	Andromeda to develop Noise Management Procedures to cover all noise and not just blasting
	13.4.1 Predicted noise levels - construction	350	Table 13.5 Mobile plant – construction (comments relevant for Table 13-7, page 354))	If blasting and/or a rock breaker are going to be required, they should be factored into these tables and the noise model as they are extremely noisy. Information on frequency and duration of use should also be provided.
		353	it is considered that impact to local residents is expected to be minor.	Exceeding noise criterion at R1 is not minor.  Noise impacts need to be reassessed with R1 as the key indicator of consequence.  What control measures are going to be investigated and implemented?

Section	Sub heading	Page	Mining Proposal text	Comment
	13.4.2 Predicted noise levels – operations	358	Table 13-9	Does the model take into account that the ROM will be elevated 4m?  R1 – Predicted noise level is exceeding noise limits in stage 2  R1 Operation noise criteria is exceeding limits in stage 2
			Information on the criteria for the noise model in general	We are not satisfied with the rationale to use Part 4 of the Noise EPP relevant criteria, which is based on an average of the indicative noise factors for the source and receivers. This doesn't take into account the rural setting of the proposal area and the nature of the development. This is not an area that we have technical expertise in and we would appreciate some independent advice on this.  We believe that relevant criteria should be based on Part 5 of the Noise EPP, which is based on the following thresholds for sensitive receivers in a 'Rural Living' land use category:  47 dB(A) during the day, 7 am to 10 pm  40 dB(A) at night, 10 pm to 7 am  We feel that the use of Part 4 criteria is disingenuous to the impact assessment process, as set out under the Guidelines for use of the Environment Protection (Noise) Policy 2007. By using Part 4 criteria, there is an increase in 10 dB(A) for day (57 dB) and night (50 dB) values, which allows the model as presented in the Mining Proposal to be compliant. This subsequently reduces the perceived risk, minimises the potential impact and negates the need for costly noise mitigation requirements.  Regardless of Part 4 or Part 5 criteria, the proposed exceeds construction noise limits and as such requires more mitigations to reduce the risk.
		360	Operations noise impact As discussed above, in addition to controls listed in Section 13.3, the following control measures are available:	Has the use of buffering from permanent stockpile being considered?
		360	The Proposed Development is expected to be minor, as noise criteria are predicted to be achieved at all receptors, with the exception of one receptor.	At R1 it is not a minor impact.
	13.5	365	Table 13.15 Column 3, row 1 Noise generated from the ML during construction, operations and closure measured for or at, all sensitive receptors in accordance with the Environment Protection (Noise) Policy 2007 and as per the Planning, Development and Infrastructure Act 2016 for a Primary Production Zone.	There are some instances of non-compliant at R1. Not all receptors were in accordance with the EP (Noise) Policy.

Section	Sub heading	Page	Mining Proposal text	Comment
			Table 13.15 Column 4, row 1 and row 2	Indicator criteria to include: Implementation of control measures as described previously (page 354). Develop a noise management plan Develop a noise and blast management procedure (work instructions)
14 Soil and Land Quality	14.3.5 Contamination	379	Contamination of land from unplanned spills, leaks and other uncontrolled releases impacts soils and land quality	Does this include the planned saline water discharge from RO reject and process water reject?
	14.4 Proposed outcomes and criteria	380	Table 14.4 Column 4, row 1	Indicator Criteria to include regular soil testing in and around the site
15 Visual Amenity	15.5 Proposed outcomes and criteria	395	Table 15.3 Column 4, row 1	Indicator Criteria to include implementation of design measures (from section 15.3.1).
Volume 5 Appendix K Air quality mitigation		76, 87, 97	Construction – 113,368 kg/year PM10 Emissions Stage 1 – 234600kg/year PM10 Emissions Stage 2 – 212928kg/year PM10 Emissions	How are these levels of fine dust deemed to be acceptable for affected nearby landholders, the community and the environment.

