

Submission #	Issue #	Topic	Technical Issues Raised in Public Submissions.	Kookaburra Gully Response	TBRARA Page #	Response #1	Response #2	Reference Issue #1	Reference Issue #2	Reference Issue #3	Reference Issue #4
Submission 1 – MD & SR Sheehan											
1	1	Transport Route (Sect 7.9)	Transport route has been determined in the absence of consultation with the community and Elected Members of the District Council of Tumby Bay	Page 83		7.9					
1	2	Transport Route (Sect 7.9)	There is no agreement with the DCTB as to the actual transport route	Page 84		7.9					
1	3	Transport Route (Sect 7.9)	Assumptions have been made on the part of the Works Manager as to the transport route, but these are not transparent to Elected Members not the Community at large	Page 84		7.9		1	2		
1	4	Transport Route (Sect 7.9)	The capability of the 'Determined route' appears not to have been subjected to any formal approval process through DPTI	Page 85		7.9		1	2		
1	5	Transport Route (Sect 7.9)	Impact upon native vegetation and EPBC listed species is not recognised in the Application	Page 85		7.9		742			
1	6	Transport Route (Sect 7.9)	The application includes cost estimates from a private contractor as to upgrading the road, but no Council budget exists for this work to be undertaken and no agreement to cost sharing exists	Page 88		7.9					
1	7	Transport Route (Sect 7.9)	There is no economic benefit statement to the community pertaining to the proposed road upgrade, only the potential for continued maintenance and repair liabilities for the life of mine and beyond.	Page 88		7.9					
1	8	Dust (Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the ore body that are potentially harmful to human health and plant health. These include not only the graphite, but Chromium, Manganese, Nickel, Rare Earths, Strontium, Thorium and Uranium together with Copper, Magnesium and Zinc. These minerals are potential carcinogens and or neurotoxins in humans and growth inhibitors in plants. ()	Page 57		7.6					
1	9	Dust (Sect 7.4)	The nature and health impacts together with potential agricultural industry impacts of the dust emanating from mining operations	Page 57		7.6					
1	10	Dust (Sect 7.4)	In the absence of on-site meteorological data, the dispersion pattern modelled from data remote from the site is of concern, given the potential nature of the contaminant within the dust and their impact upon humans and plants alike. There is no consideration given to the impact upon pastures and thence animals whom ingest these contaminants over a period of time.	Page 61		7.6		8	9		
1	11	Dust (Sect 7.4)	Economic losses attributed to the impact of copper, magnesium and zinc (in excess of trace levels) on grain production	Page 61		7.6		8	9		
1	12	Dust (Sect 7.4)	Impact upon agricultural businesses within the fallout cloud of contaminated dust through contaminated grain deliveries	Refer Issues 8-11 Pages 57-61		7.6		8	9	10	11
1	13	Dust (Sect 7.4)	Potential contamination of rain water, the main source of drinking water for the area	Page 61		7.6					
1	14	Dust (Sect 7.4)	Impact of the contaminated dust reaching the township of Tumby Bay having regard to the topography (height above sea level of the proposed mine) and the wind direction (and velocity) towards Tumby Bay.	Page 62		7.6					
1	15	Dust (Sect 7.4)	Impact on surface water contained within the Tod River Water Protection Zone (as per the DCTB Development Plan) or the Tod River Wetland of National Significance.	Page 62		7.6					
1	16	Groundwater (Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the ore body that are potentially harmful to human health and plant health. These include not only the graphite, but Chromium, Manganese, Nickel, Rare Earths, Strontium, Thorium and Uranium together with Copper, Magnesium and Zinc. These minerals are potential carcinogens and or neurotoxins in humans and growth inhibitors in plants.	Page 42		7.4					

1	17	Groundwater (Sect 7.4)	The nature of the hazardous materials emanating from mining operations inclusive of the processing operations is inadequately described in the application	Page 42		7.4					
1	18	Groundwater (Sect 7.4)	Environmental impact associated with contamination of groundwater with the hazardous materials identified is not fully disclosed neither is the long term health impacts associated with contaminated ground water - damage to be caused to the groundwater on Lower EP	Page 43		7.4					
1	19	Groundwater (Sect 7.4)	There are significant limitations with respect to the geotechnical, hydrogeology and hydrology of the site, especially in regard to the design of the TSF facility (Section 4.7.7.4 pp 198). It is significant concern that the limitations highlighted by the consultant extend beyond the TSF facility to include the known fact that no data exists for MC4372, nor does the geo-hydrology or hydrology exist beyond the boundaries of MC4373 which may impact upon the Prescribed Wells Area to the South, the source of potable water for the lower Eyre Peninsula.	Page 43		7.4					
Submission 2 – Carole Wetherby											
2	20	Transport Route (Sect 7.9)	The number of heavy vehicles using the road differs in a number of paragraphs	Page 89		7.9					
2	21	Transport Route (Sect 7.9)	There is no agreement with the District Council of Tumby Bay as to the actual transport route	Refer Issue #2 Page 84		7.9		2			
2	22	Dust (Sect 7.4)	This report has nothing mentioned to the major impact upon agricultural businesses within the fallout cloud of contaminated dust due to constant very windy conditions that will contaminate Eyre Peninsula's huge grain deliveries.	Refer Issues #8-12 Pages 57-61		7.6		12			
2	23	Dust (Sect 7.4)	Potential contamination of rain water which happens to be the Eyre Peninsula's main source of drinking water	Refer Issue #13 Page 61		7.6		13			
2	24	Groundwater (Sect 7.4)	Nature of the hazardous materials emanating from mining operations inclusive of the processing operations is inadequately described in the application	Refer Issue #17 Page 42		7.4		17			
2	25	Groundwater (Sect 7.4)	Environmental impact associated with contamination of groundwater with the hazardous materials is not fully disclosed neither is the long term health impacts of contaminated ground water	Refer Issue #18 Page 43		7.4		18			
2	26	Groundwater (Sect 7.4)	There are significant limitations with respect to the geotechnical, hydrogeology and hydrology of the site, especially in regard to the design of the TSF facility. It is significant concern that the limitations highlighted by the consultant extends beyond the TSF facility to include the known fact that no data exists for MC4372, nor does the geo-hydrology or hydrology review exist beyond the boundaries of MC4373 which may impact upon the Prescribed Wells Area to the South, the source of potable water for the Lower Eyre Peninsula	Refer Issue #19 Page 43		7.4		19			
2	27	Explosives	Community members have been informed there would be limited blasting. However, the lease application document states there will be a huge amount of explosives and dangerous toxic chemicals stored on site. This is a direct conflict to what the mining company had originally informed the community	Pages 15-18		4.5.7		27	77	78	79
Submission 3 – District Council of Tumby Bay											
3	28	Employment and Business Development	RDAWEP estimated the FTE employment for DCTB in 2012/2013 to be 975 with 52 jobs in the mining sector. An additional 30 jobs overall is a small percentage increase and there is a possibility that some of the current 52 jobs are FIFO or DIDO thereby creating the opportunity for skilled mine workers to obtain employment closer to home.	Page 106		noted Appendix 1					
3	29	Employment and Business Development (Sect 5.1.1, 5.1.2 and 5.2)	The benefit to the local business economy during construction and then during normal operations is yet to be determined however DCTB would be encouraging or facilitating AGL to use local businesses where possible	Page 106		Appendix 1					
3	30	Traffic Management (Sect.5.1.4 and 7.9)	AGL will need to provide DCTB with a traffic management plan for the construction period including an	Page 89		7.9					

3	31	Traffic Management (Sect.5.1.4 and 7.9)	AGL will need to provide DCTB, and DPTI (Main Roads) with a traffic management plan for the operational life of the mine including an upgrade/maintenance plan with financial considerations for Pillaworta Road and the Pillaworta Road/Bratten Way intersection.	Page 91		7.9		2	30		
3	32	Stakeholder and Community Engagement (Sect 6)	The extensive consultation undertaken by AGL is noted as is their recent engagement of a community liaison consultant. The actions of AGL within the community, especially those relating to drilling programs, have generally been an improvement on previous experiences with other companies.	Page 106		noted Appendix 1					
Submission 4											
4	33	Social License (Sect 5 & 6, Appendix A)	Lack of specific information provided throughout the so called consultation process	Page 34		6.7		39			
4	34	Social License (Sect 5 & 6, Appendix A)	Lack of availability of hard copy	Page 35		6.7					
4	35	Social License (Sect 5 & 6, Appendix A)	Lack of knowledge of the inadequacies of internet capabilities on Lower Eyre Peninsula and inability to download a 139Mb file	Page 35		6.7					
4	36	Social License (Sect 5 & 6, Appendix A)	The fact that some people do not have computers	Page 35		6.7					
4	37	Social License (Sect 5 & 6, Appendix A)	The expectation that the recipient of the document of 1169 pages will be able to read, comprehend and formulate a response within the period provided.	Page 35		6.7					
4	38	Social License (Sect 5 & 6, Appendix A)	The complete inflexibility of DSD with respect to an extension of time in which to respond.	Page 35		6.7					
4	39	Social License (Sect 5 & 6, Appendix A)	The lack of public presentation either by DSD or the Company with respect to the Application	Page 34		6.7		33			
4	40	Social License (Sect 5 & 6, Appendix A)	Demographic data that is four years out of date.	Page 7		3.1					
4	41	Social License (Sect 5 & 6, Appendix A)	Reference to 52 mining jobs currently in the town of Tumbay Bay noting that the previous mining employer (Centrex Metals/Eyre Iron) has left the area is totally incorrect	Page 30		5.1		28			
4	42	Social License (Sect 5 & 6, Appendix A)	The availability of jobs for the local community is based upon what data, given the job profiles of the proposed positions are not identified and the glut of mine employees on the market	Page 31		5.1					
4	43	Social License (Sect 5 & 6, Appendix A)	The oft stated 'benefits' to the community have not been quantified nor have the costs. There is no cost benefit analysis provided.	Pages 32		5.2					
4	44	Social License (Sect 5 & 6, Appendix A)	There is no recognition of the costs to the agricultural industry through contamination dust arising from the mining operations.	Refer Issues #10, 11, & 12 Page 61		7.6		10	11	12	
4	45	Social License (Sect 5 & 6, Appendix A)	There are no agreements with the DCTB with respect to costs, inclusive of potential decline in revenue due to the devaluation of properties in the vicinity of the proposed mines and the loss of rate revenue.	Page 73		7.9		2			
4	46	Social License (Sect 5 & 6, Appendix A)	The significant lack of information in respect to the potential health impacts of fugitive dust on the community.	Refer Issues #8, 9 & 10 Pages 57-61		7.6		8	9	10	
4	47	Transport Route Sect 7.9	It is noted that the transport route has been determined in the absence of consultation with the community and Elected Members of the DCTB.	Refer Issue #1 Page 83		7.9		1			
4	48	Transport Route Sect 7.9	There is no agreement with the DCTB as to the actual transport route	Refer Issue #2 Page 84		7.9		2			
4	49	Transport Route Sect 7.9	Assumptions have been made on the part of the Works Manager as to the transport route, but these are not transparent to Elected Members nor the Community at large.	Refer Issue #1 & 3 Pages 83-84		7.9		1	3		
4	50	Transport Route Sect 7.9	The capability of the 'determined route' appears not to have been subjected to any formal approval process through DPTI	Refer Issue #4 Page 85		7.9		4			
4	51	Transport Route Sect 7.9	The impact upon native vegetation and EPBC listed species is not recognised in the Application.	Refer Issue #5 Page 85		7.9		5	742		
4	52	Transport Route Sect 7.9	The Application includes cost estimates from a private contractor as to upgrading the road, but no Council budget exists for this work to be undertaken and no agreement to cost sharing exists.	Refer Issue #6 Page 88		7.9		6			

4	53	Transport Route (Sect 7.9)	There is no economic benefit statement to the Community pertaining to the proposed road upgrade, only the potential for continued maintenance and repair liabilities for the life of the mine and beyond.	Refer Issue #7 Page 89	7.9		7			
4	54	Transport Route (Sect 7.9)	Dependent upon which section of the Application one reads, the impact of road use in the proposal varies.	Refer Issue #20 Page 89	7.9		20			
4	55	Dust (Sect 4 pp106-107 & Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the orebody that are potentially harmful to human and plant health. These include not only the graphite, but Chromium, Manganese, Nickel, Rare Earths, Manganese (twice), Strontium, Thorium and Uranium. These minerals are potential carcinogens and or neurotoxins in humans. Also included are Copper, Magnesium and Zinc which are known growth inhibitors in plants.	Refer Issue #8 Page 57	7.6		8	9	10	
4	56	Dust (Sect 4 pp106-107 & Sect 7.4)	The nature and health impacts together with potential agricultural industry impacts of the dust emanating from mining operations are inadequately described in the Application. This includes the lack of information in relation to requirements of the National Residue Monitoring Scheme	Page 63 Also refer Issue #9 Page 57	7.6		8	9		
4	57	Dust (Sect 4 pp106-107 & Sect 7.4)	In the absence of on-site meteorological data, the dispersion pattern modelled from data remote from the site is of concern. Given the potential nature of the contaminant within the dust and their impact upon humans and plants alike. There is no consideration to the impact upon pastures and thence animals which ingest these contaminants over a period of time	Refer Issue #10 Page 61	7.6		10			
4	58	Dust (Sect 4 pp106-107 & Sect 7.4)	Economic losses attributed to the impact of copper, magnesium and zinc (in excess of trace levels) on grain production	Refer Issue #11 Page 61	7.6		11			
4	59	Dust (Sect 4 pp106-107 & Sect 7.4)	The impact upon agricultural businesses within the fallout cloud of contaminated dust due to possible contaminated grain deliveries.	Refer Issue #12 & 56 Page 63	7.6		12	56		
4	60	Dust (Sect 4 pp106-107 & Sect 7.4)	Potential contamination of rain water, the main source of drinking water for the area	Refer Issue #13 Page 61	7.6		13			
4	61	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact of contaminated dust reaching the township of Tumby Bay	Refer Issue #14 Page 62	7.6		14			
4	62	Surface Water	Impact on surface water contained within the Tod River Water Protection Zone (as per the DCTB Development Plan) or the Tod River Wetland of National Significance	Refer Issue #15 Page 62	7.6		15			
4	63	Surface Water	Reference to the northern WRSF and its resultant runoff	Page 52	7.5					
4	64	Surface Water	Consideration...over the full course of Pillaworta Creek and Tod River to the sea. It should be noted that this area of coast also caters for the Marine Park and Aquaculture Zones	Refer Issues #273 & 15 Pages 41 & 62	7.6	7.3	15	273		
4	65	Groundwater (Sect 7.4)	Nature of the hazardous materials (graphite, Chromium, Copper, Manganese, Nickel, Rare Earths, Strontium, Thorium and Uranium) emanating from mining operations inclusive of the processing operations	Refer Issue #16 & 17 Pages 41-42	7.4		16	17		
4	66	Groundwater (Sect 7.4)	Environmental impact associated with contamination of groundwater with the hazardous materials	Refer Issue #18 Page 43	7.4		18			
4	67	Groundwater (Sect 7.4)	Limitations with respect to the geotechnical, hydrogeology and hydrology of the site, especially in regard to the design of the TSF facility (Section 4.7.7.4 pp 198). No data exists for MC4372, nor does the geo-hydrology or hydrology exists beyond the boundaries of MC4373 which may impact upon the Prescribed Wells Area to the South the source of potable water for lower Eyre Peninsula	Refer Issue #19 Page 43	7.4		19			
4	68	Noise (Sect 7.7)	Insufficient data exists in relation to noise generation and dispersion as a consequence of night time operations which not only generate audible noise but also infrasound	Page 81	7.7					
4	69	Noise (Sect 7.7)	Lack of actual site specific wind dispersion data implies that the noise dispersion patterns having regard to the wind and to the topography are subject to conjecture	Page 81	7.7	7.6	56			
4	70	Construction of TSF (Appendix H)	Limitations of the design of the retaining embankment due to "insufficient geotechnical, geohydrology and hydrology of the site"	Pages 26	4.7	7.1				

4	71	Construction of TSF (Appendix H)	Approval should not be granted until all relevant data is available and the design reflects this	Page 109		noted					
4	72	Construction of TSF (Appendix H)	Application must contain all relevant information so that the public is well informed of the intentions of the applicant	Page 109		noted					
4	73	Construction of TSF (Appendix H)	Rehabilitation of the TSF in the long term	Page 95		8.6					
4	74	Construction of TSF (Appendix H)	Leaching into the aquifer and also in the Pillaworta Creek environs is of paramount concern, one which is not readily satisfied by the proposed treatment of the TSF. The migration of Chromium, Copper, Manganese, Uranium etc into the groundwater and to the Pillaworta Creek will have significant consequences.	Page 27		4.7	7.1				
4	75	Environmental Impacts (Sect 7)	Environmental impact of surface water run-off from the activities of mining operations fails to deal with the fact that this water has a high probability of being contaminated water (as a consequence of the activities) and whilst a sediment tank is employed, the Application is devoid of information pertaining to the quality of the water (dissolved salts etc) that may (will) reach the confines of Pillaworta Creek and beyond.	Pages 41 & 62		7.6	7.3	15	273		
4	76	Environmental Impacts (Sect 7)	Environmental sensitivity of this catchment and its ultimate outflow to the sea (marine park and aquaculture zones)	Pages 41 & 62		7.6	7.3	15	273		
4	77	Explosives Magazine (Sect 4.5.7)	Risk assessment to this facility in the event of a bushfire	Page 16		4.5.7					
4	78	Explosives Magazine (Sect 4.5.7)	Risk to employee fire fighters or to the CFS as a consequence of a bushfire in the vicinity of the magazine	Page 17		4.5.7		82	194		
4	79	Explosives Magazine (Sect 4.5.7)	Assessment of the impact of a catastrophic explosion of the	Page 17		4.5.7					
4	80	Explosives Magazine (Sect 4.5.7)	Increase in insurance risk to neighbouring properties as a result of the location of the magazine. Is this potential increase in insurance subject to compensation from the Company?	Page 110		Appendix 1					
4	81	Explosives Magazine (Sect 4.5.7)	Chemical composition of the detonators. If they contain mercury fulminate, what is the environmental risk of such a large amount of mercury being released during the mining operations (dust and groundwater implications)?	Page 18		4.5.7					
4	82	Explosives Magazine (Sect 4.5.7)	There are other issues pertaining to the magazine, particularly in relation to the security of the contents, noting ammonium nitrate is a precursor to many Improvised Explosive Devices. Presumably South Australian Police, Australian Police and ASIO have been informed as to the location and contents of the proposed magazine and the security of its contents.	Refer Issue #78 Page 17		4.5.7		78	194		
4	83	Eyre Iron Data	Some data has been cut and pasted from information generated by Eyre Iron Pty Ltd for the purpose of mining activities associated with the iron ore Project Fusion...and AGL did not carry out sufficient research to ensure the studies were verifiable for the site of Kookaburra Gully. The data so imported was obtained by another company and not under the care and control of AGL.	Page 8		3.8					
4	84	Long Term Issues	Kookaburra Gully is potentially not a stand alone development, but a component of the development of the prospect inclusive of Kookaburra Gully extension (for which the Company has received a \$3M grant to drill as part of the PACE program) and the original Koppio Graphite Mine area.	Page 15		4.4					
4	85	Long Term Issues	Is the application an overarching application for the activities not only associated with Kookaburra Gully Mine site but for the holistic view encompassing the original Koppio Mine and Kookaburra Gully extended?	Page 15		4.4		84			
4	86	Long Term Issues	Local suggestions that this development may also enable some symbiotic arrangement to exist between Australian Graphite Limited and Valance (Uley) Graphite ...part of the relationship may be the establishment of haul routes between the two prospects.	Page 14		4.2					
Submission 5											

5	87	Social License (Sect 5 & 6, Appendix A)	Lack of specific information provided throughout the so called consultation process	Refer Issue #33 Page 34	6.7		33			
5	88	Social License (Sect 5 & 6, Appendix A)	Lack of availability of hard copy	Refer Issue #34 Page 35	6.7		34			
5	89	Social License (Sect 5 & 6, Appendix A)	Lack of knowledge of the inadequacies of internet capabilities on Lower Eyre Peninsula and inability to download a 139Mb file	Refer Issue #35 Page 35	6.7		35			
5	90	Social License (Sect 5 & 6, Appendix A)	The expectation that the recipient of the document of 1169 pages will be able to read, comprehend and formulate a response within the period provided.	Refer Issue #37 Page 35	6.7		37			
5	91	Social License (Sect 5 & 6, Appendix A)	Demographic data that is four years out of date.	Refer Issue #40 Page 7	3.1		40			
5	92	Social License (Sect 5 & 6, Appendix A)	Reference to 52 mining jobs currently in the town of Tumbly Bay noting that the previous mining employer (Centrex Metals/Eyre Iron) has left the area is totally incorrect	Refer Issue #41 Page 30	5.1		28	41		
5	93	Social License (Sect 5 & 6, Appendix A)	There are no agreements with the DCTB with respect to costs, inclusive of potential decline in revenue due to the devaluation of properties in the vicinity of the proposed mines and the loss of rate revenue.	Refer Issue #6 & 7 Page 88	7.9		6	7		
5	94	Social License (Sect 5 & 6, Appendix A)	Recognition of the costs to the agricultural industry through contamination dust arising from the mining operations	Refer Issues #10, 11, & 12 Page 61	7.6	6.7	10	11	12	
5	95	Transport Route Sect 7.9	The impact upon native vegetation and EPBC listed species is not recognised in the Application	Refer Issue # 5 Page 85	7.9		5			
5	96	Transport Route Sect 7.9	It is noted that the transport route has been determined in the absence of consultation with the community and Elected Members of the DCTB.	Refer Issue #1 Page 83	7.9		1			
5	97	Dust (Sect 4 pp106-107 & Sect 7.4)	Nature and health impacts together with potential agricultural industry impacts of the dust emanating from mining operations (graphite, Chromium, Manganese, Nickel, Rare Earths, Strontium, Thorium and Uranium together with Copper, Magnesium and Zinc). These minerals are potential carcinogens and or neurotoxins in humans and growth inhibitors in plants.	Refer Issue #8 Page 57	7.6		8			
5	98	Dust (Sect 4 pp106-107 & Sect 7.4)	The nature and health impacts together with potential agricultural industry impacts of the dust emanating from mining operations are inadequately described in the application	Refer Issue #9 & 56 Page 57	7.6		9	56		
5	99	Dust (Sect 4 pp106-107 & Sect 7.4)	In the absence of on-site meteorological data, the dispersion pattern modelled from data remote from the site is of concern, given the potential nature of the contaminant within the dust and their impact upon humans and plants alike. There is no consideration given to the impact upon pastures and thence animals whom ingest these contaminants over a period of time.	Refer Issue #10 Page 61	7.6		10			
5	100	Dust (Sect 4 pp106-107 & Sect 7.4)	Economic losses attributed to the impact of copper, magnesium and zinc (in excess of trace levels) on grain production	Refer Issue #11 Page 61	7.6		11			
5	101	Dust (Sect 4 pp106-107 & Sect 7.4)	The impact upon agricultural businesses within the fallout cloud of contaminated dust due to possible contaminated grain deliveries.	Refer Issue #12 & 56 Page 57	7.6		12	56		
5	102	Dust (Sect 4 pp106-107 & Sect 7.4)	Potential contamination of rain water, the main source of drinking water for the area	Refer Issue #13 Page 61	7.6		13			
5	103	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact of contaminated dust reaching the township of Tumbly Bay	Refer Issue #14 Page 62	7.6		14			
5	104	Surface water	Impact on surface water contained within the Tod River Water Protection Zone (as per the DCTB Development Plan) or the Tod River Wetland of National Significance	Refer Issue #15 Page 62	7.5		15			
5	105	Groundwater (Sect 7.4)	Nature of the hazardous materials (graphite, Chromium, Copper, Manganese, Nickel, Rare Earths, Strontium, Thorium and Uranium) emanating from mining operations inclusive of the processing operations	Refer Issue #16 & 17 Page 42	7.4		16	17		
5	106	Groundwater (Sect 7.4)	Environmental impact associated with contamination of groundwater with the hazardous materials identified is not fully disclosed neither is the long term health impacts associated with contaminated ground water	Refer Issue #18 Page 43	7.4		18			

5	107	Groundwater (Sect 7.4)	The nature of the hazardous materials emanating from mining operations inclusive of the processing operations is inadequately described in the application	Refer Issue #16 & 17 Page 42		7.4		16	17		
5	108	Environmental Impacts (Sect 7)	Environmental impact of surface water run-off from the activities of mining operations fails to deal with the fact that this water has a high probability of being contaminated water (as a consequence of the activities) and whilst a sediment tank is employed, the application is devoid of information pertaining to the quality of the water (dissolved salts etc) that may (will) reach the confines of Pillaworta Creek and beyond.	Refer Issues #15, 75, 178 & 273 Pages 62, 41 & 54		7.6	7.4	75	15	273	178
5	109	Explosives Magazine (Sect 4.5.7)	Risk assessment to this facility in the event of a bushfire	Refer Issue #77 Page 16		4.5.7		77			
5	110	Explosives Magazine (Sect 4.5.7)	Risk to employee fire fighters or to the CFS as a consequence of a bushfire in the vicinity of the magazine	Refer Issue #78 Page 17		4.5.7		78			
5	111	Explosives Magazine (Sect 4.5.7)	I am a CFS volunteer and I WILL NOT be attending any fire at a mining company site on Eyre Peninsula.	Pages 16-18		Noted		78			
Submission 6											
6	112	Social License (Sect 5 & 6, Appendix A)	Lack of information provided throughout the so called consultation process	Refer Issue #33 Page 34		6.7		33			
6	113	Social License (Sect 5 & 6, Appendix A)	Lack of availability of hard copy	Refer Issue #34 Page 35		6.7		34			
6	114	Social License (Sect 5 & 6, Appendix A)	Lack of knowledge of the inadequacies of internet capabilities on Lower Eyre Peninsula and inability to download a 139Mb file	Refer Issue #35 Page 35		6.7		35			
6	115	Social License (Sect 5 & 6, Appendix A)	Demographic data that is four years out of date.	Refer Issue #40 Page 7		3.1		40			
6	116	Social License (Sect 5 & 6, Appendix A)	Reference to 52 mining jobs currently in the town of Tumbly Bay noting that the previous mining employer (Centrex Metals/Eyre Iron) has left the area is totally incorrect	Refer Issue #41 Page 30		5.1		41			
6	117	Social License (Sect 5 & 6, Appendix A)	There are no agreements with the DCTB with respect to costs, inclusive of potential decline in revenue due to the devaluation of properties in the vicinity of the proposed mines and the loss of rate revenue.	Refer Issue #6 & 7 Page 88		7.9		6	7		
6	118	Transport Route Sect 7.9	The impact upon native vegetation and EPBC listed species is not recognised in the Application.	Refer Issue #5 Page 85		7.9		5			
6	119	Transport Route Sect 7.9	It is noted that the transport route has been determined in the absence of consultation with the community and Elected Members of the DCTB.	Refer Issue #1 Page 83		7.9		5			
6	120	Transport Route (Sect 7.9)	As a land owner in the Hundred of Koppio, I work in the Tumbly Bay Health services. As I frequently travel along the Bratten Way Highway I am very concerned in the traffic load that will be put on the Pillaworta /Bratten Way Intersection.	Page 91		7.9					
6	121	Dust (Sect 4 pp106-107 & Sect 7.4)	Nature and health impacts together with potential agricultural industry impacts of the dust emanating from mining operations	Refer Issue #56 Page 57		7.6		56			
6	122	Dust (Sect 4 pp106-107 & Sect 7.4)	The proposed graphite mine is across the road from where these breeding ewes graze.	Refer Issue #56 Page 57		noted		56			
6	123	Groundwater (Sect 7.4)	Environmental impact associated with contamination of groundwater with the hazardous materials	Refer Issue #18 Page 43		7.4		18			
6	124	Groundwater (Sect 7.4)	Water that our livestock drink comes from nature soaks,	Page 44		7.4					
6	125	Groundwater (Sect 7.4)	We do not have any mains water supply to any of our properties so we rely on the rainwater that we catch on our roof tops and dams. This includes our water that we drink, cook in and bath in. Is this going to be contaminated by the dust produced from the graphite mine?	Refer Issue #13 Page 61		7.6		13			
6	126	Environmental Impacts (Sect 7)	Located on Section 162, Hd of Koppio is 80 ha of natural woodland which has not been stock for 30 years....This area	Page 38		7.2	7.6				
6	127	Environmental Impacts (Sect 7)	It is unjust that our government can give a mining company the approval to destroy our land with a mine with a life span of	Page 38		7.2					
6	128	Environmental Impacts (Sect 7)	Our wish is to be able to pass onto our grand children a parcel of land with natural vegetation that has NOT been tarnished	Page 38		7.2					
Submission 7											
7	129	Social License (Sect 5 & 6, Appendix A)	Lack of information provided throughout the so called consultation process	Refer Issue #33 Page 34		6.7		33			

7	130	Social License (Sect 5 & 6, Appendix A)	Lack of availability of hard copy	Refer Issue #34 Page 35	6.7	34			
7	131	Social License (Sect 5 & 6, Appendix A)	Lack of knowledge of the inadequacies of internet capabilities on Lower Eyre Peninsula and inability to download a 139Mb file	Refer Issue #35 Page 35	6.7	35			
7	132	Social License (Sect 5 & 6, Appendix A)	The expectation that the recipient of the document of 1169 pages will be able to read, comprehend and formulate a response within the period provided.	Refer Issue #37 Page 35	6.7	37			
7	133	Social License (Sect 5 & 6, Appendix A)	The complete inflexibility of DSD with respect to an extension of time in which to respond.	Refer Issue #38 Page 35	6.7	38			
7	134	Social License (Sect 5 & 6, Appendix A)	The lack of public presentation either by DSD or the Company with respect to the Application	Refer Issue #39 Page 34	6.7	39			
7	135	Social License (Sect 5 & 6, Appendix A)	Demographic data that is four years out of date.	Refer Issue #40 Page 7	3.1	40			
7	136	Social License (Sect 5 & 6, Appendix A)	Reference to 52 mining jobs currently in the town of Tumbly Bay noting that the previous mining employer (Centrex Metals/Eyre Iron) has left the area is totally incorrect	Refer Issue #41 Page 30	5.1	41			
7	137	Social License (Sect 5 & 6, Appendix A)	The availability of jobs for the local community is based upon what data, given the job profiles of the proposed positions are not identified and the glut of mine employees on the market due to the significant down turn in the mining industry.	Refer Issue #42 Page 31	5.1	42			
7	138	Social License (Sect 5 & 6, Appendix A)	The oft stated 'benefits' to the community have not been quantified nor have the costs. There is no cost benefit analysis provided.	Refer Issue #43 Page 32	5.2	43			
7	139	Social License (Sect 5 & 6, Appendix A)	There is no recognition of the costs to the agricultural industry through contamination dust arising from the mining operations.	Refer Issues #10, 11, & 12 Page 61	7.6	10	11	12	
7	140	Social License (Sect 5 & 6, Appendix A)	There are no agreements with the DCTB with respect to costs, inclusive of potential decline in revenue due to the devaluation of properties in the vicinity of the proposed mines and the loss of rate revenue.	Refer Issue #6 & 7 Page 88	7.9	6	7		
7	141	Transport Route Sect 7.9	It is noted that the transport route has been determined in the absence of consultation with the community and Elected Members of the DCTB.	Refer Issue #1 Page 83	7.9	1			
7	142	Transport Route Sect 7.9	There is no agreement with the DCTB as to the actual transport route	Refer Issue #2 Page 84	7.9	2			
7	143	Transport Route Sect 7.9	Assumptions have been made on the part of the Works Manager as to the transport route, but these are not transparent to Elected Members nor the Community at large.	Refer Issue #1 & 3 Page 83-84	7.9	1	3		
7	144	Transport Route Sect 7.9	The capability of the 'determined route' appears not to have been subjected to any formal approval process through DPTI	Refer Issue #4 Page 85	7.9	4			
7	145	Transport Route Sect 7.9	The impact upon native vegetation and EPBC listed species is not recognised in the Application.	Refer Issue #5 Page 85	7.9	5			
7	146	Transport Route Sect 7.9	The Application includes cost estimates from a private contractor as to upgrading the road, but no Council budget exists for this work to be undertaken and no agreement to cost sharing exists.	Refer Issue #6 Page 88	7.9	6			
7	147	Transport Route (Sect 7.9)	There is no economic benefit statement to the Community pertaining to the proposed road upgrade, only the potential for continued maintenance and repair liabilities for the life of the mine and beyond.	Refer Issue #7 Page 88	7.9	7			
7	148	Dust (Sect 4 pp106-107 & Sect 7.4)	Nature and health impacts together with potential agricultural industry impacts of the dust emanating from mining operations (graphite, Chromium, Manganese, Nickel, Rare Earths, Strontium, Thorium and Uranium together with Copper, Magnesium and Zinc) These minerals are potential carcinogens and or neurotoxins in humans and growth inhibitors in plants	Refer Issue #8 Page 57	7.6	8			
7	149	Dust (Sect 4 pp106-107 & Sect 7.4)	The nature and health impacts together with potential agricultural industry impacts of the dust emanating from mining operations are inadequately described in the application	Refer Issue #9 & 56 Page 57	7.6	9	56		

