

Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory
Committee - EES

563

Request to be heard?: No

Full Name: Grace Burt

Organisation:

Affected property:

Attachment 1: Outrageous_Proj

Attachment 2:

Attachment 3:

Comments: See attached submission by 'Shocked'

Dear Inquiry and Advisory Committee members,

Re: Kalbar Resources Ltd. The Fingerboards mineral sand mine,

I am horrified to learn toxic minerals are about to be mined and released into water systems and surrounding fertile land in Gippsland.

With increasing global warming water is an increasingly rare commodity; it is essential to maintain and protect every last drop.

Gippsland lakes will become impossible to promote as a pristine tourist attraction, while the rare and endangered Burrunan Dolphin will be trapped in a toxic soup.

Unbelievably, this is also where essential horticulture is taking place. This established industry will be forced out, and it is all to happen without any creditable accountability.

These contaminants will poison and pollute not only water and land for generations to come but also people, animals, birds and plants dependent upon these essential resources.

To imperil water and food resources knowingly is to commit to a path of generational and future suicide.

I find the whole situation astounding, contrary to common sense.

I wish to add my protest to the voice of others. Please listen.

Appendix

Heavy Minerals and GHS

Quick reference guides to the heavy minerals identified by Kalbar at The Fingerboards site.

GHS Hazardous Chemicals Poster is available at Safe Work Australia.¹

ICSC - The International Chemical Safety Cards

<https://www.ilo.org/dyn/icsc/showcard.home>

ToxGuides™ATDSR. - <https://www.atsdr.cdc.gov/toxguides/index.asp>

Lenntech <https://www.lenntech.com/periodic/elements/index.htm>

Pubchem.(NIH). <https://pubchem.ncbi.nlm.nih.gov/>.

2. GHS – Globally Harmonized System

The warning system of the Globally Harmonized System GHS is for the classification and labelling of substances / chemicals.

The hazard pictograms and statements are used to signal the dangers in substances and for the safety of workers. Applying GHS pictograms and Hazard Statements.¹⁹

3. Kalbar's Mineral Formula converted to Identity

In 2017, Kalbar presented a list of formula with their percentage, but omitted the mineral identity by the 'Analyst for Kalbar' in their marketing presentation.⁶

So, the team elected to identify the minerals by applying the quick-guides from global agencies for reader's convenience.

The mineral products with GHS hazard statements and pictograms are indicative only of the general mineral traits that are enhanced with separation / concentration, and may not apply to the natural and undisturbed minerals.

Note: Digging for the Facts Team (DFT) advises that the information contained in this submission is sourced from general references. Do not rely or act upon this information without seeking prior expert professional, scientific and technical advice. DFT does not take any liability for any consequences to any person arising directly or indirectly from using this information or material, including but not limited to losses, damages, costs, expenses or any other compensation.

Product list by Kalbar Resources Ltd

Premium Zircon	Rare Earth Concentrate	Primary Ilmenite Rutile 92
   	  	   
Radio- active Harmful Irritant Environmental Hazard Health Hazard	Harmful Irritant Health Hazard Environmental Hazard	Harmful Irritant Health Hazard Environmental Hazard Corrosive
Life of Mine Product Quantities ZrO ₂ Zircon – 1,234,000 tons Kalbar: Analyst Pre-Feasibility Study. 2017	Life of Mine Product Quantities ReO - 187,000 tons Kalbar: Analyst Pre-Feasibility Study. 2017	Life of Mine Product Quantities TiO ₂ - 1,664,000 tons Kalbar: Analyst Pre-Feasibility Study. 2017
ZrO ₂ - Zirconium dioxide – 66% SiO ₂ - Silicon dioxide --32.5%	Y ₂ O ₃ . - Yttrium oxide,	TiO ₂ - Titanium dioxide Fe ₂ O ₃ – Iron (III) oxide (calc)

