

Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory
Committee - EES

365

Request to be heard?: Yes

Full Name: Allanna Margaret Knight

Organisation:

Affected property:

Attachment 1: Submission_regar

Attachment 2:

Attachment 3:

Comments: I have uploaded my submission

Dear Inquiry and Advisory Committee members,

As a resident of Lindenow, I am writing this submission in regard to the EES for the Fingerboards mineral sands mine project. I live within the area that will be impacted by the mine and I strongly oppose this project for the reasons listed below.

I have been a resident of East Gippsland for 36 years and lived in Lindenow since 2014. My son and his young family have been residents since 2013. We are all [REDACTED] and suffer [REDACTED]. We have concerns for the residents' health and wellbeing and the beautiful, sacred environment this mine would affect:

1. The proposed mine will have a serious impact on the health, wellbeing and livelihoods of residents.

Kalbar will produce toxic airborne dust that will spread to local residential, farming and agricultural communities, local schools, Mitchell River flats, and our water reservoirs.

Evidence shows that the dust will contain radioactivity, silica neurotoxins, carcinogens and mutagens and has potential to spread as far as Bairnsdale and beyond. The mines own air quality and greenhouse gas assessment found that the operation could create dust levels that exceeded air quality standards up to 74% and that additional measures would need to be taken for safety.

The spread of dust from the mine cannot be contained by Kalbar. The wind in our area is constant throughout summer, winter and spring. Westerlies blow daily and are rarely under the wind speed of 7kph as data between 2010 to 2020 shows. Wind speed ranges between 7 kmph to 25kmph.

The International Agency for Research on Cancer and by the National Institute for Occupational Health and Safety has classified that the particles contained in the dust are carcinogenic to humans. The following are minerals that will be mined and subsequently contained in the dust:

- Zirconium, rutile, ilmenite and titanium. Zirconium – while not toxic it can cause contact irritation to skin and eyes and can form granulomas in lungs if inhaled. It is one of the radionuclides involved in atmospheric testing of nuclear weapons. It is among the long lived radionuclides that have produced and will continue to produce increased cancer risk for decades and centuries to come.
- Ilmenite - is a titanium-iron oxide mineral containing radioactive elements of Uranium and Thorium series. The main radiological hazard from the product is internal exposure to alpha particles given off by inhaled dust.
- Rutile - contains naturally of the radioactive elements of Uranium and Thorium series. It causes coughing, sneezing.
- Titanium – nanoparticles predominately cause adverse effects via induction of oxidative stress resulting in cell damage genotoxicity, inflammation, immune responses etc.

The dust threatens to damage Victoria's biggest food bowls, our waterways flowing into the environmentally fragile Gippsland Lakes, (the Ramsar listed Wetlands), and residents' homes, gardens, and schoolyards.

Irritants and toxins would be a health hazard for children and teachers attending the two primary schools in the area. Lindenow Primary School also has a second campus at Woodglen.

The Woodglen Reservoir where domestic and commercial water is stored for the whole area is 3.5kms downwind from the mine. What are the contamination risks? Those on tank water living near the mine are also at risk of water contamination.

The 24/7 operations of the mine will impact on our wellbeing through constant noise, dust and the transportation of the product.

This 1,675-hectare Open cut mine estimates 200million tonnes of ore will be mined over 20years. Kalbar will be using double B trucks and will need to travel along a narrow country road through Lindenow South, also passing a school. There will be up to 30 to 50 trucks transporting the products every day through the community. These trucks and their noise will be intolerable and dangerous in every way.

2. The Environment and Cultural land would be damaged by the proposed mine

The mine requires the destruction of 13 square kilometres of valuable native vegetation.

This includes removal of magnificent mature trees – this is not only deplorable but affects carbon dioxide emissions, erosion, and causes destruction of native habitat (already struggling due to the 2019/2020 devastating East Gippsland fires). Mature trees store more carbon as they age.

The full extent of the damage causes is not known because the EES technical studies have not comprehensively surveyed the area. This could mean more loss than reported in the EES. The landscape of the area will never be replaced; offsets can't address this loss.

Extreme water consumption of the mine would impact local water sources and risk contamination to ground water, as well as compound effects of expected extreme weather events.

The mine requires extremely large amounts of water from surface sources and ground water. East Gippsland has endured four years of drought and further drains on reserves should be of great concern. Our rainfall is minimal to the rest of the state. Since I have lived in East Gippsland, I have watched the rivers deteriorate; once fast flowing rivers they are reduced to trickles in comparison to 36 years ago.

Climate change is a reality. Extreme weather events are predicted and are already occurring through climate change. I am deeply concerned that the combination of flood, storms, fire, drought and the effects of the mine will have a profound and irreversible effect on our communities.

There will be a tailings dam 90 hectares in size, that's nearly 1 square km. It will contain mine tailings waste and flocculants (chemicals used to treat the tailings) which have warnings on safety data sheets about being harmful to aquatic life. Located on high ground above both the Perry and Mitchell Rivers there is a stated risk of leaching from the dam. An East coast low can produce 255ml rain causing floods. If there is a 1 in 100-year flood, tailings waste & flocculants could be released into the creeks/ivers, harming aquatic life and aquifers. The risks are considerable and foreseeable given the many examples of dam failures (Benambra example). The EES fails to detail plans for the dam's construction - so I challenge that the risk of failure is low.