7	150	Dust (Sect 4 pp106-107 & Sect 7.4)	In the absence of on-site meteorological data, the dispersion pattern modelled from data remote from the site is of concern. . Given the potential nature of the contaminant within the dust and their impact upon humans and plants alike. There is no consideration to the impact upon pastures and thence animals which ingest these contaminates over a period of time	Refer Issue #10 Page 61		7.6		10			
7	151	Dust (Sect 4 pp106-107 & Sect 7.4)	Economic losses attributed to the impact of copper, magnesium and zinc (in excess of trace levels) on grain production	Refer Issue #11 Page 61		7.6		11			
7	152	Dust (Sect 4 pp106-107 & Sect 7.4)	The impact upon agricultural businesses within the fallout cloud of contaminated dust due to possible contaminated grain deliveries.	Refer Issue #12 & 56 Page 57		7.6		12	56		
7	153	Dust (Sect 4 pp106-107 & Sect 7.4)	Potential contamination of rain water, the main source of drinking water for the area	Refer Issue #13 Page 61		7.6		13			
7	154	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact of contaminated dust reaching the township of Tumby Bay	Refer Issue #14 Page 62		7.6		14			
7	155	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact on surface water contained within the Tod River Water Protection Zone (as per the DCTB Development Plan) or the Tod River Wetland of National Significance	Refer Issue #15 Page 62		7.6		15			
7	156	Groundwater (Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the ore body that are potentially harmful to human health and plant health. These include not only the graphite, but Chromium, Copper, Manganese, Rare Earths, Strontium, Thorium and Uranium. These materials are potential carcinogens and or neurotoxins in human and growth inhibitors in plants	Refer Issue #16 & 17 Page 42		7.4		16	17		
7	157	Groundwater (Sect 7.4)	The nature of the hazardous materials emanating from mining operations inclusive of the processing operations is inadequately described in the application	Refer Issue #16 & 17 Page 42		7.4		16	17		
7	158	Groundwater (Sect 7.4)	Environmental impact associated with contamination of groundwater with the hazardous materials identified is not fully disclosed neither is the long term health impacts associated with contaminated ground water	Refer Issue #18 Page 43		7.4		18			
7	159	Groundwater (Sect 7.4)	Limitations with respect to the geotechnical, hydrogeology and hydrology of the site, especially in regard to the design of the TSF facility (Section 4.7.7.4 pp 198) It is significant concern that the limitations highlighted by the consultant extends	Refer Issue #19 Page 43		7.4		19			
7	160	Noise (Sect 7.7)	Insufficient data exists in relation to noise generation and dispersion as a consequence of night time operations which not only generate audible noise but also infrasound	Refer Issues #68 & 279 Page 81		7.7		68			
7	161	Noise (Sect 7.7)	Lack of actual site specific wind dispersion data implies that the noise dispersion patterns having regard to the wind and to the topography are subject to conjecture	Refer Issue #69 Page 81		7.7		69			
7	162	Construction of TSF (Appendix H)	Limitations of the design of the retaining embankment due to "insufficient geotechnical, geohydrology and hydrology of the site"	Refer Issue #70 Page 26		4.7	7.1	70			
7	163	Construction of TSF (Appendix H)	Approval should not be granted until all relevant data is available and the design reflects this	Refer Issue #71 Page 109		Noted		71			
7	164	Construction of TSF (Appendix H)	Application must contain all relevant information so that the public is well informed of the intentions of the applicant. It is our view that the deficiencies of information should be rectified and provided to the public by way of an amendment to the application and be subjected to an appropriate period of public scrutiny. Failure of the applicant to be required to provide this information and to provide approval for the project on the basis of what has been tendered is tantamount to an approval of a faulty design for whom legal liability can be established in the future should there be a catastrophic failure of the wall.	Refer Issue #72 Page 109		Noted		72			

7	165	Environmental Impacts (Sect 7)	Environmental impact of surface water run-off from the activities of mining operations fails to deal with the fact that this water has a high probability of being contaminated water (as a consequence of the activities) and whilst a sediment tank is employed, the Application is devoid of information pertaining to the quality of the water (dissolved salts etc) that may (will) reach the confines of Pillaworta Creek and beyond.	Refer Issues #15, 75, 178 & 273 Pages 41, 54 & 62		7.6	7.4	75	15	273	178
7	166	Environmental Impacts (Sect 7)	Environmental sensitivity of this catchment and its ultimate outflow to the sea (marine park and aquaculture zones)	Refer Issues #76 & 75 Pages 41 & 62		7.6	7.3	76			
7	167	Explosives Magazine (Sect 4.5.7)	Risk assessment to this facility in the event of a bushfire	Refer Issue #77 Page 16		4.5.7		77			
7	168	Explosives Magazine (Sect 4.5.7)	Risk to employee fire fighters or to the CFS as a consequence of a bushfire in the vicinity of the magazine	Refer Issue #78 Page 17		4.5.7		78			
7	169	Explosives Magazine (Sect 4.5.7)	Assessment of the impact of a catastrophic explosion of the magazine. In such an event, what would be the blast radius?	Refer Issue #79 Page 17		4.5.7		79			
7	170	Explosives Magazine (Sect 4.5.7)	Increase in insurance risk to neighbouring properties as a result of the location of the magazine. Is this potential increase in insurance subject to compensation from the Company?	Refer Issue #80 Page 110		Appendix 1		80			
7	171	Explosives Magazine (Sect 4.5.7)	Chemical composition of the detonators. If they contain mercury fulminate, what is the environmental risk of such a large amount of mercury being released during the mining operations (dust and groundwater implications)?	Refer Issue #81 Page 18		4.5.7		81			
7	172	Explosives Magazine (Sect 4.5.7)	There are other issues pertaining to the magazine, particularly in relation to the security of the contents, (noting ammonium nitrate is a precursor to many IED's)	Refer Issue #82 Page 17		4.5.7		82			
7	173	Long Term Issues	Kookaburra Gully is potentially not a stand alone development, but a component of the development of the prospect inclusive of Kookaburra Gully extension (for which the Company has received a \$3M grant to drill as part of the PACE program) and the original Koppio Graphite Mine area.	Refer Issue #84 Page 15		4.4		84			
7	174	Long Term Issues	Is the application an overarching application for the activities not only associated with Kookaburra Gully Mine site but for the holistic view encompassing the original Koppio Mine and Kookaburra Gully extended?	Refer Issue #85 Page 15		4.4		85			
7	175	Long Term Issues	Local suggestions that this development may also enable some symbiotic arrangement to exist between Australian Graphite Limited and Valance (Uley) Graphitepart of the relationship may be the establishment of haul routes between the two prospects.	Refer Issue #86 Page 14		4.2		86			
Submission 8											
8	176	Water	AGL intends having ponds of kerosene and diesel to float the graphite off	Page 53		7.5					
8	177	Water	The proposed mine site is within the Tod River Catchment...(AGL) have no true understanding of the local rainfall in this area...12 hour rainfall event 15-16 June 2014 over 85mm fell and resulted in creeks and fords overflowing and residents being unable to leave their properties. The DCTB has now erected 2m high flood markers at these crossings. Photos take at approx. 4pm on 16 th June 2014, after floodwaters show the road damage on Pillaworta and Bailla Hill Road junctions, and debris caught on the fence up at head height. This debris has since been removed, strangely, and the locals wouldn't and couldn't be bothered. The force of this rainfall event was so huge that the pipeline across the Tod River below Reservoir, was such that the pipeline was swept off its' concrete supports south of the causeway.	Page 53		7.5	3.8	633			

8	178	Water/TSF	If a Tailings Dam had been constructed where proposed, would have contaminated the Tod River all the way down to the Tod mouth at the sea, into Fish farming and breeding areas, affecting the Clean, Green Fish farms and our many beautiful beaches	Page 54 & Issues #15, #64 & #273 Pages 41 & 62	7.6	7.5	15	64	273	
8	179	Water/Dust	Potential contamination "with this potentially deadly dust" of rain water, the main source of drinking water for the area	Refer Issue #13 Page 61	7.6		13			
8	180	Dust	Breathing air with radioactive and heavy metal particles in it.	Page 64	7.6					
8	181	Dust	Dust contamination of agricultural land, grain and animals (particularly sheep)	Refer Issue #8, 9 & 56 Page 57-61	7.6		8	9	10	11
8	182	Dust	Dust contamination of water flowing into Lake Wangary and then Coffin Bay....risk to tourism and aquaculture at Coffin Bay	Page 64	7.6					
8	183	Dust	Sustainable agriculture has existed here for over 100 years and has the potential to continue for over hundreds of years. Even miners have to breather drink and eat! None is this is included in the Mining Lease Application. Our farming land will be worthless and non viable. This MLA is for approx. 7-8 years balance that against thousands of people for over another 100 years. ABS show that 1 Australian farmer feeds 600 people, 150 in Australia and 450 overseas.	Refer Issues #8-9, #452 & # 514 Pages 31 & 57 - 61	7.6	5.2	8	9	452	514
8	184	Roads and Transport	Pillaworta Road is used mainly by cars and utes and a very small number of trucks (carting stock and grain at harvest time). This road is too narrow for the size and number of trucks proposed by AGL.	Page 91	7.9		30			
8	185	Roads and Transport	Heavily lined with protected EPBC varieties of trees including the protected EP Blue Gum (Eucalyptus petiolaris) and the road is not suited to widening.	Refer Issue #5 Page 85	7.9		5			
8	186	Roads and Transport	The junction of the Bratten Way and Pillaworta Road is on a sweeping downhill bend and slow moving graphite transport trucks entering a road with over 6 kms of double white lines has potentially fatal consequences.	Refer Issue #120 Page 91	7.9		120	184		
8	187	Roads and Transport	It is noted that the transport route has been determined in the absence of consultation with the community and Elected Members of the DCTB.	Refer Issue #1 Page 83	7.9		1			
8	188	Roads and Transport	There is no agreement with the DCTB as to the actual transport route	Refer Issue #2 Page 84	7.9		2			
8	189	Roads and Transport	There is no economic benefit statement to the Community pertaining to the proposed road upgrade, only the potential for continued maintenance and repair liabilities for the life of the mine and beyond.	Refer Issue #7 Page 88	7.9		7			
8	190	Roads and Transport	Assumptions have been made on the part of the Works Manager as to the transport route, but these are not transparent to Elected Members nor the Community at large.	Refer Issue #1 & 3 Page 83	7.9		1	3		
8	191	Roads and Transport	The capability of the 'determined route' appears not to have been subjected to any formal approval process through DPTI	Refer Issue #4 Page 85	7.9		4			
8	192	Roads and Transport	The impact upon native vegetation and EPBC listed species is not recognised in the Application.	Refer Issue #5 Page 85	7.9		5			
8	193	Explosives Magazine Site	Risk assessment to this facility in the event of a bushfire	Refer Issue #77 Page 16	4.5.7		77			
8	194	Explosives Magazine Site	What safety precautions for local residents, employees and CFS fire fighters.	Refer Issue #78 Page 17	4.5.7		78	82		
8	195	Explosives Magazine Site	Being located in a gully would channel the blast over a huge area. Assessment of the impact of a catastrophic explosion of the magazine. In such an event, what would be the blast radius?	Refer Issue #79 Page 17	4.5.7		79			
8	196	Explosives Magazine Site	Increase in insurance risk to neighbouring properties as a result of the location of the magazine. Is this potential increase in insurance subject to compensation from the Company?	Refer Issue #80 Page 110	Appendix 1		80			

8	197	Explosives Magazine Site	Chemical composition of the detonators. If they contain mercury fulminate, what is the environmental risk of such a large amount of mercury being released during the mining operations (dust and groundwater implications)?	Refer Issue #81 and Issues #16, #17, #18 and #19 Pages 18 & 42-43	4.5.7	7.4	81	16	17	18
8	198	Explosives Magazine Site	What about security of the magazine contents? (note ammonium nitrate is a precursor to many IED's)	Refer Issue #82 Pages 17	4.5.7		82			
8	199	Social License and Data Deficiency	Demographic data that is four years out of date.	Refer Issue #40 Page 7	3.1		40			
8	200	Social License and Data Deficiency	What data is the availability of jobs for the local community based upon. The job profiles of the proposed positions are not identified and there is a glut of mine employees on the market due to the significant down turn in the mining industry.	Refer Issue #42 Page 31	5.1		42			
8	201	Social License and Data Deficiency	What are stated 'benefits' to the community they have not been quantified nor have the costs.	Refer Issue #43 Page 32	5.2		43			
8	202	Social License and Data Deficiency	No mention has been made of the loss of jobs in a highly productive farming and tourism area due to dust contamination through mining activities. Where is the cost benefit analysis	Refer Issue #43 Page 32	5.2		43			
8	203	Social License and Data Deficiency	Rference to 52 mining jobs currently in the town of Tumbly Bay noting that the previous mining employer (Centrex Metals/Eyre Iron) has left the area in totally incorrect	Refer Issue #41 Page 30	5.1		41			
8	204	Long Term Issues	Kookaburra Gully is potentially not a stand alone development, but a component of the development of the prospect inclusive of Kookaburra Gully extension (for which the Company has received a \$3M grant to drill as part of the PACE program) and the original Koppio Graphite Mine area.	Refer Issue #84 Page 15	4.4		84			
8	205	Long Term Issues	Is the application an overarching application for the activities not only associated with Kookaburra Gully Mine site but for the holistic view encompassing the original Koppio Mine and Kookaburra Gully extended as inferred by information provided in relation to haul routes and transport requirements in Volume 2?	Refer Issue #85 Page 15	4.4		85			
8	206	Long Term Issues	Local suggestions that this development may also enable some symbolic arrangement to exist between Australian Graphite Limited and Valance (Uley) Graphite for which there has been no public consultation. Part of the relationship may be the establishment of haul routes between the two prospects.	Refer Issue #86 Page 14	4.2		86			
8	207	Long Term Issues	Graphite mines are the filthiest, dirtiest of all mines, they must be crazy to be mining in such high rainfall and productive country, No mining should be allowed in that country	Page 36	7		207			
8	208	Long Term Issues	AGL/LML have no proof and no independent data (using Eyre Iron data which we know has not been independently collected, in sealed, tamper proof containers)	Refer Issue #83 Page 8	3.8	3.7	83	666		
8	209	Long Term Issues	AGL have no environmental history and no social license in the community to proceed with this proposal. What redress and compensation for the community and the environment is shown in this application.	Page 102	9.2		209			
8	210	Social License and Data Deficiency	Lack of information provided throughout the so called consultation process	Refer Issue #33 Page 34	6.7		33			
8	211	Social License and Data Deficiency	To expect the ordinary person to have to pay \$250 just to get a copy to respond to the application. Lack of availability of hard copy	Refer Issue #34 Page 35	6.7		34			
8	212	Social License and Data Deficiency	There are many people without a computer and internet facilities and the inability to access such a large document	Refer Issue #34 & 35 Page 35	6.7		34	35		
8	213	Social License and Data Deficiency	To expect a lay person to be able to access, read and formulate a response within such a rigid and short time frame.	Refer Issue #37 & 38 Page 35	6.7		37	38		
8	214	Social License and Data Deficiency	No extension of time in which to lodge a submission.	Refer Issue #38 Page 35	6.7		38			
8	215	Social License and Data Deficiency	The lack of public presentation either by DSD or the Company with respect to the Application	Refer Issue #39 Page 34	6.7		39			
8	216	Environmental	What about the kookaburras of Kookaburra Gully	Page 41	7.3		216			

Submission 9 - Caryl Cabot										
9	217	Social License (Sect 5 & 6, Appendix A)	Lack of information provided throughout the so called consultation process	Refer Issue #33 Page 34	6.7		33			
9	218	Social License (Sect 5 & 6, Appendix A)	Lack of availability of hard copy	Refer Issue #34 Page 35	6.7		34			
9	219	Social License (Sect 5 & 6, Appendix A)	Lack of knowledge of the inadequacies of internet capabilities on Lower Eyre Peninsula and inability to download a 139Mb file	Refer Issue #35 Page 35	6.7		35			
9	220	Social License (Sect 5 & 6, Appendix A)	The expectation that the recipient of the document of 1169 pages will be able to read, comprehend and formulate a response within the period provided.	Refer Issue #37 Page 35	6.7		37			
9	221	Social License (Sect 5 & 6, Appendix A)	The complete inflexibility of DSD with respect to an extension of time in which to respond.	Refer Issue #38 Page 35	6.7		38			
9	222	Social License (Sect 5 & 6, Appendix A)	The lack of public presentation either by DSD or the Company with respect to the Application	Refer Issue #39 Page 34	6.7		39			
9	223	Social License (Sect 5 & 6, Appendix A)	Demographic data that is four years out of date.	Refer Issue #40 Page 7	3.1		40			
9	224	Social License (Sect 5 & 6, Appendix A)	Reference to 52 mining jobs currently in the town of Tumbly Bay noting that the previous mining employer (Centrex Metals/Eyre Iron) has left the area is totally incorrect	Refer Issue #41 Page 30	5.1		41			
9	225	Social License (Sect 5 & 6, Appendix A)	The availability of jobs for the local community is based upon what data, given the job profiles of the proposed positions are not identified and the glut of mine employees on the market due to the significant down turn in the mining industry.	Refer Issue #42 Page 31	5.1		42			
9	226	Social License (Sect 5 & 6, Appendix A)	The oft stated 'benefits' to the community have not been quantified nor have the costs. There is no cost benefit analysis provided.	Refer Issue #43 Page 32	5.2		43			
9	227	Social License (Sect 5 & 6, Appendix A)	There is no recognition of the costs to the agricultural industry through contamination dust arising from the mining operations.	Refer Issues #10, 11, & 12 Page 61	7.6		10	11	12	
9	228	Social License (Sect 5 & 6, Appendix A)	There are no agreements with the DCTB with respect to costs, inclusive of potential decline in revenue due to the devaluation of properties in the vicinity of the proposed mines and the loss of rate revenue.	Refer Issue #6 & 7 Page 88	7.9		6	7		
9	229	Transport Route Sect 7.9	It is noted that the transport route has been determined in the absence of consultation with the community and Elected Members of the DCTB.	Refer Issue #1 Page 83	7.9		1			
9	230	Transport Route Sect 7.9	There is no agreement with the DCTB as to the actual transport route	Refer Issue #2 Page 84	7.9		2			
9	231	Transport Route Sect 7.9	Assumptions have been made on the part of the Works Manager as to the transport route, but these are not transparent to Elected Members nor the Community at large.	Refer Issue #1 & 3 Page 83	7.9		1	3		
9	232	Transport Route Sect 7.9	The capability of the 'determined route' appears not to have been subjected to any formal approval process through DPTI	Refer Issue #4 Page 85	7.9		4			
9	233	Transport Route Sect 7.9	The impact upon native vegetation and EPBC listed species is not recognised in the Application.	Refer Issue #5 Page 85	7.9		5			
9	234	Transport Route Sect 7.9	The Application includes cost estimates from a private contractor as to upgrading the road, but no Council budget exists for this work to be undertaken and no agreement to cost sharing exists.	Refer Issue #6 Page 88	7.9		6			
9	235	Transport Route (Sect 7.9)	There is no economic benefit statement to the Community pertaining to the proposed road upgrade, only the potential for continued maintenance and repair liabilities for the life of the mine and beyond.	Refer Issue #7 Page 88	7.9		7			
9	236	Dust (Sect 4 pp106-107 & Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the orebody that are potentially harmful to human and plant health. These include not only the graphite, but Chromium, Manganese, Nickel, Rare Earths, Manganese, Strontium, Thorium and Uranium together with Copper, Magnesium and Zinc. These minerals are potential carcinogens and or neurotoxins in humans and growth inhibitors in plants.	Refer Issue #8 Page 57	7.6		8			

9	237	Dust (Sect 4 pp106-107 & Sect 7.4)	The nature and health impacts together with potential agricultural industry impacts of the dust emanating from mining operations.	Refer Issue #9 & 56 Page 57		7.6		9	56		
9	238	Dust (Sect 4 pp106-107 & Sect 7.4)	In the absence of on-site meteorological data, the dispersion pattern modelled from data remote from the site is of concern. . Given the potential nature of the contaminant within the dust and their impact upon humans and plants alike. There is no consideration to the impact upon pastures and thence animals which ingest these contaminates over a period of time	Refer Issue #10 Page 61		7.6		10			
9	239	Dust (Sect 4 pp106-107 & Sect 7.4)	Economic losses attributed to the impact of copper, magnesium and zinc (in excess of trace levels) on grain production	Refer Issue #11 Page 61		7.6		11			
9	240	Dust (Sect 4 pp106-107 & Sect 7.4)	The impact upon agricultural businesses within the fallout cloud of contaminated dust due to possible contaminated grain deliveries.	Refer Issue #12 & 56 Page 57		7.6		12	56		
9	241	Dust (Sect 4 pp106-107 & Sect 7.4)	Potential contamination of rain water, the main source of drinking water for the area	Refer Issue #13 Page 61		7.6		13			
9	242	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact of contaminated dust reaching the township of Tumby Bay	Refer Issue #14 Page 62		7.6		14			
9	243	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact on surface water contained within the Tod River Water Protection Zone (as per the DCTB Development Plan) or the Tod River Wetland of National Significance	Refer Issue #15 Page 62		7.6		15			
9	244	Groundwater (Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the ore body that are potentially harmful to human health and plant health. These include not only the graphite, but Chromium, Copper, Manganese, Rare Earths, Strontium, Thorium and Uranium. These materials are potential carcinogens and or neurotoxins in human and growth inhibitors in plants	Refer Issue #16 & 17 Page 42		7.4		16	17		
9	245	Groundwater (Sect 7.4)	The nature of the hazardous materials emanating from mining operations inclusive of the processing operations is inadequately described in the application	Refer Issue #16 & 17 Page 42		7.4		16	17		
9	246	Groundwater (Sect 7.4)	Environmental impact associated with contamination of groundwater with the hazardous materials	Refer Issue #18 Page 43		7.4		18			
9	247	Groundwater (Sect 7.4)	Limitations with respect to the geotechnical, hydrogeology and hydrology of the site, especially in regard to the design of the TSF facility (Section 4.7.7.4 pp 198) It is significant concern that the limitations highlighted by the consultant extends beyond the TSF facility to include the known fact that no data exists for MC4372, nor does the geo-hydrology or hydrology exists beyond the boundaries of MC4373 which may impact upon the Prescribed Wells Area to the South, the source of potable water for the lower Eyre Peninsula.	Refer Issue #19 Page 43		7.4		19			
9	248	Noise (Sect 7.7)	Insufficient data exists in relation to noise generation and dispersion as a consequence of night time operations which not only generate audible noise but also infrasound	Refer Issues #68 & 279 Page 81		7.7		68	279		
9	249	Noise (Sect 7.7)	Lack of actual site specific wind dispersion data implies that the noise dispersion patterns having regard to the wind and to the topography are subject to conjecture	Refer Issue #69 Page 81		7.7		69			
9	250	Construction of TSF (Appendix H)	Limitations of the design of the retaining embankment due to "insufficient geotechnical, geohydrology and hydrology of the site"	Refer Issue #70 Page 26		4.7	7.1	70			
9	251	Construction of TSF (Appendix H)	Approval should not be granted until all relevant data is available and the design reflects this	Refer Issue #71 Page 109		Noted		71			
9	252	Construction of TSF (Appendix H)	Application must contain all relevant information so that the public is well informed of the intentions of the applicant. It is our view that the deficiencies of information should be rectified and provided to the public by way of an amendment to the application and be subjected to an appropriate period of public scrutiny. Failure of the applicant to be required to provide this information and to provide approval for the project on the basis of what has been tendered is tantamount to an approval of a faulty design for whom legal liability can be established in the future should there be a catastrophic failure of the wall.	Refer Issue #72 Page 109		Noted		72			

9	253	Environmental Impacts (Sect 7)	Environmental impact of surface water run-off from the activities of mining operations fails to deal with the fact that this water has a high probability of being contaminated water (as a consequence of the activities) and whilst a sediment tank is employed, the Application is devoid of information pertaining to the quality of the water (dissolved salts etc) that may (will) reach the confines of Pillaworta Creek and beyond.	Refer Issues #15, 75, 178 & 273 Pages 41 & 62		7.6	7.4	75	15	273	178
9	254	Environmental Impacts (Sect 7)	Environmental sensitivity of this catchment and its ultimate outflow to the sea (marine park and aquaculture zones)	Refer Issues #76 & 75 Pages 41 & 62		7.6	7.3	76			
9	255	Explosives Magazine (Sect 4.5.7)	Risk assessment to this facility in the event of a bushfire	Refer Issue #77 Page 16		4.5.7		77			
9	256	Explosives Magazine (Sect 4.5.7)	Risk to employee fire fighters or to the CFS as a consequence of a bushfire in the vicinity of the magazine	Refer Issue #78 Page 17		4.5.7		78			
9	257	Explosives Magazine (Sect 4.5.7)	Assessment of the impact of a catastrophic explosion of the magazine. In such an event, what would be the blast radius?	Refer Issue #79 Page 17		4.5.7		79			
9	258	Explosives Magazine (Sect 4.5.7)	Increase in insurance risk to neighbouring properties as a result of the location of the magazine. Is this potential increase in insurance subject to compensation from the Company?	Refer Issue #80 Page 110		Appendix 1		80			
9	259	Explosives Magazine (Sect 4.5.7)	Chemical composition of the detonators. If they contain mercury fulminate, what is the environmental risk of such a large amount of mercury being released during the mining operations (dust and groundwater implications)?	Refer Issue #81 Page 18		4.5.7		81			
9	260	Explosives Magazine (Sect 4.5.7)	What about security of the magazine contents? (note ammonium nitrate is a precursor to many IED's)	Refer Issue #82 Page 17		4.5.7		82			
9	261	Long Term Issues	Kookaburra Gully is potentially not a stand alone development, but a component of the development of the prospect inclusive of Kookaburra Gully extension (for which the Company has received a \$3M grant to drill as part of the PACE program) and the original Koppio Graphite Mine area.	Refer Issue #84 Page 15		4.4		84			
9	262	Long Term Issues	Is the application an overarching application for the activities not only associated with Kookaburra Gully Mine site but for the holistic view encompassing the original Koppio Mine and Kookaburra Gully extended?	Refer Issue #85 Page 15		4.4		85			
9	263	Long Term Issues	Local suggestions that this development may also enable some symbiotic arrangement to exist between Australian Graphite Limited and Valance (Uley) Graphitepart of the relationship may be the establishment of haul routes between the two prospects.	Refer Issue #86 Page 14		4.2		86			
Submission 10 - Anne Daw											
10	264	Earthquakes	Impact on mining induced earthquakes in the Kookaburra Gully area....This may impact the soil, air and water and have detrimental affects, causing a threat to agriculture and fishing, as well as on residents and other businesses of Eyre Peninsula	Page 10		3.9					
10	265	Earthquakes	Earthquakes may be triggered by mining and drilling	Page 10		3.9		264			
10	266	Earthquakes	Historically, in USA, earthquake insurance has excluded earth movement resulting from human activities such as mining, explosives and oil and gas exploration. How many insurance policies cover mining induced earthquakes in Australia, and does this mean that farmers and residents on Eyre Peninsula have to fork out more for their insurance to cover incidents as the result of mining activities? With unconventional gas activities such as shale or coal seam gas, there are no insurance companies in Australia that want to cover properties where these activities are taking place.	Pages 10 & 114		3.9		264	267		
10	267	Earthquakes	The 4 main causes of man made induced seismicity are the following:	Page 10		3.9					
10			- Injection induced seismicity for oil and gas.			3.9					

10			- Reservoir induced seismicity because of the filling of water storage reservoirs (holding ponds for dewatering and waste water come into this category and are required for this proposed project).			3.9					
10			- Mining and quarrying induced seismicity from both open pit and underground mining.			3.9					
10			- Seismicity induced by nuclear explosions – particularly underground.			3.9					
10	268	Earthquakes	Detonation of explosives are also responsible for triggering seismic activity. Australian Graphite Limited is seeking approval to construct and operate an explosives magazine on site. I understand that 60 tonnes of ammonium nitrate and 1 tonne of detonators will be stored in the complex. This is a	Page 10		3.9	4.5.7	264	27		
10	269	Earthquakes	Mining induced earthquakes can vary in nature and be	Page 11		3.9		264			
10	270	Dewatering to Access Graphite	Dewatering of the area to obtain the graphite may cause earthquakes and subsidence (with reference to land subsidence over 40 years in the Gippsland and Morwell areas of Victoria because of the extraction of underground water for dewatering for mining, and oil and gas activities)	Page 45		7.4		270			
10	271	Seawater Intrusion	'Seawater Intrusion, by the National Centre for Ground Water Research and Training' states that Eyre Peninsula is highly vulnerable to seawater intrusion.	Page 46		7.4		271			
10	272	Threat to Potable Groundwater	Threat to potable ground water in the Lower Eyre Peninsula (Uley South) as the result of overflowing of waste-water holding pond....extreme weather conditions such as a 100 year flood.	Page 46		7.4		272			
10	273	Threat to Potable Groundwater	The Pillaworta Creek joins the Tod River and flows into the sea, Spencer Gulf, at Poonindie and the Port Lincoln harbour is just around a land point to the south. The Southern Right Whales are known to be in the sea at Port Lincoln and Spencer Gulf each year.	Pages 46 & 54		7.3		272	178		
10	274	Threat to Potable Groundwater	Taking a pipeline for potable water from the Uley Basin to the	Page 46		7.4		274			
10	275	Threat to Potable Groundwater	Water from the Tod Reservoir: The Tod Reservoir use ceased in 2002 because of contamination, and yet it is planned with this project to use it for dust suppression. This may environmentally open up a can of worms. This water would leach through into the soil, and possibly into water that is used for stock.	See response to Issue 272 and 273, above. Pages 46 & 54		7.4	7.5	272	273		
10	276	Threat to Potable Groundwater	Impact on the Southern Basins PWA: if groundwater salinity increases or becomes contaminated (because of impacts of this proposed mining project), coupled with an increasing demand for water, this would act as a major risk to the region's water supply security, development and economic growth.	Pages 43 & 46		7.4	7.3	19	272	273	
10	277	Diesel	impact of diesel fumes and ultra-fine particulate matter on neighbours and animals adjacent to the mine.	Page 65		7.6		Govt-26			
10	278	Dust	An analysis of the data provided indicates the existence of a significant number of minerals within the orebody that are potentially harmful to human and plant health. These include not only the graphite, but Chromium, Manganese, Nickel, Rare Earths, Manganese, Strontium, Thorium and Uranium together with Copper, Magnesium and Zinc. These minerals are potential carcinogens and or neurotoxins in humans and growth inhibitors in plants.	Refer Issue #8 Page 57		7.6		8			
10	279	Noise (and Dust)	Impact of noise on lambing, as well as the quality of the wool, if it is discoloured by the dust	Refer Issues #68 & #56 Pages 57 & 81		7.7	7.6	68	56		
10	280	Noise	Impact of explosives (blasting) on neighbours and animals	Page 82		7.7	4.5.7				
10	281	Lighting	The processing plant which would be operating 24 hours a day. would be lit up at night for security measures. Again, this is detrimental to humans and animals.	Page 93		7.1					
10	282	Loss of Property Valuation	Adjoining properties would become devalued or worthless and impossible to sell.	Refer Issue #6 & 7 Page 88		7.9		6	7	45	
Submission 11 – J & J Moore											
11	283	Water Ways	Contamination to the fragile water ways and eco system will have a direct impact on the farming community.	Pages 41 & 63		7.6	7.5	15	64	273	

