

# Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory  
Committee - EES

# 473

---

**Request to be heard?:** Yes

**Full Name:** Timothy John Frazer

**Organisation:**

**Affected property:**

**Attachment 1:** EES\_Kalbar\_Final.

**Attachment 2:**

**Attachment 3:**

**Comments:** See Attached Submission

Dear Inquiry and Advisory Committee Members,

Re: STRONG OBJECTION TO FINGERBOARDS MINERAL SANDS MINE PROJECT

The letter (K) is Kalbar's Proposed Mine Conclusion Reports Statements.

Even-though I live 2.5hrs away from the proposed mine site in Mallacoota I'm still conscious of the risks for the regions Food / Seafood Industry and the fact it's buying local thats really driving the local economy particularly after the Fires. I am surprised that the long list of environmental, social, economic risks has not seen Kalbar pull the pin on the project earlier on considering the Community at Glenaladale / Surrounds strongly oppose the Kalbar Mine causing the Company to have "No Social License" to proceed. Kalbar's EES Conclusion states (K) "The project is the culmination of an iterative design process that aimed to develop the Fingerboards resource in the most economically viable manner and at the same time avoid or limit potentially significant environmental and social impacts" yet Kalbar regards Direct Impact to be placed on the 19 Landholders risking a radius of up-to 50 kilometres in diameter, surely economics far outweighs any calculation and demise environmentally and socially, it would be of interest to work out that risk in Monetary Terms?

I was concerned to read that the Victorian State Government gave Kalbar \$40,000 through its Community Advisor Grants program to support community involvement when I had been asking for Kalbar to provide information to the Community of Mallacoota only to be ignored.

I have provided questions through Kalbar's website regarding issues of Risks from the Mine to the Mitchell River through floods / tailing dam collapse, serious risks contained in the substances being dug up and contamination of Mitchell River / Food Bowl, Risks to the Water Quality and Quantity Collapsing, no reply yet dating back more than twelve months.

From afar it has been concerning to continually read each week in the paper that the Rights of Landholders / Community of Glenaladale and Surrounds were being degraded by Kalbar's poor process, poor consultation and a lack of respect. Concerns also raised over connections between the East Gippsland Shire Council, Gippsland Tafe, Kalbar were also of concern and valid.

I was also concerned when I noticed Kalbar's Community Engagement Officer Martin Richardson on MLC for Eastern Victoria, Ms Harriet Shing's Facebook page attempting to pressure her to propose the deregulation of Environmental Restrictions on Mining in East Gippsland or to that effect. He did not disclose his conflicts of interest nor did he seemed concerned by his statements deemed questionable based on the EES Process. I did convey my concern before he publicly shamed me then deleted everything he had written, this from a Community Engagement Officer for Kalbar. For this reason I hope the panel members carry out a thorough forensic inquiry that assesses all the concerns relating to the Proposed Mine and how much duty of care has been provided to the Community and Region by Kalbar.

The health of the Mitchell River has been of concern and the fact its suggested that bores have very little relationship to the Mitchell is even more concerning. Many problems and disputes around water rights already exist in all States and Territories due to the balance between Food / Minerals / Exports / Ownership / Corruption, sadly in most cases Mining / Big Investors take a precedent. What happens in the scenario that water shortages increase and a choice needs to be made between Mining or Water / Food Bowl / Agriculture / Horticulture, based on currents statistical data which would take precedent?

3 Billion litres of water per year for up to 15 years is a lot of resources to be exported or wasted on keeping the dust down, is that really what clean water is good for based on what it is being used by Industry / Community surrounding the proposed Kalbar Mine Site? I thought the Mitchell River was a Ramsar protected waterway yet Kalbar's own conclusion states (K) "The project could impact agricultural and horticultural enterprises surrounding the project area, including through loss of market due to reputational damage, labour shortages and diminished surface water and groundwater quality and availability" this would surely be one of the most obvious reasons it shouldn't go ahead.

I would also like Kalbar to disclose where it will be sourcing its Gas from and whether it will be accessing Conventional or Unconventional Gas?

The Local Media has continually presented material from concerned citizens / landholders relating to consultation, loss of income, loss of water quality / access and the reality that Agriculture / Horticulture and Mining cannot exist in such close proximity. The understanding by Kalbar that an actual functioning Community exists there and recognition of that has been lost in Kalbar's Media Statements. Its also concerning that so many of the surrounding land owners will be directly impacted but acknowledge that compensation will fix that. Kalbar's EES statement fails to provide any recognition of Community Gains relating to the Mines Risks to their Businesses / Homes, compensation measures only relate to how much loss they maintain, all pain no gain.

