

Introduction

As per section 35A of the *Mining Act 1971* the mining lease application submitted by Kara Resources Pty Ltd underwent a period of statutory circulation. During this period the mining lease proposal (MLP) was circulated to a number of government departments that were deemed relevant based on the information provided. This document is a consolidated list of the issues raised by SA Government departments during the statutory consultation period. It also outlines what Kara Resources must submit to address these issues.

Mining Lease Application Process

- Kara Resource's final draft of the MLP was submitted for assessment on 26 November 2013;
- Kara Resource's Mining LP was released for statutory consultation on 5 December 2013 for a period of 4 weeks;
- The statutory consultation period was extended until 10 February 2014;
- Kara Resources is now requested to prepare a Response Document, responding to all issues raised in submissions;
- Upon receipt of Kara Resource's Response Document, DMITRE will assess if the issues raised during statutory consultation have been satisfactorily addressed or otherwise. If the response document is deemed suitable, DMITRE will continue with assessment of the MLP.

Final Outcome

The South Australian Minister for Mineral Resources and Energy will consider the government assessment and recommendation and subsequently make a decision whether or not to offer Kara resources the Mining Lease.

Appendix 1 – SA Government Issues and Requirements Arising from Statutory Consultation

#	Topic	Section	Description of Issue Raised by SA Government	Requirement
1	Noise	1.5 & 4.10	<ol style="list-style-type: none"> 1. A description of the existing background noise level was not provided. This is required to determine possible noise impacts resulting from the proposed mining operation; 2. An impact event analysis as per section 4.3 of Ministerial Determination 003 has not been included. 	<ol style="list-style-type: none"> 1. Provide a description of the existing noise levels at all sensitive receptors as defined in the EPA Guidelines for Separation Distances (2007). 2. Provide the following in regard to noise as per Ministerial Determination 003: <ul style="list-style-type: none"> - Impact event analysis - Reviewed Control strategies; - Justification for acceptance of residual risk; - Outcome - Draft measurement criteria incorporating details of any proposed monitoring. <p>Note: The control strategies provided must be adequate to prevent noise impacts, given; several receptors are located well within the EPA separation distance of 3 kilometres.</p>
2	Air quality	1.5 & 4.11	<ol style="list-style-type: none"> 1. A description of the existing dust level was not provided. This is required to determine possible impacts resulting from the proposed mining operation; 2. An impact event analysis as per section 4.3 of Ministerial Determination 003 has not been included. 	<ol style="list-style-type: none"> 1. Provide a description of the existing Air Quality at all sensitive receptors as defined in the EPA Guidelines for Separation Distances (2007). 2. Provide the following in regard to noise as per Ministerial Determination 003: <ul style="list-style-type: none"> - Impact event analysis - Reviewed Control strategies; - Justification for acceptance of residual risk; - Outcome - Draft measurement criteria incorporating details of any proposed monitoring.

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3	Hydrology and Sediment control	1.9 & 2.8.4	<ol style="list-style-type: none"> 1. The description of hydrology must be for the entire site. The proposal wrongly states that there are no water courses that would be affected by mining. Mining has the potential to change the flow regime of the Walker Creek Catchment area. 2. The removal of groundcover associated with mining has the potential to generate a substantial increase in sediment loads in the Walker Creek Catchment. 	<ol style="list-style-type: none"> 1. Provide a map of current drainage patterns on and adjacent to the Mineral Claim including the location of creeks, rivers, drains and dams and the direction of drainage. 2. The drainage swale referred to feeds into the Walker Creek Catchment. Due to the potential discharge into this watercourse and a change in flow volume, provide an assessment of the use of this water by any downstream landowner or the environment. 3. Describe how erosion and sediment will be managed in the following mine life phases: <ul style="list-style-type: none"> - Construction phase - Operational phase - Post Closure phase. <p>The following should be shown in map form for each phase:</p> <ul style="list-style-type: none"> - location of bunding - location and direction of any flow diversion - location of all sediment retaining structures 4. Describe the capacity of sediment control structures and how this was determined. 5. Provide detail on any storage, diversion or use of clean water.
4	Groundwater	1.10	<p>The wells/bores described to the north and south, do not indicate a standing water level. The 20 metre depth to groundwater stated in the proposal document is the drill hole depth.</p>	<p>Provide the estimated depth of groundwater across the entire Mineral Claim and provide justification for this estimate.</p> <p>If the proposed operation may intercept groundwater the following must be included:</p> <ul style="list-style-type: none"> - Accurate detail of local groundwater including information on water quality and pressure, recharge areas and aquifer details; - An assessment of any current use of this water by the landowner (including adjacent landowners) and environment.

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5	Mining Plan	2.3	The text and Mine Plan are only based on stage 1 and do not provide enough information for assessment.	<p>Describe the sequence of mining (staging) and progressive rehabilitation over the entire Mineral Claim area and for the proposed full life of mine.</p> <p>Provide a surveyed mine plan that shows the above information graphically over the entire site. This plan must include:</p> <ul style="list-style-type: none"> - Mining stages - Progressive rehabilitation stages and scheduling - Proposed bench heights - Proposed berm width - Topsoil stockpile location - Overburden stockpile location - Location of sediment control structures - Fuel storage location <p>This map must be supported by a series of cross-sections (both north-south and east-west)</p>
6	Mine Completion	2.4	The closure diagram and supporting cross sections do not provide details over the entire Mineral Claim.	<p>Provide a closure plan over the entire Mineral Claim that includes the following as per section 2.4 of Ministerial Determination 003 :</p> <ul style="list-style-type: none"> - natural contours of land proposed not to be disturbed by the mining operations; - existing native vegetation that will not be disturbed due to the proposed mining operations; - any mining infrastructure that will remain on site and will become the responsibility of the landowner; - Terminal face boundaries - location of groundwater in relation to final pit depth; - location, description and management of waste disposal areas; - location of reshaped and rehabilitated areas showing proposed surface contours, and re-vegetation.