11	284	Dust	Potential contamination of rain water from graphite dust	Refer Issue #13 Page 61		7.6		13			
11	285	Dust Suppression	Method to try to suppress the dust within the mining operation is to spray non potable water onto the road systems and operational areas of the mine, this can lead to contaminated water leaching into the waterways. Which in turn will have a direct effect on the surrounding land.	Page 54		7.5		275			
11	286	Mine Rehabilitation	Once the operation is abandoned the fence surrounding the pit will fall into disarray ,the pit will fill with water , wildlife and animals will fall into the pit/s and drown. Worse of all children could access the area fall from a great height into the pit and drown.	Page 94		8.6					
Submission 12											
12	287	Social License (Sect 5 & 6, Appendix A)	Lack of information provided throughout the so called consultation process	Refer Issue #33 Page 34		6.7		33			
12	288	Social License (Sect 5 & 6, Appendix A)	Lack of availability of hard copy	Refer Issue #34 Page 35		6.7		34			
12	289	Social License (Sect 5 & 6, Appendix A)	Lack of knowledge of the inadequacies of internet capabilities on Lower Eyre Peninsula and inability to download a 139Mb file	Refer Issue #35 Page 35		6.7		35			
12	290	Social License (Sect 5 & 6, Appendix A)	The expectation that the recipient of the document of 1169 pages will be able to read, comprehend and formulate a response within the period provided.	Refer Issue #37 Page 35		6.7		37			
12	291	Social License (Sect 5 & 6, Appendix A)	The complete inflexibility of DSD with respect to an extension of time in which to respond.	Refer Issue #38 Page 35		6.7		38			
12	292	Social License (Sect 5 & 6, Appendix A)	The lack of public presentation either by DSD or the Company with respect to the Application	Refer Issue #39 Page 34		6.7		39			
12	293	Social License (Sect 5 & 6, Appendix A)	Demographic data that is four years out of date.	Refer Issue #40 Page 7		3.1		40			
12	294	Social License (Sect 5 & 6, Appendix A)	Reference to 52 mining jobs currently in the town of Tumbly Bay noting that the previous mining employer (Centrex Metals/Eyre Iron) has left the area is totally incorrect	Refer Issue #41 Page 30		5.1		41			
12	295	Social License (Sect 5 & 6, Appendix A)	The availability of jobs for the local community is based upon what data, given the job profiles of the proposed positions are not identified and the glut of mine employees on the market due to the significant down turn in the mining industry.	Refer Issue #42 Page 31		5.1		42			
12	296	Social License (Sect 5 & 6, Appendix A)	The oft stated 'benefits' to the community have not been quantified nor have the costs. There is no cost benefit analysis provided.	Refer Issue #43 Page 32		5.2		43			
12	297	Social License (Sect 5 & 6, Appendix A)	Recognition of the costs to the agricultural industry through contamination dust arising from the mining operations	Refer Issues #10, 11, & 12 Page 61		7.6		10	11	12	
12	298	Social License (Sect 5 & 6, Appendix A)	There are no agreements with the DCTB with respect to costs, inclusive of potential decline in revenue due to the devaluation of properties in the vicinity of the proposed mines and the loss of rate revenue.	Refer Issue #6 & 7 Page 88		7.9		6	7		
12	299	Social License (Sect 5 & 6, Appendix A)	Neighboring properties will suffer a huge reduction in capital value. Landholders should be eligible for compensation with regard to loss of value of property.	Page 31		5.2		452	514		
12	300	Transport Route Sect 7.9	It is noted that the transport route has been determined in the absence of consultation with the community and Elected Members of the DCTB.	Refer Issue #1 Page 83		7.9		1			
12	301	Transport Route Sect 7.9	There is no agreement with the DCTB as to the actual transport route	Refer Issue #2 Page 84		7.9		2			
12	302	Transport Route Sect 7.9	Assumptions have been made on the part of the Works Manager as to the transport route, but these are not transparent to Elected Members nor the Community at large.	Refer Issue #1 & 3 Page 83		7.9		1	3		
12	303	Transport Route Sect 7.9	The capability of the 'determined route' appears not to have been subjected to any formal approval process through DPTI	Refer Issue #4 Page 85		7.9		4			
12	304	Transport Route Sect 7.9	The impact upon native vegetation and EPBC listed species is not recognised in the Application.	Refer Issue #5 Page 85		7.9		5			

12	305	Transport Route Sect 7.9	The Application includes cost estimates from a private contractor as to upgrading the road, but no Council budget exists for this work to be undertaken and no agreement to cost sharing exists.	Refer Issue #6 Page 88	7.9	6			
12	306	Transport Route (Sect 7.9)	There is no economic benefit statement to the Community pertaining to the proposed road upgrade, only the potential for continued maintenance and repair liabilities for the life of the mine and beyond.	Refer Issue #7 Page 88	7.9	7			
12	307	Dust (Sect 4 pp106-107 & Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the orebody that are potentially harmful to human and plant health. These include not only the graphite, but Chromium, Manganese, Nickel, Rare Earths, Manganese, Strontium, Thorium and Uranium together with Copper, Magnesium and Zinc. These minerals are potential carcinogens and or neurotoxins in humans and growth inhibitors in plants.	Refer Issue #8 Page 57	7.6	8			
12	308	Dust (Sect 4 pp106-107 & Sect 7.4)	The nature and health impacts together with potential agricultural industry impacts of the dust emanating from mining operations.	Refer Issue #9 & 56 Pages 57 & 63	7.6	9	56		
12	309	Dust (Sect 4 pp106-107 & Sect 7.4)	In the absence of on-site meteorological data, the dispersion pattern modelled from data remote from the site is of concern.	Refer Issue #10 Page 61	7.6	10			
12	310	Dust (Sect 4 pp106-107 & Sect 7.4)	Economic losses attributed to the impact of copper, magnesium and zinc (in excess of trace levels) on grain production	Refer Issue #11 Page 61	7.6	11			
12	311	Dust (Sect 4 pp106-107 & Sect 7.4)	The impact upon agricultural businesses within the fallout cloud of contaminated dust due to possible contaminated grain deliveries.	Refer Issue #12 & 56 Page 63	7.6	12	56		
12	312	Dust (Sect 4 pp106-107 & Sect 7.4)	Potential contamination of rain water, the main source of drinking water for the area	Refer Issue #13 Page 61	7.6	13			
12	313	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact of contaminated dust reaching the township of Tumbly Bay	Refer Issue #14 Page 62	7.6	14			
12	314	Dust (Sect 4 pp106-107 & Sect 7.4)	Dust will have the potential to contaminate grain to such an extent that the grain will become non deliverable.	Refer Issue #12 & 56 Page 63	7.6	12	56		
12	315	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact on surface water contained within the Tod River Water Protection Zone (as per the DCTB Development Plan) or the Tod River Wetland of National Significance	Refer Issue #15 Page 62	7.6	15			
12	316	Groundwater (Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the ore body that are potentially harmful to human health and plant health. These include not only the graphite, but Chromium, Copper, Manganese, Rare Earths, Strontium, Thorium and Uranium. These materials are potential carcinogens and or neurotoxins in human and growth inhibitors in plants	Refer Issue #16 & 17 Page 42	7.4	16	17		
12	317	Groundwater (Sect 7.4)	The nature of the hazardous materials emanating from mining operations inclusive of the processing operations is inadequately described in the application	Refer Issue #16 & 17 Page 42	7.4	16	17		
12	318	Groundwater (Sect 7.4)	Environmental impact associated with contamination of groundwater with the hazardous materials	Refer Issue #18 Page 43	7.4	18			
12	319	Groundwater (Sect 7.4)	Limitations with respect to the geotechnical, hydrogeology and hydrology of the site, especially in regard to the design of the TSF facility (Section 4.7.7.4 pp 198) It is significant concern that the limitations highlighted by the consultant extends beyond the TSF facility to include the known fact that no data exists for MC4372, nor does the geo-hydrology or hydrology exists beyond the boundaries of MC4373 which may impact	Refer Issue #19 Page 43	7.4	19			
12	320	Groundwater (Sect 7.4)	As previous owner of Section 196 in Hd of Koppio we have experienced vast difference in quality of water used to supply livestock...2 water supply points within 100 metres of one another where one was saltier than sea water and the other was of quite good quality.	Page 12	3.11	320			
12	321	Noise (Sect 7.7)	Insufficient data exists in relation to noise generation and dispersion as a consequence of night time operations which not only generate audible noise but also infrasound	Refer Issues #68 & 279 Page 81	7.7	68			
12	322	Noise (Sect 7.7)	Lack of actual site specific wind dispersion data implies that the noise dispersion patterns having regard to the wind and to the topography are subject to conjecture	Refer Issue #69 Page 81	7.7	69			

12	323	Construction of TSF (Appendix H)	Limitations of the design of the retaining embankment due to "insufficient geotechnical, geohydrology and hydrology of the site"	Refer Issue #70 Page 26	4.7	7.1	70			
12	324	Construction of TSF (Appendix H)	Approval should not be granted until all relevant data is available and the design reflects this	Refer Issue #71 Page 109	Noted		71			
12	325	Construction of TSF (Appendix H)	Application must contain all relevant information so that the public is well informed of the intentions of the applicant. It is our view that the deficiencies of information should be rectified and provided to the public by way of an amendment to the application and be subjected to an appropriate period of public scrutiny. Failure of the applicant to be required to provide this information and to provide approval for the project on the basis of what has been tendered is tantamount to an approval of a faulty design for whom legal liability can be established in the future should there be a catastrophic failure of the wall.	Refer Issue #72 Page 109	Noted		72			
12	326	Environmental Impacts (Sect 7)	Environmental impact of surface water run-off from the activities of mining operations fails to deal with the fact that this water has a high probability of being contaminated water (as a consequence of the activities) and whilst a sediment tank is employed, the Application is devoid of information pertaining to the quality of the water (dissolved salts etc) that may (will) reach the confines of Pillaworta Creek and beyond.	Refer Issues #15, 75, 178 & 273 Pages 41 & 62	7.6	7.4	75	15	273	178
12	327	Environmental Impacts (Sect 7)	Environmental sensitivity of this catchment and its ultimate outflow to the sea (marine park and aquaculture zones)	Refer Issues #76 & 75 Pages 41 & 62	7.6	7.3	76			
12	328	Explosives Magazine (Sect 4.5.7)	Risk assessment to this facility in the event of a bushfire	Refer Issue #77 Page 16	4.5.7		77			
12	329	Explosives Magazine (Sect 4.5.7)	Risk to employee fire fighters or to the CFS as a consequence of a bushfire in the vicinity of the magazine	Refer Issue #78 Page 17	4.5.7		78			
12	330	Explosives Magazine (Sect 4.5.7)	Assessment of the impact of a catastrophic explosion of the magazine. In such an event, what would be the blast radius?	Refer Issue #79 Page 17	4.5.7		79			
12	331	Explosives Magazine (Sect 4.5.7)	Increase in insurance risk to neighbouring properties as a result of the location of the magazine. Is this potential increase in insurance subject to compensation from the Company?	Refer Issue #80 Page 110	Appendix 1		80			
12	332	Explosives Magazine (Sect 4.5.7)	Chemical composition of the detonators. If they contain mercury fulminate, what is the environmental risk of such a large amount of mercury being released during the mining operations (dust and groundwater implications)?	Refer Issue #81 Pages 18	4.5.7		81			
12	333	Explosives Magazine (Sect 4.5.7)	What about security of the magazine contents? (note ammonium nitrate is a precursor to many IED's)	Refer Issue #82 Page 17	4.5.7		82			
12	334	Long Term Issues	Kookaburra Gully is potentially not a stand alone development, but a component of the development of the prospect inclusive of Kookaburra Gully extension (for which the Company has received a \$3M grant to drill as part of the PACE program) and the original Koppio Graphite Mine area.	Refer Issue #84 Page 15	4.4		84			
12	335	Long Term Issues	Is the application an overarching application for the activities not only associated with Kookaburra Gully Mine site but for the holistic view encompassing the original Koppio Mine and Kookaburra Gully extended?	Refer Issue #85 Page 15	4.4		85			
12	336	Long Term Issues	Local suggestions that this development may also enable some symbiotic arrangement to exist between Australian Graphite Limited and Valance (Uley) Graphite ...part of the relationship may be the establishment of haul routes between the two prospects.	Refer Issue #86 Page 14	4.2		86			
Submission 13										
13	337	Social License (Sect 5 & 6, Appendix A)	Lack of information provided throughout the so called consultation process	Refer Issue #33 Page 34	6.7		33			
13	338	Social License (Sect 5 & 6, Appendix A)	Lack of availability of hard copy	Refer Issue #34 Page 35	6.7		34			
13	339	Social License (Sect 5 & 6, Appendix A)	Lack of knowledge of the inadequacies of internet capabilities on Lower Eyre Peninsula and inability to download a 139Mb file	Refer Issue #35 Page 35	6.7		35			

13	340	Social License (Sect 5 & 6, Appendix A)	The expectation that the recipient of the document of 1169 pages will be able to read, comprehend and formulate a response within the period provided.	Refer Issue #37 Page 35	6.7	37			
13	341	Social License (Sect 5 & 6, Appendix A)	The complete inflexibility of DSD with respect to an extension of time in which to respond.	Refer Issue #38 Page 35	6.7	38			
13	342	Social License (Sect 5 & 6, Appendix A)	The lack of public presentation either by DSD or the Company with respect to the Application	Refer Issue #39 Page 34	6.7	39			
13	343	Social License (Sect 5 & 6, Appendix A)	Demographic data that is four years out of date.	Refer Issue #40 Page 7	3.1	40			
13	344	Social License (Sect 5 & 6, Appendix A)	Reference to 52 mining jobs currently in the town of Tumbly Bay noting that the previous mining employer (Centrex Metals/Eyre Iron) has left the area is totally incorrect	Refer Issue #41 Page 30	5.1	41			
13	345	Social License (Sect 5 & 6, Appendix A)	The availability of jobs for the local community is based upon what data, given the job profiles of the proposed positions are not identified and the glut of mine employees on the market due to the significant down turn in the mining industry.	Refer Issue #42 Page 31	5.1	42			
13	346	Social License (Sect 5 & 6, Appendix A)	The oft stated 'benefits' to the community have not been quantified nor have the costs. There is no cost benefit analysis provided.	Refer Issue #43 Page 32	5.2	43			
13	347	Social License (Sect 5 & 6, Appendix A)	There is no recognition of the costs to the agricultural industry through contamination dust arising from the mining operations.	Refer Issues #10, 11, & 12 Page 61	7.6	10	11	12	
13	348	Social License (Sect 5 & 6, Appendix A)	There are no agreements with the DCTB with respect to costs, inclusive of potential decline in revenue due to the devaluation of properties in the vicinity of the proposed mines and the loss of rate revenue.	Refer Issue #6 & 7 Page 88	7.9	6	7		
13	349	Transport Route Sect 7.9	It is noted that the transport route has been determined in the absence of consultation with the community and Elected Members of the DCTB.	Refer Issue #1 Page 83	7.9	1			
13	350	Transport Route Sect 7.9	There is no agreement with the DCTB as to the actual transport route	Refer Issue #2 Page 84	7.9	2			
13	351	Transport Route Sect 7.9	Assumptions have been made on the part of the Works Manager as to the transport route, but these are not transparent to Elected Members nor the Community at large.	Refer Issue #1 & 3 Page 83	7.9	1	3		
13	352	Transport Route Sect 7.9	The capability of the 'determined route' appears not to have been subjected to any formal approval process through DPTI	Refer Issue #4 Page 85	7.9	4			
13	353	Transport Route Sect 7.9	The impact upon native vegetation and EPBC listed species is not recognised in the Application.	Refer Issue #5 Page 85	7.9	5			
13	354	Transport Route Sect 7.9	The Application includes cost estimates from a private contractor as to upgrading the road, but no Council budget exists for this work to be undertaken and no agreement to cost sharing exists.	Refer Issue #6 Page 88	7.9	6			
13	355	Transport Route (Sect 7.9)	There is no economic benefit statement to the Community pertaining to the proposed road upgrade, only the potential for continued maintenance and repair liabilities for the life of the mine and beyond.	Refer Issue #7 Page 88	7.9	7			
13	356	Dust (Sect 4 pp106-107 & Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the orebody that are potentially harmful to human and plant health. These include not only the graphite, but Chromium, Manganese, Nickel, Rare Earths, Manganese, Strontium, Thorium and Uranium together with Copper, Magnesium and Zinc. These minerals are potential carcinogens and or neurotoxins in humans and growth inhibitors in plants.	Refer Issue #8 Page 57	7.6	8			
13	357	Dust (Sect 4 pp106-107 & Sect 7.4)	The nature and health impacts together with potential agricultural industry impacts of the dust emanating from mining operations.	Refer Issue #9 & 56 Page 63	7.6	9	56		
13	358	Dust (Sect 4 pp106-107 & Sect 7.4)	In the absence of on-site meteorological data, the dispersion pattern modelled from data remote from the site is of concern.	Refer Issue #10 Page 61	7.6	10			
13	359	Dust (Sect 4 pp106-107 & Sect 7.4)	Economic losses attributed to the impact of copper, magnesium and zinc (in excess of trace levels) on grain production	Refer Issue #11 Page 61	7.6	11			

13	360	Dust (Sect 4 pp106-107 & Sect 7.4)	The impact upon agricultural businesses within the fallout cloud of contaminated dust due to possible contaminated grain deliveries.	Refer Issue #12 & 56 Page 63	7.6		12	56		
13	361	Dust (Sect 4 pp106-107 & Sect 7.4)	Potential contamination of rain water, the main source of drinking water for the area	Refer Issue #13 Page 61	7.6		13			
13	362	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact of contaminated dust reaching the township of Tumbly Bay	Refer Issue #14 Page 62	7.6		14			
13	363	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact on surface water contained within the Tod River Water Protection Zone (as per the DCTB Development Plan) or the Tod River Wetland of National Significance	Refer Issue #15 Page 62	7.6		15			
13	364	Groundwater (Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the ore body that are potentially harmful to human health and plant health. These include not only the graphite, but Chromium, Copper, Manganese, Rare Earths, Strontium, Thorium and Uranium. These materials are potential carcinogens and or neurotoxins in human and growth inhibitors in plants	Refer Issue #16 & 17 Page 42	7.4		16	17		
13	365	Groundwater (Sect 7.4)	The nature of the hazardous materials emanating from mining operations inclusive of the processing operations is inadequately described in the application	Refer Issue #16 & 17 Page 42	7.4		16	17		
13	366	Groundwater (Sect 7.4)	Environmental impact associated with contamination of groundwater with the hazardous materials	Refer Issue #18 Page 43	7.4		18			
13	367	Groundwater (Sect 7.4)	Limitations with respect to the geotechnical, hydrogeology and hydrology of the site, especially in regard to the design of the TSF facility (Section 4.7.7.4 pp 198)) It is significant concern that the limitations highlighted by the consultant extends beyond the TSF facility to include the known fact that no data exists for MC4372, nor does the geo-hydrology or hydrology exists beyond the boundaries of MC4373 which may impact upon the Prescribed Wells Area to the South, the source of potable water for the lower Eyre Peninsula.	Refer Issue #19 Page 43	7.4		19			
13	368	Noise (Sect 7.7)	Insufficient data exists in relation to noise generation and dispersion as a consequence of night time operations which not only generate audible noise but also infrasound	Refer Issues #68 & 279 Page 81	7.7		68			
13	369	Noise (Sect 7.7)	Lack of actual site specific wind dispersion data implies that the noise dispersion patterns having regard to the wind and to the topography are subject to conjecture	Refer Issue #69 Page 81	7.7		69			
13	370	Construction of TSF (Appendix H)	Limitations of the design of the retaining embankment due to "insufficient geotechnical, geohydrology and hydrology of the site"	Refer Issue #70 Page 26	4.7	7.1	70			
13	371	Construction of TSF (Appendix H)	Approval should not be granted until all relevant data is available and the design reflects this	Refer Issue #71 Page 109	Noted		71			
13	372	Construction of TSF (Appendix H)	Application must contain all relevant information so that the public is well informed of the intentions of the applicant. It is our view that the deficiencies of information should be rectified and provided to the public by way of an amendment to the application and be subjected to an appropriate period of public scrutiny. Failure of the applicant to be required to provide this information and to provide approval for the project on the basis of what has been tendered is tantamount to an approval of a faulty design for whom legal liability can be established in the future should there be a catastrophic failure of the wall.	Refer Issue #72 Page 109	Noted		72			
13	373	Environmental Impacts (Sect 7)	Environmental impact of surface water run-off from the activities of mining operations fails to deal with the fact that this water has a high probability of being contaminated water (as a consequence of the activities) and whilst a sediment tank is employed, the Application is devoid of information pertaining to the quality of the water (dissolved salts etc) that may (will) reach the confines of Pillaworta Creek and beyond.	Refer Issues #15, 75, 178 & 273 Pages 41 & 62	7.6	7.4	75	15	273	178
13	374	Environmental Impacts (Sect 7)	Environmental sensitivity of this catchment and its ultimate outflow to the sea (marine park and aquaculture zones)	Refer Issues #76 & 75 Pages 41 & 62	7.6	7.3	76			
13	375	Explosives Magazine (Sect 4.5.7)	Risk assessment to this facility in the event of a bushfire	Refer Issue #77 Page 16	4.5.7		77			

13	376	Explosives Magazine (Sect 4.5.7)	Risk to employee fire fighters or to the CFS as a consequence of a bushfire in the vicinity of the magazine	Refer Issue #78 Page 17		4.5.7		78			
13	377	Explosives Magazine (Sect 4.5.7)	Assessment of the impact of a catastrophic explosion of the magazine. In such an event, what would be the blast radius?	Refer Issue #79 Page 17		4.5.7		79			
13	378	Explosives Magazine (Sect 4.5.7)	Increase in insurance risk to neighbouring properties as a result of the location of the magazine. Is this potential increase in insurance subject to compensation from the Company?	Refer Issue #80 Page 110		Appendix 1		80			
13	379	Explosives Magazine (Sect 4.5.7)	Chemical composition of the detonators. If they contain mercury fulminate, what is the environmental risk of such a large amount of mercury being released during the mining operations (dust and groundwater implications)?	Refer Issue #81 Pages 18		4.5.7		81			
13	380	Explosives Magazine (Sect 4.5.7)	What about security of the magazine contents? (note ammonium nitrate is a precursor to many IED's)	Refer Issue #82 Page 17		4.5.7		82			
13	381	Long Term Issues	Kookaburra Gully is potentially not a stand alone development, but a component of the development of the prospect inclusive of Kookaburra Gully extension (for which the Company has received a \$3M grant to drill as part of the PACE program) and the original Koppio Graphite Mine area.	Refer Issue #84 Page 15		4.4		84			
13	382	Long Term Issues	Is the application an overarching application for the activities not only associated with Kookaburra Gully Mine site but for the holistic view encompassing the original Koppio Mine and Kookaburra Gully extended?	Refer Issue #85 Page 15		4.4		85			
13	383	Long Term Issues	Local suggestions that this development may also enable some symbiotic arrangement to exist between Australian Graphite Limited and Valance (Uley) Graphitepart of the relationship may be the establishment of haul routes between the two prospects.	Refer Issue #86 Page 14		4.2		86			
Submission 14											
14	384	Social License	Persons seeking a copy would need to pay \$250	Refer Issue #34 Page 35		6.7		34			
14	385	Social License	Internet on Lower Eyre Peninsula is unable to download a 139MB file	Refer Issue #35 Page 35		6.7		35			
14	386	Social License	The time period to read and make a judgment on the Application is way too short	Refer Issue #37 Page 35		6.7		37			
14	387	Social License	The Application does not provided costs or possible benefits to make even a starting point	Refer Issue #43 Page 32		5.2		43			
14	388	Transport Route (Sect 7.9)	Pillaworta Road follows the valley floor on the eastern side of Pillaworta Creek and run off from rainfall on sloping ground on	Page 92		7.9					
14	389	Transport Route (Sect 7.9)	Budget for maintaining Pillaworta Road due to increase in traffic and heavy trucks	Refer Issue #7 Page 88		7.9		7			
14	390	Transport Route (Sect 7.9)	Impact of dust on native vegetation along Pillaworta Road	Refer Issue #5 Page 85		7.6		8			
14	391	Dust (Sect 7.4)	Property values adjacent to the mine site will be devalued if harmful dust containing a significant number of minerals potentially harmful to human, animal and plant health is detected	Refer Issue #8, 9 & 56 Page 57		7.6		8	9	56	
14	392	Dust (Sect 7.4)	Impact of dust on Eyre Peninsula's grain industry	Refer Issue #9 & 56 Page 57		7.6		9	56		
14	393	Dust (Sect 7.4)	Impact of dust on rainwater (domestic and stock dams) and native animals and birds are at risk	Refer Issue #13 Page 61		7.6		13			
14	394	Groundwater (Sect 7.4)	Potential for groundwater contamination due to water run-off from mining operations and potential for contamination of Pillaworta Creek	Refer Issue #18 Page 43		7.4		18			
14	395	TSF	The embankment due to lack of information and as identified by the consultant. If the embankment fails or there is leakage of potentially contaminated water it will enter Pillaworta Creek enter the sea and possibly damage sensitive Aquaculture areas	Refer Issue #19, #64, #70, #71 & #72 Pages 26, 43 & 62		7.4		19	64	70	72
14	396	Explosives Magazine Sect 4.5.7	Insurance risk to adjacent properties regarding possibility of a fire or explosion	Refer Issue #77 Page 16		4.5.7		77	78	79	80
Submission 15											
15	397	Transport Route (Sect 7.9)	Potential impact and risk to CFS crews of a traffic related or product spill incident on public roads (and potential need for Breathing Apparatus)	Page 92		4.5.7	7.9	78			

15	398	Dust (Sect 7.4)	Nature and health impacts together with potential agricultural industry impacts of the dust emanating from mining operations (graphite, Chromium, Manganese, Nickel, Rare Earths, Strontium, Thorium and Uranium together with Copper, Magnesium and Zinc) and risk to CFS volunteers	Refer Issue #8, 9 & 56 Page 57	7.6	8	9	56		
15	399	Explosives Magazine (Sect 4.5.7)	Explosives materials are commonly recognised as ingredients for many IED's	Refer Issue #82 Page 17	4.5.7	82				
15	400	Explosives Magazine (Sect 4.5.7)	Potential impact should magazine be exposed to a bushfire (including construction specifications in regard to protection from radiant heat)	Refer Issue #77 Page 16	4.5.7	77	78	79		
15	401	Explosives Magazine (Sect 4.5.7)	Risk to CFS volunteers should magazine be exposed to bushfire (composition of emissions and potential blast zone)	Refer Issue #77 Page 16	4.5.7	77	78	79		
15	402	Social Consequences	Potential impact on local CFS services and volunteers including their time and additional training needs as a consequence from bushfires/industrial accidents related to mining.	Refer Issues #78 & 397 Pages 17 & 92	4.5.7	78	397			
Submission 16										
16	403	Social License (Sect 5 & 6, Appendix A)	Lack of information provided throughout the so called consultation process	Refer Issue #33 Page 34	6.7	33				
16	404	Social License (Sect 5 & 6, Appendix A)	Lack of availability of hard copy	Refer Issue #34 Page 35	6.7	34				
16	405	Social License (Sect 5 & 6, Appendix A)	Lack of knowledge of the inadequacies of internet capabilities on Lower Eyre Peninsula and inability to download a 139Mb file	Refer Issue #35 Page 35	6.7	35				
16	406	Social License (Sect 5 & 6, Appendix A)	The expectation that the recipient of the document of 1169 pages will be able to read, comprehend and formulate a response within the period provided.	Refer Issue #37 Page 35	6.7	37				
16	407	Social License (Sect 5 & 6, Appendix A)	The complete inflexibility of DSD with respect to an extension of time in which to respond.	Refer Issue #38 Page 35	6.7	38				
16	408	Social License (Sect 5 & 6, Appendix A)	The lack of public presentation either by DSD or the Company with respect to the Application	Refer Issue #39 Page 34	6.7	39				
16	409	Social License (Sect 5 & 6, Appendix A)	Demographic data that is four years out of date.	Refer Issue #40 Page 7	3.1	40				
16	410	Social License (Sect 5 & 6, Appendix A)	Reference to 52 mining jobs currently in the town of Tumbly Bay noting that the previous mining employer (Centrex Metals/Eyre Iron) has left the area is totally incorrect	Refer Issue #41 Page 30	5.1	41				
16	411	Social License (Sect 5 & 6, Appendix A)	The availability of jobs for the local community is based upon what data, given the job profiles of the proposed positions are not identified and the glut of mine employees on the market due to the significant down turn in the mining industry.	Refer Issue #42 Page 31	5.1	42				
16	412	Social License (Sect 5 & 6, Appendix A)	The oft stated 'benefits' to the community have not been quantified nor have the costs. There is no cost benefit analysis provided.	Refer Issue #43 Page 32	5.2	43				
16	413	Social License (Sect 5 & 6, Appendix A)	There is no recognition of the costs to the agricultural industry through contamination dust arising from the mining operations.	Refer Issues #10, 11, & 12 Page 61	7.6	10	11	12		
16	414	Social License (Sect 5 & 6, Appendix A)	There are no agreements with the DCTB with respect to costs, inclusive of potential decline in revenue due to the devaluation of properties in the vicinity of the proposed mines and the loss of rate revenue.	Refer Issue #6 & 7 Page 88	7.9	6	7			
16	415	Transport Route Sect 7.9	It is noted that the transport route has been determined in the absence of consultation with the community and Elected Members of the DCTB.	Refer Issue #1 Page 83	7.9	1				
16	416	Transport Route Sect 7.9	There is no agreement with the DCTB as to the actual transport route	Refer Issue #2 Page 84	7.9	2				
16	417	Transport Route Sect 7.9	Assumptions have been made on the part of the Works Manager as to the transport route, but these are not transparent to Elected Members nor the Community at large.	Refer Issue #1 & 3 Page 83	7.9	1	3			
16	418	Transport Route Sect 7.9	The capability of the 'determined route' appears not to have been subjected to any formal approval process through DPTI	Refer Issue #4 Page 85	7.9	4				