Al ₂ O ₃ - Aluminium oxide Fe ₂ O ₃ - Iron (III) oxide TiO ₂ - Titanium dioxide MnO – Manganese (II) oxide MgO - Magnesium oxide or magnesia CeO ₂ - Cerium (IV) oxide P ₂ O ₅ - P ₄ O ₁₀ Phosphorus pentoxide Th – Thorium - 300 ppm U – Uranium – 420 ppm. Monazite – 0.6% - 60,000 tons Metallica Minerals Ltd. Report to ASX. (MLM) 26 April 2012.	Xenotime -YPO ₄ - Yttrium Phosphate Lanthanoids La ₂ O ₃ - Lanthanum oxide CeO ₂ - Cerium (IV) oxide – 19.36% Pr ₆ O ₁₁ - Praseodymium oxide Nd ₂ O ₃ - Neodymium (III) oxide Sm ₂ O ₃ – Samarium (III) oxide Eu ₂ O ₃ - Europium (III) oxide Gd ₂ O ₃ - Gadolinium (III) oxide Tb ₄ O ₇ - Terbium (III, IV) oxide Dy ₂ O ₃ - Dysprosium Oxide Ho ₂ O ₃ - Holmium (III) oxide Er ₂ O ₃ - Erbium (III) oxide Tm ₂ O ₃ - Thulium (III) oxide Yb ₂ O ₃ – Ytterbium (III) oxide Lu ₂ O ₃ – Lutetium (III) oxide	FeO – iron Oxide SiO ₂ - Silicon dioxide Al ₂ O ₃ - Aluminium oxide Cr ₂ O ₃ – Chromium (III) MgO - Magnesium oxide or magnesia MnO - Manganese (II) oxide ZrO ₂ - Zirconium dioxide P ₂ O ₅ - Phosphorus oxide U XRF – Uranium – 41 ppm Th XRF – Thorium – 75 ppm V ₂ O ₅ - Vanadium Pentoxide – Nb ₂ O ₅ - Niobium pentoxide CaO - Calcium oxide, Quick lime K ₂ O - Potassium oxide CeO ₂ – Cerium (IV) oxide SnO ₂ – Tin oxide
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5. Exposure Levels

Formula	Titanium Feedstock consist of: - TiO ₂ - Life of Mine Product Quantities - 1,664,000 tons Rutile (TiO ₂ with up to 10% iron). Ilmenite (FeTiO ₃ with manganese and magnesium). Leucoxene (Fe ₂ O ₃ ·TiO ₂), with uranium and thorium.	
TiO ₂	Rutile 92 Titanium dioxide. CAS 13463-67-7. ICSC CARD: 0338 Is the purest, highest-grade natural form of titanium dioxide and the preferred feedstock in manufacturing titanium. Exposure can irritate the eyes, nose and throat Lung fibrosis; potential occupational carcinogen. Suspected of causing cancer. https://www.cdc.gov/niosh/npg/npgd0617.html https://pubchem.ncbi.nlm.nih.gov/compound/26042#section=Safety-and-Hazards https://www.cdc.gov/niosh/docs/2011-160/pdfs/2011-160.pdf	 Health

