Submission Cover Sheet

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Fingerboards Mineral Sands Project Inquiry and Advisory Committee - EES

Request to be heard?: Yes

Full Name: Ross Preston Scott

Organisation:

Affected property:

Attachment 1: Submission_to_Fi
Attachment 2: -scott-bus._cards.j

Attachment 3:

Comments: See attached submission.

Dear Inquiry and Advisory Committee Members, I submit the following on the basis of my extensive Civil Engineering experience on large construction projects in Australia, and on overseas British and Australian Aid and Asian Development Bank Projects.

I have managed construction projects in Central Australia, and in 180 inch rainfall areas of Fiji and Cambodia.

These projects have provided me with experience in 'dust and mud' and dispersive soils, and provide the basis of my concern regarding the proposed Kalbar project.

Dust.

Kalbar have declared dust as low risk; whereas I see it as high risk, particularly when it may contain carcinogenic materials. This area is known for its strong wind events, and the probability of dust impacting on the Lindenow vegetable crops is high. It also forms a risk to farms crops, employees and local community health. I recommend that the Committee assess the highly likely mobilization of dust from site within the early establishment phase; when the site is stripped of stabilizing topsoil, and the topsoil is stockpiled in onsite mounds.

Soil Mobilization.

This area is also known for its high intensity storm events, and the risk of such an event, particularly during the site establishment phase of the project is high. Such an event will result in soil being discharged to both the Perry and Mitchell rivers and then to the Gippsland Lakes.

The Lakes are Ramsar listed, and the Australian Government has also signed Treaties with China, Japan and South Korea to protect the habitat of migratory wading birds.

The likelihood of the soil discharge containing carcinogenic materials should be assessed by the Committee, as it will have an adverse impact on the lakes' ecology.

Dispersive Soil

The Committee's attention is drawn to the proposed project site being a dispersive soil area.

This soil type is not suited or recommended for construction, yet it is proposed for use throughout the project.

Once again it is not being rated as high risk; and the Committee is requested to assess its use.

Attention is drawn to the number of farm dams in the general area, constructed from dispersive soil, that have failed by piping. Similar failures can be expected on this site, resulting in the mobilization of sediment to the rivers.

Construction material.

Natural gravel is specified for use in structures and road works. There appears to have been no effort to quantify this onsite resource. This throws the credibility of the design of many structures in doubt.

Chain of Ponds.

This waterway formation is now rare in Victoria/Australia, and is much valued by Fluvial Geomorphologists. The ponds are currently being rehabilitated by WGCMA under a State grant.

They are at great risk from sediment transfer from site, and the use of dispersive soil in construction makes this event "high risk".

Site Rehabilitation.

This aspect of the project should be of great concern, as existing topsoil onsite is quite shallow; and the exercise of stripping and stockpiling will result in mixing with dispersive soil. It is very doubtful if the topsoil can be successfully restored on project completion. This task will be made even more difficult as much of the placed tailings will be subjected to differential settlement; and over time the mine site profile will present problems.

My assessment of this proposed project is that it is a commercial exercise that demonstrates no care for the safety of the local community, local farm operations or the environment.

Ross P Scott. AMIE Aust.



ADB TA: 1794 CAMBODIA - PROJECT IMPLEMENTATION / TRANSPORT SECTOR)

ROSS SCOTT

Highway Engineer



Ross Scott PROJECT MANAGER



Rivers Authority

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