16	419	Transport Route Sect 7.9	The impact upon native vegetation and EPBC listed species is not recognised in the Application.	Refer Issue #5 Page 85	7.9		5			
16	420	Transport Route Sect 7.9	The Application includes cost estimates from a private contractor as to upgrading the road, but no Council budget exists for this work to be undertaken and no agreement to cost sharing exists.	Refer Issue #6 Page 88	7.9		6			
16	421	Transport Route (Sect 7.9)	There is no economic benefit statement to the Community pertaining to the proposed road upgrade, only the potential for continued maintenance and repair liabilities for the life of the mine and beyond.	Refer Issue #7 Page 88	7.9		7			
16	422	Dust (Sect 4 pp106-107 & Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the orebody that are potentially harmful to human and plant health. These include not only the graphite, but Chromium, Manganese, Nickel, Rare Earths, Manganese, Strontium, Thorium and Uranium together with Copper, Magnesium and Zinc. These minerals are potential carcinogens and or neurotoxins in humans and growth inhibitors in plants.	Refer Issue #8 Page 57	7.6		8			
16	423	Dust (Sect 4 pp106-107 & Sect 7.4)	The nature and health impacts together with potential agricultural industry impacts of the dust emanating from mining operations.	Refer Issue #9 & 56 Page 63	7.6		9	56		
16	424	Dust (Sect 4 pp106-107 & Sect 7.4)	In the absence of on-site meteorological data, the dispersion pattern modelled from data remote from the site is of concern.	Refer Issue #10 Page 61	7.6		10			
16	425	Dust (Sect 4 pp106-107 & Sect 7.4)	Economic losses attributed to the impact of copper, magnesium and zinc (in excess of trace levels) on grain production	Refer Issue #11 Page 61	7.6		11			
16	426	Dust (Sect 4 pp106-107 & Sect 7.4)	The impact upon agricultural businesses within the fallout cloud of contaminated dust due to possible contaminated grain deliveries.	Refer Issue #12 & 56 Page 63	7.6		12	56		
16	427	Dust (Sect 4 pp106-107 & Sect 7.4)	Potential contamination of rain water, the main source of drinking water for the area	Refer Issue #13 Page 61	7.6		13			
16	428	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact of contaminated dust reaching the township of Tumby Bay	Refer Issue #14 Page 62	7.6		14			
16	429	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact on surface water contained within the Tod River Water Protection Zone (as per the DCTB Development Plan) or the Tod River Wetland of National Significance	Refer Issue #15 Page 62	7.6		15			
16	430	Groundwater (Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the ore body that are potentially harmful to human health and plant health. These include not only the graphite, but Chromium, Copper, Manganese, Rare Earths, Strontium, Thorium and Uranium. These materials are potential carcinogens and or neurotoxins in human and growth inhibitors in plants	Refer Issue #16 & 17 Page 42	7.4		16	17		
16	431	Groundwater (Sect 7.4)	The nature of the hazardous materials emanating from mining operations inclusive of the processing operations is inadequately described in the application	Refer Issue #16 & 17 Page 42	7.4		16	17		
16	432	Groundwater (Sect 7.4)	Environmental impact associated with contamination of groundwater with the hazardous materials	Refer Issue #18 Page 43	7.4		18			
16	433	Groundwater (Sect 7.4)	Limitations with respect to the geotechnical, hydrogeology and hydrology of the site, especially in regard to the design of the TSF facility (Section 4.7.7.4 pp 198)) It is significant concern that the limitations highlighted by the consultant extends beyond the TSF facility to include the known fact that no data exists for MC4372, nor does the geo-hydrology or hydrology exists beyond the boundaries of MC4373 which may impact	Refer Issue #19 Page 43	7.4		19			
16	434	Noise (Sect 7.7)	Insufficient data exists in relation to noise generation and dispersion as a consequence of night time operations which not only generate audible noise but also infrasound	Refer Issues #68 & 279 Page 81	7.7		68			
16	435	Noise (Sect 7.7)	Lack of actual site specific wind dispersion data implies that the noise dispersion patterns having regard to the wind and to the topography are subject to conjecture	Refer Issue #69 Page 81	7.7		69			
16	436	Construction of TSF (Appendix H)	Limitations of the design of the retaining embankment due to "insufficient geotechnical, geohydrology and hydrology of the site"	Refer Issue #70 Page 26	4.7	7.1	70			
16	437	Construction of TSF (Appendix H)	Approval should not be granted until all relevant data is available and the design reflects this	Refer Issue #71 Page 109	Noted		71			

16	438	Construction of TSF (Appendix H)	Application must contain all relevant information so that the public is well informed of the intentions of the applicant. It is our view that the deficiencies of information should be rectified and provided to the public by way of an amendment to the application and be subjected to an appropriate period of public scrutiny. Failure of the applicant to be required to provide this information and to provide approval for the project on the basis of what has been tendered is tantamount to an approval of a faulty design for whom legal liability can be established in the future should there be a catastrophic failure of the wall.	Refer Issue #72 Page 109		Noted		72			
16	439	Environmental Impacts (Sect 7)	Environmental impact of surface water run-off from the activities of mining operations fails to deal with the fact that this water has a high probability of being contaminated water	Refer Issues #15, 75, 178 & 273 Pages 41 & 62		7.6	7.4	75	15	273	178
16	440	Environmental Impacts (Sect 7)	Environmental sensitivity of this catchment and its ultimate outflow to the sea (marine park and aquaculture zones)	Refer Issues #76 & 75 Pages 41 & 62		7.6	7.3	76			
16	441	Explosives Magazine (Sect 4.5.7)	Risk assessment to this facility in the event of a bushfire	Refer Issue #77 Page 16		4.5.7		77			
16	442	Explosives Magazine (Sect 4.5.7)	Risk to employee fire fighters or to the CFS as a consequence of a bushfire in the vicinity of the magazine	Refer Issue #78 Page 17		4.5.7		78			
16	443	Explosives Magazine (Sect 4.5.7)	Assessment of the impact of a catastrophic explosion of the magazine. In such an event, what would be the blast radius?	Refer Issue #79 Page 17		4.5.7		79			
16	444	Explosives Magazine (Sect 4.5.7)	Increase in insurance risk to neighbouring properties as a result of the location of the magazine. Is this potential increase in insurance subject to compensation from the Company?	Refer Issue #80 Page 110		Appendix 1		80			
16	445	Explosives Magazine (Sect 4.5.7)	Chemical composition of the detonators. If they contain mercury fulminate, what is the environmental risk of such a large amount of mercury being released during the mining operations (dust and groundwater implications)?	Refer Issue #81 Pages 18		4.5.7		81			
16	446	Explosives Magazine (Sect 4.5.7)	Explosives materials are commonly recognised as ingredients for many IED's	Refer Issue #82 Page 17		4.5.7		82			
16	447	Long Term Issues	Kookaburra Gully is potentially not a stand alone development, but a component of the development of the prospect inclusive of Kookaburra Gully extension (for which the Company has received a \$3M grant to drill as part of the PACE program) and the original Koppio Graphite Mine area.	Refer Issue #84 Page 15		4.4		84			
16	448	Long Term Issues	Is the application an overarching application for the activities not only associated with Kookaburra Gully Mine site but for the holistic view encompassing the original Koppio Mine and Kookaburra Gully extended?	Refer Issue #85 Page 15		4.4		85			
16	449	Long Term Issues	Local suggestions that this development may also enable some symbiotic arrangement to exist between Australian Graphite Limited and Valance (Uley) Graphitepart of the relationship may be the establishment of haul routes between the two prospects.	Refer Issue #86 Page 14		4.2		86			
Submission 17											
17	450	Introduction	Is the short term gain of mining minerals in the Kookaburra Gully worth the risk of losing productive agricultural land forever.	Refer Issues # 452 & 514 Page 31		5.2		452	514		
17	451	Introduction	How much is this beautiful country worth	Page 31		5.2		452	514		
17	452	Introduction	How much will this beautiful country produce in the next 100 years if it is not mined	Page 31		5.2		514			
17	453	Introduction	How much will the community of lower Eyre Peninsula benefit	Page 31		5.2		43			
17	454	Introduction	Will mining dust contaminate and condemn our beef, wool, lamb and grain	Pages 31 & 57		7.6	5.2	8	9	56	
17	455	Social License (Sect 5 & 6, Appendix A)	Lack of information provided throughout the so called consultation process	Refer Issue #33 Page 34		6.7		33			
17	456	Social License (Sect 5 & 6, Appendix A)	Lack of availability of hard copy	Refer Issue #34 Page 35		6.7		34			

17	457	Social License (Sect 5 & 6, Appendix A)	Lack of knowledge of the inadequacies of internet capabilities on Lower Eyre Peninsula and inability to download a 139Mb file	Refer Issue #35 Page 35		6.7		35			
17	458	Social License (Sect 5 & 6, Appendix A)	The expectation that the recipient of the document of 1169 pages will be able to read, comprehend and formulate a response within the period provided.	Refer Issue #37 Page 35		6.7		37			
17	459	Social License (Sect 5 & 6, Appendix A)	The complete inflexibility of DSD with respect to an extension of time in which to respond.	Refer Issue #38 Page 35		6.7		38			
17	460	Social License (Sect 5 & 6, Appendix A)	The lack of public presentation either by DSD or the Company with respect to the Application	Refer Issue #39 Page 34		6.7		39			
17	461	Social License (Sect 5 & 6, Appendix A)	Demographic data that is four years out of date.	Refer Issue #40 Page 7		3.1		40			
17	462	Social License (Sect 5 & 6, Appendix A)	Reference to 52 mining jobs currently in the town of Tumbly Bay noting that the previous mining employer (Centrex Metals/Eyre Iron) has left the area is totally incorrect	Refer Issue #41 Page 30		5.1		41			
17	463	Social License (Sect 5 & 6, Appendix A)	The availability of jobs for the local community is based upon what data, given the job profiles of the proposed positions are not identified and the glut of mine employees on the market due to the significant down turn in the mining industry.	Refer Issue #42 Page 31		5.1		42			
17	464	Social License (Sect 5 & 6, Appendix A)	The oft stated 'benefits' to the community have not been quantified nor have the costs. There is no cost benefit analysis provided.	Refer Issue #43 Page 32		5.2		43			
17	465	Social License (Sect 5 & 6, Appendix A)	There is no recognition of the costs to the agricultural industry through contamination dust arising from the mining operations.	Refer Issues #10, 11, & 12 Page 61		7.6		10	11	12	
17	466	Social License (Sect 5 & 6, Appendix A)	There are no agreements with the DCTB with respect to costs, inclusive of potential decline in revenue due to the devaluation of properties in the vicinity of the proposed mines and the loss of rate revenue.	Refer Issue #6 & 7 Page 88		7.9		6	7		
17	467	Transport Route Sect 7.9	It is noted that the transport route has been determined in the absence of consultation with the community and Elected Members of the DCTB.	Refer Issue #1 Page 83		7.9		1			
17	468	Transport Route Sect 7.9	There is no agreement with the DCTB as to the actual transport route	Refer Issue #2 Page 84		7.9		2			
17	469	Transport Route Sect 7.9	Assumptions have been made on the part of the Works Manager as to the transport route, but these are not transparent to Elected Members nor the Community at large.	Refer Issue #1 & 3 Page 83		7.9		1	3		
17	470	Transport Route Sect 7.9	The capability of the 'determined route' appears not to have been subjected to any formal approval process through DPTI	Refer Issue #4 Page 85		7.9		4			
17	471	Transport Route Sect 7.9	The impact upon native vegetation and EPBC listed species is not recognised in the Application.	Refer Issue #5 Page 85		7.9		5			
17	472	Transport Route Sect 7.9	The Application includes cost estimates from a private contractor as to upgrading the road, but no Council budget exists for this work to be undertaken and no agreement to cost sharing exists.	Refer Issue #6 Page 88		7.9		6			
17	473	Transport Route (Sect 7.9)	There is no economic benefit statement to the Community pertaining to the proposed road upgrade, only the potential for continued maintenance and repair liabilities for the life of the mine and beyond.	Refer Issue #7 Page 88		7.9		7			
17	474	Dust (Sect 4 pp106-107 & Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the orebody that are potentially harmful to human and plant health. These include not only the graphite, but Chromium, Manganese, Nickel, Rare Earths, Manganese, Strontium, Thorium and Uranium together with Copper, Magnesium and Zinc. These minerals are potential carcinogens and or neurotoxins in humans and growth inhibitors in plants.	Refer Issue #8 Page 57		7.6		8			
17	475	Dust (Sect 4 pp106-107 & Sect 7.4)	The nature and health impacts together with potential agricultural industry impacts of the dust emanating from mining operations.	Refer Issue #9 & 56 Page 63		7.6		9	56		
17	476	Dust (Sect 4 pp106-107 & Sect 7.4)	In the absence of on-site meteorological data, the dispersion pattern modelled from data remote from the site is of concern.	Refer Issue #10 Page 61		7.6		10			

17	477	Dust (Sect 4 pp106-107 & Sect 7.4)	Economic losses attributed to the impact of copper, magnesium and zinc (in excess of trace levels) on grain production	Refer Issue #11 Page 61		7.6		11			
17	478	Dust (Sect 4 pp106-107 & Sect 7.4)	The impact upon agricultural businesses within the fallout cloud of contaminated dust due to possible contaminated grain deliveries.	Refer Issue #12 & 56 Page 57		7.6		12			
17	479	Dust (Sect 4 pp106-107 & Sect 7.4)	Potential contamination of rain water, the main source of drinking water for the area	Refer Issue #13 Page 61		7.6		13			
17	480	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact of contaminated dust reaching the township of Tumbly Bay	Refer Issue #14 Page 62		7.6		14			
17	481	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact on surface water contained within the Tod River Water	Refer Issue #15		7.6		15			
17	482	Groundwater (Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the ore body that are potentially harmful to human health and plant health. These include not only the graphite, but Chromium, Copper, Manganese, Rare Earths, Strontium, Thorium and Uranium. These materials are potential carcinogens and or neurotoxins in human and growth inhibitors in plants	Refer Issue #16 & 17 Page 42		7.4		16	17		
17	483	Groundwater (Sect 7.4)	The nature of the hazardous materials emanating from mining operations inclusive of the processing operations is inadequately described in the application	Refer Issue #16 & 17 Page 42		7.4		16	17		
17	484	Groundwater (Sect 7.4)	Environmental impact associated with contamination of groundwater with the hazardous materials	Refer Issue #18 Page 43		7.4		18			
17	485	Groundwater (Sect 7.4)	Limitations with respect to the geotechnical, hydrogeology and	Refer Issue #19		7.4		19			
17	486	Noise (Sect 7.7)	Insufficient data exists in relation to noise generation and dispersion as a consequence of night time operations which	Refer Issues #68 & 279 Page 81		7.7		68			
17	487	Noise (Sect 7.7)	Lack of actual site specific wind dispersion data implies that	Refer Issues #68 & 279		7.7		68			
17	488	Construction of TSF (Appendix H)	Limitations of the design of the retaining embankment due to "insufficient geotechnical, geohydrology and hydrology of the site"	Refer Issue #70 Page 26		4.7	7.1	70			
17	489	Construction of TSF (Appendix H)	Approval should not be granted until all relevant data is available and the design reflects this	Refer Issue #71 Page 109		Noted		71			
17	490	Construction of TSF (Appendix H)	Application must contain all relevant information so that the public is well informed of the intentions of the applicant. It is our view that the deficiencies of information should be rectified and provided to the public by way of an amendment to the application and be subjected to an appropriate period of public scrutiny. Failure of the applicant to be required to provide this information and to provide approval for the project on the basis of what has been tendered is tantamount to an approval of a faulty design for whom legal liability can be established in the future should there be a catastrophic failure of the wall.	Refer Issue #72 Page 109		Noted		72			
17	491	Environmental Impacts (Sect 7)	Environmental impact of surface water run-off from the activities of mining operations fails to deal with the fact that this water has a high probability of being contaminated water	Refer Issues #15, 75, 178 & 273 Pages 41 & 62		7.6	7.4	75	15	273	178
17	492	Environmental Impacts (Sect 7)	Environmental sensitivity of this catchment and its ultimate outflow to the sea (marine park and aquaculture zones)	Refer Issues #76 & 75 Pages 41 & 62		7.6	7.3	76			
17	493	Explosives Magazine (Sect 4.5.7)	Risk assessment to this facility in the event of a bushfire	Refer Issue #77 Page 16		4.5.7		77			
17	494	Explosives Magazine (Sect 4.5.7)	Risk to employee fire fighters or to the CFS as a consequence of a bushfire in the vicinity of the magazine	Refer Issue #78 Page 17		4.5.7		78			
17	495	Explosives Magazine (Sect 4.5.7)	Assessment of the impact of a catastrophic explosion of the magazine. In such an event, what would be the blast radius?	Refer Issue #79 Page 17		4.5.7		79			
17	496	Explosives Magazine (Sect 4.5.7)	Increase in insurance risk to neighbouring properties as a result of the location of the magazine. Is this potential increase in insurance subject to compensation from the Company?	Refer Issue #80 Page 110		Appendix 1		80			
17	497	Explosives Magazine (Sect 4.5.7)	Chemical composition of the detonators. If they contain mercury fulminate, what is the environmental risk of such a large amount of mercury being released during the mining operations (dust and groundwater implications)?	Refer Issue #81 Pages 18		4.5.7		81			

17	498	Explosives Magazine (Sect 4.5.7)	Explosives materials are commonly recognised as ingredients for many IED's	Refer Issue #82 Page 17		4.5.7		82			
17	499	Long Term Issues	Kookaburra Gully is potentially not a stand alone development, but a component of the development of the prospect inclusive of Kookaburra Gully extension (for which the Company has received a \$3M grant to drill as part of the PACE program) and the original Koppio Graphite Mine area.	Refer Issue #84 Page 15		4.4		84			
17	500	Long Term Issues	Is the application an overarching application for the activities not only associated with Kookaburra Gully Mine site but for the holistic view encompassing the original Koppio Mine and Kookaburra Gully extended?	Refer Issue #85 Page 15		4.4		85			
17	501	Long Term Issues	Local suggestions that this development may also enable some symbiotic arrangement to exist between Australian Graphite Limited and Valance (Uley) Graphitepart of the relationship may be the establishment of haul routes between the two prospects.	Refer Issue #86 Page 14		4.2		86			
Submission 18											
18	502	Native Title (Sect 1.5.3)	Potential existence of Native Title on Road Reserve that is leased to a neighbour	Page 7		3.2					
18	503	Native Title (Sect 1.5.3)	What consultation did the company have with the local Barnjarla community.	Page 13		3.15					
18	504	Social License (Sect 5 & 6, Appendix A)	Lack of information provided throughout the so called consultation process	Refer Issue #33 Page 34		6.7		33			
18	505	Social License (Sect 5 & 6, Appendix A)	Lack of availability of hard copy	Refer Issue #34 Page 35		6.7		34			
18	506	Social License (Sect 5 & 6, Appendix A)	Lack of knowledge of the inadequacies of internet capabilities on Lower Eyre Peninsula and inability to download a 139Mb file	Refer Issue #35 Page 35		6.7		35			
18	507	Social License (Sect 5 & 6, Appendix A)	The expectation that the recipient of the document of 1169 pages will be able to read, comprehend and formulate a response within the period provided.	Refer Issue #37 Page 35		6.7		37			
18	508	Social License (Sect 5 & 6, Appendix A)	The complete inflexibility of DSD with respect to an extension of time in which to respond.	Refer Issue #38 Page 35		6.7		38			
18	509	Social License (Sect 5 & 6, Appendix A)	The lack of public presentation either by DSD or the Company with respect to the Application	Refer Issue #39 Page 34		6.7		39			
18	510	Social License (Sect 5 & 6, Appendix A)	Demographic data that is four years out of date.	Refer Issue #40 Page 7		3.1		40			
18	511	Social License (Sect 5 & 6, Appendix A)	Reference to 52 mining jobs currently in the town of Tumby Bay noting that the previous mining employer (Centrex Metals/Eyre Iron) has left the area is totally incorrect	Refer Issue #41 Page 30		5.1		41			
18	512	Social License (Sect 5 & 6, Appendix A)	The availability of jobs for the local community is based upon what data, given the job profiles of the proposed positions are not identified and the glut of mine employees on the market due to the significant down turn in the mining industry.	Refer Issue #42 Page 31		5.1		42			
18	513	Social License (Sect 5 & 6, Appendix A)	The oft stated 'benefits' to the community have not been quantified nor have the costs. There is no cost benefit analysis provided.	Refer Issue #43 Page 32		5.2		43			
18	514	Social License (Sect 5 & 6, Appendix A)	At what cost is the proposal to the community (Koppio, Yallunda Flat, Cummins, Port Lincoln, Tumby Bay) that are currently and sustainably relying on agriculture and will continue to do so for 100's years.	Refer Issue #452 Page 31		5.2		452	514	43	
18	515	Social License (Sect 5 & 6, Appendix A)	There is no cost benefit analysis provided	Refer Issue #43 Page 32		5.2		43			
18	516	Social License (Sect 5 & 6, Appendix A)	There is no recognition of the costs to the agricultural industry through contamination dust arising from the mining operations.	Refer Issues #10, 11, & 12 Page 61		7.6		10	11	12	
18	517	Social License (Sect 5 & 6, Appendix A)	There are no agreements with the DCTB with respect to costs, inclusive of potential decline in revenue due to the devaluation of properties in the vicinity of the proposed mines and the loss of rate revenue.	Refer Issue #6 & 7 Page 88		7.9		6	7		
18	518	Transport Route Sect 7.9	It is noted that the transport route has been determined in the absence of consultation with the community and Elected Members of the DCTB.	Refer Issue #1 Page 83		7.9		1			

18	519	Transport Route Sect 7.9	There is no agreement with the DCTB as to the actual transport route	Refer Issue #2 Page 84	7.9	2			
18	520	Transport Route Sect 7.9	Assumptions have been made on the part of the Works Manager as to the transport route, but these are not transparent to Elected Members nor the Community at large.	Refer Issue #1 & 3 Page 83	7.9	1	3		
18	521	Transport Route Sect 7.9	The capability of the 'determined route' appears not to have been subjected to any formal approval process through DPTI	Refer Issue #4 Page 85	7.9	4			
18	522	Transport Route Sect 7.9	The impact upon native vegetation and EPBC listed species is not recognised in the Application.	Refer Issue #5 Page 85	7.9	5			
18	523	Transport Route Sect 7.9	The Application includes cost estimates from a private contractor as to upgrading the road, but no Council budget exists for this work to be undertaken and no agreement to cost sharing exists.	Refer Issue #6 Page 88	7.9	6			
18	524	Transport Route (Sect 7.9)	There is no economic benefit statement to the Community pertaining to the proposed road upgrade, only the potential for continued maintenance and repair liabilities for the life of the mine and beyond.	Refer Issue #7 Page 88	7.9	7			
18	525	Dust (Sect 4 pp106-107 & Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the orebody that are potentially harmful to human and plant health. These include not only the graphite, but Chromium, Manganese, Nickel, Rare Earths, Manganese, Strontium, Thorium and Uranium together with Copper, Magnesium and Zinc. These minerals are potential carcinogens and or neurotoxins in humans and growth inhibitors in plants.	Refer Issue #8 Page 57	7.6	8			
18	526	Dust (Sect 4 pp106-107 & Sect 7.4)	The nature and health impacts together with potential agricultural industry impacts of the dust emanating from mining operations.	Refer Issue #9 & 56 Page 63	7.6	9	56		
18	527	Dust (Sect 4 pp106-107 & Sect 7.4)	In the absence of on-site meteorological data, the dispersion pattern modelled from data remote from the site is of concern.	Refer Issue #10 Page 61	7.6	10			
18	528	Dust (Sect 4 pp106-107 & Sect 7.4)	Economic losses attributed to the impact of copper, magnesium and zinc (in excess of trace levels) on grain production	Refer Issue #11 Page 61	7.6	11			
18	529	Dust (Sect 4 pp106-107 & Sect 7.4)	The impact upon agricultural businesses within the fallout cloud of contaminated dust due to possible contaminated grain deliveries.	Refer Issue #12 & 56 Page 63	7.6	12	56		
18	530	Dust (Sect 4 pp106-107 & Sect 7.4)	Potential contamination of rain water, the main source of drinking water for the area	Refer Issue #13 Page 61	7.6	13			
18	531	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact of contaminated dust reaching the township of Tumby Bay	Refer Issue #14 Page 62	7.6	14			
18	532	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact on surface water contained within the Tod River Water Protection Zone (as per the DCTB Development Plan) or the Tod River Wetland of National Significance	Refer Issue #15 Page 62	7.6	15			
18	533	Groundwater (Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the ore body that are potentially harmful to human health and plant health. These include not only the graphite, but Chromium, Copper, Manganese, Rare Earths, Strontium, Thorium and Uranium. These materials are potential carcinogens and or neurotoxins in human and growth inhibitors in plants	Refer Issue #16 & 17 Page 42	7.4	16	17		
18	534	Groundwater (Sect 7.4)	The nature of the hazardous materials emanating from mining operations inclusive of the processing operations is inadequately described in the application	Refer Issue #16 & 17 Page 42	7.4	16	17		
18	535	Groundwater (Sect 7.4)	Environmental impact associated with contamination of groundwater with the hazardous materials	Refer Issue #18 Page 43	7.4	18			

18	536	Groundwater (Sect 7.4)	Limitations with respect to the geotechnical, hydrogeology and hydrology of the site, especially in regard to the design of the TSF facility (Section 4.7.7.4 pp 198) It is significant concern that the limitations highlighted by the consultant extends beyond the TSF facility to include the known fact that no data exists for MC4372, nor does the geo-hydrology or hydrology exists beyond the boundaries of MC4373 which may impact upon the Prescribed Wells Area to the South, the source of potable water for the lower Eyre Peninsula.	Refer Issue #19 Page 43		7.4		19			
18	537	Noise (Sect 7.7)	Insufficient data exists in relation to noise generation and dispersion as a consequence of night time operations which not only generate audible noise but also infrasound	Refer Issues #68 & 279 Page 81		7.7		68			
18	538	Noise (Sect 7.7)	Lack of actual site specific wind dispersion data implies that the noise dispersion patterns having regard to the wind and to the topography are subject to conjecture	Refer Issue #69 Page 81		7.7		69			
18	539	Construction of TSF (Appendix H)	Limitations of the design of the retaining embankment due to "insufficient geotechnical, geohydrology and hydrology of the site"	Refer Issue #70 Page 26		4.7	7.1	70			
18	540	Construction of TSF (Appendix H)	Approval should not be granted until all relevant data is available and the design reflects this	Refer Issue #71 Page 109		Noted		71			
18	541	Construction of TSF (Appendix H)	Application must contain all relevant information so that the public is well informed of the intentions of the applicant. It is our view that the deficiencies of information should be rectified and provided to the public by way of an amendment to the application and be subjected to an appropriate period of public scrutiny. Failure of the applicant to be required to provide this information and to provide approval for the project on the basis of what has been tendered is tantamount to an approval of a faulty design for whom legal liability can be established in the future should there be a catastrophic failure of the wall.	Refer Issue #72 Page 109		Noted		72			
18	542	Environmental Impacts (Sect 7)	Environmental impact of surface water run-off from the activities of mining operations fails to deal with the fact that this water has a high probability of being contaminated water	Refer Issues #15, 75, 178 & 273 Pages 41 & 62		7.6	7.4	75	15	273	178
18	543	Environmental Impacts (Sect 7)	Environmental sensitivity of this catchment and its ultimate outflow to the sea (marine park and aquaculture zones)	Refer Issues #76 & 75 Pages 41 & 62		7.6	7.3	76			
18	544	Explosives Magazine (Sect 4.5.7)	Risk assessment to this facility in the event of a bushfire	Refer Issue #77 Page 16		4.5.7		77			
18	545	Explosives Magazine (Sect 4.5.7)	Risk to employee fire fighters or to the CFS as a consequence of a bushfire in the vicinity of the magazine	Refer Issue #78 Page 17		4.5.7		78			
18	546	Explosives Magazine (Sect 4.5.7)	Assessment of the impact of a catastrophic explosion of the magazine. In such an event, what would be the blast radius?	Refer Issue #79 Page 17		4.5.7		79			
18	547	Explosives Magazine (Sect 4.5.7)	Increase in insurance risk to neighbouring properties as a result of the location of the magazine. Is this potential increase in insurance subject to compensation from the Company?	Refer Issue #80 Page 110		Appendix 1		80			
18	548	Explosives Magazine (Sect 4.5.7)	Chemical composition of the detonators. If they contain mercury fulminate, what is the environmental risk of such a large amount of mercury being released during the mining operations (dust and groundwater implications)?	Refer Issue #81 Pages 18		4.5.7		81			
18	549	Explosives Magazine (Sect 4.5.7)	Explosives materials are commonly recognised as ingredients for many IED's	Refer Issue #82 Page 17		4.5.7		82			
18	550	Long Term Issues	Kookaburra Gully is potentially not a stand alone development, but a component of the development of the prospect inclusive of Kookaburra Gully extension (for which the Company has received a \$3M grant to drill as part of the PACE program) and the original Koppio Graphite Mine area.	Refer Issue #84 Page 15		4.4		84			
18	551	Long Term Issues	Is the application an overarching application for the activities not only associated with Kookaburra Gully Mine site but for the holistic view encompassing the original Koppio Mine and Kookaburra Gully extended?	Refer Issue #85 Page 15		4.4		85			

18	552	Long Term Issues	Local suggestions that this development may also enable some symbiotic arrangement to exist between Australian Graphite Limited and Valance (Uley) Graphitepart of the relationship may be the establishment of haul routes between the two prospects.	Refer Issue #86 Page 14		4.2		86			
Submission 19											
19	553	Introduction	Is the short term gain of mining minerals in the Kookaburra Gully worth the risk of losing productive agricultural land forever.	Refer Issue #452 Page 31		5.2		450	452	514	
19	554	Introduction	How much is this beautiful country worth	Refer Issue #452 Page 31		5.2		451			
19	555	Introduction	How much will this beautiful country produce in the next 100 years if it is not mined	Refer Issue #452 Page 31		5.2		452			
19	556	Introduction	How much will the community of lower Eyre Peninsula benefit	Refer Issue #452 Page 31		5.2		453			
19	557	Introduction	Will mining dust contaminate and condemn our beef, wool, lamb and grain	Refer Issue #8 Page 57		7.6		454			
19	558	Social License (Sect 5 & 6, Appendix A)	Lack of information provided throughout the so called consultation process	Refer Issue #33 Page 34		6.7		33			
19	559	Social License (Sect 5 & 6, Appendix A)	Lack of availability of hard copy	Refer Issue #34 Page 35		6.7		34			
19	560	Social License (Sect 5 & 6, Appendix A)	Lack of knowledge of the inadequacies of internet capabilities on Lower Eyre Peninsula and inability to download a 139Mb file	Refer Issue #35 Page 35		6.7		35			
19	561	Social License (Sect 5 & 6, Appendix A)	The expectation that the recipient of the document of 1169 pages will be able to read, comprehend and formulate a response within the period provided.	Refer Issue #37 Page 35		6.7		37			
19	562	Social License (Sect 5 & 6, Appendix A)	The complete inflexibility of DSD with respect to an extension of time in which to respond.	Refer Issue #38 Page 35		6.7		38			
19	563	Social License (Sect 5 & 6, Appendix A)	The lack of public presentation either by DSD or the Company with respect to the Application	Refer Issue #39 Page 34		6.7		39			
19	564	Social License (Sect 5 & 6, Appendix A)	Demographic data that is four years out of date.	Refer Issue #40 Page 7		3.1		40			
19	565	Social License (Sect 5 & 6, Appendix A)	Reference to 52 mining jobs currently in the town of Tumbly Bay noting that the previous mining employer (Centrex Metals/Eyre Iron) has left the area is totally incorrect	Refer Issue #41 Page 30		5.1		41			
19	566	Social License (Sect 5 & 6, Appendix A)	The availability of jobs for the local community is based upon what data, given the job profiles of the proposed positions are not identified and the glut of mine employees on the market due to the significant down turn in the mining industry.	Refer Issue #42 Page 31		5.1		42			
19	567	Social License (Sect 5 & 6, Appendix A)	The oft stated 'benefits' to the community have not been quantified nor have the costs. There is no cost benefit analysis provided.	Refer Issue #43 Page 32		5.2		43			
19	568	Social License (Sect 5 & 6, Appendix A)	There is no recognition of the costs to the agricultural industry through contamination dust arising from the mining operations.	Refer Issues #10, 11, & 12 Page 61		7.6		10	11	12	
19	569	Social License (Sect 5 & 6, Appendix A)	There are no agreements with the DCTB with respect to costs, inclusive of potential decline in revenue due to the devaluation of properties in the vicinity of the proposed mines and the loss of rate revenue.	Refer Issue #6 & 7 Page 88		7.9		6	7		
19	570	Transport Route Sect 7.9	It is noted that the transport route has been determined in the absence of consultation with the community and Elected Members of the DCTB.	Refer Issue #1 Page 83		7.9		1			
19	571	Transport Route Sect 7.9	There is no agreement with the DCTB as to the actual transport route	Refer Issue #2 Page 84		7.9		2			
19	572	Transport Route Sect 7.9	Assumptions have been made on the part of the Works Manager as to the transport route, but these are not transparent to Elected Members nor the Community at large.	Refer Issue #1 & 3 Page 83		7.9		1	3		
19	573	Transport Route Sect 7.9	The capability of the 'determined route' appears not to have been subjected to any formal approval process through DPTI	Refer Issue #4 Page 85		7.9		4			
19	574	Transport Route Sect 7.9	The impact upon native vegetation and EPBC listed species is not recognised in the Application.	Refer Issue #5 Page 85		7.9		5			