	The New Jersey Department of Health Hazardous Substances List https://nj.gov/health/eoh/rtkweb/documents/fs/1861.pdf	Hazard
FeTiO ₃	Ilmenite – CAS 12168-52-4 Titanium-iron oxide metal with manganese and magnesium.	
Fe ₂ O ₃ TiO ₂	Leucoxene - is not regarded as being a mineral, a term for products containing a TiO ₂ titanium content of 70 to 93 percent. Leucoxene can contain crystalline silica which may cause silicosis. Can contain low levels of uranium and thorium, making it slightly radio-active. If inhaled constantly that can result in shortness of breath and coughing. MiningLink: http://mininglink.com.au/natural-resource/leucoxene	
Y(PO ₄) ₄	Xenotime Yttrium phosphate CAS 13990-54-0 Yttrium phosphate, Phosphoric acid. Similar to monazite except enriched in the heavy lanthanides and yttrium. phosphate mineral , Britannica. Monazite and xenotime ores are treated the same way, being phosphate minerals . Causes serious eye irritation, skin, and respiratory irritation. https://echa.europa.eu/substance-information/-/substanceinfo/100.034.341 https://www.britannica.com/science/rare-earth-element/Minerals-and-ores https://www.industry.gov.au/sites/default/files/2019-04/lpsdp-hazardous-materials-management-handbook-english.pdf https://www.world-nuclear.org/information-library/safety-and-security/radiation-and-health/naturally-occurring-radioactive-materials-norm.aspx	 Irritant
	Zircon ZrO ₂ . Life of Mine Product Quantities–1,234,000 tons.	
ZrO ₂	ZIRCONIUM OXIDE, - Zirconium dioxide - CAS 1314-23-4 May cause an allergic skin reaction. https://pubchem.ncbi.nlm.nih.gov/compound/62395#datasheet=LCSS&section=GHS-Classification	 Irritant
ZrSiO ₂ SiO ₂	Zirconium silicate CAS 233-252-7 Causes serious eye irritation, is harmful if inhaled, causes skin irritation and may cause respiratory irritation. Silicon dioxide, - Respirable crystalline silica CAS 14808-60-7. Kalbar levels – 32.5% - in Premium Zircon Product. Immunological (Immune System), Renal (Urinary System or Kidneys), Respiratory (From the Nose to the Lungs). May cause cancer - Danger Carcinogenicity. Causes damage to organs through prolonged or repeated exposure https://www.atsdr.cdc.gov/substances/toxsubstance.asp?toxicid=290 https://pubchem.ncbi.nlm.nih.gov/compound/24261#section=GHS-Classification https://echa.europa.eu/substance-information/-/substanceinfo/100.035.329	 Danger  Irritant  Health Hazard

P2O5	<p>Phosphorus pentoxide CAS Number - 1314-56-3. EC - 215-236-1 (Seek independent advice on hazards for the natural state).</p> <p>FIRE & EXPLOSION. Many reactions may cause fire or explosion.</p> <p>Gives off irritating or toxic fumes (or gases) in a fire.</p> <p>Reacts violently with water. NO contact with water or combustible substances.</p> <p>Health Hazard: Causes eye damage / Skin corrosion/ severe skin burns.</p> <p>https://www.ilo.org/dyn/icsc/showcard.display?p_version=2&p_card_id=0545</p> <p>http://hcis.safeworkaustralia.gov.au/HazardousChemical/Details?chemicalID=3532</p>	 Danger.  Corrosion
Al ₂ O ₃	<p>Alumina CAS Number - 1344-28-1. EC Number - 215-691-6</p> <p>Health Hazard Causes serious eye and respiratory irritation.</p> <p>Causes damage to organs through prolonged or repeated exposure.</p> <p>https://pubchem.ncbi.nlm.nih.gov/compound/Alumina#datasheet=LCSS&section=GHS-Classification</p>	 Irritant 
V2O5	<p>Vanadium Pentoxide CAS 1314-62-1</p> <p>Causes serious eye damage, respiratory irritation.</p> <p>Suspected of damaging fertility. Suspected to be Toxic to Reproduction.</p> <p>Suspected of causing genetic defects, and damaging the unborn child.</p> <p>Suspected of causing cancer Suspected to be Mutagenic.</p> <p>Toxic to aquatic life with long lasting effects.</p> <p>Safe Work Australia</p> <p>http://hcis.safeworkaustralia.gov.au/HazardousChemical/Details?chemicalID=1798</p> <p>https://echa.europa.eu/substance-information/-/substanceinfo/100.013.855</p>	   Corrosive  Environ Hazard
Nb ₂ O ₅	<p>Niobium(V) oxide CAS – 1313-96-8</p> <p>Niobium Nb is a vanadium group element atom.</p> <p>Serious eye irritation / Skin corrosion / Respiratory tract irritation.</p> <p>https://pubchem.ncbi.nlm.nih.gov/compound/Niobium_V_oxide</p>	 Irritant
Cr ₂ O ₃	<p>Chromium oxide CAS 1308-38-9</p> <p>Catches fire spontaneously if exposed to air (seek independent advice on natural state).</p> <p>May damage fertility or the unborn child.</p> <p>Causes serious eye irritation, allergic skin reaction.</p> <p>Seed germination and growth was inhibited at 25 -100 ug/mL</p> <p>https://www.cdc.gov/niosh/npg/nengapdx.html</p> <p>https://pubchem.ncbi.nlm.nih.gov/compound/Chromium-oxide#section=GHS-Classification</p>	  

