

Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory
Committee - EES

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Request to be heard?: Yes

Full Name: David Campbell

Organisation:

Affected property: [REDACTED]

Attachment 1: EES_SCOPING_RE

Attachment 2:

Attachment 3:

Comments: See attached submission

EES SCOPING REQUIREMENTS -- HUMAN HEALTH

Minister's Requirement for this EES

Include potential effects of project construction and operation on air quality and noise on nearby sensitive receptors (especially residents).

Assessment of likely effects

- *Assess likely effects to the social cohesion, health and well-being of the communities in the vicinity of the project.*

From ENVIRONMENTAL EFFECTS STATEMENT
Appendix A019 Human Health Risk Assessment

2.2 SCOPE

- Evaluating potential health risks associated with predicted off-site conditions to identified populations as a result of project activities

EXTRACTS:

“ Although a relatively conservative approach has been adopted, the uncertainties regarding the adequacy and quality of the data set and potential data gaps should be accounted for when considering the conclusions of the Tier 1 baseline evaluation. In particular, where uncertainties or data gaps are noted in Table 8.31, additional data collection should be considered prior to the commencement of construction, to refine the outcomes of this HHRA.”

“ The conclusions of the HHRA are based on the available data provided in the specialist assessments and other technical reports prepared for the project, the current project description, the limitations of the predictive modelling, and assuming implementation of the proposed management measures.

The risk assessment has been limited to addressing the impacts of selected substances, to a specific assumed receptor population under a defined exposure scenario, based on information available at the time of the assessment. The risk assessment approach presented does not consider a fully probabilistic estimate of risk, but presents conditional estimates based on assumptions regarding exposure and toxicity consistent with the internationally endorsed regulatory approaches. Further assessments would be required to assess risk where off-site uses vary from the assumed regional conditions noted and/or exposure settings used in this risk assessment.”

RESPONSE

Despite the Minister's requirement that the Human Health Risk Assessment include assessment of the “likely effects to the social cohesion, health and well-being of the communities in the vicinity of the project” , this has not been adequately addressed in the report.

In the conclusion to Appendix A019, it is clear that this risk assessment has been “limited to addressing the impacts of selected substances to a specific assumed receptor population.”

This “receptor population” is confined to an arbitrary radius of 5 km from the proposed mine. This completely ignores the impact of the proposed project on populations outside this 5 km radius, including the impact of dust and radioactive material carried by high wind, truck noise, availability of water resources in the Bairnsdale region, and the potential for contamination of water catchment for the Gippsland Lakes.

The impact of these aspects of the proposed project on human health are dealt with in other sections of this response.

Despite the Ministerial requirement and the identified Scope of work under 2.2 of Appendix A019, the report has not addressed in any way the potential impact of the proposed project on the “social cohesion, health and well-being of the communities in the vicinity of the project.”

Any consideration of these aspects of human health must include an analysis of the impact on the mental health of the communities affected by the proposed mine.

This aspect of human health is completely ignored in the Environment Effects Statement, despite this clearly being part of the Minister's requirement of the EES.

The proposed project is likely to have a significant impact on the social cohesion and well-being of nearby communities.

There are already reports of the severe detrimental impact on the mental health of landowners adjacent to the proposed mine. This has resulted from repeated approaches to landowners from Kalbar staff regarding acquisition of land, and the presumption by the project proponents that this proposal has an irretrievable momentum, regardless of the objections of the landowners and others opposed to the project.

The impact on the mental health of these landowners has been significant, giving rise to anxiety, depression, sleep disturbance, inability to function, deterioration of personal and family relationships and disruption to long-standing community friendships and associations.

In addition, the impact of mental health disorders on general human health is well understood. Mental illness is associated with increased risk of cardiovascular and respiratory disease, weight disturbance, substance abuse, diabetes and increased risk of accident and trauma.

The chronicity of this existing impact on local communities is consistent with a diagnosis of post-traumatic stress disorder (PTSD).

Post-traumatic stress disorder (PTSD) is a particular set of reactions that can develop in people who have been through a traumatic event which threatened their life or safety, or that of others around them. This could be a car or other serious accident, physical or sexual assault, war or torture, or disasters such as bushfires or floods. As a result, the person experiences feelings of intense fear, helplessness or horror.

Ref: www.beyondblue.org.au

Discussions with local landholders in the "receptor population" reveal the existence of post-traumatic stress disorder amongst this group already, even before the commencement of the mine operation.

The feelings of anxiety, depression and helplessness amongst this group are exacerbated by resentment of Kalbar's activities in the Bairnsdale region to promote the company as a good corporate citizen through employment of a consultant to "engage with stakeholders", and to support local sporting bodies and tourist activities with small financial contributions.

In addition, the uncertainty generated by changes to ownership of the Kalbar entity, the frequent changes in company names, and the replacement of senior administration staff within Kalbar has further increased the psychological impact of this proposal.

"We don't know who we're dealing with", "We don't know how much overseas money is involved", "We don't know who is being offered large sums of money to purchase property," "They are deliberately down-grading and underestimating the value of our vegetable-growing industry" are commonly-heard reflections from this group of landholders.

This uncertainty has further exacerbated the PTSD suffered by this group.

It is arguable that the detrimental impact of the mine proponent's activities over the past 8 years on the mental health of this group of landholders could justifiably give rise to a class action by this group seeking compensation for this impact on their health.

If this project is approved, it is likely that this impact will expand geographically to communities outside the arbitrary 5 km radius, as well as compound the existing impact on adjacent communities.

For example, the water storage that supplies the majority of domestic water to the towns of Bairnsdale, Lakes Entrance, Metung, Swan Reach, Nicholson, Paynesville and Nowa Nowa lies within 3.5 km of the proposed mine, in a north-easterly direction. The potential for contaminated dust from the mine carried by the prevailing south-westerly winds being deposited in this water storage cannot be underestimated.

This risk has been all but ignored by the EES, and is not widely known by the East Gippsland community.

When this becomes known and understood by the wider community, regarding the threat of contamination of a fundamental human resource (reticulated water), this will inevitably have a huge psychological impact on the affected communities, giving rise to anger, severe anxiety, and exacerbation of a sense of helplessness and fear.

This is only one example of the risk to human health, particularly mental health, that has been ignored by this EES.

The “big picture” impact of this proposed project on the Lindenow flats horticultural industry, the amenity of the Gippsland Lakes as a major tourist attraction, and the possible contamination of the local domestic water supply are all likely to lead to loss of local jobs and loss of stable income for the region. This will further exacerbate the impact on the mental health of the East Gippsland community.

An objective risk analysis of this proposal illustrates the likely effect on the social cohesion, health and well-being of the “receptor population” as well as the wider East Gippsland community. The flow-on detrimental impact on the socio-economic fabric of the region is potentially devastating.

The sense of helplessness and loss of control in the face of decisions being imposed by “big business and government” has the potential for deterioration of the socio-economic status of the region, as a result of people leaving, fall in tourist numbers, increasing unemployment and loss of amenity of the region that has the reputation for being one of the most attractive parts of Victoria.