(K) "The project will directly impact 19 landholders with agricultural and forestry operations within the project area. These affected landholders will be compensated for the loss of access to their properties and associated impacts on productivity and livelihood in accordance with Victorian legislation. The project will result in a total loss of agricultural average gross margin of between \$57,750 to \$83,000 per year, based on the average amount of land expected to be out of agricultural production per year"

Then Kalbar assumes without any acknowledgement of the above statement that Landholders will also be presented with new problems which will cause even more hardship for the existing Agricultural / Horticultural Industry / Functioning Community, it remains undeterred (K) "The project may attract labour away from horticulture enterprises due to higher wages and longer-term job security" I'm sure Generations of farming in the region, connection, commitment and dedication would outweigh the premise of Kalbar's EES Report.

Questions relating to conflicts of interest between Kalbar and East Gippsland Shire Councillors also need inquiry based on statements made by Councillors / Questions during the voting in Council to support the mine. (K) "Potential solutions to labour competition will be identified and pursued through continued communication and engagement with industry training bodies, such as TAFE Gippsland"

Having visited the Lindenow Valley and being a great supporter of the Buy Local - Support Local in keeping with a huge shift in the ideals relating to the huge growth of Farmers Markets the idea of risking 15 years of Mining for an Agricultural / Horticultural Institution dating back / looking forward longterm is unimaginable. The EES Conclusion States (K) "Mining operations near the Lindenow Valley could affect the region's reputation for high quality produce if the project significantly affected the amenity of the landscape or a food safety-related issue arose" Kalbar has already declared in the EES Conclusion as written above that the Mine directly impacts Landowners as part of its risk assessment how far that travels is an unknown based on minimal risks raised in the EES rather than using impact directly which is medium / high risk.

The East Gippsland Water Bores in that area need to be protected from any contamination, drawdown. If at any stage water restrictions are actioned the proposed mine should be shut down first to prioritise Community / Horticulture / Agriculture and Environment. Mining Companies in other drought affected areas seem to continually override water for life, food or even households, this should be an obligation of the Proposed Mine to stop greed over necessity. (K) The project will require water for activities such as ore processing, dust suppression, rehabilitation, and wash-down, as well as for domestic uses. During operations, water requirements are likely to be approximately 3 gigalitres per year. Water for the project will be sourced from the Mitchell River

Its clear that Kalbar's EES fails to provide even the slightest bit of regard for the existing economic, social and environmental reality at Glenaladale / Surrounds and the possible 50 Kilometre Contamination Zone. Too refuse to acknowledge these facts is to inevitable ignore the effects the Proposed Mine will have providing only loss, contamination, extinction, this will equate to the possibility of a dire reality that the commodity of Water / Horticultural / Agricultural / Social / Community will be lost or greatly degraded for Generations.

Kalbar's EES Concluded:

(K)The project is the culmination of an iterative design process that aimed to develop the Fingerboards resource in the most economically viable manner and at the same time avoid or limit potentially significant environmental and social impacts. Alternatives were considered including options for alternative mine sites, mining and minerals processing methods, tailings management,

mine infrastructure, water sources, transport methods and routes, and a 'no project' scenario. Criteria used to select the preferred option (the project) included economic, social and environmental considerations. Detailed specialist studies were prepared as part of the EES process on aspects of the physical and biological environment as well as cultural heritage and socioeconomic aspects. The outcomes of these studies supported the further development of the project and are the basis for the preparation of the EMF.

Statements in Kalbar's EES Report in part state that the design, assessment and material gathering during the Mines Beginning to End will remedy any serious risk to 19 Landholders, Environment, Horticulture / Agriculture, Social Economics yet in other parts of the Conclusion its inevitable that those causes and effects cannot be mitigated as in the end it is "A Mine Site".

(K) Mining operations near the Lindenow Valley could affect the region's reputation for high quality produce if the project significantly affected the amenity of the landscape or a food safety-related issue arose. Analysis of public perceptions and buying habits indicated that losses of value and income is unlikely as a result of project activities.