		Flammable
K2O	<p>Potassium Oxide CAS 1310-58-3, 12136-45-7</p> <p>Harmful if swallowed May cause respiratory irritation Causes severe skin burns and eye damage.</p> <p>https://pubchem.ncbi.nlm.nih.gov/compound/Potassium-oxide</p>	 Corrosive
CaO	<p>Calcium oxide Quicklime, Burnt lime. CAS 1305-78-8</p> <p>Causes serious eye damage, skin and respiratory irritation.</p> <p>http://hcis.safeworkaustralia.gov.au/HazardousChemical/Details?chemicalID=4835</p> <p>https://www.cdc.gov/niosh/npg/npgd0093.html</p>	  Corrosive
SnO2	<p>Tin dioxide CAS 18282-10-5</p> <p>May cause respiratory irritation.</p> <p>May cause long lasting harmful effects to aquatic life.</p> <p>https://pubchem.ncbi.nlm.nih.gov/compound/Tin-dioxide</p>	
REE REO	<p>Rare Earth Concentrate Life of Mine Product Quantities - 187,000 tons</p> <p>Rare Earth Oxides are formed in two groups: -</p> <p>Actinoids (includes thorium, Uranium).</p> <p>Lanthanoids - cerium (Ce), praseodymium (Pr), neodymium (Nd), promethium (Pm), samarium (Sm), europium (Eu), gadolinium (Gd), terbium (Tb), dysprosium (Dy), holmium (Ho), erbium (Er), thulium (Tm), ytterbium (Yb), and lutetium (Lu).</p> <p>https://www.newworldencyclopedia.org/entry/Inner_transition_element</p>	
Actinoids	<p>Actinoids - All the actinoids group are radioactive.</p> <p>The 14 elements in the actinoid series are: thorium (Th), protactinium (Pa), uranium (U), neptunium (Np), plutonium (Pu), americium (Am), curium (Cm), berkelium (Bk), californium (Cf), einsteinium (Es), fermium (Fm), mendelevium (Md), nobelium (No), and lawrencium (Lr)</p> <p>https://www.newworldencyclopedia.org/entry/Inner_transition_element</p>	
		
	<p>Monazite – (Ce,La,Nd,Th)(PO₄,SiO₄). CAS 1306-41-8</p> <p>Composite of rare earth metals. (particularly cerium and lanthanum) and 5–12% (typically about 7%) thorium.</p> <p>Radionuclides - Thorium (Th) Uranium (U).</p> <p>OSHA HAZARDS: Highly toxic by inhalation. Highly toxic by ingestion.</p> <p>TARGET ORGANS: Kidney, liver, lungs, brain.</p> <p>Fatal if swallowed or inhaled, Causes skin irritation, May cause cancer,</p> <p>May cause damage to organs through prolonged or repeated exposure.</p>	 Danger  Deadly  Health Hazard