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				<p>This plan must be supported by a series of cross-sections (both north-south and east-west) that include:</p> <ul style="list-style-type: none"> - pre-mining natural surface; - emplacement areas, waste disposal areas, rehabilitated areas; and - conceptual final rehabilitated surface.
7	Industrial and domestic wastes	2.8.3	The aspect of the proposed fuel storage/ refuelling station configuration is not clear.	Provide a diagram of the proposed fuel storage/refuelling station configuration including bunding provisions.
8	Public Roads, services and utilities used by the operation and Traffic	2.9.3 & 4.2	A Traffic Impact Statement is required to determine potential impacts from the proposed operation on local road networks.	<p>1. A Traffic Impact Statement (TIS) must be undertaken by a suitably qualified traffic engineer.</p> <p>The TIS must address the sections of Old Kapunda Rd / Freeling Rd / Daveyston Rd which will be used along with a review of the left/right turn via the Thiele Highway at Freeling and Old Kapunda Rd / Freeling Rd / Daveyston Rd and then the left turn/right turn via Sturt Highway, and specifically investigate/identify the following:</p> <ul style="list-style-type: none"> • Whether access to/from Old Kapunda Rd / Freeling / Daveyston Rd is viable and if so, what changes are required to the Old Kapunda Rd / Freeling / Daveyston Rd junctions are required to ensure that safe and efficient vehicle movements will occur; • The projected peak traffic generation of the mining operation, particularly at peak times of demand; • The treatments required at any access or junction to/from Old • Kapunda Rd / Freeling / Daveyston Rd in light of projected volumes;

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				<ul style="list-style-type: none"> • That any access point/s to/from Old Kapunda Rd / Freeling / Daveyston Rd are consistent with Australian Standards and Austroads guides with regard to their location and associated treatments; • A detailed concept plan of any proposed new junctions/accesses or changes to existing; • The largest vehicle expected on-site and provide turn paths that demonstrate that these vehicles can safely access the junctions / intersections along Old Kapunda Rd / Freeling Rd / Daveyston Rd / Thiele Highway and via Sturt Highway. Note that separate approval may be required for any vehicle that is classed as a Restricted Access Vehicle (RAV) refer: http://www.sa.gov.au/topics/transport-travel-and-motoring/heavy-vehicles/operating-a-heavy-vehicle/heavy-vehicle-access-framework. <p>Note: The above section should be used to determine potential impacts associated with mining and therefore what outcome will be required.</p> <p>2. Review the following based on the TIS:</p> <ul style="list-style-type: none"> - Impact event analysis - Reviewed Control strategies; - Justification for acceptance of residual risk; - Outcome - Draft measurement criteria incorporating details of any proposed monitoring.
9	Water use	2.10	A statement on the quantity of water to be used and the source was not included.	Provide the estimated water required for operations and discuss where this will be sourced from.

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13	Consultation	3	<p>The details of consultation between the landowner and Kara Resources provided in this section are incorrect.</p> <p>The mine design proposed in the Mining Proposal has been devised on the assumption that Kara Resources will negotiate waivers in order to undertake operations.</p>	<p>Provide details of all consultation between the landowner and Kara Resources Pty Ltd in regard to the required waiver of exemption under section 9AA of the <i>Mining Act 1971</i>.</p>
10	Heritage	4.3	<p>The location of nearby European heritage was not included.</p> <p>The outcome and criteria provided does not address European heritage mentioned by council.</p>	<ol style="list-style-type: none"> 1. Provide a map showing: <ul style="list-style-type: none"> - MC 4322; - location of the four local heritage places described in the Light Regional Council Development Plan; - The adjacent dry stone wall; - The original Anders blacksmith site; and - The stopping depot for bullock's. 2. Provide the following as per Ministerial Determination 003 : <ul style="list-style-type: none"> - Impact event analysis - Control strategies to mitigate/avoid the risk to these sites; - Evaluation of the residual risk; - Justification for acceptance of residual risk; - Outcome - Draft measurement criteria including details of any proposed monitoring.
11	Blasting vibration	4.12	<p>A full impact assessment has not been submitted.</p>	<p>Provide the following in regard to blasting vibration:</p> <ul style="list-style-type: none"> - Impact event analysis; - Reviewed Control strategies; - Justification for acceptance of residual risk; - Outcome - Draft measurement criteria incorporating details of any proposed monitoring.

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12	Waste	4.6	The proposal states that fuel will be stored on site. An outcome for fuel storage has not been included.	Provide the following in relation to chemical (fuel) storage; <ul style="list-style-type: none"> - Context - Impact analysis - Control strategies - Residual risk and justification - Outcome - Draft measurement criteria
14	Visual Amenity	4.9	The potential impacts are required to accurately determine an appropriate outcome.	Provide the following in regard to visual amenity: <ul style="list-style-type: none"> - Impact event analysis; - Control strategies; - Residual risk and justification; - Outcome; - Draft measurement criteria.
15	Adjacent land use		Potential impacts on adjacent land use have been identified during the public consultation period.	Provide the following in relation to adjacent land use; <ul style="list-style-type: none"> - Context - Impact analysis - Control strategies - Residual risk and justification - Outcome - Draft measurement criteria
16	Native fauna		Potential impacts on native fauna have been identified during the public consultation period.	Provide the following in relation to native fauna; <ul style="list-style-type: none"> - Context - Impact analysis - Control strategies - Residual risk and justification - Outcome - Draft measurement criteria