(K) The project is the culmination of an iterative design process that aimed to develop the Fingerboards resource in the most economically viable manner and at the same time avoid or limit potentially significant environmental and social impacts. Alternatives were considered including options for alternative mine sites, mining and minerals processing methods, tailings management, mine infrastructure, water sources, transport methods and routes, and a 'no project' scenario. Criteria used to select the preferred option (the project) included economic, social and environmental considerations.. Sadly the processes of assessment as written above alienates the basic fact that functioning industry, homesteads, social cohesion already exists a Glenaladale and Surrounds yet the significance of that is continually down played or ignored. What is known is that right from the start date of the Proposed Kalbar Mine the area and region will be changed forever in a way that would have never been thought possible when Lindenow / Glenaladale became a Horticultural / Agricultural Community Hub? Day 1 of Mining License Granted (K)These activities include vegetation clearing, construction of roads, pipelines and powerlines, disturbance to waterbodies, use of vehicles and machinery, and a general increase in human activity.

(K) Detailed specialist studies were prepared as part of the EES process on aspects of the physical and biological environment as well as cultural heritage and socioeconomic aspects. The outcomes of these studies supported the further development of the project and are the basis for the preparation of the EMF. These activities include vegetation clearing, construction of roads, pipelines and powerlines, disturbance to waterbodies, use of vehicles and machinery, and a general increase in human activity. Not by chance, logic or even the title of a specialist is it possible to fathom the amounts of material already presented to Kalbar publicly, submissions or through local media. Citizen Science some of which based on Generations ranging in topics more valid / factual than short term studies that are usually carried out in a small period / not based on any season of weather or subject to the sorts of climate that's been unprecedented for the last decade. One thing that's always forgotten is once resources in water, food, well-being, social cohesion is effected then the idea of Community is lost, it is as simple or technical as that.

(K) The key biodiversity values outside the project area, which could be impacted by project activities are associated with the Gippsland Lakes (a Ramsar site). This site is located 25 km southeast of the project area (approximately 50 kilometres downstream along the Mitchell River) and supports internationally significant wetlands and estuaries. The ephemeral creeks within the project area drain to the Mitchell River and Perry River, which ultimately discharge to the Gippsland Lakes. Construction and operations activities will result in the loss, reduction or reduced viability of terrestrial and aquatic biodiversity values within and around the project area. Kalbar states that the Landholders surrounding the proposed mine site will be directly impacted yet above it describes its footprint of risk, contamination, effects ranging possibly 25-50 Kilometres. Too propose 50 kilometres of risk would mean its become insolent before its even assessed risks via a value in dollars. At what cost would rehabilitation be on that scale of risk? Does this mean the region and

state would own this risk like it has after the contamination of the Omeo River from the Benambra Mine? Does the State insure that risk from the Kalbar Mine to protect itself from possible future costs where it could exceed the hundreds of millions?

Do the landholders insure against the risks of loss of income, contamination of property, health decline from stress, sleep deprivation, water shortages or even the loss of the Community, this means over insuring or just selling up for good as the costs for landholders are too great to consume / conceive? Construction and operations activities will result in the loss, reduction or reduced viability of terrestrial and aquatic biodiversity values within and around the project area. These activities include vegetation clearing, construction of roads, pipelines and powerlines, disturbance to waterbodies, use of vehicles and machinery, and a general increase in human activity.

### Kalbar's EES Conclusion Report

#### (K) Amenity and environmental quality

**Amenity and environmental quality** – To protect the health and wellbeing of residents and local communities, and minimise effects on air quality, noise and the social amenity of the area, having regard to relevant limits, targets or standards.

Changes to air quality and the existing noise environment have the potential to impact on the health and wellbeing of people and the general amenity of where they live. Quantitative modelling was undertaken to predict the likely air quality, greenhouse gas emissions and noise impacts from the project.

Air quality modelling was undertaken to predict the levels of potential air pollutants from the project for construction and three operational scenarios, namely year 5, year 8 and year 12. These years were chosen as they represent the worst case in terms of the project activities that would be generating emissions. Predicted ground-level concentrations of exhaust pollutants from the use of generators during construction comply with relevant criteria at all sensitive receptors, and are at most 17% of the air quality criteria. During project operations, ground-concentrations of small particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>), respirable crystalline silica, and heavy metals, and dust deposition rates, all comply with the relevant criteria at all sensitive receptors. Monthly maximum and average annual dust deposition rates were also predicted to comply with relevant guidelines at all sensitive receptors during construction and operations. When I read the details above regarding the risks, remedy and mitigation I'm also Assessing how its possible that the Kalbar Mine Proposal and the Glenaladale / Lindenow and Surrounds Food Bowl Hub can coexist, is it possible. Can we eat an excess of sugar and not be overcome by ailments like Diabetes or excessively drink alcohol and not expect to become ill at some point depending on consumption levels? The fact that within a radius of 19 Landholders abutting the Proposed Kalbar Mine from as far as 50 Kilometres away the risks on all levels to Water / Horticultural / Agricultural / Social / Community clearly show its unviable, unethical and totally void of actually being supported by the Panel Inquiry then recognised by the Victorian Government as Extreme Risk.