	<p>Glenaladale deposit: 60,000 tons monazite- (Metallica Minerals Ltd.) prior owner. Report to ASX - 26 April 2012. http://www.metallicaminerals.com.au/wp-content/uploads/2016/09/Maiden-Gippsland-Mineral-Resource.pdf</p> <p>https://science.osti.gov/-/media/nbl/pdf/price-lists/SDS/SDS-Monazite_Sand.pdf?la=en&hash=2BD57B8A2A9717257915A88DBDE90172040E7BC6</p> <p>https://pubchem.ncbi.nlm.nih.gov/compound/Monazite-CE</p>	 Irritant
Th	<p>Thorium CAS 7440-29-1.</p> <p>May intensify fire - oxidiser. (Seek independent advice in natural state).</p> <p>Harmful if swallowed, causes serious eye, skin irritation. May cause damage to organs through prolonged or repeated exposure.</p> <p>May cause long lasting harmful effects to aquatic life.</p> <p>https://echa.europa.eu/substance-information/-/substanceinfo/100.028.308</p>	 Oxidiser  Health Hazard
U	<p>Uranium CAS 7440-61-1</p> <p>May cause damage to organs through prolonged or repeated exposure.</p> <p>May cause long lasting harmful effects to aquatic life.</p> <p>Potential for cancer as a result of alpha-emitting properties & radioactive decay products (e.g., radon). [Potential occupational carcinogen].</p> <p>https://www.cdc.gov/niosh/npg/npgd0650.html</p> <p>https://echa.europa.eu/substance-information/-/substanceinfo/100.028.336</p> <p>The Department of Mines, Industry Regulation and Safety. Guidance about radiation safety on mining operations. http://www.dmp.wa.gov.au/Safety/Guidance-about-radiation-safety-6950.aspx</p> <p>https://www.arpansa.gov.au/sites/default/files/legacy/pubs/technicalreports/tr165.pdf</p> <p>https://science.osti.gov/-/media/nbl/pdf/price-lists/SDS/SDS-Monazite_Sand.pdf?la=en&hash=2BD57B8A2A9717257915A88DBDE90172040E7BC6</p>	 Danger  Irritant
	<p>Yttrium Is a mixture of oxides from which nine elements were separated.—yttrium, scandium (atomic number 21), and the heavy lanthanide metals from terbium (atomic number 65) to lutetium (atomic number 71)—</p> <p>Britannica https://www.britannica.com/science/yttrium</p>	
Y2O3.	<p>Yttrium oxide CAS 1314-36-9</p> <p>Causes serious eye skin and respiratory irritation.</p> <p>Commercially recovered from monazite sand & in almost all rare-earth minerals plus uranium ores.</p> <p>OSHA PEL TWA 1 mg/m³ The PEL also applies to other yttrium compounds (as Y).</p> <p>https://www.newworldencyclopedia.org/entry/Yttrium</p> <p>https://pubchem.ncbi.nlm.nih.gov/compound/Yttrium-oxide#datasheet=LCSS</p>	 Irritant