**From:** Greg Walters - CEO @ Peninsula Ports [REDACTED]  
**Sent:** Tuesday, 4 May 2021 12:03 PM  
**To:** DEM:Mining Reg Rehab  
**Subject:** Submission on the Mining Lease Application for the Great White Project - Poochera (MC4510)  
**Attachments:** Submission on the Mining Lease Application for the Great White Project - Poochera (MC4510).pdf

Dear Sir/Madam,

I was hoping that it would be possible for you to accept our public submission on the application for Mining Lease for the Great White Project – Poochera (MC 4510). Whilst our submission was completed, dated and signed within the submission period and was supposed to have been sent, I have discovered that it was not dispatched to you last Friday as intended but had remained within our office.

Please find attached our submission. I am hoping that it might be possible to still have it included noting that it was signed and dated within the submission period.

For your consideration.

Regards,  
Greg

**Greg Walters**  
Chief Executive Officer

**PENINSULA PORTS**

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P.O. Box 2301 Adelaide, SA 5001

29 April 2021

Our ref: PP/Man/L/004/V1

Business Support Officer  
Mining Regulation Branch  
Department for Energy and Mining  
GPO Box 320  
Adelaide SA 5001

Dear Sir/Madam,

**Subject: Submission on the Mining Lease Application for the Great White Project – Poochera (MC 4510)**

Thank you for the opportunity to make a submission on the Mining Lease Application for the Great White Project – Poochera (MC 4510). Peninsula Ports is developing a new multi-user, multi-commodity port on the Eyre Peninsula and recognise that this project has the potential to interact with our approved port.

We have had an opportunity to review all available documentation and meet with the proponents to further understand the project, its impacts and opportunities. We recognise that whilst the proposed mine is a complex undertaking it has the potential to provide a number of significant benefits for both industry and the community on the Eyre Peninsula.

The Andromeda Great White Project has a 26-year life-of-mine (LOM), at a planned mining rate of 500,000 tonnes per annum and has an estimated pre-tax cashflow of A\$1.97B. This investment would move through the South Australian economy over the course of the Project. The project also has the potential to generate direct employment for 55 to 75 employees, sourced from and residing in Streaky Bay and surrounding towns. This would include long term rural jobs including many technical positions. In addition, it is likely to support many additional jobs within the logistics and supply chain including within export facilities such as ourselves.

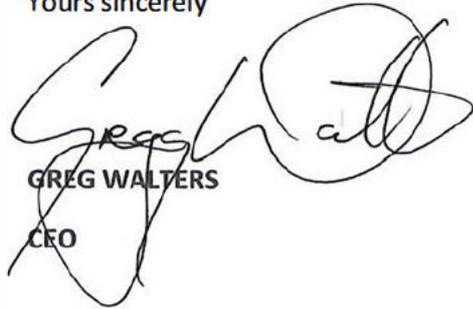
Beyond the generation of employment opportunities, the Great White Project will also create many opportunities in the supply chain for local and regional businesses and it is anticipated that works will be planned and put out for tender, with local and regional businesses able to submit a proposal in response to work requests.

We feel that based on the documentation provided the applicant has diligently addressed issues of environmental concern and has adequately described the existing environment as far as this is relevant to the proposed operations. Furthermore, we believe that they have adequately identified all relevant potential impacts on the environment that may arise from the proposed operations.

We recognise that refining of the kaolin ore uses a physical washing method but that no harmful chemicals are used and that a by product of the process is washed sand. This sand can be used in commercial applications or returned to the mined area as part of the backfill and rehabilitation. We also note that there are no tailings or tailings storage facilities in the Proposed Development. We therefore feel that the proposed environmental outcomes are acceptable and that the proposed mitigation measures are practical and are likely to achieve the desired outcomes.

We therefore strongly support the granting of a mining lease to Andromeda for their Great White Kaolin Project – Poochera (MC4510)

Yours sincerely



GREG WALTERS  
CEO