19	575	Transport Route Sect 7.9	The Application includes cost estimates from a private contractor as to upgrading the road, but no Council budget exists for this work to be undertaken and no agreement to cost sharing exists.	Refer Issue #6 Page 88	7.9	6			
19	576	Transport Route (Sect 7.9)	There is no economic benefit statement to the Community pertaining to the proposed road upgrade, only the potential for continued maintenance and repair liabilities for the life of the mine and beyond.	Refer Issue #7 Page 88	7.9	7			
19	577	Dust (Sect 4 pp106-107 & Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the orebody that are potentially harmful to human and plant health. These include not only the graphite, but Chromium, Manganese, Nickel, Rare Earths, Manganese, Strontium, Thorium and Uranium together with Copper, Magnesium and Zinc. These minerals are potential carcinogens and or neurotoxins in humans and growth inhibitors in plants.	Refer Issue #8 Page 57	7.6	8			
19	578	Dust (Sect 4 pp106-107 & Sect 7.4)	The nature and health impacts together with potential agricultural industry impacts of the dust emanating from mining operations.	Refer Issue #9 & 56 Page 63	7.6	9	56		
19	579	Dust (Sect 4 pp106-107 & Sect 7.4)	In the absence of on-site meteorological data, the dispersion pattern modelled from data remote from the site is of concern.	Refer Issue #10 Page 61	7.6	10			
19	580	Dust (Sect 4 pp106-107 & Sect 7.4)	Economic losses attributed to the impact of copper, magnesium and zinc (in excess of trace levels) on grain production	Refer Issue #11 Page 61	7.6	11			
19	581	Dust (Sect 4 pp106-107 & Sect 7.4)	The impact upon agricultural businesses within the fallout cloud of contaminated dust due to possible contaminated grain deliveries.	Refer Issue #12 & 56 Page 63	7.6	12	56		
19	582	Dust (Sect 4 pp106-107 & Sect 7.4)	Potential contamination of rain water, the main source of drinking water for the area	Refer Issue #13 Page 61	7.6	13			
19	583	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact of contaminated dust reaching the township of Tumby Bay	Refer Issue #14 Page 62	7.6	14			
19	584	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact on surface water contained within the Tod River Water Protection Zone (as per the DCTB Development Plan) or the Tod River Wetland of National Significance	Refer Issue #15 Page 62	7.6	15			
19	585	Groundwater (Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the ore body that are potentially harmful to human health and plant health. These include not only the graphite, but Chromium, Copper, Manganese, Rare Earths, Strontium, Thorium and Uranium. These materials are potential carcinogens and or neurotoxins in human and growth inhibitors in plants	Refer Issue #16 & 17 Page 42	7.4	16	17		
19	586	Groundwater (Sect 7.4)	The nature of the hazardous materials emanating from mining operations inclusive of the processing operations is inadequately described in the application	Refer Issue #16 & 17 Page 42	7.4	16	17		
19	587	Groundwater (Sect 7.4)	Environmental impact associated with contamination of groundwater with the hazardous materials	Refer Issue #18 Page 43	7.4	18			
19	588	Groundwater (Sect 7.4)	Limitations with respect to the geotechnical, hydrogeology and hydrology of the site, especially in regard to the design of the TSF facility (Section 4.7.7.4 pp 198)) It is significant concern that the limitations highlighted by the consultant extends beyond the TSF facility to include the known fact that no data exists for MC4372, nor does the geo-hydrology or hydrology exists beyond the boundaries of MC4373 which may impact upon the Prescribed Wells Area to the South, the source of potable water for the lower Eyre Peninsula.	Refer Issue #19 Page 43	7.4	19			
19	589	Noise (Sect 7.7)	Insufficient data exists in relation to noise generation and dispersion as a consequence of night time operations which not only generate audible noise but also infrasound	Refer Issues #68 & 279 Page 81	7.7	68			
19	590	Noise (Sect 7.7)	Lack of actual site specific wind dispersion data implies that the noise dispersion patterns having regard to the wind and to the topography are subject to conjecture	Refer Issue #69 Page 81	7.7	69			
19	591	Construction of TSF (Appendix H)	Limitations of the design of the retaining embankment due to "insufficient geotechnical, geohydrology and hydrology of the site"	Refer Issue #70 Page 26	4.7	70	7.1		

19	592	Construction of TSF (Appendix H)	Approval should not be granted until all relevant data is available and the design reflects this	Refer Issue #71 Page 109		Noted		71			
19	593	Construction of TSF (Appendix H)	Application must contain all relevant information so that the public is well informed of the intentions of the applicant. It is our view that the deficiencies of information should be rectified and provided to the public by way of an amendment to the application and be subjected to an appropriate period of public scrutiny. Failure of the applicant to be required to provide this information and to provide approval for the project on the basis of what has been tendered is tantamount to an approval of a faulty design for whom legal liability can be established in the future should there be a catastrophic failure of the wall.	Refer Issue #72 Page 109		Noted		72			
19	594	Environmental Impacts (Sect 7)	Environmental impact of surface water run-off from the activities of mining operations fails to deal with the fact that this water has a high probability of being contaminated water	Refer Issues #15, 75, 178 & 273 Pages 41 & 62		7.6	7.4	75	15	273	178
19	595	Environmental Impacts (Sect 7)	Environmental sensitivity of this catchment and its ultimate outflow to the sea (marine park and aquaculture zones)	Refer Issues #76 & 75 Pages 41 & 62		7.6	7.3	76			
19	596	Explosives Magazine (Sect 4.5.7)	Risk assessment to this facility in the event of a bushfire	Refer Issue #77 Page 16		4.5.7		77			
19	597	Explosives Magazine (Sect 4.5.7)	Risk to employee fire fighters or to the CFS as a consequence	Refer Issue #78		4.5.7		78			
19	598	Explosives Magazine (Sect 4.5.7)	Assessment of the impact of a catastrophic explosion of the	Refer Issue #79		4.5.7		79			
19	599	Explosives Magazine (Sect 4.5.7)	Increase in insurance risk to neighbouring properties as a	Refer Issue #80		Appendix 1		80			
19	600	Explosives Magazine (Sect 4.5.7)	Chemical composition of the detonators. If they contain	Refer Issue #81		4.5.7		81			
19	601	Explosives Magazine (Sect 4.5.7)	Explosives materials are commonly recognised as ingredients for many IED's	Refer Issue #82 Page 17		4.5.7		82			
19	602	Long Term Issues	Kookaburra Gully is potentially not a stand alone development, but a component of the development of the prospect inclusive of Kookaburra Gully extension (for which the Company has received a \$3M grant to drill as part of the PACE program) and the original Koppio Graphite Mine area.	Refer Issue #84 Page 15		4.4		84			
19	603	Long Term Issues	Is the application an overarching application for the activities not only associated with Kookaburra Gully Mine site but for the holistic view encompassing the original Koppio Mine and Kookaburra Gully extended?	Refer Issue #85 Page 15		4.4		85			
19	604	Long Term Issues	Local suggestions that this development may also enable some symbiotic arrangement to exist between Australian Graphite Limited and Valance (Uley) Graphitepart of the relationship may be the establishment of haul routes between the two prospects.	Refer Issue #86 Page 14		4.2		86			
Submission 20											
20	605	Social License (Sect 5 & 6, Appendix A)	BOM at Port Lincoln Airport and Cummins Airport do not accurately relate to weather at the proposed mine site	Refer Issues # 83, 633 & 769 Page 8		3.8		83	769	633	
20	606	Social License (Sect 5 & 6, Appendix A)	Has there been true and accurate community consultation by AGL/LML	Refer Issue #1 Page 83		7.9		1			
20	607	Social License (Sect 5 & 6, Appendix A)	Lack of information provided throughout the so called consultation process	Refer Issue #33 Page 34		6.7		33			
20	608	Social License (Sect 5 & 6, Appendix A)	Presentations by AGL/LML have tended to be of the attitude of "we are right, we are good for you and no you are wrong"	Noted		5	6				
20	609	Social License (Sect 5 & 6, Appendix A)	Lack of availability of hard copy, these hard copies should have been provided by the mining company to local communities	Refer Issue #34 Page 35		6.7		34			
20	610	Social License (Sect 5 & 6, Appendix A)	Lack of knowledge of the inadequacies of internet capabilities on Lower Eyre Peninsula and inability to download a 139Mb file	Refer Issue #35 Page 35		6.7		35			
20	611	Social License (Sect 5 & 6, Appendix A)	The expectation that the recipient of the document of 1169 pages will be able to read, comprehend and formulate a response within the period provided.	Refer Issue #37 Page 35		6.7		37			
20	612	Social License (Sect 5 & 6, Appendix A)	The complete inflexibility of DSD with respect to an extension of time in which to respond.	Refer Issue #38 Page 35		6.7		38			

20	613	Social License (Sect 5 & 6, Appendix A)	The lack of public presentation either by DSD or the Company with respect to the Application	Refer Issue #39 Page 34	6.7		39			
20	614	Social License (Sect 5 & 6, Appendix A)	Weather monitoring is questionable as the two areas for data collection are not applicable to the mine site. AGL have used data from a weather station that Eyre Iron erected near Koppio Museum and this was self-monitored by Eyre Iron and not independently assessed/recorded. The local community knows that the weather patterns in the Koppio Hills are vastly different to what has been used by AGL.	Refer Issue #605 Pages 8	3.8		83	769	633	
20	615	Social License (Sect 5 & 6, Appendix A)	Demographic data that is four years out of date.	Refer Issue #40 Page 7	3.1		40			
20	616	Social License (Sect 5 & 6, Appendix A)	Reference to 52 mining jobs currently in the town of Tumbly Bay noting that the previous mining employer (Centrex Metals/Eyre Iron) has left the area is totally incorrect	Refer Issue #41 Page 30	5.1		41			
20	617	Social License (Sect 5 & 6, Appendix A)	The availability of jobs for the local community is based upon what data, given the job profiles of the proposed positions are not identified and the glut of mine employees on the market due to the significant down turn in the mining industry.	Refer Issue #42 Page 31	5.1		42			
20	618	Social License (Sect 5 & 6, Appendix A)	The often stated 'benefits' to the community have not been quantified nor have the costs. There is no cost benefit analysis provided.	Refer Issue #43 Page 32	5.2		43			
20	619	Social License (Sect 5 & 6, Appendix A)	There is no recognition of the costs to the agricultural industry through contamination dust arising from the mining operations.	Refer Issues #10, 11, & 12 Page 61	7.6		10	11	12	
20	620	Social License (Sect 5 & 6, Appendix A)	There are no agreements with the DCTB with respect to costs, inclusive of potential decline in revenue due to the devaluation of properties in the vicinity of the proposed mines and the loss of rate revenue.	Refer Issue #6 & 7 Page 88	7.9		6	7		
20	621	Dust (Sect 4 pp106-107 & Sect 7.4)	Potential contaminated dust will travel a lot further than modeling suggests. Predicted cumulative impacts for annual average PM2.5 concentrations do not spread as far as PM10. AGL nearly have the dust confined within their mine site. Impossible with the winds we have in the Koppio hills	Refer Issue #769 Pages 9 & 65	7.6	3.8	769			
20	622	Dust (Sect 4 pp106-107 & Sect 7.4)	Contaminated dust has the potential of reaching our farm which would contaminate our drinking rain water collected off farm building roofs and stored in tanks	Refer Issue #13 Page 61	7.6		13			
20	623	Dust (Sect 4 pp106-107 & Sect 7.4)	We have no main water supply so our stock water could also be contaminated in our dams and creeks	Refer Issue #13 Page 61	7.6		13			
20	624	Dust (Sect 4 pp106-107 & Sect 7.4)	Our pastures and crops are at risk of contamination from the dust	Refer Issues #10, 11, & 12 Page 61	7.6		10			
20	625	Dust (Sect 4 pp106-107 & Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the orebody that are potentially harmful to human and plant health. These include not only the graphite, but Chromium, Manganese, Nickel, Rare Earths, Manganese, Strontium, Thorium and Uranium together with Copper, Magnesium and Zinc. These minerals are potential carcinogens and or neurotoxins in humans and growth inhibitors in plants.	Refer Issue #8 Page 57	7.6		8			
20	626	Dust (Sect 4 pp106-107 & Sect 7.4)	The nature and health impacts together with potential agricultural industry impacts of the dust emanating from mining operations.	Refer Issue #9 & 56 Page 63	7.6		9	56		
20	627	Dust (Sect 4 pp106-107 & Sect 7.4)	In the absence of on-site meteorological data, the dispersion pattern modelled from data remote from the site is of concern.	Refer Issue #10 Page 61	7.6		10			
20	628	Dust (Sect 4 pp106-107 & Sect 7.4)	Economic losses attributed to the impact of copper, magnesium and zinc (in excess of trace levels) on grain production	Refer Issue #11 Page 61	7.6		11			
20	629	Dust (Sect 4 pp106-107 & Sect 7.4)	The impact upon agricultural businesses within the fallout cloud of contaminated dust due to possible contaminated grain deliveries.	Refer Issue #12 & 56 Page 63	7.6		12	56		
20	630	Dust (Sect 4 pp106-107 & Sect 7.4)	Potential contamination of rain water, the main source of drinking water for the area	Refer Issue #13 Page 61	7.6		13			

20	631	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact of contaminated dust reaching the township of Tumbly Bay	Refer Issue #14 Page 62	7.6	14				
20	632	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact on surface water contained within the Tod River Water Protection Zone (as per the DCTB Development Plan) or the Tod River Wetland of National Significance	Refer Issue #15 Page 62	7.6	15				
20	633	Groundwater (Sect 7.4)	I live at the headwaters of Kapperna creek which flows into the Pillaworta Creek that flows past the proposed mine site. In 2013 and 2014 we had rainfall of 12 inches (305mm) over a six-week period in both years. The proposed mine site will be a lot wetter than the modelling. An AGL/LML re stated that the 13th June 2014 was a one in one hundred year event, when questioned where he obtained the data it was stated, "I read it in the paper". Is this the sort of accurate and reasonable data that AGL/LML rely on? Local records show that this statement is wrong.	Refer Issue #177 Page 53	7.5	177				
20	634	Groundwater (Sect 7.4)	Pillaworta Creek joins the Tod River and flows into the sea impacts to aquaculture	Refer Issue #273 Page 46	7.4	273				
20	635	Groundwater (Sect 7.4)	AGL/LML stated they have spoken to the EPNRM and this water, by then including kerosene and other processing agents, will not harm the environment if it overflows into the adjacent areas.	Page 47	7.4					
20	636	Groundwater (Sect 7.4)	We use a bore on our property for stock water and this proposed mine is 10kms south of the farm. Not enough is known about the hydrology in the area to be sure this mine will not affect the underground water supplies in the Koppio Hills.	Page 47	7.4					
20	637	Groundwater (Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the ore body that are potentially harmful to human health and plant health. These include not only the graphite, but Chromium, Copper, Manganese, Rare Earths, Strontium, Thorium and Uranium. These materials are potential carcinogens and or neurotoxins in human and growth inhibitors in plants	Refer Issue #16 & 17 Page 42	7.4	16	17			
20	638	Groundwater (Sect 7.4)	The nature of the hazardous materials emanating from mining operations inclusive of the processing operations is inadequately described in the application	Refer Issue #16 & 17 Page 42	7.4	16	17			
20	639	Groundwater (Sect 7.4)	Environmental impact associated with contamination of groundwater with the hazardous materials	Refer Issue #18 Page 43	7.4	18				
20	640	Groundwater (Sect 7.4)	Limitations with respect to the geotechnical, hydrogeology and hydrology of the site, especially in regard to the design of the TSF facility (Section 4.7.7.4 pp 198) It is significant concern that the limitations highlighted by the consultant extends beyond the TSF facility to include the known fact that no data exists for MC4372, nor does the geo-hydrology or hydrology exists beyond the boundaries of MC4373 which may impact upon the Prescribed Wells Area to the South, the source of potable water for the lower Eyre Peninsula.	Refer Issue #19 Page 43	7.4	19				
20	641	Transport Route Sect 7.9	The intersection of Pillaworta Road and Bratten Way is downhill, has very limited vision due to vegetation and a bend in the road, and has double white lines either side. The present intersection has a huge camber that slopes the wrong way for loaded trucks turning and travelling east to Tumbly Bay, as loaded graphite trucks will go	Refer Issues #5, 6, 7, 120, 184 Page 85	7.9	5	6	7		120
20	642	Transport Route Sect 7.9	The capability of the 'determined route' appears not to have been subjected to any formal approval process through DPTI	Refer Issue #4 Page 85	7.9	4				
20	643	Transport Route Sect 7.9	It is noted that the transport route has been determined in the absence of consultation with the community and Elected Members of the DCTB.	Refer Issue #1 Page 83	7.9	1				
20	644	Transport Route Sect 7.9	There is no agreement with the DCTB as to the actual transport route	Refer Issue #2 Page 84	7.9	2				
20	645	Transport Route Sect 7.9	Assumptions have been made on the part of the Works Manager as to the transport route, but these are not transparent to Elected Members nor the Community at large.	Refer Issue #1 & 3 Page 83	7.9	1	3			

20	646	Transport Route Sect 7.9	The impact upon native vegetation and EPBC listed species is not recognised in the Application.	Refer Issue #5 Page 85		7.9		5			
20	647	Transport Route Sect 7.9	The Application includes cost estimates from a private contractor as to upgrading the road, but no Council budget exists for this work to be undertaken and no agreement to cost sharing exists.	Refer Issue #6 Page 88		7.9		6			
20	648	Transport Route (Sect 7.9)	There is no economic benefit statement to the Community pertaining to the proposed road upgrade, only the potential for continued maintenance and repair liabilities for the life of the mine and beyond.	Refer Issue #7 Page 88		7.9		7			
20	649	Noise (Sect 7.7)	Insufficient data exists in relation to noise generation and dispersion as a consequence of night time operations which not only generate audible noise but also infrasound	Refer Issues #68 & 279 Page 81		7.7		68			
20	650	Noise (Sect 7.7)	Lack of actual site specific wind dispersion data implies that the noise dispersion patterns having regard to the wind and to the topography are subject to conjecture	Refer Issue #69 Page 81		7.7		69			
20	651	Construction of TSF (Appendix H)	Limitations of the design of the retaining embankment due to "insufficient geotechnical, geohydrology and hydrology of the site"	Refer Issue #70 Page 26		4.7	7.1	70			
20	652	Construction of TSF (Appendix H)	Approval should not be granted until all relevant data is available and the design reflects this	Refer Issue #71 Page 109		Noted		71			
20	653	Construction of TSF (Appendix H)	Application must contain all relevant information so that the public is well informed of the intentions of the applicant. It is our view that the deficiencies of information should be rectified and provided to the public by way of an amendment to the application and be subjected to an appropriate period of public scrutiny. Failure of the applicant to be required to provide this information and to provide approval for the project on the basis of what has been tendered is tantamount to an approval of a faulty design for whom legal liability can be established in the future should there be a catastrophic failure of the wall.	Refer Issue #72 Page 109		Noted		72			
20	654	Environmental Impacts (Sect 7)	Environmental impact of surface water run-off from the activities of mining operations fails to deal with the fact that this water has a high probability of being contaminated water	Refer Issues #15, 75, 178 & 273 Pages 41 & 62		7.6	7.4	75	15	273	178
20	655	Environmental Impacts (Sect 7)	Environmental sensitivity of this catchment and its ultimate outflow to the sea (marine park and aquaculture zones)	Refer Issues #76 & 75 Pages 41 & 62		7.6	7.3	76			
20	656	Explosives Magazine (Sect 4.5.7)	Risk assessment to this facility in the event of a bushfire	Refer Issue #77 Page 16		4.5.7		77			
20	657	Explosives Magazine (Sect 4.5.7)	Risk to employee fire fighters or to the CFS as a consequence of a bushfire in the vicinity of the magazine	Refer Issue #78 Page 17		4.5.7		78			
20	658	Explosives Magazine (Sect 4.5.7)	Assessment of the impact of a catastrophic explosion of the magazine. In such an event, what would be the blast radius?	Refer Issue #79 Page 17		4.5.7		79			
20	659	Explosives Magazine (Sect 4.5.7)	Increase in insurance risk to neighbouring properties as a result of the location of the magazine. Is this potential increase in insurance subject to compensation from the Company?	Refer Issue #80 Page 110		Appendix 1		80			
20	660	Explosives Magazine (Sect 4.5.7)	Chemical composition of the detonators. If they contain mercury fulminate, what is the environmental risk of such a large amount of mercury being released during the mining operations (dust and groundwater implications)?	Refer Issue #81 Pages 18		4.5.7		81			
20	661	Explosives Magazine (Sect 4.5.7)	Explosives materials are commonly recognised as ingredients for many IED's	Refer Issue #82 Page 17		4.5.7		82			
20	662	Long Term Issues	Kookaburra Gully is potentially not a stand alone development, but a component of the development of the prospect inclusive of Kookaburra Gully extension (for which the Company has received a \$3M grant to drill as part of the PACE program) and the original Koppio Graphite Mine area.	Refer Issue #84 Page 15		4.4		84			
20	663	Long Term Issues	Is the application an overarching application for the activities not only associated with Kookaburra Gully Mine site but for the holistic view encompassing the original Koppio Mine and Kookaburra Gully extended?	Refer Issue #85 Page 15		4.4		85			

20	664	Long Term Issues	Local suggestions that this development may also enable some symbiotic arrangement to exist between Australian Graphite Limited and Valance (Uley) Graphitepart of the relationship may be the establishment of haul routes between the two prospects.	Refer Issue #86 Page 14		4.2		86			
Submission 21											
21	665	Social License (Sect 5 & 6, Appendix A)	BOM at Port Lincoln Airport and Cummins Airport do not accurately relate to weather at the proposed mine site	Refer Issue #177, 605 & 633 Pages 8 & 53		3.8	7.5	177	605	633	
21	666	Social License (Sect 5 & 6, Appendix A)	Data, especially dust, should be independently monitored	Page 8		3.7		666			
21	667	Social License (Sect 5 & 6, Appendix A)	Lack of information provided throughout the so called consultation process	Refer Issue #33 Page 34		6.7		33			
21	668	Social License (Sect 5 & 6, Appendix A)	Lack of availability of hard copy	Refer Issue #34 Page 35		6.7		34			
21	669	Social License (Sect 5 & 6, Appendix A)	Lack of knowledge of the inadequacies of internet capabilities on Lower Eyre Peninsula and inability to download a 139Mb file	Refer Issue #35 Page 35		6.7		35			
21	670	Social License (Sect 5 & 6, Appendix A)	The expectation that the recipient of the document of 1169 pages will be able to read, comprehend and formulate a response within the period provided.	Refer Issue #37 Page 35		6.7		37			
21	671	Social License (Sect 5 & 6, Appendix A)	The complete inflexibility of DSD with respect to an extension of time in which to respond.	Refer Issue #38 Page 35		6.7		38			
21	672	Social License (Sect 5 & 6, Appendix A)	The lack of public presentation either by DSD or the Company with respect to the Application	Refer Issue #39 Page 34		6.7		39			
21	673	Social License (Sect 5 & 6, Appendix A)	Where is the true community consultation	Refer Issue #1 Page 83		7.9		1			
21	674	Social License (Sect 5 & 6, Appendix A)	Demographic data that is four years out of date.	Refer Issue #40 Page 7		3.1		40			
21	675	Social License (Sect 5 & 6, Appendix A)	Reference to 52 mining jobs currently in the town of Tumbly Bay noting that the previous mining employer (Centrex Metals/Eyre Iron) has left the area is totally incorrect	Refer Issue #41 Page 30		5.1		41			
21	676	Social License (Sect 5 & 6, Appendix A)	The availability of jobs for the local community is based upon what data, given the job profiles of the proposed positions are not identified and the glut of mine employees on the market due to the significant down turn in the mining industry.	Refer Issue #42 Page 31		5.1		42			
21	677	Social License (Sect 5 & 6, Appendix A)	The often stated 'benefits' to the community have not been quantified nor have the costs. There is no cost benefit analysis provided.	Refer Issue #43 Page 32		5.2		43			
21	678	Social License (Sect 5 & 6, Appendix A)	There is no recognition of the costs to the agricultural industry through contamination dust arising from the mining operations.	Refer Issues #10, 11, & 12 Page 61		7.6		10	11	12	
21	679	Social License (Sect 5 & 6, Appendix A)	There are no agreements with the DCTB with respect to costs, inclusive of potential decline in revenue due to the devaluation of properties in the vicinity of the proposed mines and the loss of rate revenue.	Refer Issue #6 & 7 Page 88		7.9		6	7		
21	680	Dust (Sect 4 pp106-107 & Sect 7.4)	Potential contaminated dust will travel a lot further than modeling suggests. Predicted cumulative impacts for annual average PM2.5 concentrations do not spread as far as PM10.	Refer Issues #621 & 769 Pages 9 & 64		7.6	3.8	621	769		
21	681	Dust (Sect 4 pp106-107 & Sect 7.4)	Contaminated dust has the potential of reaching our farm which would contaminate our drinking rain water collected off farm building roofs and stored in tanks	Refer Issue #13 Page 61		7.6		13			
21	682	Dust (Sect 4 pp106-107 & Sect 7.4)	We have no main water supply so our stock water could also be contaminated in our dams and creeks	Refer Issue #13 Page 61		7.6		13			
21	683	Dust (Sect 4 pp106-107 & Sect 7.4)	Our pastures and crops are at risk of contamination from the dust	Refer Issues #10, 11, & 12 Page 61		7.6		10			

21	684	Dust (Sect 4 pp106-107 & Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the orebody that are potentially harmful to human and plant health. These include not only the graphite, but Chromium, Manganese, Nickel, Rare Earths, Manganese, Strontium, Thorium and Uranium together with Copper, Magnesium and Zinc. These minerals are potential carcinogens and or neurotoxins in humans and growth inhibitors in plants.	Refer Issue #8 Page 57	7.6	8				
21	685	Dust (Sect 4 pp106-107 & Sect 7.4)	The nature and health impacts together with potential agricultural industry impacts of the dust emanating from mining operations.	Refer Issue #9 & 56 Page 63	7.6	9	56			
21	686	Dust (Sect 4 pp106-107 & Sect 7.4)	In the absence of on-site meteorological data, the dispersion pattern modelled from data remote from the site is of concern.	Refer Issue #10 Page 61	7.6	10				
21	687	Dust (Sect 4 pp106-107 & Sect 7.4)	Economic losses attributed to the impact of copper, magnesium and zinc (in excess of trace levels) on grain production	Refer Issue #11 Page 61	7.6	11				
21	688	Dust (Sect 4 pp106-107 & Sect 7.4)	The impact upon agricultural businesses within the fallout cloud of contaminated dust due to possible contaminated grain deliveries.	Refer Issue #12 & 56 Page 63	7.6	12	56			
21	689	Dust (Sect 4 pp106-107 & Sect 7.4)	Potential contamination of rain water, the main source of drinking water for the area	Refer Issue #13 Page 61	7.6	13				
21	690	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact of contaminated dust reaching the township of Tumbly Bay	Refer Issue #14 Page 62	7.6	14				
21	691	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact on surface water contained within the Tod River Water Protection Zone (as per the DCTB Development Plan) or the Tod River Wetland of National Significance	Refer Issue #15 Page 62	7.6	15				
21	692	Groundwater (Sect 7.4)	An analysis of the data provided indicates the existence of a significant number of minerals within the ore body that are potentially harmful to human health and plant health. These include not only the graphite, but Chromium, Copper, Manganese, Rare Earths, Strontium, Thorium and Uranium. These materials are potential carcinogens and or neurotoxins in human and growth inhibitors in plants	Refer Issue #16 & 17 Page 42	7.4	16	17			
21	693	Groundwater (Sect 7.4)	The nature of the hazardous materials emanating from mining operations inclusive of the processing operations is inadequately described in the application	Refer Issue #16 & 17 Page 42	7.4	16	17			
21	694	Groundwater (Sect 7.4)	Environmental impact associated with contamination of groundwater with the hazardous materials	Refer Issue #18 Page 43	7.4	18				
21	695	Groundwater (Sect 7.4)	Limitations with respect to the geotechnical, hydrogeology and hydrology of the site, especially in regard to the design of the TSF facility (Section 4.7.7.4 pp 198) It is significant concern that the limitations highlighted by the consultant extends beyond the TSF facility to include the known fact that no data exists for MC4372, nor does the geo-hydrology or hydrology exists beyond the boundaries of MC4373 which may impact upon the Prescribed Wells Area to the South, the source of potable water for the lower Eyre Peninsula.	Refer Issue #19 Page 43	7.4	19				
21	696	Transport Route Sect 7.9	The intersection of Pillaworta Road and Bratten Way is downhill, has very limited vision due to vegetation and a bend in the road, and has double white lines either side.. The present intersection has a huge camber that slopes the wrong way for loaded trucks turning and travelling east to Tumbly Bay, as loaded graphite trucks will go	Refer Issue #641 Page 85	7.9	5	6	7	120	
21	697	Transport Route Sect 7.9	It is noted that the transport route has been determined in the absence of consultation with the community and Elected Members of the DCTB.	Refer Issue #1 Page 83	7.9	1				
21	698	Transport Route Sect 7.9	There is no agreement with the DCTB as to the actual transport route	Refer Issue #2 Page 84	7.9	2				
21	699	Transport Route Sect 7.9	Assumptions have been made on the part of the Works Manager as to the transport route, but these are not transparent to Elected Members nor the Community at large.	Refer Issue #1 & 3 Page 83	7.9	1	3			
21	700	Transport Route Sect 7.9	The capability of the 'determined route' appears not to have been subjected to any formal approval process through DPTI	Refer Issue #4 Page 85	7.9	4				

