

Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory
Committee - EES

54

Request to be heard?: Yes

Full Name: Ian Phillip Campbell

Organisation:

Affected property: [REDACTED]

Attachment 1: Kalbar_mine_EES_

Attachment 2:

Attachment 3:

Comments: Attached

Dear enquiry and advisory committee members,

I strongly oppose the proposed Fingerboards Mineral Sands Project at Glenaladale for many reasons;

When I worked for Regional Development Victoria as a Rural Community Development Officer, I wrote weekly reports that would make their way to Minister for Regional Development, John Brumby. These reports would outline issues that would damage the lives of local communities, damage the local economy, cause job losses, or damage the environment and embarrass the government in the media. I was seldom wrong in my reporting and predictions. The few times my warnings were not acted upon, the government was embarrassed on television, radio and on the front page of the local paper.

Even though I am now retired, I believe I have a duty to the government and to the people of this region to warn of the inevitable impacts to the economy, the environment and the communities of East Gippsland.

The proposed mine producing radio-active dust and sediment

- Contaminating vegetable crops,
- People complaining about gritty lettuce or cabbage then finding on Facebook they might be contaminated with Ilmenite
- Vegetables being rejected by supermarkets
- Throwing hundreds of vegetable industry workers out of work
- Bankrupting businesses
- The mining company and government being sued
- Contaminating Bairnsdale's water supply,
- Contaminating the Mitchell River
- Contaminating the Gippsland Lakes, a RAMSAR site
- Coating Lindenow township in radioactive dust (school children, cafes, shops, homes...)
- Every time there is an East Coast Low and the tailings dams overflow, the gullies will run with mine tailing sediments and contaminate the Mitchell River. The media are sure to include this aspect in their stories and feature the impact on the Gippsland lakes.

People will ask; "How could this mine have been approved? Who recommended it? Which Minister and government approved it?"

Below I have outlined in more detail some of the issues that approval of the mine will trigger.

- The environmental impacts and costs to government that flow from mining companies minimising their costs and avoiding responsibility.
 - The tailings dam at a goldmine near Benambra leaked arsenic and other pollutants into the Tambo and thus into the Gippsland Lakes for years until the Bracks / Brumby government paid millions of dollars to

cap it after the mine was sold to a shelf company, which then folded. This practice and that of mothballing a mine, to avoid restitution is not unusual in the mining industry. It is foreseeable that this will happen at the Fingerboards. The penalties and fines are too low to be a deterrent.

- The leaking and catastrophic failing of tailings dams is also not unusual and can have huge environmental and economic impact with comparatively low fines for mining companies.
- The Hazelwood mine fire is a perfect example of a mining company cutting costs on water mains maintenance and the government watchdog dropping the ball at great cost to the government, the environment and the community.
- Having lived on the Mitchell River for over 20 years I am very aware of just how often the Mitchell River produces major flooding that engulfs the Lindenow Valley and inundates the many farms and communities downstream. During that 20 years, I experienced two, 'one in a hundred year' floods. **It is foreseeable that during the life of this mine, there will be several major rain events and associated major floods. This will not only lead to overflowing of tailings dams, but also seriously erode the tailings and exposed earth at the mine, washing it into the Mitchell and Perry Rivers and the RAMSAR listed Gippsland Lakes.**
- The proposed tailings dam is 90 hectares in size, that's nearly 1 square km. It will contain mine tailings waste and flocculants (chemicals used to treat the tailings). These chemicals 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. If there is a 1 in 100-year flood, tailings waste and flocculants could be released into the creeks/rivers, harming aquatic life and aquifers.
- The EES acknowledges that the predominant wind will blow dust from the mine and tailings, across the extensive vegetable farms in the Lindenow valley contaminating crops.
 - **The EES fails to map or define the distances that the dust will travel under different wind speeds. It is foreseeable that farms, school, homes, businesses and water supply will be contaminated by radioactive dust. This needs to be rectified. It is foreseeable that affected businesses will sue for economic damage and residents and parents will take legal action over health and amenity impacts.**
- While the EES acknowledges that the dust will contaminate crops, it flippantly claims that a (unnamed) grower said it would be washed out during irrigation or in the packing shed.
 - **There is no evidence that all growers, or even a majority agree with this position. A recent successful appeal over the approval for a windfarm was upheld, because the windfarm proponent failed to secure agreement from 100% of the affected properties.**

The two property owners who did not give written consent had their rights upheld.