	https://www.world-nuclear.org/information-library/safety-and-security/radiation-and-health/naturally-occurring-radioactive-materials-norm.aspx	
	<p>Lanthanoids -are the most reactive of the rare earth metals.</p> <p>The 14 elements follow lanthanum in the periodic table - cerium (Ce), praseodymium (Pr), neodymium (Nd), promethium (Pm), samarium (Sm), europium (Eu), gadolinium (Gd), terbium (Tb), dysprosium (Dy), holmium (Ho), erbium (Er), thulium (Tm), ytterbium (Yb), and lutetium (Lu).</p> <p>Chemistry: The lanthanoids react with water to liberate hydrogen.</p> <p>New World Encyclopaedia: https://www.newworldencyclopedia.org/entry/Lanthanum https://www.newworldencyclopedia.org/entry/Inner_transition_element</p>	
La2O ₃	<p>Lanthanum Oxide CAS 1312-81-8</p> <p>Causes serious eye skin and respiratory irritation.</p> <p>Very toxic to aquatic life with long lasting effects</p> <p>https://pubchem.ncbi.nlm.nih.gov/compound/Lanthanum-oxide#datasheet=LCSS&section=GHS-Classification https://www.newworldencyclopedia.org/entry/Inner_transition_element</p>	 
CeO ₂	<p>Cerium dioxide CAS 1306-38-3</p> <p>Harmful if swallowed.</p> <p>Causes damage to organs through prolonged or repeated exposure.</p> <p>May cause long lasting harmful effects to aquatic life.</p> <p>Corrosive to metals, Skin corrosion, Serious eye damage. (Chemical Book).</p> <p>Cerium can be a threat to the liver when it accumulates in the human body.</p> <p>Lenntech https://www.lenntech.com/periodic/elements/ce.htm#ixzz6YoGJsHq1 https://pubchem.ncbi.nlm.nih.gov/compound/Cerium-dioxide#section=GHS-Classification https://www.chemicalbook.com/ChemicalProductProperty_EN_CB4666451.htm https://cfpub.epa.gov/ncea/iris/iris_documents/documents/toxreviews/1018tr.pdf</p>	 Health Hazard  Irritant  Corrosive
Pr ₆ O ₁₁	<p>Praseodymium oxide CAS 12037-29-5</p> <p>Causes serious eye skin and respiratory irritation.</p> <p>Causes damage to cell membranes, which affect reproduction and the nervous systems of water animals.</p> <p>https://www.lenntech.com/periodic/elements/pr.htm#ixzz6YoNcAbD0</p>	 Irritant
Nd ₂ O ₃	<p>Neodymium oxide CAS 1313-97-9</p> <p>Hazardous to the aquatic environment, acute / long-term hazard.</p> <p>Neodymium can be a threat to the liver when it accumulates.</p> <p>https://www.lenntech.com/periodic/elements/nd.htm#ixzz6YoPRrJIU https://pubchem.ncbi.nlm.nih.gov/compound/Neodymium-oxide</p>	 Environ Hazard
Sm ₂ O ₃	<p>Samarium (III) oxide CAS 12060-58-1</p>	

Eu2O 3	Europium (III) oxide CAS 1308-96-9 Causes serious eye, skin and respiratory irritation. https://pubchem.ncbi.nlm.nih.gov/compound/159371#datasheet=LCSS&section=GHS-Classification https://echa.europa.eu/substance-information/-/substanceinfo/100.013.787	 Irritant
Gd2 O3.	Gadolinium (III) oxide CAS 11129-31-0 Causes serious eye irritation. Very toxic to aquatic life with long lasting effects. https://pubchem.ncbi.nlm.nih.gov/compound/Gadolinium-oxide	 Irritant  Environ Hazard
Yb2O 3	Ytterbium (III) oxide CAS 1314-37-0 Causes serious eye, skin and respiratory, irritation. All compounds of ytterbium known to cause irritation to the skin and eye, and some might be teratogenic. http://www.eurare.org/docs/internalGuidanceReport.pdf Page 16. https://pubchem.ncbi.nlm.nih.gov/compound/Ytterbium-oxide- Yb2O3	 Irritant
Tb4O 7	Terbium oxide CAS 12037-01-3	
Dy2O 3	Dysprosium Oxide CAS 1308-87-8	
Ho2O 3	Holmium (III) oxide CAS 12055-62-8	
Er2O 3	Erbium (III) oxide CAS 1206-16-4 Causes serious eye, skin and respiratory irritation.	 Irritant
Tm2 O3.	Thulium (III) oxide CAS 12036-44-1 Causes serious eye, skin and respiratory irritation https://echa.europa.eu/substance-information/-/substanceinfo/100.031.670	 Irritant
Lu2 O3	Lutetium (III) oxide CAS 12032-20-1	
	Exposure levels: Raw material for production of rare earth compounds. Hazard Statement: Harmful if swallowed. Harmful if inhaled. mg/m³ Milligrams per Cubic Metre OEL Occupational Exposure Limit . Safety Data Sheet - SDS Date: 26 Jun 2020 by Iluka Resources.	

	http://sds.chemalert.com/company/10002061/download/3225200_030_001.pdf	
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