21	701	Transport Route Sect 7.9	The impact upon native vegetation and EPBC listed species is not recognised in the Application.	Refer Issue #5 Page 85		7.9		5			
21	702	Transport Route Sect 7.9	The Application includes cost estimates from a private contractor as to upgrading the road, but no Council budget exists for this work to be undertaken and no agreement to cost sharing exists.	Refer Issue #6 Page 88		7.9		6			
21	703	Transport Route (Sect 7.9)	There is no economic benefit statement to the Community pertaining to the proposed road upgrade, only the potential for continued maintenance and repair liabilities for the life of the mine and beyond.	Refer Issue #7 Page 88		7.9		7			
21	704	Noise (Sect 7.7)	Insufficient data exists in relation to noise generation and dispersion as a consequence of night time operations which not only generate audible noise but also infrasound	Refer Issues #68 & 279 Page 81		7.7		68			
21	705	Noise (Sect 7.7)	Lack of actual site specific wind dispersion data implies that the noise dispersion patterns having regard to the wind and to the topography are subject to conjecture	Refer Issue #69 Page 81		7.7		69			
21	706	Construction of TSF (Appendix H)	Limitations of the design of the retaining embankment due to "insufficient geotechnical, geohydrology and hydrology of the site"	Refer Issue #70 Page 26		4.7	7.1	70			
21	707	Construction of TSF (Appendix H)	Approval should not be granted until all relevant data is available and the design reflects this	Refer Issue #71 Page 109		Noted		71			
21	708	Construction of TSF (Appendix H)	Application must contain all relevant information so that the public is well informed of the intentions of the applicant. It is our view that the deficiencies of information should be rectified and provided to the public by way of an amendment to the application and be subjected to an appropriate period of public scrutiny. Failure of the applicant to be required to provide this information and to provide approval for the project on the basis of what has been tendered is tantamount to an approval of a faulty design for whom legal liability can be established in the future should there be a catastrophic failure of the wall.	Refer Issue #72 Page 109		Noted		72			
21	709	Environmental Impacts (Sect 7)	Environmental impact of surface water run-off from the activities of mining operations fails to deal with the fact that this water has a high probability of being contaminated water	Refer Issues #15, 75, 178 & 273 Pages 41 & 62		7.6	7.4	75	15	273	178
21	710	Environmental Impacts (Sect 7)	Environmental sensitivity of this catchment and its ultimate outflow to the sea (marine park and aquaculture zones)	Refer Issues #76 & 75 Pages 41 & 62		7.6	7.3	76	75		
21	711	Explosives Magazine (Sect 4.5.7)	Risk assessment to this facility in the event of a bushfire	Refer Issue #77 Page 16		4.5.7		77			
21	712	Explosives Magazine (Sect 4.5.7)	Risk to employee fire fighters or to the CFS as a consequence of a bushfire in the vicinity of the magazine	Refer Issue #78 Page 17		4.5.7		78			
21	713	Explosives Magazine (Sect 4.5.7)	Assessment of the impact of a catastrophic explosion of the magazine. In such an event, what would be the blast radius?	Refer Issue #79 Page 17		4.5.7		79			
21	714	Explosives Magazine (Sect 4.5.7)	Increase in insurance risk to neighbouring properties as a result of the location of the magazine. Is this potential increase in insurance subject to compensation from the Company?	Refer Issue #80 Page 110		Appendix 1		80			
21	715	Explosives Magazine (Sect 4.5.7)	Chemical composition of the detonators. If they contain mercury fulminate, what is the environmental risk of such a large amount of mercury being released during the mining operations (dust and groundwater implications)?	Refer Issue #81 Pages 18		4.5.7		81			
21	716	Explosives Magazine (Sect 4.5.7)	Explosives materials are commonly recognised as ingredients for many IED's	Refer Issue #82 Page 17		4.5.7		82			
21	717	Long Term Issues	Kookaburra Gully is potentially not a stand alone development, but a component of the development of the prospect inclusive of Kookaburra Gully extension (for which the Company has received a \$3M grant to drill as part of the PACE program) and the original Koppio Graphite Mine area.	Refer Issue #84 Page 15		4.4		84			
21	718	Long Term Issues	Is the application an overarching application for the activities not only associated with Kookaburra Gully Mine site but for the holistic view encompassing the original Koppio Mine and Kookaburra Gully extended?	Refer Issue #85 Page 15		4.4		85			

21	719	Long Term Issues	Local suggestions that this development may also enable some symbiotic arrangement to exist between Australian Graphite Limited and Valance (Uley) Graphitepart of the relationship may be the establishment of haul routes between the two prospects.	Refer Issue #86 Page 14		4.2		86			
Submission 22											
22	720	Uranium	AGL has identified the presence of uranium in the proposed site yet have made no mention of monitoring or exclusion zones in relation to rayon gases being released in to the atmosphere or environment (either as gasses or leached into water course in the tod river catchment through drilling)	Page 14		4.3					
22	721	Uranium	Mamota had a public meeting in Cummins about extraction of uranium in our district and talked about exclusion zones of up to 5km of extraction areas.	Page 14		4.3					
Submission 24 – Stop Invasive Mining Group (Bronte Gregurke or Keith Coventry)											
24	722	Social License (Sect 5 & 6, Appendix A)	Lack of information provided throughout the so called consultation process	Refer Issue #33 Page 34		6.7		33			
24	723	Social License (Sect 5 & 6, Appendix A)	Lack of availability of hard copy – Stop Invasive Mining Group twice requested hard copies and an extension of time	Refer Issue #34 Page 35		6.7		34			
24	724	Social License (Sect 5 & 6, Appendix A)	Lack of knowledge of the inadequacies of internet capabilities on Lower Eyre Peninsula and inability to download a 139Mb file	Refer Issue #35 Page 35		6.7		35			
24	725	Social License (Sect 5 & 6, Appendix A)	The expectation that the recipient of the document of 1169 pages will be able to read, comprehend and formulate a response within the period provided.	Refer Issue #37 Page 35		6.7		37			
24	726	Social License (Sect 5 & 6, Appendix A)	The complete inflexibility of DSD with respect to an extension of time in which to respond.	Refer Issue #38 Page 35		6.7		38			
24	727	Social License (Sect 5 & 6, Appendix A)	The lack of public presentation either by DSD or the Company with respect to the Application	Refer Issue #39 Page 34		6.7		39			
24	728	Social License (Sect 5 & 6, Appendix A)	BOM at Port Lincoln Airport and Cummins Airport do not accurately relate to weather at the proposed mine site. Weather in Koppio Hills is vastly different.	Refer Issues # 83, 633 & 769 Page 8		3.8		83	633	769	
24	729	Social License (Sect 5 & 6, Appendix A)	AGL have used data from a weather station that Eyre Iron erected near Koppio Museum and this was self-monitored by Eyre Iron and not independently assessed/recorded.	Refer Issue #605 Page 8		3.8		83	769	633	
24	730	Social License (Sect 5 & 6, Appendix A)	Reference to 52 mining jobs currently in the town of Tumbly Bay noting that the previous mining employer (Centrex Metals/Eyre Iron) has left the area is totally incorrect	Refer Issue #41 Page 30		5.1		41			
24	731	Social License (Sect 5 & 6, Appendix A)	The availability of jobs for the local community is based upon what data, given the job profiles of the proposed positions are not identified and the glut of mine employees on the market due to the significant down turn in the mining industry.	Refer Issue #42 Page 31		5.1		42			
24	732	Social License (Sect 5 & 6, Appendix A)	The often stated 'benefits' to the community have not been quantified nor have the costs. There is no cost benefit analysis provided.	Refer Issue #43 Page 32		5.2		43			
24	733	Social License (Sect 5 & 6, Appendix A)	There is no recognition of the costs to the agricultural industry through contamination dust arising from the mining operations.	Refer Issues #10, 11, & 12 Page 61		7.6		10	11	12	
24	734	Transport Route Sect 7.9	It is noted that the transport route has been determined in the absence of consultation with the community and Elected Members of the DCTB.	Refer Issue #1 Page 83		7.9		1			
24	735	Transport Route Sect 7.9	There are no agreements with the DCTB with respect to costs, inclusive of potential decline in revenue due to the devaluation of properties in the vicinity of the proposed mines and the loss of rate revenue.	Refer Issues #6 & 7 Page 88		7.9		6	7		
24	736	Transport Route Sect 7.9	There is no agreement with the DCTB as to the actual transport route	Refer Issue #2 Page 84		7.9		2			
24	737	Transport Route Sect 7.9	Assumptions have been made on the part of the Works Manager as to the transport route, but these are not transparent to Elected Members nor the Community at large.	Refer Issue #1 & 3 Page 83		7.9		1	3		

24	738	Transport Route Sect 7.9	The capability of the 'determined route' appears not to have been subjected to any formal approval process through DPTI	Refer Issue #4 Page 85		7.9		4			
24	739	Transport Route Sect 7.9	The impact upon native vegetation and EPBC listed species is not recognised in the Application.	Refer Issue #5 Page 85		7.9		5			
24	740	Transport Route Sect 7.9	The Application includes cost estimates from a private contractor as to upgrading the road, but no Council budget exists for this work to be undertaken and no agreement to cost sharing exists.	Refer Issue #6 Page 88		7.9		6			
24	741	Transport Route (Sect 7.9)	There is no economic benefit statement to the Community pertaining to the proposed road upgrade, only the potential for continued maintenance and repair liabilities for the life of the mine and beyond.	Refer Issue #7 Page 88		7.9		7			
24	742	Transport Route (Sect 7.9)	Pillaworta Road upgrade will destroy EP Blue Gums or an alternative route has to be used, namely Bailla Hill Road, in our opinion. This Bailla Hill Road, on the southern side, is more central....Less vegetation to clear for the first half of distance to Lincoln Highway, the second half is already a wider council road and the intersection onto Lincoln Highway is flat with good vision for motorists.	Refer Issue #5 Page 85		7.9		5			
24	743	Transport Route Sect 7.9	The intersection of Pillaworta Road and Bratten Way is downhill, has very limited vision due to vegetation and a bend in the road, and has double white lines either side.	Refer Issues #5, 6, 7, 120, 184 Pages 85 & 91		7.9		5	6	7	120
24	744	Environmental Impacts (Sect 7)	Environmental impact of surface water run-off from the activities of mining operations fails to deal with the fact that this water has a high probability of being contaminated water	Refer Issues #15, 75, 178 & 273 Pages 41 & 62		7.6	7.4	75	15	273	178
24	745	Environmental Impacts (Sect 7)	Environmental sensitivity of this catchment and its ultimate outflow to the sea (Southern Right Whales, abalone nurseries, marine park and aquaculture zones)	Refer Issues #76 & 75 Pages 41 & 62		7.6	7.3	76			
24	746	Dust (Sect 4 pp106-107 & Sect 7.4)	BOM at Port Lincoln Airport and Cummins Airport do not accurately relate to weather at the proposed mine site. Weather in Koppio Hills is vastly different.	Refer Issue #177, 605 & 633 Pages 9 & 53		3.8		614			
24	747	Dust (Sect 4 pp106-107 & Sect 7.4)	AGL have used data from a weather station that Eyre Iron erected near Koppio Museum and this was self-monitored by Eyre Iron and not independently assessed/recorded.	Refer Issue #177, 605 & 633 Pages 9 & 53		3.8		614			
24	748	Dust (Sect 4 pp106-107 & Sect 7.4)	Nature and health impacts together with potential agricultural industry impacts of the dust emanating from mining operations (graphite, Chromium, Manganese, Nickel, Rare	Refer Issue #8, 9 & 56 Page 57		7.6		8	9	56	
24	749	Dust (Sect 4 pp106-107 & Sect 7.4)	In the absence of on-site meteorological data, the dispersion pattern modelled from data remote from the site is of concern.	Refer Issue #10 Page 61		7.6		10			
24	750	Dust (Sect 4 pp106-107 & Sect 7.4)	Most significant emission of concern is particulate matter, as a result of the development and operation of the open pit, WRSFs and, to a smaller extent, graphite- processing plant.... A small fleet of mobile equipment for loading/dumping of ore and fresh rock waste will also contribute to dust via movement on haul roads causing wheel generated dust and loading and dumping of product. Wind erosion will generate fugitive emissions from the pits, WRSFs and stockpiles.	Page 65		7.6					
24	751	Dust (Sect 4 pp106-107 & Sect 7.4)	Predicted cumulative impacts for annual average PM2.5 concentrations do not spread as far as PM10.	Refer Issues #621 & 769 Pages 9 & 65		7.6	3.8	621	769		
24	752	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact upon vegetation /pastures and thence native animals and landowners stock that ingest these contaminants over a period of time	Refer Issue #9, 10, 11 & 56 Page 57		7.6		9	10	11	56
24	753	Dust (Sect 4 pp106-107 & Sect 7.4)	Economic losses attributed to the impact of copper, magnesium and zinc (in excess of trace levels) on grain production	Refer Issue #11 Page 61		7.6		11			
24	754	Dust (Sect 4 pp106-107 & Sect 7.4)	The impact upon agricultural businesses within the fallout cloud of contaminated dust due to possible contaminated grain deliveries.	Refer Issue #12 & 56 Page 63		7.6		12	56		
24	755	Dust (Sect 4 pp106-107 & Sect 7.4)	Potential contamination of rain water, the main source of drinking water for the area	Refer Issue #13 Page 61		7.6		13			
24	756	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact of contaminated dust reaching the township of Tumby Bay	Refer Issue #14 Page 62		7.6		14			

24	757	Dust (Sect 4 pp106-107 & Sect 7.4)	Impact on surface water contained within the Tod River Water Protection Zone (as per the DCTB Development Plan) or the Tod River Wetland of National Significance	Refer Issue #15 Page 62		7.6		15			
24	758	Water Supply	AGL, state they are in discussions with SA Water to supply "20ML per annum (110KL per day) of potable drinking water...Impossible to want that amount of potable water for amenities! Is this excess amount of potable water to be used for mine operations?	Page 25		4.7		758			
24	759	Water Supply	Non-potable water from the Tod Reservoir...is reported to be contaminated and has not been used for public supply for years. How can AGL construct a pipeline to supply their mine operations with contaminated water, over agricultural land, or along local government roadsides? This contaminated water will be in their holding ponds and used for dust suppression and thereby available to the environment.	Refer Issues #275 & #285 Page 54		7.5		275			
24	760	Water Supply	There is no agreement with DCTB or local land owners for the location of pipeline from Tod Reservoir	Pages 30 & 55		4.9	7.5	760			
24	761	Water Supply	Flood of 13th June 2014 was a one in one hundred- year event...local records show that this data	Page 9		3.8		633			
24	762	Groundwater (Sect 7.4)	Nature of the hazardous materials (graphite, Chromium, Copper, Manganese, Nickel, Rare Earths, Strontium, Thorium and Uranium) emanating from mining operations inclusive of the processing operations	Refer Issue #16 & 17 Page 42		7.4		16	17		
24	763	Groundwater (Sect 7.4)	Environmental impact associated with contamination of groundwater with the hazardous materials	Refer Issue #18 Page 43		7.4		18			
24	764	Groundwater (Sect 7.4)	Limitations with respect to the geotechnical, hydrogeology and hydrology of the site, especially in regard to the design of the TSF facility (Section 4.7.7.4 pp 198)	Refer Issue #19 Page 43		7.4		19			
24	765	Groundwater (Sect 7.4)	No data exists for MC4372, nor does the geo-hydrology or hydrology exists beyond the boundaries of MC4373 which may impact upon the Prescribed Wells Area to the South	Refer Issue #19 Page 43		7.4		19			
24	766	Noise (Sect 7.7)	Insufficient data exists in relation to noise generation and dispersion as a consequence of night time operations which not only generate audible noise but also infrasound	Refer Issues #68 & 279 Page 81		7.7		68			
24	767	Noise (Sect 7.7)	When the plant is working the noise level rises beyond acceptable level as shown in table 4.26 noise processing plant equipment noise levels.	Page 82		7.7		767			
24	768	Noise (Sect 7.7)	The national standard for exposure to noise in the occupational environment is an average daily exposure level of 85 decibels...For peak noise, the national standard is a peak sound pressure level of 140 decibels. (Source: National Occupational Health and Safety Commission, National Strategy for the Prevention of Occupational Noise-induced Hearing Loss [NOHSC: 4004(1989)], Australian Government Publishing Service, Canberra, 1989)	Page 82		7.7		768			
24	769	Noise (Sect 7.7)	Winds in the Koppio hills are different than BoM data of Pt.	Page 9		3.8	7.6	769			
24	770	Noise (Sect 7.7)	Lack of actual site specific wind dispersion data implies that the noise dispersion patterns having regard to the wind and to the topography are subject to conjecture	Refer Issue #69 Page 81		7.7		69			
24	771	Construction of TSF (Appendix H)	Limitations of the design of the retaining embankment due to "insufficient geotechnical, geohydrology and hydrology of the site"	Refer Issue #70 Page 26		4.7	7.1	70			
24	772	Construction of TSF (Appendix H)	Approval should not be granted until all relevant data is available and the design reflects this	Refer Issue #71 Page 109		Noted		71			
24	773	Construction of TSF (Appendix H)	Application must contain all relevant information so that the public is well informed of the intentions of the applicant. It is our view that the deficiencies of information should be rectified and provided to the public by way of an amendment to the application and be subjected to an appropriate period of public scrutiny. Failure of the applicant to be required to provide this information and to provide approval for the project on the basis of what has been tendered is tantamount to an approval of a faulty design for whom legal liability can be established in the future should there be a catastrophic failure of the wall.	Refer Issue #72 Page 109		Noted		72			

24	774	Explosives Magazine (Sect 4.5.7)	Risk assessment to this facility in the event of a bushfire	Refer Issue #77 Page 16		4.5.7		77			
24	775	Explosives Magazine (Sect 4.5.7)	Risk to employee fire fighters or to the CFS as a consequence of a bushfire in the vicinity of the magazine	Refer Issue #78 Page 17		4.5.7		78			
24	776	Explosives Magazine (Sect 4.5.7)	Assessment of the impact of a catastrophic explosion of the magazine. In such an event, what would be the blast radius?	Refer Issue #79 Page 17		4.5.7		79			
24	777	Explosives Magazine (Sect 4.5.7)	Increase in insurance risk to neighbouring properties as a result of the location of the magazine. Is this potential increase in insurance subject to compensation from the Company?	Refer Issue #80 Page 110		Appendix 1		80			
24	778	Explosives Magazine (Sect 4.5.7)	Chemical composition of the detonators. If they contain mercury fulminate, what is the environmental risk of such a large amount of mercury being released during the mining operations (dust and groundwater implications)?	Refer Issue #81 Pages 18		4.5.7		81			
24	779	Explosives Magazine (Sect 4.5.7)	Explosives materials are commonly recognised as ingredients for many IED's	Refer Issue #82 Pages 17		4.5.7		82			
24	780	Long Term Issues	Kookaburra Gully is potentially not a stand alone development, but a component of the development of the prospect inclusive of Kookaburra Gully extension (for which the Company has received a \$3M grant to drill as part of the PACE program) and the original Koppio Graphite Mine area.	Refer Issue #84 Page 15		4.4		84			
24	781	Long Term Issues	AGL/LML should be detailing their entire plans for the area....This is not just one potential mine although they are only wanting to start with this one....over time they want to mine all the deposits.	Refer Issue #85 Page 15		4.4		85			
24	782	Long Term Issues	Is the application an overarching application for the activities not only associated with Kookaburra Gully Mine site but for the holistic view encompassing the original Koppio Mine and Kookaburra Gully extended?	Refer Issue #85 Page 15		4.4		85			
24	783	Long Term Issues	Local suggestions that this development may also enable some symbiotic arrangement to exist between Australian Graphite Limited and Valance (Uley) Graphitepart of the relationship may be the establishment of haul routes between the two prospects.	Refer Issue #86 Page 14		4.2		86			
Submission 25 – Emie Borthwick											
25	784	(a) Diversion Channel	A catch drain/diversion channel to intercept surface water flows will be sized and constructed around the TSF and....redirected to the Pillaworta Creek. What are the water sensitive design and treatment techniques?	Page 56		7.5		784			
25	785	(b) Groundwater	A complex understanding of the hydrogeology of the immediate area is unknown and concern is raised into this determination.	Pages 12 & 42-		3.11	7.4				
25	786	(c) Surface Water	The salinity of the raw water that will be used extensively for dust suppression will accumulate over time within the mineral lease, discharge into the environment will be determined by the ability to meet the regulatory requirements	Refer Issues # 275 & 285 Pages 54 & 55		7.5		275	285		
25	787	(d) Aboriginal Heritage	Barnarla people advised that reinstatement of the ephemeral creek was the preferred outcome. Contact and information from the Barnarla women renders this statement false.	Refer Issue #503 Page 13		3.15		503			
25	788	1. Environmental Issues	Economic gain being identified fails to recognize Environmental Diversity and Resilience	Page 323		5.2		788			
25	789	2. Environmental Issues	Concern in relation to the unknown hydrogeological interactions within the 400km2 area that is the Tod River Catchment and Wetland System	Page 48		7.4		789			
25	790	3. Environmental Issues	Ecological and hydrological functioning of the Tod River Estuary....is not identified in the Mining Lease proposal	Page 48		7.4		790			
25	791	4. Environmental Issues	Pillaworta Creek Catchment is a major component of the environmental water....baseline data must be determined for both upstream and downstream of the proposed project so that management criteria can be determined for the known impacts and potential risks of the project before mining begins.	Page 48		7.4		791			

25	792	5. Environmental Issues	Eyre Iron identified significant water sources from previous drilling within close proximity to the Kookaburra Gully site that has been ignored by the company	Page 13		3.11		792			
25	793	6. Environmental Issues	Resupply the creek using pit-water if necessary.... this statement holds limited credibility and should be withdrawn from the proposal if not able to be supported by significant additional information that is site-specific	Page 49		7.4		793			
25	794	7. Mine Rehabilitation	AGL will work with the EPNRM Board in rehabilitation methods....What technical and engineering experience does the EPMRN Board have to be referenced in this way?	Page 120		Appendix 1		794			
25	795	7. Construction of TSF	The concerns of the consultants report, summaries and conclusions....there is no scientific evidence and baseline data that supports the concepts and plans the company has submitted in the Mining lease proposal.	Refer Issues #70, 74, Govt 4, Pages 26 & 36		4.7	7.1	70	74	Govt-4	
25	796	7. Construction of TSF	Low permeability clay within the TSF basin will form a barrier to water movement....should never be relied upon, especially in light of the enormous lack of data that this company has to support this kind of statement.	Refer Issues #70, 74, Govt 4, Pages 26 & 36		4.7	7.1	70	74	Govt-4	
25	797	7. Environmental Issues	Acid Sulphate Soil in inland aquatic ecosystems recognised as an important issue....includes both actual and potential acid sulphate soils....often found in the same soil profile	Page 121		Appendix 1		797			
25	798	8. Dust	Baseline dust data were collected by Eyre Iron Pty Ltd for the Fusion project over a period of one year on Pillaworta Road adjacent to the proposed mine site, although continuous meteorological, particulate matter and suspended particle data were collected approximately 6 km away....why did the company not produce any data to support that investment of time which can credibly be concluded as knowledge relevant to this Mining Lease proposal?	Page 8		3.8	7.6	666			
25	799	9. Transport Route	Ephemeral creeks cross the Pillaworta Road in many locations, some have simple structures to mitigate flows others have none. After heavy rainfall events this road can become impassable to any traffic apart from a 4wd.....potentially 'dangerous when wet' conditions of this road have not been addressed and/or acknowledged	Refer Issue #388 Page 92		7.9		30	120	388	
25	800	9. Transport Route	Traffic predicted for Pillaworta Road....inaccurate and misleading....School bus timetables have been mentioned....how can the company plan for and mitigate something that has never been discussed with the affected community members?	Refer Issue #1 Page 83		7.9		1	803		
25	801	9. Transport Route	Dangers of the intersection of Pillaworta Road and the Tod Hwy have not been identified.	Refer Issue #120 Pages 121 & 91		Appendix 1	7.9	5	30	120	
25	802	9. Transport Route	How often and what Pillaworta Road is used for has been ignored by the Company and therefore will not be included in the management plans that are yet to be established.	Page 121		Appendix 1		802			
25	803	9. Transport Route	The company has failed to engage the local community so as to ensure that as affected landowners we will not be impacted	Page 122		Appendix 1		803			
25	804	9. Transport Route	Baseline data, which council and EPNRM does not have, that relevantly supports the safety, environmental impacts....suitability and predicted ongoing costs of Pillaworta Road being the most suitable road for the proposal	Refer Issues #1 & #2 Page 83		7.9		804			
25	805	10. SEB Contribution	An SEB contribution in accordance with legislative requirements will be made....significant concern as to the Company's claims for the use of offsets, EPNRM Boards understanding of the process....and ability to not create a conflict of interest, DSD delegated authority's and the lack of transparency and accountability	Page 41		Appendix 2		Govt-34	Govt-35	Govt-37	
25	806	11. Environmental Management	There is little known data and understanding of the existing local and regional environment....How do we know that the company is following recommendations specified from the departments	Page 122		Appendix 1		806			

25	807	12. Fauna and Flora	No potential impacts on fauna have been raised by DEWNR. What are the concerns raised by DEWNR in relation to other aspects of the project?	Refer Govt submissions Appendix 2 Page 144 on		Appendix 2		807			
25	808	Economic Viability	Is the graphite grade high enough for a premium price? Once the proposal is refined and quantified is the deposit economically viable? The recent downgrading of operations at the only other graphite mine in South Australia, that recently only reopened, is of significant concern.	Page 33		5.2		808			
Submission 23 – Tumby Residents and Ratepayers Association and Port Lincoln Residents and Ratepayers Association					Page #						
23	1. INTRODUCTION										
23	809	1.1. Availability Of Documents	Reliance has been placed upon environmental data related to the Eyre Iron Pty Ltd, Project Fusion. The Association has significant concerns whereby AGL has used data not in their care and control	Page 8	4	3.8		83			
23	810	1.1. Availability Of Documents	Given the local groundwater conditions....where excessive groundwater conditions are encountered and the water is fresh and uncontaminated, the water may be released into local waterways.	Page 123	4	Appendix 1		810			
23	811	1.1. Availability Of Documents	DENR's Eyre Peninsula Biodiversity Plan (Matthews, et al, 2001) identifies the Koppio Hills as a threatened habitat area.	Page 123	4	Appendix 1		811			
23	812	1.1. Availability Of Documents	There is potential for artesian conditions in fractured rock environments in steeper terrain settings	Page 124	4	Appendix 1		812			
23	813	1.1. Availability Of Documents	Eyre Iron groundwater records....multiple aquifers (having differing Standing Water Levels) in the immediate region of the proposed Kookaburra Gully Graphite Project.	Page 124	4	Appendix 1		813			
23	814	1.1. Availability Of Documents	The impact of fugitive dust...(on) the potential for contamination of food resources (grain and meat) as a consequence of the nature of the contaminants.	Refer Issue #12 Page 57	5	7.6		12			
23	815	1.1. Availability Of Documents	Have sought hard copies of the Mineral Lease documentation to facilitate analysis and commentary upon, together with an extension of time, given the 1169 page document and the deadline of 29th October 2015.	Refer Issue #34 Page 35	5	6.7		34			
23	816	1.1. Availability Of Documents	The Bargarla community are not listed as Stakeholders (page 225), however the document does mention that the Bargarla community have been consulted in the project (page 229), A representative of Bargarla has recently been in contact our Association and asked us for information as they know nothing of the proposal being released.	Refer Issue #503 Page 13	7	3.15		503			
23	817	1.1. Availability Of Documents	Internet access on Eyre Peninsula is limited and unreliable....few have the capacity to print the 1169 page document....some in the community do not have computers.	Refer Issue #35 Page 35	7	6.7		35			
23	818	1.2 Public Meeting	At a public meeting held by the District Council of Tumby Bay....Chief Executive Officer stated that there are significant difficulties being experienced by Council in communicating with the company...(and) "that a MoU would be not worth the paper it was written on."	Refer Issue #1 Page 83	8	7.9		1			
23	819	1.3 The Pipeline	No discussion of the route of pipeline or its impact upon the environment was offered (or) was identified in the information provided	Page 54	8	7.5		275	760	Govt-5	
23	820	1.3 The Pipeline	Concerns relating to the quality of the water from the Reservoir being saline and contaminated with other substances and the transportation of contaminated water through a primary production area	Page 54	8	7.5		275	759		
23	821	1.3 The Pipeline	Construction of the pipeline will, with a high degree of probability, spread the known infestation of cape tulip, a noxious toxic weed.	Page 124	8	Appendix 1		821			
23	822	1.4 Public Meeting	No public meetings have been scheduled by either the Department for State Development OR Australian Graphite Pty Ltd to present or discuss the application for the Mineral Lease	Refer Issue #33 Page 34	8	6.7		33	39		
23	823	1.5 Financial	Has the Company (AGL) the financial resources to meet the required compliance obligations, and in particular those of rehabilitation?	Page 125	8	Appendix 1		823			

23	824	1.6 Agreement	Certification that...the Mineral Claim is a valid claim and thereby the application for a mineral licence upon the Mineral Claim is valid.	Page 125	8	Appendix 1		824			
23	825	1.7 Variations	Variations of information between The Proposal, Volume 1, and Volume 2 Supporting Documents	Page 125	8	Appendix 1		825			
23	826	1.8 Risk Management	Risk management is geared to mitigate the liability of the Department to uphold the interests of the landowner and the environment.	Page 125	8	Appendix 1		826			
23	827	1.9 Agricultural Land	The application is severely lacking in its identification and control of 'declared weeds' in the area.	Page 125	9	Appendix 1		827			
23	828	1.10 Fugitive Dust	Composition of the fugitive dust: no reference has been made to the National Residue Monitoring Scheme managed by the Commonwealth Department of Agriculture...the Department's role is in testing these products to ensure they are not contaminated with toxic residues....(and) certification of agricultural products for export.	Refer Issue #56 Page 63	9	7.6		56			
23	829	1.11 Environmental Survey	Issues of native vegetation (including listed species) on Pillaworta Road as one travels from Bratten Way to the proposed mine site...limited room for upgrading to the desired minimum 12 metre width without the removal of some very significant trees and under-croft apart from the actual alignment of the road.	Refer Issue #5 Page 85	9	7.9		5			
23	2 COMMENTS SPECIFIC TO THE MINERAL LEASE APPLICATION										
23		2.1 INTRODUCTION			9						
23	830	2.1.1 Statement	The application has been lodged before final determination by the Warden's Court of South Australia...in the knowledge that the Environmental Impact Assessment had not been undertaken on MC 4372.	Page 125	9	Appendix 1		830			
23	831	2.1.2 Relationship	The relationship between South Australian Iron Ore Group, Centrex Metals Limited, Lincoln Minerals Limited and Australian Graphite Pty Ltd is principally undisclosed	Page 125	10	Appendix 1		831			
23	832	2.1.2 Relationship	MC 4372...location listed as Yallunda Flat. MC 4373...location listed as Koppio...But the two Mineral claims are joined.	Page 126	10	Appendix 1		832			
23	833	2.1.2 Relationship	Inconsistency as to the actual life of the mine with different life cycles recorded in this application...and...(ASX) reference to Kookaburra Gully extension and Koppio. This causing a direct consideration for this application to be not for a single mine project but a conjoined stage for a greater project?	Refer Issue #84 Page 15	10	4.4		84			
23	834	2.1.2 Relationship	NO drilling program has been undertaken on MC 4372 as access to the property has been unable to be achieved	Refer Issue #903 Page 129	10	Appendix 1		903			
23	835	2.1.2 Relationship	The analysis contained on pages 106-7 of Volume 1...(shows) a significant number of Rare Earth minerals; chromium, copper, manganese, strontium, thorium and uranium...with concentrations in parts per million (ppm). The question now being whether the Company (AGL) has a right of access to these minerals under the terms of the agreements between the parties (South Australian Iron Ore Group, Centrex Metals Limited, Lincoln Minerals Limited and Australian Graphite Limited)?	Refer Issue #831 Pages 125	10	Appendix 1		831			
23	836	2.1.3 Native Title	It is the Associations' understanding that the unmade road located on the project site is Crown Land over which Native Title has not been extinguished.	Refer Issue #177 Page 53	10	3.2		502			
23	837	2.1.4 MD006	Uranium mining has been identified (pp. 107) as a component of the project with little reference to the practices and procedures required to be undertaken to gain an approval for such to occur	Refer Issue #720 Page 14	10	4.3		720			
23		2.2 LEGISLATIVE FRAMEWORK			11						
23	838	2.2.1 Referring to MLA 2.1.2.1	Contamination of the water (within the Tod River Water Protection Zone) through surface run off or through contaminated ground water with its origin within the proposed Mineral Lease	Pages 41 & 62	11	7.6	7.3	15			