- **Kalbar's position appears to be that they will 'talk' to individual growers if crops are impacted. It would be far more helpful and comforting if Kalbar took out liability insurance against such a risk. (though it would not comfort the hundreds of seasonal workers who were left unemployed).**
- My experience with Regional Development Victoria and as Senior Economic Development Officer with Wellington Shire Council gave me a good understanding of the vegetable and retail industries. **It is foreseeable that the major supermarkets and customers will reject vegetables such as lettuce, cabbage, broccoli and cauliflower that are contaminated with dust from the mine. Each crop rejected could cost tens or hundreds of thousands of dollars. Across several farms this would amount to millions of dollars and with repeated occurrence the cancellation of supply contracts worth tens of millions.**
- The EES states "Non-compliance with a certification scheme, through a failed audit or repeated product rejection by major retailers (e.g. foreign bodies or contaminants), could prevent producers from supplying particular lines of produce or lose their status as an approved supplier (Woolworths, Coles, IGA). The latter would render a producer unable to supply any produce line at all." Yet the proponent, at a recent Webinar, when questioned by Food and Fibre Gippsland had no strategy to outline what redress would be offered to individual growers or to regional grower organisations to address loss of income or brand and reputational damage.
 - **One Harvest Vegco could weather this storm, by switching operation and supply to its Queensland factory and Queensland based suppliers and processing, however Lindenow growers and local process workers would lose contracts and jobs.**
 - **The jobs in vegetable growing, processing and transporting are ten times those being claimed by Kalbar. These are being put at risk by the proposed mine. Firms like Bonnaccord Ingram, based in Lindenow, close to the mine site, supply not only Vegco and Patties but also supermarkets and retailers interstate via their extensive fleet of trucks. There are many other major vegetable producers at Lindenow.**
- It is a matter of record that for significant periods during the drought, irrigation by farmers in the Lindenow Valley was not permitted from river or aquifer. Even the town water supply was restricted. Yet the Kalbar mine would require water all year round. There are environmental and water sustainability reasons for these water restrictions. If Kalbar is given an exemption, as so often happens with mining, there will be environmental and economic impacts. 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.
- The EES acknowledges that Kalbar's bores could lower water levels in existing bores by up to 5 metres and presents this fact as being

inconsequential. The EES simply states that this and other water supply challenges is something for Southern Rural Water to deal with. **It is a matter of record that impacts of mining on the Latrobe Aquifer are lowering the water table by up to 1 metre each year. This has had significant impact not only on the cost and ability of farmers to reach water but also the salinity of that water and has led to financial compensation, (though inadequate) being paid by the government to farmers in the southern part of Wellington Shire, near Yarram. It is foreseeable that the Kalbar mine could lead to similar impacts and consequences.**

- The proposed mine is in the wrong place. Only 500 metres from major vegetable growing, and only a few kilometres to the town of Lindenow, with a school, shops, homes and cafes all subject to the dust from the mine and the 24 hour a day 7days per week noise. **There appears to be no ANEF (Australian Noise Exposure Forecast) mapping or modelling for the proposed mine.**
- The example of mine and vegetable farm coexistence given in the EES is an example of just how biased this EES is. The growing and marketing of carrots is in no way comparable to vulnerable crops like cabbage, lettuce and cauliflower.
- Woodglen Reservoir is only 3.5km from the mine. This is the East Gippsland Water, water storage for Bairnsdale and district. While the EES has maintained that the radioactive dust from the mine will not contaminate the storage beyond allowable levels, without complete wind studies and modelling public confidence in the water will be eroded. What consideration has been given to the water solubility of radioactive minerals and the build-up of radiation levels in the water supply over the five, ten- or twenty-year life of the mine
- Given the history of the mining industry, I have strong doubts that progressive rehabilitation will actually occur. For example; the Douglas mine at Balmoral in Western Victoria where a toxic waste dump was left behind. The risks of inadequate rehabilitation are high if the mine goes into 'care & maintenance'. With the tailings dam and 19 dams on gullies/creeks being abandoned or the mine being abandoned as occurred at Benambra this could be catastrophic. Rehabilitation bonds have been shown to be grossly inadequate to cover costs.
- The Draft Planning Scheme Amendment - Attachment C in the EES, outlines planned 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? This is not a project of National or even State importance or essential services. It is for private profit
- The EES must consider the economic impacts of establishing an open cut mineral sands mine in the midst of an established vegetable growing area with by its own estimation has earnings of over \$62 million per year in