3. Commercial mining companies cannot be trusted to implement sufficient safety and environmental protection.

Evidence shows that commercial mining companies frequently fail to abide by safety and environmental regulations.

The asbestos industry and its lifelong harm to workers and residents is still being felt. James Hardy were aware and hid the devastating problems from the people. Mount Isa Mines (now Glencore) continues to exceed lead emissions approximately 40 times a year – they simply pay a fine and continue to ignore regulations. The Coal industry and the tobacco industries have a history of lies and deception. All these industries told Australians they were safe and would be managed by the companies. History doesn't lie but mining companies and governments do.

Commercial mining companies have disregard for cultural and environmental significance. Recent examples include the destruction of 65,000-year-old sacred sites in WA. Little response to something that cannot be replaced. Destruction of irreplaceable valuable areas in WA, NT, Queensland, New Guinea, Africa, Alaska, and closer to home the Latrobe Valley, Morwell opencut fire, and the Benambra mine. East Gippsland ratepayers paid for the mess that the mining company walked away from at Benambra. In addition, full rehabilitation rarely happens. (example is Douglas mine at Balmoral in Western Victoria where a toxic waste dump was left behind)? The risks of no rehabilitation are high if the mine goes into 'care & maintenance' with the tailings dam and 19 dams on gullies/creeks being abandoned. Rehabilitation bonds have been shown to be grossly inadequate to cover costs.

The EES for Kalbar is full of assumptions. The risk is too much to base on assumption. History shows us that Kalbar cannot be held accountable for meaningful monitoring, ongoing rehabilitation, acknowledging and fixing issues as they arise in the next 20 years of operation and the impact on the land. I cannot.

Moreover, the mineral sands that are to be mined are plentiful in WA and NT where sites already provide enough for the future for Australia's use (Western Australia Mining).

The proposed mine will disturb and hurt the cultural connection of the Traditional Owners to the land, water, air that is part of the development area.

The impact and the inability to compensate damage to significant sites is recognised by our traditional owners. Gunai Kurnai hold Native Title rites over the public area of this project. Their rites and their culture must be respected and understood. They are part of the country and have deep spiritual connections and responsibility to care for country. We should all support the Gurnai Kurnai in their -Whole Country Principles of Glawac- *“Don’t wait till it is gone. When you lose a site, it’s gone forever. We need to act now to prevent any further loss of environmental or cultural values. Our values exist even when you can’t see them, whether they are underwater, deep inside caves, covered by vegetation, they are still important to us.”* With the massive excavation down to 45m, it will be impossible to avoid destruction of artefacts and heritage. This is unacceptable. Their mitigation measures will not avoid the obliteration of cultural heritage.

4. The proposed mine will cause damage to the livelihoods and economic sustainability of the local Agricultural and Tourist Industries

The Mitchell River flats produce 30 to 40% of vegetables to the Melbourne market and also supply local stores. Broccoli, sweet corn, cauliflower, cabbage, spinach, and lucerne are some of the crops grown and beef, dairy and sheep are also major primary industries in the area. Most of which are grown above ground. Moreover, the East Gippsland Council’s ‘Lindenow & District Community Plan’ did not foresee a mine in that area. Government needs to recognise the pre-existing residential, cultural, and agricultural land use.

The Agriculture industries’ “quality assurance program does not allow for any tolerance to foreign matter.” This industry is only 500 metres downwind of this project. The Clean Green image of our vegie production in the valley is invaluable to the economic future of the area.

The estimated value of the Vegetable industry is \$150 million per annum and employs at least 1500 workers directly. In stark contrast, Kalbar’s statements estimate only 200 jobs will be used over 15 years of the operation; 63 of these directly employed.

Kalbar’s 200 jobs are in construction the construction phase and will only retain 197 of these jobs on an ongoing basis; 63 will be directly employed by the company and the rest will be contracted out. The proceeds of the mine will not be kept in East Gippsland they will go to the company and shareholders. The \$144 million backing of this project is coming from British firm Appian Capital Advisory. The number of jobs and proposed economic stimulus is far outweighed by that provide by (and at risk to) the agricultural industry, its workers and resident’s health and to the irreplaceable cultural sites and our beautiful East Gippsland environment.

Over 3 billion litres of water (3GL) is required by the mine annually for up to 15 years (the maximum life of the mine) for processing and to control dust. What will the impact of this be on bores, aquifers and the Mitchell River? According to irrigation

data, if the 3GL of water was redirected to the horticulture industry, 3 times more jobs could be created than proposed by the mine. It is also indicative of the huge problem the dust containment poses.

Substantial tourist dollars will be lost to the area as people do not want to come to visit mining areas.

The mine will be visible along the tourist roads to Dargo and our beautiful Mitchell River. Fisherman will likely not want to fish in the very popular Mitchell River. The beauty of the flats, the hills, the magnificent mature trees, wildlife, food, wine, all attract a growing tourist industry to our area but this will all be jeopardised by the mine project. La Trobe valley is a good example, people are just not interested in areas where there are mines.

It is unacceptable to allow compulsory acquisition of private land to be used by the mine for infrastructure that is located outside the mining project boundary for: water pipelines, bore pumps, bore field, roadworks, new powerlines, easements, rail siding and vegetation removal. Why wasn't this part of the mine project area? Why isn't this a matter for the EG Shire Council to determine?

Thank you for your consideration of this submission and the opportunity to raise my deep concerns as a resident of the impacted area.

Yours sincerely
Allanna Knight