23	839	2.2.1 Referring to MLA 2.1.2.1	The regional hydrogeology and hydrology is not established whereby the aquifers within the project site may be linked to those within the Southern Basin Prescribed Wells Area to the South.	Refer Issue #19 Page 43	11	7.4		19			
23	840	2.2.2 Referring to MLA 2.1.3.1	What are the undisclosed 'lease conditions' and what impact do these have upon the project?	Page 126	11	Appendix 1		840			
23	841	2.2.2 Referring to MLA 2.1.3.1	The nature of the pollution has not been taken into consideration.	Refer Issues # 9, 17, 62 & 68 Pages 57, 42, 62 & 81	11	7.6	7.7	9	17	62	68
23	842	2.2.3 EPBC Referral	An EPBC referral has been lodged (2015/7470 30th April 2015) but at the time of writing of this response, no approval has been granted. The Commonwealth Department is aware of the legal action before the Warden's Court.	Page 39	11	7.2		882	883		
23	843	2.3 THE EXISTING ENVIRONMENT			12						
23	844	2.3.1 Local Towns	"The main coastal towns are reliant on mineral processing" is clearly misleading. The economies of the lower Eyre Peninsula are primary industries (agriculture and fishing), industries that rely upon contamination free environments in order to protect export markets, together with the tourism industry.	Page 30	12	5.1	5.2				
23	845	2.3.2 Out Of Date Data	Figures presented are FOUR years out of date...employment in the mining industry has slumped...claimed 52 employees in mining are highly questionable at today's date.	Refer Issue #40 Page 7	12	3.1		40			
23	846	2.3.3 Validity Of Data	Authority for data is the RDA not ABS...(and) relates to a period 2006 to 2011 which do not reflect the reality of 2105	Refer Issue #40 Page 7	12	3.1		40			
23	847	2.4 SOCIAL INFRASTRUCTURE			12						
23	848	2.4.1 Referring to MLA 3.1.7.1	Port Lincoln Hospital upgrade is completed, but there is no reference to the capacity of the hospital to deal with industrial accidents/emergencies that might arise from a proposed mine at Kookaburra Gully. The Tumby Bay Hospital's capacity to deal with a similar event is not discussed. No reference has been made to the evacuation capacity of the Royal Flying Doctor Service.	Page 127	12	Appendix 1		848			
23	849	2.4.2 Referring to MLA 3.1.7.2	What is the educational capacity within the towns of Port Lincoln, Tumby Bay and Cummins to meet an hitherto undefined educational program sought by the Company	Page 127	13	Appendix 1		849			
23	850	2.4.3 Referring to MLA 3.2.2	'Exempt land' pertaining to this Mineral Lease application has not been subjected to verification by DSD, landowners or the Warden's Court. Identified areas of exempt land have not had the required waiver of exemption achieved by the Company...(and) there are no disclosed and/or confirmed agreements in place at this point in time.	Page 127	13	Appendix 1		850			
23	851	2.4.3 Referring to MLA 3.2.2	Enquiries of the Mayor, District Council of Tumby Bay suggest no formal agreements exist in relation to the road reserve.	Refer Issue #2 Page 84		7.9		2			
23	852	2.4.4 Referring to MLA 3.2.3.1	The Tod River Water Protection Zone (as declared in the Development Plan) which is an integral part of the Eyre Peninsula's water supply. "Objective 1, notes that activities liable to cause pollution in the zone should not be established"	Pages 41 & 62	13	7.6	7.3	15	62	64	
23	853	2.4.5 Referring to MLA 3.2.4.2	What is the net economic benefit for the local community (i.e. Lower Eyre Peninsula) and in particular, the community of Tumby Bay through the development of the mine versus economic benefit derived by agriculture in the region?	Refer Issue #452 Pages 31	14	5.2		453	514		
23	854	2.4.5 Referring to MLA 3.2.4.2	There is a small benefit to the State through royalties, but...these royalties may not be receive until after the first five years of operation.	Page 127		Appendix 1					
23	855	2.4.5 Referring to MLA 3.2.4.2	What would be the potential cost to Government for the rehabilitation of a contaminated water catchment that arose from the mining operations on the proposed site?	Page 127		Appendix 1					

23	856	2.4.6 Referring to MLA 3.3.2	Power supply system is already at capacity...use of a 24/7 diesel power generation system and the pollution arising there from requires consideration from a public (and employee) health aspect.	Page 127	14	Appendix 1		277	Govt-26		
23	857	2.4.7 Referring to MLA 3.3.3.1	In winter, a number of the dirt roads become impassable...seven semi- trailer per day impact on these roads will present a significant maintenance liability to the District Council of Tumby Bay and its ratepayers	Page 92	14	7.9		388			
23	858	2.4.7 Referring to MLA 3.3.3.1	There exists significant native vegetation on the roadside, the fate of which is not, in our opinion, fully disclosed. This vegetation contains listed species (EPBC and State) being not only trees but grasses and native orchids.	Refer Issues #2 & 51 Page 84	15	7.9		51			
23	859	2.4.7 Referring to MLA 3.3.3.1	There appears to have been no environmental impact assessment done for proposed pipeline to be constructed from the Tod Reservoir to the site using the road verge.	Refer Addendum 4 and Issue #819 Page 54	15	7.5	Addendum 4	275	760	Govt-5	819
23	860	2.4.7 Referring to MLA 3.3.3.1	Water being piped to the site is contaminated saline water, water that has been declared saline by SA Water...known to contain other contaminant such as insecticides, herbicides, nickel and benzo- pyrenes to name a few. The Associations are concerned at the transportation of contaminated water through an agricultural producing area.	Refer Issue #275 Page 54	15	7.5		275			
23	861	2.4.8 Referring to MLA 3.3.4	Mobile phone reception in the area is limited due to the topography...A community benefit would be achieved if the mobile network is upgraded at the Company's cost to wireless broadband capability.	Page 127	15	Appendix 1		861			
23	862	2.4.9 Referring to MLA 3.4	The wind distribution pattern for the actual site has not been determined through actual empirical measurements on the site. The channelling of wind as a consequence of the topography is critical in determining the dispersion of contaminated (fugitive) dust and noise emanating from the mining operations.	Refer Issue #10 Page 61	15	7.6		10			
23	863	2.4.9 Referring to MLA 3.4	One of the critical issues is the potential contamination of cereal grain which historically will be rejected at the silo resulting in a considerable economic impact for the affected cereal growers.	Refer Issue #8 & 9 Page 57	15	7.6		8	9		
23	864	2.4.10 Referring to MLA 3.5	What is not illustrated is the superimposition of a photographic representation of the rock dump, the tailing dam and the pit	Refer Figures 4.29 & 4.30 in MLP	16	MLP		864			
23	865	2.4.11 Referring to MLA 3.6	What clearly is missing is an appropriate noise survey that is site specific having regard to the actual topographic conditions surrounding the proposed site and thence the establishment of baseline audible noise levels over a period that is representative of the activities of an agricultural area	Refer Issue #69 Page 81	16	7.7		69			
23	866	2.4.11 Referring to MLA 3.6	It appears that the data does not take into consideration the ACTUAL channelling impact of the wind and its impact upon noise dispersion	Refer Issue #69 Page 81	16	7.7		69			
23	867	2.4.11 Referring to MLA 3.6	The Resonate Acoustics report fails to discuss the infrasound impacts likely to be generated by the mining operations within the site.	Refer Issues #68 & 279 Page 81	16	7.7		68			
23	868	2.4.12 Referring to MLA 3.7	Air quality (dust) data is considered to be inadmissible given that it was obtained by another entity and is not subject to verification within the context of this application. It is also, as acknowledged, NOT SITE SPECIFIC for this application.	Page 8	17	3.7		666			
23	869	2.4.12 Referring to MLA 3.7	The establishment of a baseline for local dust over a twelve month period relevant to the proposed site is not provided.	Page 8	17	3.7		666			
23	870	2.4.12 Referring to MLA 3.7	Rainfall data...not site-specific...but that provided by the 'nearest BoM weather stations'...many kilometres outside of the catchment and hills region.	Refer Issue 177 Page 53	17	7.5		177	633		
23	871	2.4.12 Referring to MLA 3.7	No PM10 data for the actual site nor is there any mention of PM2.5 or PM1.0 measurement being undertaken...TSP and dust deposition data for the actual site is non-existent.	Refer Response Section 7.6 Page 57	17	7.6		Govt-23			

23	872	2.4.13 Referring to MLA 3.8	Conclusions drawn as to the climate and meteorology of the actual site are based upon data remote from the site and thus are not representative of the actuality.	Page 9	17	7.6	7.5	56	124	177	
23	873	2.4.14 Referring to MLA 3.9.3	Discrepancy with respect to the concentration of uranium at the site...Irrespective of the standard (200 ppm), the question arises as to the fate of this ore, once mined and thus becoming mobile either in solution or as a component of fugitive dust	Refer Issue# 720 Page 14	18	4.3		720			
23	874	2.4.14 Referring to MLA 3.9.3	Table 4.5 (pp. 106 - 107) identifies the presence (and concentrations in ppm) of a variety of Rare Earth minerals; significant concentrations of chromium, copper, nickel, thorium and strontium; and very significant concentrations of manganese, all of which exhibit various deleterious effects upon humans and animals and potential lead to rejection of cereal grain and meat, if found as a contaminant in these products.	Refer Issue #8 & 9 Page 57	18	7.6		8	9		
23	875	2.4.15 Referring to MLA 3.10	Kookaburra Gully does not fall within the Southern Basin Prescribed Wells Area, but what has not been established is the regional hydrogeology & hydrology whereby groundwater interconnection by transmissivity flows from the upper reaches of the Tod River Basin enter the Southern Basin Prescribed Wells Area.	Page 115	18	Appendix 1		276			
23	876	2.4.15 Referring to MLA 3.10	The "impact of the proposed mine infrastructure on drainage into Pillaworta Creek will be negligible" is clearly contestable given that detailed designs have yet to be provided and the nature of said mining operations, especially in light of the potential chemical hazards	Page 55	18	7.5		285			
23	877	2.4.16 Referring to MLA 3.11	NO ACCESS has been achieved to MC 4372 to enable hydrological study; therefore all references to groundwater on the 'site' are applicable only to MC 4373...validity of the data and the conclusions derived there from in these circumstances is invalid.	Refer Issue #19 Page 43	19	7.4		19			
23	878	2.4.16 Referring to MLA 3.11	Hydrogeological assessment of features described on the Borthwick property as ephemeral springs concluded that it is very unlikely the features...are in fact springs. NO drilling or collection of samples was permitted as a condition of entry imposed by the Warden's Court. The conclusions drawn are not conclusive.	Refer Response Section 7.4 Page 42	19	7.4		878			
23	879	2.4.17 Referring to MLA 3.12	The information contained in this AGL MLA is devoid of any comprehensive flora study undertaken over any period of time on the Borthwick properties, inclusive of the land contained within MC 4372.	Refer Addendum 3 Page 128	19	Addendum 3	Appendix 1	879			
23	880	2.4.17 Referring to MLA 3.12	A one day (daylight hours) visit to a designated portion of MC 4372 does not constitute a thorough assessment of the flora on the site...It is suggested more work is required to verify the conclusion drawn.	Page 128	19	Appendix 1		880			
23	881	2.4.17 Referring to MLA 3.12	Advice has been received that the area contains some 30 listed species of native orchids as found during the environmental assessment for the proposed upgrade to the power line in the area. Such information appears to be absent from the assessment tendered.	Page 128	19	Appendix 1		881			
23	882	2.4.18 The Hon G Hunt, MHR		Page 39	20	7.2	EPBC Referral	882			
23	883	2.4.19 The Hon G Hunt, MHR		Page 39	31	7.2	EPBC Referral	883			
23	884	2.4.20 EPBC And Roadside Vegetation		Page 39 & Addendum	39	7.2	EPBC Referral	884			
23	885	2.4.21 Referring to MLA 3.12.3	The impact of contaminated groundwater arising from the proposed mining operations upon the ecosystems, not the least of which is the known Tod River Wetland System and the Tod River Water Protection Zone. The 'Government Groundwater Dependent Ecosystems Map Report' identifies information that the AGL MLA has not referred to in its considerations or modelling of GDE's and the potential impacts upon the local environmental ecosystems.	Pages 19 & 135	49	4.5.9		Govt-3	Govt-11		
23	886	2.4.21 Referring to MLA 3.12.3	Listed species on the roadways affected by this project have not had due consideration with respect to any potential groundwater impact of the project.	Refer Issue #5 Page 85	49	7.9	7.4	5			

23	887	2.4.22 Referring to MLA 3.13	The observations presented in the AGL MLA are devoid of information relating to the Borthwick and wider local properties.	Refer Addendum 3 Page 128	49	Addendum 3		879			
23	888	2.4.22 Referring to MLA 3.13	Observations made during the short period (one day, daylight hours) under the auspices of the Warden's Court can only be described as opportunistic and not representative of the fauna residing in the wooded areas contained on MC 4372 or the adjacent northern land.	Refer Issue #880 Page 128	49	Appendix 1		880			
23	889	2.4.23 Referring to MLA 3.14	The observations presented in the AGL MLA are devoid of information relating to the Borthwick and wider local properties.	Refer Addendum 3 & 4	50	Addendum 3	Addendum 4	879			
23	890	2.4.24 Referring to MLA 3.14.2.2	The observations presented in the AGL MLA are devoid of information relating to the Borthwick and wider local properties.	Refer Addendum 3 & 4	50	Addendum 3	Addendum 4	879			
23	891	2.4.24 Referring to MLA 3.14.2.2	The full extent of the occurrence of sulphides in the deposit appears not to be disclosed (especially on MC 4372), so the extent of potential impact of acid soils is not fully described.	Page 129		Appendix 1	7.1	891	797		
23	892	2.4.25 Referring to MLA 3.15	The road reserve is understood to be Crown Land under the control of the DC Tumby Bay. It is suggested that Native Title....has not been extinguished on this portion of land.	Refer Issue 177 Page 53	50	3.2		502			
23	893	2.5 DESCRIPTION OF OPERATIONS									
23	894	2.5.1 General Description	Rehabilitation will be progressively undertaken..... at the end of mine life, should there be no further mining development proposed...' in regard to Kookaburra Gully extension, the Koppio Mine and the PACE program	Refer Issue #85 Page 15	50	4.4		85			
23	895	2.5.2 Project Characteristics	Environmental impacts and risks associated with construction and use for a pipeline from the Tod Reservoir to the site	Page 54	50	7.5		275	760	Govt-5	
23	896	2.5.2 Project Characteristics	The financial position of Australian Graphite Limited...is unknown. Does the company (ies) have the financial capacity to promote the project, especially, the capacity to meet its current exploration rehabilitation obligations?	Page 124	51	Appendix 1		823			
23	897	2.5.3 Waste Storage Facilities	The final angle of repose for the WRSF and the TSF embankment will be less than 20 degrees...A 20 degree slope would be significant for current machinery to traverse...the final height of some 50-60 metres above current ground level, which would also impact upon the ability to use the area for agricultural (arable) purposes...what happens to the material removed from the embankment, especially if it has been subject to seepage and thus contains the contaminant held with the TSF?	Page 129	51	Appendix 1		891			
23	898	2.5.3 Waste Storage Facilities	Limitations of the hydrogeology and hydrology of the site in respect to the TSF facility and its ultimate design.	Refer Issue #19 Page 43	51	7.4		19			
23	899	2.5.4 Offsite Processing	Off-site processing (at Uley Graphite Mine) as proposed by the Applicant would appear not to be an option in this instance. However, a reciprocal arrangement may well be the case	Refer Issue #86 Page 14	51	4.2		86			
23	900	2.5.5 Site Access	Route assessment...two of the principle landholders have not been consulted over the proposed models	Refer Issue #1 Page 83	51	7.9		1			
23	901	2.5.5 Site Access	Provision of DPTI assessment and approval of the proposed route together with....approval from EPBC and Native Vegetation Council with respect to impact upon listed species along the road verges	Refer Issue #5 Page 85	51	7.9		5			
23	902	2.5.6 Local Geology	Section 9 traversing MC 4372 and MC 4373....drill holes featured appear at an angle to the vertical, the question is do the drill holes (or any of) traverse the property boundary?	Page 129	51	Appendix 1		902			
23	903	2.5.7 Mineral Resources	NO drilling has been undertaken on MC 4372; hence the suggested resource supposedly compliant with JORC Code 2012 is speculative.	Page 129	52	Appendix 1		903			
23	904	2.5.8 Testing Program	No drilling or analyses attributable to samples from MC 4372 are represented in the AGL MLA	Refer Issue #903 Page 129	52	Appendix 1		903			

23	905	2.5.9 Results	What is the standard (in relation to sulphides and acid soil formation) to be used for compliance' and thus incorporated in the approval of the application	Refer Appendix I in MLP	52	Appendix I		905			
23	906	2.5.9 Results	The Associations categorically reject the assertion " while there are some exceedances of some EIL's the proposed groundwater and surface water control and management measures indicated in Section 7.4 and 7.5 respectively would mitigate against potential impacts (not fully disclosed) from the ore and low grade stockpiles and ARD drainage from the PAF storage area".	Page 130	52	Appendix 1		906			
23	907	2.5.10 Asbestos Minerals	The presence or otherwise of asbestos on MC 4372 needs to be determined, and if found, an acceptable management/control program provided for the community to comment upon	Page 130	52	Appendix 1		907			
23	908	2.5.11 Exploration Activities	The extent of mining for graphite in this area is highly likely NOT to be confined that area sought within this application. It is a reasonable assumption, given the data currently available, that this mine will be (subject to funding) part of an extended mining prospect of some 4.5 kilometres in length.	Refer Issue #85 Page 15	53	4.4		85			
23	909	2.5.12 Proposed Exploration Program	Locations of further trenching and drill holes on or near the property boundary between MC 4372 and MC 4373...will these drill holes traverse the property boundary...approval for the drilling and trenching program expired 25 August 2015	Refer Govt Issue #6 Page 147	53	Appendix 2		Govt-6			
23	910	2.5.13 Mining Operations	It is assumed the public will have the opportunity to scrutinize the PEPR prior to its final acceptance by the DSD.	Pages 147-148	53	Appendix 2		Govt-6			
23	911	2.5.14 Rehabilitation Operations For Open Pit	Saline water that will enter the pit post dewatering, will become further contaminated with the remnants of the mining operations...(and) details in relation to the locations of the additional pits	Page 130	53	Appendix 1		911			
23	912	2.5.15 Workforce	Will the workforce be subject to zero tolerance with respect to drugs and alcohol?	Page 130	53	Appendix 1		912			
23	913	2.5.15 Workforce	Ability of local educational facilities to train prospective employees to the level envisaged...(and) on-going training and development	Refer Issue #849 Page 127	54	Appendix 1		849			
23	914	2.5.15 Workforce	A detailed workforce profile has not been provided, thereby not allowing local persons seeking employment, the opportunity to access training in advance. Assume that employment opportunities will not be met from the local community	Refer Issue #42 Page 31	54	5.1		42			
23	915	2.5.16 Use Of Explosives	It is noted that 1 tonne of detonator material; up to 60 tonnes of ammonium nitrate and other premade products will be stored on site. Given the worst case scenario, what is the blast radius should the magazine containing this quantity of explosives, explode?	Refer Issue #79 Page 17	54	4.5.7		79			
23	916	2.5.16 Use Of Explosives	It is not apparent, but assumed that blasting will not occur on fire ban days.	Refer Issue #77 Page 16	54	4.5.7		77			
23	917	2.5.16 Use Of Explosives	Given the quantity of ammonium nitrate what are the security risks associated with this facility, having regard to the limited SA Police resources in the area?	Refer Issue #82 Page 17	54	4.5.7		82			
23	918	2.5.16 Use Of Explosives	What are the increased insurance liabilities that have to be absorbed by neighbours to the facility as a consequence of an explosive magazine of this size?	Refer Issue #80 Page 110	54	Appendix 1		80			
23	919	2.5.16 Use Of Explosives	What are the risks to emergency services in the event of a bushfire in the area?	Refer Issue #78 Page 17	54	4.5.7		78			
23	920	2.5.17 Type Of Equipment	Operational risk during mining operations of equipment in use starting a fire...assumed this implies cessation of activities on fire ban days.	Page 130	54	Appendix 1		920			
23	921	2.5.18 Mine Dewatering	The assumptions within the modelling lack credibility, especially in relation to MC 4372, and non- existent data pertaining to water levels from exploration holes in the vicinity of the pit	Page 130	54	Appendix 1		921			
23	922	2.5.18 Mine Dewatering	The assumption based on one hole in the middle of the pit area (one where transmissivity is at the lowest end of the scale), hardly a reliable scientific quantity as it could well be 100% wrong.	Page 131	54	Appendix 1		922			

23	923	2.5.19 Processing	It is noted that plant operators will be protected from fugitive dust through enclosed cabin loaders (presumably air-conditioned), however, the health issue of fugitive dust to the public needs to be addressed in detail, as outlined further in this response.	Refer Issue #8 & 9 Page 57	55	7.6		8	9		
23	924	2.5.19 Processing	The impact of fugitive dust on the environment also needs to be considered at length, having regard to the contaminants and the potential economic loss to neighbouring farmers through contaminated grain and potential plant growth inhibition etc. (see later discussion in this response).	Refer Issue #12 Pages 57 & 63	55	7.6		12			
23	925	2.5.19 Processing	The discussion is devoid of consideration of fugitive dust with particulate matter PM2.5 and PM1.0, given that the dust will contain not only the hazardous minerals outlined previously, but graphite and possibly free silica (which to date has not been mentioned).	Refer Response Section 7.6 Page 57	55	7.6		Govt-23			
23	926	2.5.19 Processing	Fugitive dust dispersion could impact upon the township of Tumbly Bay, dependent upon the climatic conditions (noting no specific site meteorological data has been tendered).	Refer Issue #14 Page 62	55	7.6		14			
23	927	2.5.19 Processing	Fugitive dust has the potential to contaminate all rain water catchment in the area, noting rain water is the principle supply of water for this area as it has no reticulated water supply.	Refer Issue #13 Page 61	55	7.6		13			
23	928	2.5.20 Processing Plant	The impact of infrasound so generated has not been addressed, inclusive of the dispersal pattern, which is more far reaching than audible sound.	Refer Issues #68 & 279 Page 81	55	7.7		68			
23	929	2.5.20 Processing Plant	Full disclosure of the chemistry and chemicals used in the process and their environmental impact, together with MSDS data is not apparent.	Page 131	55	Appendix 1		929			
23	930	2.5.20 Processing Plant	It is noted that in the cleaning process (page 168) excess sodium chloride (salt) is removed from the product....where does all of the sodium chloride end up?	Page 131	56	Appendix 1		930			
23	931	2.5.21 Flocculent Dosing System	Magnafloc has known high toxicity to freshwater fish and aquatic vertebrates. The problem for this site is the close proximity to Pillaworta Creek which is also supplied with water from the mine site.	Page 131	56	Appendix 1	7.5	931			
23	932	2.5.22 Product Storage	In the event that a bag is rupture in transit...Curtained semitrailers would not provide the security of capture in such an event.	Page 131	56	Appendix 1		932			
23	933	2.5.23 Process Chemicals	Whilst there is some discussion concerning the levels of kerosene that may enter the environment, the issue remains, kerosene, once in the system cannot readily be removed.	Page 131	56	Appendix 1		933			
23	934	2.5.24 Process Plant And Site Water Balance	Provision of potable water...would this include the supply of permanent potable water to all those in the vicinity of yet another pipeline, this time carrying potable water, as opposed to a metered stand pipe located some distance away.	Page 132	56	Appendix 1		934			
23	935	2.5.24 Process Plant And Site Water Balance	What is the impact upon the Water Allocation Plan that is apparently soon to be released by the EPNRM Board...(and) impact the proposal may have upon the local water supply	Page 132	57	Appendix 1		935			
23	936	2.5.25 Rehabilitation Operations	Detailed time line post cessation of mining activity at this site...the time line for cessation of processing could well be longer than mining activity in the pit, with the source material being transported from Kookaburra Gully extension and Koppio Graphite mine.	Refer Issue #85 Page 15	57	4.4		85			
23	937	2.5.25 Rehabilitation Operations	Fence around the mine will be removed exposing the mined area (up to 100 metres deep) to people and animal intrusions with the risk of falling in	Refer Issue #286 Page 94	57	8.6		286			
23	938	2.5.25 Rehabilitation Operations	Land under which the toxic waste is buried....will be subject to mobility due to groundwater impacts.	Refer Response Section 8.6 Pages 94 & 156	57	8.6		Govt-29			
23	939	2.5.26 Slope Stability	Given that significant infiltration is not expected to occur under the assumed conditions, what is the risk assessment relevant to the actual site rainfall, taken over a twelve month period?	Refer Response Section 7.5 Pages 52	57	7.5	7.6	939			

23	940	2.5.26 Slope Stability	What is the risk assessment of the structure(s) when subjected to the torrential rainfall that can occasional occur in this region	Page 132	58	Appendix 1		940			
23	941	2.5.27 Methods Of Stabilisation And Erosion Control	The potential exists for heavy metals, uranium, thorium, strontium, manganese, copper, Rare Earth minerals, kerosene and other processing chemicals (inclusive of magnafloc) and chromium etc to be released into the Pillaworta Creek system.	Refer Issues #15, 75, 178 & 273 Pages 41 & 62	58	7.6	7.4	75	15	273	178
23	942	2.5.27 Methods Of Stabilisation And Erosion Control	What is the quality of water used for dust suppression and what is the environmental impact of this water, especially if it contains salt and contaminants?	Page 55	58	7.5		285			
23	943	2.5.28 Tailings Management	Reservations with respect to the reuse of water and hence the potential for increased concentrations of the hazardous materials to be contained therein and distributed across the site.	Refer Response Sections 4.7 & 7.5 Pages 25 & 52	58	4.7	7.5				
23	944	2.5.29 Embankment Details	Lack of detailed geology, hydrogeology and hydrology characteristics of the TSF area	Refer Issue #19 Page 43	58	7.4		19			
23	945	2.5.29 Embankment Details	Management of PAF: what chemical reactions are likely to occur, given the composition of the TSF and what are the results of such chemical reactions. The chemistry should also include potential photochemical reactions	Page 133	58	Appendix 1		945			
23	946	2.5.29 Embankment Details	Diversion Channel: the construction of the open rock lined channel...would allow for absorption of water to occur thereby allowing potentially contaminated water to enter the environment en-route to the aquifer	Page 133	58	Appendix 1		946			
23	947	2.5.29 Embankment Details	Rainfall data obtainable from BoM (Poonindie and Cummins) is not site specific. What are the monthly site specific rainfall figures?	Refer Issue 177 Page 53	58	7.5		177	633		
23	948	2.5.29 Embankment Details	Will water the result of seepage from the TSF facility contain elevated levels of contaminants of the nature previously identified...(and) where will this water go?	Page 155	60	Appendix 2		Govt-19			
23	949	2.5.30 Rehabilitation Operations For The TSF	To what depth has the contaminants contained with the TSF penetrated the substrate and thus to what depth below the surface does the 'removal of tailing' require? Where will this contaminated material go, once removed?	Page 133	60	Appendix 1		949			
23	950	2.5.30 Rehabilitation Operations For The TSF	It is noted that the topsoil stockpile will most likely contain seed banks of listed species (pp. 197). That being the case, the Company should ensure that the seed bank is totally protected. A detailed horticulture...should be inclusive in the PEPR.	Page 133		Appendix 1		950			
23	951	2.5.31 Detailed Design For TSF	Insufficient investigations have been undertaken by the applicant especially in the areas of the sites hydrogeology and hydrological properties.	Refer Issue #19 Page 43	60	7.4		19			
23	952	2.5.32 Wastes	Results published are those applicable to a limited (if not restricted) sample and can be considered to be NOT representative of the complete picture of the ore body, given that the 'sample' was taken from the 'Kookaburra Gully trench' at depth of a few metres beneath surface level.	Page 133	61	Appendix 1		952			
23	953	2.5.33 Oils And Storage Of Chemicals	It is assumed flocculants will be stored under similar constraints as all other hazardous materials.	Page 134	61	Appendix 1		953			
23	954	2.5.33 Oils And Storage Of Chemicals	Will all vehicles leaving the site be washed down and what control measures will be instigated to ensure that the wastes arising from this facility do not contribute to the spreading of weeds?	Page 134	61	Appendix 1		954			
23	955	2.5.33 Oils And Storage Of Chemicals	Have the necessary approvals been sought from the EPA and the District Council of Tumbly Bay with respect to the sewerage system to be employed?	Page 134	61	Appendix 1		955			
23	956	2.5.33 Supporting Surface Infrastructure	Native vegetation is locally encroaching on the existing alignment and will have to be removed to enable road widening and particularly to provide adequate sight distance.	Refer Issues #2 & 51 Page 84	62	7.9		51	829		
23	957	2.5.33 Supporting Surface Infrastructure	no appreciation of the fact that these roads are subject to restricted travel in winter due to flooding and subsequent damage to the surface.	Page 92	62	7.9		388			

23	958	2.5.33 Supporting Surface Infrastructure	There appears to be no contact/agreement let alone an application for support and approval (pp. 206) with DCTB on these matters, especially in light of the anticipated construction costs involved and the ongoing maintenance liability.	Refer Issue #2 Page 84	63	7.9		2			
23	959	2.5.33 Supporting Surface Infrastructure	It is assumed that the (onsite) laboratory will be capable of monitoring the air and water quality for compliance requirements as well as those activities associated with the mining operations.	Page 134	63	Appendix 1		959			
23	960	2.5.33 Supporting Surface Infrastructure	Risks incurred should a breach of the (diesel fuel) tank or pipeline or the involvement of the fuel store in fire and the fire-fighting procedures that would prevent diesel from entering the Pillaworta Creek environment (or the ground water system).	Page 134	63	Appendix 1		960			
23	961	2.5.33 Supporting Surface Infrastructure	Mobile phone connectivity is marginal. A community benefit would be gained through the installation of a communication tower capable of delivering quality mobile phone and broadband internet services.	Refer Issue #861 Page 127	64	Appendix 1		861			
23	962	2.5.33 Supporting Surface Infrastructure	Erosion control measures outlined during the initial construction phase may be sufficient to contain particulate matter arising from runoff, but not that which is dissolved.	Page 134	64	Appendix 1		962			
23	963	2.5.33 Supporting Surface Infrastructure	Have discussions been undertaken with DCTB with respect to erection of wind turbines in this area noting the requirements under the DCTB Development Plan?	Page 134	64	Appendix 1		963			
23	964	2.5.33 Supporting Surface Infrastructure	The location of a standpipe (presumably metered) for mains water is not disclosed....potential additional drawdown on the available water within the Southern Basin Prescribed Wells Area.	Page 46	64	7.4		274			
23	965	2.5.33 Supporting Surface Infrastructure	Pipeline from Tod Reservoir: approvals for the use of road easements or for the destruction of native or listed species within the 'designated road easements'.	Refer Issue #819 Page 54	65	7.5		819			
23	966	2.5.33 Supporting Surface Infrastructure	Is this provision (water from Tod Reservoir) contrary to government policy in that mining companies are required to provide their own water supplies?	Page 134	65	Appendix 1		966			
23	967	2.6 DESCRIPTION OF POTENTIAL BENEFITS			66			967			
23	968	2.6.1 Social	Economic benefits to the community are not quantified.	Refer Issue #43 Page 32	66	5.2		43			
23	969	2.6.2 Community Support	'sponsorship of the Yallunda Flat and Lipson Horticultural Shows'....is incorrect.	Page 135	66	Appendix 1		969			
23	970	2.6.3 Provision Of Infrastructure	Pipeline will be transporting contaminated water through agricultural land without the approval of EPA and without any risk assessment being undertaken....significant risk that noxious weeds will be further distributed in the area through the proposed construction work.	Page 54	67	7.5		275	759		
23	971	2.6.4 Tourism		Mines are tourist attractions	67			971			
23	972	2.6.5 Economics	Acknowledgement of waiving of royalties (for an undefined period 3 - 5 years) by the Government.	Refer Issue #854 Page 127	67	Appendix 1		854			
23	973	2.6.5 Economics	Loss of revenue to the DCTB as a consequence of the mining operation	Refer Issue #45 Page 33	68	7.9		45			
23	974	2.6.5 Economics	Liability for road upgrades	Refer Issue #2 Page 84	68	7.9		2			
23	975	2.6.6 Environment	SEB cash payment does not return to the community in which the damage is done. Where is the community benefit in these circumstances?	Page 164	68	Appendix 2		Govt-37			
23	976	2.6.6 Environment	Establishment of an on-site native nursery and planting program immediately the project commences to ensure the replacement of native (inclusive of listed species) trees and grasses	Page 135		Appendix 1		976			
23	977	2.7 STAKEHOLDER AND COMMUNITY ENGAGEMENT									
23	978	2.7.1 Stakeholder Identification	Issues in relation to provision of electronic copy of MLP, poor internet services in region, size of MLP etc	Refer Issue #34 Page 35	69	6.7		34	35	36	37
23	979	2.7.2 Shareholder Engagement Tools And Activities	Interactions with landowners and government stakeholders including DCTB and immediate landowners.	Refer Issue #1 Page 83	69	7.9		1			