vegetable production alone. 'The figure of \$62 million was challenged in two EES technical reports, however it wasn't corrected by RMCG. Hamilton SierraCon (2020; pg 24) and BAEconomics (2020; pg 20) stated Agriculture Victoria estimates the local farmgate value of production as around \$120 million per annum. (Further independent industry statistics support this figure.) Based on information from the industry quoted in the media, the value of production is over \$155 million annually and is expected to increase further with expansion plans.'

- 'On page 19 of the RMCG report it stated that data used for the economic value of the industry did not include '*economic impacts of value adding post farm gate*'(such as Vegco and Patties). Not including this data is significant because agriculture has a much higher multiplier effect on the economy than mining. For every direct job in agriculture, a figure of 4.26 indirect jobs are created (National Farmers Federation; 2017). Only one indirect job will be created for every direct job from the Fingerboards mine (Coffey, 2020; pg 29). It also follows that every job lost in horticulture has a four times multiplier flow-on loss effect which will have a major impact on the local economy and is a significant adverse effect should loss of jobs occur to the horticulture industry as a result of the mine.
- The EES must weigh risk and benefit, what stands to be lost, and what are the likelihoods.
- The below table illustrates this well. Over a 5, 10 or 15 year period, what are the chances that the wind will blow dust from the mine 500 metres, a kilometre or two kilometres contaminating crops of leafy vegetables? The EES has admitted that this is almost certain and that there cannot be a zero chance of this and other negative impacts.

Likelihood	Consequences				
	Insignificant (Minor problem easily handled by normal day to day processes)	Minor (Some disruption possible, e.g. damage equal to \$500k)	Moderate (Significant time/resources required, e.g. damage equal to \$1million)	Major (Operations severely damaged, e.g. damage equal to \$10 million)	Catastrophic (Business survival is at risk damage equal to \$25 Million)
Almost certain (e.g. >90% chance)	High	High	Extreme	Extreme	Extreme
Likely (e.g. between 50% and 90% chance)	Moderate	High	High	Extreme	Extreme
Moderate (e.g. between 10% and 50% chance)	Low	Moderate	High	Extreme	Extreme
Unlikely (e.g. between 3% and 10% chance)	Low	Low	Moderate	High	Extreme
Rare (e.g. <3%)	Low	Low	Moderate	High	High

- How often will vegetable crops be rejected by major retailers? How many businesses will lose contracts and fail as a result of this contamination?
- How will the hundreds who will lose their employment cope?
- How many businesses will sue the mining company, its Directors and Officers and the Government?

- How many times will it flood during the period of operation of the mine? In a major event how many tons of tailings will wash into the river and the lakes? What will this do to the aquatic life and fishing?
- How many square kilometres of vegetable flat will be contaminated with Ilmenite and other toxic minerals in the event of a flood?
- How often would Woodglen Reservoir be subject to contamination with radioactive dust? What would be the impact of this on public confidence and the balance sheet of East Gippsland Water? Will customers start drinking bottled water as many have done in response to PFAS contamination of water supplies in Katherine and other towns. What will this do to tourism and the image of Bairnsdale?

Thank you for the opportunity to make a submission. I look forward to addressing the hearing in February.

Ian Campbell