#### Cultural heritage

**(K) Cultural heritage** – To avoid or minimise adverse effects on Aboriginal and non-Aboriginal cultural heritage.

All registered and recorded (known) Aboriginal cultural heritage sites located within the mining area will be impacted by the construction and operation of the project. Cultural heritage values located outside the mining area boundary will remain intact and undisturbed by the project.

The project will result in the disturbance or destruction of the physical location of a registered scarred tree (the tree itself is likely to have been destroyed in the 2014 bushfires), a registered artefact scatter comprising 218 subsurface artefacts located throughout the project area, a two registered low density artefact distributions, one comprising eight artefacts at four locations within the project area and the other 60 surface and 63 subsurface artefacts located throughout the project area (a portion of each of these low density artefact distributions is located outside the mining area boundary and will likely remain intact and undisturbed by project activities).

No non-Indigenous cultural heritage sites have been identified within the project area. If historical archaeological deposits, artefacts or features are discovered, all works that may cause harm will



cease, and Heritage Victoria will be contacted. Properties within the project area or infrastructure options area that could not be accessed during the cultural heritage study will be investigated prior to ground disturbance activities to identify non-Indigenous cultural heritage values that may be present.

Unknown Aboriginal cultural heritage sites are highly likely to be present within the project area and infrastructure options area. Predictive modelling indicates that the areas most likely to contain unknown Aboriginal sites are within the mining area and the ancillary works and infrastructure areas.

Impacts to Cultural Heritage Values will reduce following the implementation of mitigation. The primary mitigation measure is the development and implementation of an approved cultural heritage management plan and chance finds protocol.

Protections of Culturally Significant Sites is at a tipping point in Australia. Again the Glenaladale / Lindenow and Surrounds maintains its function as a Horticulturally / Agricultural Food Bowl Hub and Community and still maintains the recognised values of Cultural Heritage in cohesion, is this Utopia already? The proposed Kalbar Mine doesn't just stop once the significance of the Cultural Sites are unveiled, it will carry on as if they never existed and raw earth materials will be the end result. Too many Cultural Sites in East Gippsland and Far East Gippsland have been dug up, contaminated, placed on the sides of the Princess Highway to be sort through without the blessings of the Generations. The Mitchell River holds the key to life for all generations dating back more than 2500 generations till now, why as a species would we risk that when we know for a fact Clean Water is not far from becoming the most valuable commodity left for all species. Future Water is what happens to it now.

Mine closure

**(K) Rehabilitation** – To establish safe progressive rehabilitation and post-closure stable rehabilitated landforms capable of supporting native ecosystems and/or productive agriculture that will enable long-term sustainable use of the project area.

Closure of the project will involve the decommissioning and removal of infrastructure within the project area, backfilling the mine void and rehabilitation of the disturbed areas to pre-mining land use and capability, or other agreed post-mining land use. The project is expected to have two active mine voids of less than 60 hectares each at any one time. Progressive rehabilitation will occur behind the active mining areas. On average, 80 hectares of rehabilitation is expected to be carried out each year. The time from overburden stripping to completion of rehabilitation and re-establishment of agricultural land use is expected to be between three and five years.

Rehabilitation activities will include reshaping of landforms using overburden and tailings, replacing topsoil and applying cover crop/pasture to the land surface. Progressive rehabilitation will be conducted to return the landform within the project area to pre-mining land use capability and productivity, or an alternative land use agreed upon with stakeholders. Governments of today work in cycles of 2-4 years depending on what they accomplish, the chances of any Government taking sole responsibility for the Kalbar Mine is concerning when the region has had to already except the expenses of the Benambra Mine Tailings Dam Clean Up not so long ago. The Australia Institutes 2017 research found that more than 60,000 abandoned mines exist across Australia and the data on mine sites being fully rehabilitated is even more dire. Storms used to be 1 in 100 years in the past and now it seems extreme weather systems seem to be more existent than non existent, will rehabilitation ever go far enough to cater for this risk? With the reading of the Proposed Kalbar Mine EES Conclusion Report the risks from this Mine on this Site and Surrounds / Region are by far too great. The idea that the Mine can coexist with its Landholders, Community and a Diverse Sustainable Horticultural / Agricultural Industry doesn't heed well in terms of what the Report states even suggesting risks on this scale can be mitigated based on these risks being low which they are not.

Tim Frazer  
Mallacoota