## **Submission Cover Sheet**

439

**Fingerboards Mineral Sands Project Inquiry and Advisory Committee - EES** 

Request to be heard?: Yes

Full Name: George & Karen Neophytou

Organisation:

Affected property:

**Attachment 1:** EES\_SUBMISSION.

Attachment 2:

Attachment 3:

**Comments:** Refer to submission uploaded.

Dear Inquiry and Advisory Committee Members

# FINGERBOARDS MINERAL SANDS MINING PROJECT: ENVIRONMENTAL EFFECTS STATEMENT COMMENT

We oppose this proposal for the following reasons.

#### 1. Inappropriate location & incompatible with existing land use

There is a succesfull and economically sustainable agriculture industry at this location. The industry is regarded as "clean green" and produces over 30% of vegetables for the Victorian market. It also supplies organically certified produce to New South Wales and overseas markets.

As vegetables are low in "value" the total production in dollar terms is greatly understated, but its importance in feeding the population should place the industry with a greater weighting for its importance to society.

The East Gippsland Shire Council (Shire) "Lindenow and District Community Plan" does not entertain or foresee an extraction mining use at this location. Thus, its compatibility and safety have not been properly assessed by a "governmental" study.

## 2. Risk to East Gippsland's Clean Green reputation

This particular region of East Gippsland is known for its clean, green and organic farming, it is a significant food bowl in Australia and has growing international trade markets. The mining areas are located amongst these food producing farms. Heavy Mineral Sands Mining is not a compatible land use with clean green organic farming.

Any contamination to produce from this area would affect production, sales and tarnish the reputation of East Gippsland, similarly Victoria in all markets, this would have a severe economic consequence.

#### 3. Water Consumption

Water is a scarce resource with farmers in the region seeking greater allowances without success. The Committee may be aware that our region has been subject to a long sustaining drought. The proposal requires 3GL of water for its operation. It is of concern that over four years the proponent has progressively reduced the actual water consumption envisaged. It started at 6GL and progressively reduced to 3GL. Even at 3GL it will place a significant strain on the water supply, its security, cleanliness and bring pressure on determining priorities for water distribution in drought and adverse conditions.

## 4. Mitchell River & Perry River

This mining project will place the Mitchell River and Perry River in jeopardy, including introduction of contaminants entering these rivers and the flow on effect to the greater lakes system.

Of concern, is the Woodglen Reservoir where domestic and commercial water is stored for the whole Shire, which is only 3.5kms downstream from the mine.

#### 5. Proposed tailings dam storage

Tailings dam's storage are renowned for their failures. In fact, there are many examples of catastrophic failures.

This proposal should be refused as it is introducing a potential environmental hazard in a pristine farming area and next to rivers that provide the drinking water supply to a large regional city and run-off to the Gippsland Lakes system.

## 6. Impact on tourism

Tourism is an important industry and contributor to the local economy. The Gippsland Lakes are a drawcard for our region, whether it be for boating, fishing, water sports or leisure because of the proximity of the massive water features.

The Gippsland Lakes is listed in the Convention on Wetlands of International Importance pursuant to the *Environment Protection and Biodiversity Act 1999* (Cwlth) (EPBC Act) and like all conventions we enter it must be abided including best practice and management principles. It would not be prudent to feed the listed Gippsland Lakes with contaminants from such a mining project and place the lakes system at risk from tailings dams that are notorious for seepage and failure.

#### 7. Degradation to the environment

Mining will require the removal of many mature native trees estimated to be well over 700 large trees, and other vegetation and there will be the associated loss of fauna in order to excavate the 13 square kilometre area.

The proposed staged rehabilitation by replacing the various soil layers exactly as they have been removed is fanciful, if not impossible.

#### 8. Soils

Glenaladale is known for its sodic/dispersive soils and is regarded the cause of silt on the silt jetties and turbidity of the Mitchel River. The Mitchell River is the source of the water supply for the City of Bairnsdale and environs.

## 9. Heavy metals & radioactive materials

An experienced heavy metals expert has pointed out that at least four carcinogens which are currently in soils will be exposed as the ore body is excavated. These carcinogens have a tendency to become airborne, contaminate soils and bio accumulate. Import countries have strict testing regimes for these contaminants in vegetable and meat produce and any contaminants would affect our exports markets.

## 10. Loss of amenity

There will be a high impact on the immediate community, including noise from continuous mining, pollution, heavy transport using the road networks, visual, etc.

The mining project is too close to residential homes and farming properties and will directly impact the occupants.

#### **11. Dust**

Dust is of serious concern including: the prevention of dust settling on rivers, water storages, crops, grazing land and buildings. Grazing animals are at particular risk as they inhale air from ground level while feeding.

#### 12. Rehabilitation

Rehabilitation of land is always an issue. The Australian Institute in its paper Dark Side of the Boom (Victoria) July 2017 produces some alarming figures on the mining industry's track record on rehabilitation. The Institute states Victoria has up to 150 operating mines and 122 in care and maintenance, but only one (1) mine has been fully rehabilitated. Bonds held for rehabilitation of all mines is \$160M with estimates to complete of \$938M. The Institute obtained all statistics from government departments.

## 13. Aboriginal Cultural Heritage

Little regard has been made for the aboriginal cultural heritage and history. Some sites have been identified as having importance and full and proper audit must be made.

## 14. Compulsory acquisition of land

The compulsory acquisition by the proponent of private land outside the mining project area should not be permitted. The proponent must contain the project within the project area, or the licences should be withdrawn if this is not possible.

## 15. Employment

Employment in the Shire will be subject to a negative sum game. The alleged increase in employment for the Shire is exaggerated and does not count the significant loss of employment in existing industries by the resumption of arable land for mining, co-location of industries and causing compatibility issues and other factors.

Appreciate the opportunity to provide input in this process.

Yours sincerely

George & Karen Neophytou