23	980	EPNRM Board	Position of the EPNRM Board with respect to potential surface water contamination from the TSF or WRSF both during mining operations and post mining operations (rehabilitation).	EPNRM Board has formalated its response as part of the Government issues	70			980			
23	981	Native Vegetation Council	SEB offsets considered are not included in the report (and) any offsets are not necessarily accounted for in the region.	Page 163	70	7.2		Govt-34			
23	982	Water Management	Restriction to an impact zone of 1 kilometre radius of the mine is considered irresponsible, if not environmental vandalism, in the context of the hazardous minerals identified in the rock analysis (pages 106 - 107)	Page 135	71	Appendix 1					
23	983	Water Management	Nature of the contaminant in Tod water, apart from the obvious cause of the salinity.	Page 54	71	7.5		275			
23	984	Water Management	Destruction of native vegetation along the route of the proposed pipeline (and) presence of noxious/toxic weeds (cape tulip) in the area	Refer Issue #821 Page 124	71	Appendix 1		821			
23	985	Aboriginal Heritage	Barngarla Women were not consulted in this process.	Refer Issue #503 Page 13	72	3.15		503			
23	986	Traffic	Inconsistencies exist in the application as to the actual heavy vehicle usage of Pillaworta Road....and total road usage rate.	Page 89	72	7.9		20			
23	987	Traffic	Expertise of those who undertook the survey for a road that will be required to carry significant tonnages on a 24/7 basis.	Page 135	72	Appendix 1					
23	988	Flora and Fauna	Flora and Fauna survey for the mineral lease had not been completed at the time of the release of the application for public comment.	Refer Addendum 3 Page 128	72	Addendum 3		879			
23	989	Flora and Fauna	Information relating to some 30 species of native orchids found in an environmental survey for the nearby proposed new power transmission line.	Page 128	72	Appendix 1		881			
23	990	Blasting	Risk assessment to this facility (magazine) in the event of a bushfire....risk to employee fire-fighters or to the CFS....assessment of the impact of a catastrophic explosion of the magazine	Refer Issue #78 Page 17	73	4.5.7		78	79		
23	991	Blasting	Any increase in insurance risk to neighbouring properties as a result of the location of the magazine.	Refer Issue #80 Page 110	73	Appendix 1		80			
23	992	Blasting	Chemical composition of the detonators. If they contain mercury fulminate, what is the environmental risk of such a large amount of mercury being released during the mining operations?	Refer Issue #81 Pages 18	73	4.5.7		81			
23	993	Blasting	Security of the (magazine) contents, (noting ammonium nitrate is a precursor to the manufacture of IED's)	Refer Issue #82 Page 17	73	4.5.7		82			
23	994	Air Quality	Dust data relates to PM10 but without any analysis of the actual contaminant contained within the dust	Page 57	73	7.6		8	9	10	11
23	995	Air Quality	Impact of graphite dust from the mine as well as diesel fumes and particulates from the 24/7 operation of machinery and the power station.	Pages 72 & 77	73	7.6		277	Govt-26	Govt-24	
23	996	Air Quality	Data relevant to P2.5 and P1.0, considered essential for the monitoring of health impacts and contamination of pastures and grain, given the nature of contaminant identified.	Refer Response 7.6 Page 57	73	7.6		Govt-23	Govt-26		
23	997	Noise	Noise survey data is devoid of any reference to infrasound and impact of noise upon animal husbandry or native fauna	Refer Issues #68 & 279 Page 81	74	7.7		68			
23	998	Safety	Impacts of bushfire upon the magazine...security of the quantity of ammonium nitrate...capacity to fight a 30,000 litre diesel fire?	Refer Issue #82 Page 17	74	4.5.7		82			
23	999	Weed Management	How the company intends to control weeds and the spread of the weeds is important to property owners not only within the context of the mining operations but also in the construction of the pipeline.	Refer Issue #821 Page124	74	Appendix 1		821			
23	1000	Rehabilitation	Ability of the Company to fund the rehabilitation	Page 124	74	Appendix 1		823			
23	1001	Rehabilitation	Contamination of the aquifer that potentially flows into the aquifers of the Southern Basin Prescribed Wells Area to the south.	Refer Issue #19 Page 43	74	7.4		19			

23	1002	Rehabilitation	If, as suggested the (pit) lake is an evaporation pond, then concentrations of whatever is dissolved increases. If it is salt, then it has the potential to migrate to adjacent soils.	Page 135	75	Appendix 1		1002			
23	1003	Rehabilitation	What is the long-term (500 year) prognosis for the mine site and the lake?	Page 136	75	Appendix 1		1003			
23	1004	Economic Impacts	Economic loss associated with contaminated pasture; contaminated grain, potentially contaminated meat; potential impacts upon animal husbandry as a consequence of noise (lower mating results); potential contamination of wool with not only graphite, but other hazardous material identified herein	Refer Issue #11 Page 61	75	7.6		11	12		
23	1005	Economic Impacts	Impact of devaluation of properties in the area as a consequence of the mining operation is underestimated	Refer Issues #452 & 514 Page 31	76	5.2		452	514		
23	1006	Compensation	Due to economic losses potentially suffered by the landowners, grain being delivered to silo and rejected on grounds of contamination, and a leak in the pipeline	Refer Response Sections 7.4 to 7.9 Pages 42 onwards	76	7.4	7.9	1006			
23	1007	Behaviour of Staff	Does the Company have a drug and alcohol free employment regime	Refer Issue #912 Page 130	77	Appendix 1		912			
23	1008	Human Health	Potential human health impact, having regard to the nature of the contaminants may be significant	Refer Issue #9 Page 57	77	7.6		9			
23	1009	Tod Reservoir	Contradiction between the SA Water testing and AGL testing, given that the water in the Tod reservoir is saline and contains contaminants rendering it not fit for human consumption.	Refer Issue #275 Page 54	78	7.5		275	983		
23	1010	Flora and Fauna	A one day, daylight hours, formal 'assessment' of MC 4372 is considered inadequate	Refer Issue #830 Page 125	78	Appendix 1		830			
23	1011	Traffic	Approvals process...(and) consultation with the community was non-existent...without any agreement as to who funds the upgrade and ongoing maintenance	Refer Issue #1 Page 83	78	7.9		1			
23	1012	Safety and Health	The provision of Material Safety Data Sheets for all hazardous materials on-site is not within the report.	Refer Issue #929 Page 131	79	Appendix 1		929			
23	1013	Safety and Health	One of the listed flocculants, Magnafloc, whilst claimed to be biodegradable, is also highly toxic to fresh water fish and crustaceans.	Refer Issue #931 Page 131	79	Appendix 1		931			
23	1014	Economic Impacts	missing is a baseline of property valuations against which any movement can be gauged to either support or deny the supposition of decline of values...a farmer would not purchase property at market value if a mineral exploration licence, claim of lease were over the land	Page 136	80	Appendix 1		1014			
23	1015	Future Mine Growth	Rumours of an alliance with Valence Industries (Uley Graphite) which may impact on the future of the processing plant...issues relating to haul roads, additional noise, potentially additional fugitive dust etc for which the environmental impact of the current assessment does not address	Refer Issue #86 Page 14	81	4.2		86			
23	1016	Safety and Health	The chemistry of the tailings dam, including photochemical reactions with reagents and compounds contained therein	Refer Issue #945 Page 133	81	Appendix 1		945			
23	1017	Waste Rock Storage Facilities	Radioactive material is present in the ore body as identified (pp. 106 and 107). The fact remains these materials will be mined and the question therefore becomes what is the fate of the material as a consequence of the processing of the ore? What is the cumulative effect of these 'waste products' in the tailing dams or on the waste rock storage facilities? What controls, if any, are to be in place to ENSURE these materials do not enter the fugitive dust cycle or into the ground water system?	Refer Issue #720 Page 14	81	4.3		720			
23	1018	Rehabilitation	Access to exploration PEPRs involved with the activities that ultimately lead to the MC 4372 and MC 4373 being established	Page 147	82	Appendix 2		Govt-6			
23	1019	Economic Impact	Baseline concentration of graphite in surface soils exists and already has an identifiable impact upon wool quality	Page 136	82	Appendix 1		1019			
23	1020	Other Information	perhaps the Company would care to correct the impression given that MC 4372 is in Yallunda Flat, whilst MC 4373 is in Koppio as declared in the MESA Journal 75.	Refer Issue #832 Page 126	83	Appendix 1		832			

23	1021	Risk Register K_29	Inspections after a flood that has not been "accounted" for as the District has experience in recent time	Refer Issue #177 Page 53	83	7.5		633			
23	1022	Risk Register K_31	Control criteria and a method of disposal of the 'collected potentially contaminated water, inclusive of potentially acid forming materials	Pages 41 & 62	83	7.6	7.3	15	273		
23	1023	Risk Register K_33	The Acid Rock Drainage Management Plan should have been an integral part of the Application and subject to public scrutiny.	Page 136	83	Appendix 1		1023			
23	1024	Risk Register K_34, K_35 & K_36	The Tailings operation and Management Plan should have been an integral part of the Application and subject to public scrutiny	Page 136	83	Appendix 1		1024			
23	1025	Risk Register K_36	What considerations are given to compliance with the District Council of Tumby Bay Development Plan and the location of the system within the Water Protection Zone?	Refer Issue #2 Page 84	84	7.9		2			
23	1026	Table 6.7	In the event the Mining Lease is approved, that members of the community be invited to participate in the formulation of the various plans identified in the context of this application.	Page 136	84	Appendix 1		1026			
23	1027	6.8 Statement Two	The size of the proposal....Kookaburra Gully, Kookaburra Gully extension and Koppio is the extent of the mining prospect encompassing some 4.5 kilometres of agricultural land not just that defined by MC 4372 and MC 4373.	Refer Issue #85 Page 15	84	4.4		85			
23	1028	2.8. ENVIRONMENTAL COMPONENTS									
23	1029	2.8.1 Referring to MLA 7.1	Meteorological data and site conditions....tendered for Poonindie and Cummins is not site specific. Data borrowed from another project is data not under the control of the applicant and cannot be verified	Pages 9 & 63	85	7.6	7.5	56	69	633	
23	1030	2.8.2 Referring to MLA 7.2 - 7.2.1	"Listed species will not be impacted directly by mine activities" implies what? Will not be impacted by machinery, fugitive dust, dewatering, deprivation of water or contaminated water?	Page 137	85	Appendix 1		1030			
23	1031	7.2.2	Native orchids identified in a previous environmental survey relating to the proposed new power transmission line located nearby.	Refer Issue #881 Page 128	86	Appendix 1		881			
23	1032	7.2.4.2	There appears to be some confusion as to the location or locations of WRSF	Page 137	86	Appendix 1		1032			
23	1033	7.2.4.2	Identification of all weeds not only on MC 4373 but the whole of the Mineral Lease AND the surrounding region (especially that involving the proposed pipeline).	Refer Issues # 821 & 830 Page 124 & 125	86	Appendix 1		821	830		
23	1034	7.2.4.3	Payment to the Native Vegetation Fund does not necessarily return to the site affected. If that is the case, the Koppio location is disadvantaged.	Page 164	86	Appendix 2		Govt-37			
23	1035	7.2.4.7	Fugitive dust....impact on native species....nature of the contaminants in the dust that may inhibit growth (vide copper, zinc, magnesium, etc)	Refer Issue #8 & 9 Page 57	86	7.6		8	9		
23	1036	7.2.4.8	Impact of graphite fugitive dust upon the effectiveness of agricultural sprays (weedicides and insecticides) which may incur additional costs to neighbouring farms (those in the fall out areas of PM10; Pm2.5 and PM1.0 particulate sizes)	Refer Response Section 7.6 Pages 57	87	7.6		Govt-23			
23	1037	7.2.4.9	Cumulative impact upon the ecosystem from a continuous use of saline water for dust suppression....which will ultimately find its way into the Pillaworta Creek ecosystem	Page 55	88	7.5		285			
23	1038	7.2.4.10	Impact of fire in the vicinity of the magazine and a catastrophic detonation of the magazine and the impact such an event would have on vegetation.	Refer Issue #77 Page 16	89	4.5.7		77			
23	1039	7.2.5.1 & 7.2.5.2	Native Vegetation Management Plan....SEB....establish a plant nursery	Page 164	89	Appendix 2		Govt-37			
23	1040	7.2.5.3 & 7.2.5.4	Fate of wash water....lest the weed seeds removed by washing are spread by the use of this water in dust suppression or other mining operations.	Refer Issue #954 Page 134	90	Appendix 1		954			
23	1041	Table 7.9	Does bi-annual monitoring of flora survey sites accommodate the life cycles of all threatened species	Page 137	90	Appendix 1		1041			

23	1042	Table 7.9	Conduct of annual flora studies for the purpose of detecting impact arising from high salinity....It is suggested that continuous monitoring is required.	Page 137	91	Appendix 1		1042			
23	1043	Table 7.9	Quantity of salt potentially spread over the ML as a consequence of dewatering and ultimately as the 'lake forms' as a consequence of cessation of mining and subsequent "rehabilitation"?	Page 137	92	Appendix 1		1043			
23	1044	7.2.7.4	No standard exists for the measurement of cumulative dust, but a 'Selected baseline of 4g/m2/month' has been incorporated....What is the scientific validity of this selection?	Refer Response Section 7.6 Page 57	93	7.6		Govt-22-27			
23	1045	7.2.9	What negotiations with local land owners has taken place with respect to the location of monitors (dust, noise, vibration) on their properties?	Page 138	94	Appendix 1		1045			
23	1046	7.2.10	SEB calculations require modification.	Page 163 and Response Section 7.2	94	7.2		Govt-35			
23	1047	7.3.2	Upon what baseline study has DCTB provided advice that there are no concerns?	Page 138	95	Appendix 1		1047			
23	1048	7.3.2	Pygmy possums and echidnas are known to be in the area.	Page 138	95	Appendix 1		1048			
23	1049	Table 7.12(?) K_16	Water within the tailings dam being contaminated water and the consequences of consumption by native fauna (land based or birds)	Page 138	95	Appendix 1		1049			
23	1050	7.3.4.3 & 7.3.5.3	Noise dispersion inclusive of dispersion (air burst) of blasting/explosion and vibration (surface and in ground) and infrasound...impact on fauna	Page 81 & 138	96	7.7		68	69	279	280
23	1051	7.3.7	No night time fauna study has occurred on Section 125	Page 138	98	Appendix 1		1051			
23	1052	Figure 7.6	Modelled groundwater elevations prior to mining are...hypothetical	Refer Issue #19 Page 43	99	7.4		19			
23	1053	7.4.4	The site based drilling program was EXCLUSIVE to MC 4373 and was a single drill hole that only penetrated within the graphite resource body.	Page 138	99	Appendix 1		1053			
23	1054	7.4.5.1	Concentration (hence quantity) of...heavy metals (Chromium, Arsenic, Cadmium), manganese and uranium in addition to the graphite...that will end up in the tailings facility with leaching into the ground water system AND within the waste rock facility, now being exposed to the elements of the weather and undergoing weathering and leaching into both the ground water and surface water environs.	Refer Issue #16 & 17 Page 42	100	7.4		16	17		
23	1055	7.4.5.3	'pit area' outlined in figure 7.9 appears to ignore any impact within the 'designated pit area' within MC 4372	Page 139	101	Appendix 1		1055			
23	1056	7.4.5.4	'pit will fill with water (to a level stabilized by the Standing Water Table), BUT the problem now being the exposure of water to broken rock and thereby chemical contamination by heavy metals, manganese and uranium etc, thus allowing ready contamination of the ground water system inclusive of contaminated ground water entering the Pillaworta Creek	Page 139	101	Appendix 1		1056			
23	1057	7.4.5.7	estimated 4 - 6% of the total volume of waste rock could be potentially acid rock precursors, the question is what tonnage of rock will form the waste rock pile, thus the estimate source of contamination is an unknown	Page 139	102	Appendix 1		1057			
23	1058	7.4.6.5	compressed clay is not necessarily a low permeability liner, especially in the context that the processes used in separation of graphite from the ore/clay uses surfactant chemistry, the same chemistry that may take place in the TSF with a degradation of the so called 'low permeability layer'	Page 139	104	Appendix 1		1058			
23	1059	7.4.6.6	There is a lack of discussion with respect to the northern WRSF to be located on MC 4372 as per AGL's MLA Appendix 'H'	Refer Issue #1032 Page 137	104	Appendix 1		1032			
23	1060	7.4.6.7	"Re-use of collected water" would suggest the potential exists for concentrating the contamination after each subsequent use.	Refer Issue #16, 17 & 18 Page 42	104	7.4		16	17	18	

23	1061	7.4.6.8	Provision of septic system as required by the Tumby Bay Development Plan....better option may be to install biocycle technologies	Page 139	104	Appendix 1		1061			
23	1062	7.4.7	Dewatering is not limited to the impact of known wells. It has a hitherto undocumented impact upon the spring (and ephemeral spring) network in the area	Refer Response Section 7.4 Page 42	105	7.4		878			
23	1063	7.4.7 (K_22)	The flow of contaminants (seepage, etc.) into the pit and then to "use this water to re- establish flows in the Pillaworta Creek"	Page 139	105	Appendix 1		1063			
23	1064	7.4.8.2	The impact upon native grasses, native orchids and other listed species and the habitat is general, is ignored.	Page 139	106	Appendix 1	7.4	1064	Govt-2		
23	1065	7.4.8.5	TSF embankment has been constructed and analysis undertaken on its "impermeability"	Page 140	106	Appendix 1		1065			
23	1066	7.4.8.5	Kerosene is held in the tailings facility and has the capacity to migrate into ground water. Tailings samples were analysed for total petroleum hydrocarbons....upon what basis are the aforementioned claims made?	Refer Issue #933 Page 131	106	Appendix 1		933			
23	1067	7.4.8.5	The pit is below the Standing Water Level; therefore it is within the aquifer. Any water within the pit area has the potential to move into the confines of the aquifer.	Page 140	107	Appendix 1		Govt-31			
23	1068	7.4.8.6	it is not uncommon to have a number of aquifers (within the fractured rock network) that potentially provide environmental water which would contradict the conclusions drawn by the limited investigations to date?	Refer Issue #813 Page 124	107	Appendix 1		813			
23	1069	7.4.8.8	samples for analysis were taken from a limited number of drill holes	Page 140	107	Appendix 1		1069			
23	1070	7.4.8.8	Cr(VI) needs to be identified specifically. (Exceeds limit: no MSDS) Cr(III) → Cr(VI) is the chemistry conducive to oxidation of Cr(III) → Cr(VI)?	Page 140	107	Appendix 1		1070			
23	1071	7.4.9	ACCUMULATIVE impact of the excesses noting, in particular, that the mining operation now allows: a. These substances mobility (i.e. no longer bound is the ore body). b. Subject to weathering due to exposure above ground level. c. Leaching due to the impact of rainfall through the body of the waste rock dump back into the soil and ultimately the underlying aquifer.	Pages 42 & 141	108	7.4	7.5	16	17	1080	Govt-29
23	1072	7.5	AGL MLA uses unsubstantiated evidence from another company (Eyre Iron Pty. Ltd.) to establish salinity in the Pillaworta Creek	Page 140	109	Appendix 1		1072			
23	1073	7.5.2	"EPNRM Board expressed a desire that water flows to Pillaworta Creek and water depended ecosystems were maintained.....," what are the environmental impacts which gave rise to the concerns that the Board necessitating this condition	Page 140	109	Appendix 1		1073			
23	1074	7.5.4.7 & 7.5.4.8	What are the concentrations of all substances in the TSF and what potential exists within the TSF for chemical reactions (e.g. oxidation and reduction) to occur thereby creating other potentially significant contaminants?	Refer Issue #945 Page 133	110	Appendix 1		945			
23	1075	7.5.4.7 & 7.5.4.8	What is the precise nature of these 'sulphides' and what is the chemistry of the TSF that might impact upon these entities to enhance the production of 'acid rock' products that give rise to 'acid soils'?	Page 141	110	Appendix 1		1075			
23	1076	7.5.5.7	No site specific weather observations have been undertaken over a 12 month period, in preference of using data from Poonindie and Cummins Airport	Pages 9 & 63	111	7.6	7.5	56	69	633	
23	1077	7.5.7.3	Whilst there are some exceedance of some EILs, the proposed surface water control and management measures would mitigate against potential impacts....would control/management procedures adequately provide the "controls" required.	Refer Response Section 8.6 Pages 94 & 160	111	8.6		Govt-30			

23	1078	7.5.7.3	The risk assessment appears devoid of considerations associated with Cadmium, Manganese, Cobalt, Silver, Gold, Uranium oxide, Vanadium for which 'production tenement status was granted by DSD as reported in the MESA Journal 75 4-2014, page 82'.	Page 142	112	Appendix 1		1078			
23	1079	7.5.7.3	Rare Earth compounds (Ce, Cs, Ga, Hf, In, La, Nb, Rb, Re, Sc, Ta, Th, Te, Y)...and Strontium, Thorium and Vanadium have not been subjected to any form of risk assessment.	Page 142	112	Appendix 1					
23	1080	7.5.7.3	Reference is made to an arbitrary standard the GAI (Geochemical Abundance Index), which could for convenience be described as a fudging figure	Refer Issue #1080 Page 56	112	7.5		1080			
23	1081	7.5.7.3	The "capping" proposed is inconsistent with the stated objective of the rehabilitation plan to return the WRSF to primary production.	Page 143	112	Appendix 1		1081			
23	1082	7.5.8 & Table 7.21	What is the position of DCTB with respect to contaminated water flowing onto the public road and the road verge?	Refer Issue #2 Page 84	113	7.9		2			
23	1083	7.6.1	What is the background level of dust generation over a 12 month period for the location of the proposed mine site AND the transport corridor(s) proposed to be used...its composition....base line PM10, PM2.5 and PM1.0....and diesel emissions from agricultural enterprises?	Refer Response Section 7.6 Page 57	113	7.6		798	Govt-23		
23	1084	7.6.1	Material presented by the Project Fusion data is deficient in its recognition of the health implications of PM2.5 and PM1.0 dust particles....and chemical nature of the dust particles likely to be in fugitive dust emanating from mining operations.	Refer Response Section 7.6 Page 57	114	7.6		Govt-23			
23	1085	7.6.4.5	The impact of diesel fumes and particulates arising from the transport corridor on the basis of 24 semi-trailer movements per day during daylight hours.	Refer Govt-26 and Response Section 7.6 Pages 57 & 77	116	7.6		Govt-26			
23	1086	7.6.5	Impact of fugitive dust on cereal crop production through reduced ability for photosynthesis...levels of copper, zinc, potassium and phosphorus...and heavy metals, etc....potential also exists for contaminated grain to be banned by the silo	Refer Issue #11 Page 61	117	7.6		11	12		
23	1087	7.6.5	The health impacts of contaminated dust are not identified for the prospective workforce including health effects of the Rare Earth and Manganese compounds	Refer Issue #9 Page 57	118	7.6		9			
23	1088	7.6.9	It is noted real time monitoring is envisage. What is the location of the receptors?	Page 143	119	Appendix 1		1088			
23	1089	7.7.2	What is not clear is the intention of the applicant to operate the transport fleet outside of the 7 a.m. to 7 p.m. timeframe	Page 143	119	Appendix 1		1089			
23	1090	Figures 7.16, 7.17 & 7.18	Underlying photograph does not have the necessary reference points (road way, houses, Mining Claim boundaries) shown.	Page 143	119	Appendix 1		1090			
23	1091	Figures 7.16, 7.17 & 7.18	'modelling' or predictions for all the other residences previously identified, and plotted on an appropriate topographic map.	Page 143	120	Appendix 1		1091			
23	1092	7.7.5	no control measures are identified for infrasound	Refer Issues #68 & 279 Page 81	120	7.7		68			
23	1093	7.7.5.2	impacts of blasting on fauna, domesticated animals (horses, sheep, cattle, goats, etc.), residences identified (not just the Cullen house opposite) and concrete troughs and other agricultural industry infrastructures.	Refer Issue #280 and Explosives Section 4.5.7 Pages 82 & 15	120	7.7	Appendix 1	280			
23	1094	7.7.8	recommended that continuous noise monitoring be undertaken for a period of time during which construction and full time production is brought on line to establish an appropriate baseline	Page 143	121	Appendix 1		1094			
23	1095	7.8.2	Stakeholder views must include advice from local landowners who have practical knowledge with respect to soil management in addition to Government authorities	Page 143	122	Appendix 1		1095			
23	1096	7.8.4.1	potential causes for soil degradation...including growth inhibitors that potentially exist in the ore body....contamination of the soil with above trace levels of copper etc.	Refer Issue #11 Page 61	122	7.6		11			

23	1097	7.8.4.2 & 7.8.4.3	use of saline water for dust suppression....accumulative effect of continuous applications of saline water....progressive increase in salinity of the soil, whilst not forgetting that the saline water may contain elevated levels of contaminants (heavy metals) and Copper, etc.	Page 55	122	7.5		285			
23	1098	7.8.5.4	periodic chemical analysis of rock samples to accurately identify sources of acid forming rock in the context of a new rock face exposure (through blasting) given that it would appear the extensive drilling and analysis work has not been undertaken over the pit area	Page 143	123	Appendix 1		1098			
23	1099	Table 7.37	North-West corner of MC 4373 and the South-West corner of MC 4372 would be a more conducive location for the soil and sub-soil storage area being now outside of the natural drainage area of the ephemeral creek on MC 4373	Refer Issue #1032 Page 137	124	Appendix 1		1032			
23	1100	7.9	absence of any MoU between Council and the Company....and other traffic issues	Refer Response Section 7.9 Page 83	125	7.9		2			
23	1101	7.10	A representative of the Barnarla Women claims no knowledge of the "survey"....and survey over what is now MC 4372.	Refer Issue #503 Page 13	126	3.15		503			
23	1102	7.12	Nature of the asbestiform material, the health risks of asbestos....'control regime' where asbestiform materials may have been placed within WRSF or other locations...compliance requirements	Page 144	127	Appendix 1		1102			
23	1103	7.13.4.1 & Table 7.51	Register K_58 has no relevance to the Koppio area....alcohol or drug testing regime....emergency services....catastrophic detonation of the magazine given the quantities of explosives contained therein	Page 144	128	Appendix 1		1103			
23	1104	7.13.4.4 & 7.13.4.5	Workforce profile...impact upon the social structure of the associated communities	Refer Issue #42 Page 31	129	5.1		42			
23	1105	7.13.4.7 & 7.13.5.6	Sales of properties over which Exploration Licences, Mineral Claims and Mineral Leases, will decline in value	Refer Issues #452 & 514 Page 31	129 & 131	5.2		452	514	1005	
23	1106	7.13.5.2	Mining Act, what compliance regime exists for entry to mining operations and what compensation regime applies....does the provision of fencing come under the Fences Act?	Page 144	130	Appendix 1		1106			
23	1107	7.13.5.4	an excess of skilled workers with mining experience would most likely fill advertised positions ahead of local (inexperienced) competitors.	Refer Issue #42 Page 31	130	5.1		42			
23	1108	7.13.5.7	What level of financial support is proposed to be forth coming in order that emergency services can meet the expectations generated by the mining operation?	Page 144	131	Appendix 1		1108			
23	1109	7.13.6 & Table 7.52	What level of tangible support is envisaged for the community....scholarship fund...critical care unit and staff at the hospital...RFDS...airfield facilities...native nursery.	Page 144	132	Appendix 1		1109			
23	1110	7.13.6 & Table 7.52	Property devaluation....what compensation is attributed to District Council of Tumby Bay through loss of rate revenue?	Refer Issues #452 & 514 Page 31	132	5.2		452	514	1005	
23	1111	7.13.7	DCTB apparently, has not received a briefing from the Company since that given to the new Council....and other DCTB comments	Refer previous responses re traffic & DCTB MoU Page 83	133	7.9		1			
23	1112	7.13.9	Complaints register....a scale of incidents may be able to be generated with appropriate time lines applied.	Page 145	134	Appendix 1		1112			
23	1113	Table 7.54	Consolidated summary of environmental concerns	These issues are all repetitions of issues referred to above....refer to previous responses	134-136	Response Document					
23		2.9 MINE CLOSURE AND REHABILITATION									
23	1114	2.9.1 Referring to MLA 8.1	The proposed plan is deficient by virtue of the errors and omissions identified by consultants, especially in relation to geotechnical, geo-hydrology and hydrology, and...in relation to MC 4372	Refer Issue #19 Page 43	137	7.4		19	830		
23	1115	MLA 8.3	Native Vegetation Management Plan....proposal as outlined in Figure 8.1 identifies the southern WRSF but not the northern WRSF as described in AGL's MLA Appendix 'H'....resultant pit area will have the fence removed.	Refer Issue #1032 Page 137	137	Appendix 1		1032			

23	1116	MLA 8.5	Timeline for the 'complete removal of infrastructure', given the often quoted life of the mine being 7.5 years....is significant in the context of additional mining operations	Refer Issue #85 Page 15	138	4.4		85			
23	1117	8.6.2	Modelling pertaining to the 'resultant lake'....meteorological observations....modelling parameters....potential for contamination of water to continue....hazardous minerals opportunity to migrate into solution form....sulphides may be exposed, but covered by water in-fill	Refer Govt-31 in Response Section 8.6.2 & 8.8 Page 94	139	8.6.2	8.8	Govt-31			
23	1118	8.6.4.2	potential for the remnants of the TSF contaminants to migrate/leach to the surface over time	Refer Govt-29 & Response Section 8.6 Pages 84 & 160	140	8.6		Govt-29			
23	1119	8.6.5	Closure strategies for exploration activities will be included in the appropriate exploration work approvals or PEPR's.	Page 147	141	Appendix 2		Govt-6			
23	1120	8.7 & Table 8.7	General project closure:...potential for increased weed infestation and pest incursion to the site...land use has significantly been altered, indicating that mining and agriculture cannot co- exist....destruction of agricultural land.	Page 145	141	Appendix 1		1120			
23	1121	8.8 & Table 8.9	Rehabilitation time scale is the critical performance indicator....establishment time for Native Vegetation is significant....monitoring and eradication program for weeds has no time line....groundwater monitoring....Seepage from the TSP over time, not the life of the operation but 20, 50, 100 years....pit lake	Page 145	141-142	Appendix 1		1121			
23	3 APPENDIX										
23	1122	3.1 Road Usage Calculations	An estimation of the road usage from data contained in the Mineral Lease Application provides the following figures for the same section of road on an annual basis as 2,912 to 19,710. Which is the accurate presentation?	Refer Issue #20 Page 89	143	7.9		20	986		
23	1123	3.2.1 Traffic Issue AGL Proposal	Comments pertaining to Section 7.9: Traffic may be of assistance to Council	Refer Response Section 7.9 Page 83	146-148	7.9		2			
23	1124	3.2.2 Agenda Item Re: AGL Application	CEO's 'advice' to Elected Members as detailed in the Agenda to the Council meeting 13 October....lack of expertise or resources to deal with the issue in order to adequately represent the views of the community Council claims to serve.	Refer Issue #1 Page 83	148-150	7.9		1			
23	1125	3.2.3 Fate Of Existing Council Quarry - Borrow Pit	The borrow pit is within the Mineral Claim MC4373 and ultimately within the Mineral Lease, thereby denying access to the material?	Refer Issue #2 Page 84	150	7.9		2			
23	1126	3.2.4 Mayor Sam Telfer, District Council Of Tumby Bay	A number of questions have arisen pertaining to Council's position as described in the (MLP) document.	Refer Issue #1 Page 83	151-155	7.9		1			