Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory Committee - EES

638

Request to be heard?: No - but please email me a copy of the Timetable and any Directions

Full Name: Lisa Roberts

Organisation: Friends of Bats and Habitat Gippsland

Affected property:

Attachment 1: FriendsofbatsGipp

Attachment 2:

Attachment 3:

Comments: see attached submission

28-10-2020

To the Fingerboards Mineral Sands Project Inquiry and Advisory Committee

Prepared by Lisa Roberts
on behalf of Friends of Bats and Habitat Gippsland

28-10-2020

Dear Inquiry and Advisory Committee members,

Friends of Bats and Habitat Gippsland are a diverse group of over 200 residents of Gippsland and beyond. We advocate for protection, conservation, research, innovation and education for bats and their habitat across Gippsland and beyond and have representatives from over 12 local Landcare and national environment groups.

Friends of Bats and Habitat Gippsland monitor and survey primarily Grey-headed Flying-fox, Pteropus poliocephalus roost sites and forest foraging areas across Gippsland.

In 2001 Grey Headed flying foxes (Pteropus poliocephalus) were listed as

- Vulnerable under the EPBC Act.
- Threatened under Flora and Fauna Guarantee Act 1988 (Victoria).
- Vulnerable (Advisory List of Threatened Vertebrate Fauna in Victoria: 2013 list).
- Vulnerable (Global Status: IUCN Red List of Threatened Species: 2019.2 list).

Grey Headed flying foxes are a species vulnerable to extinction and are one of the 113 animal species identified as the highest priorities for urgent management intervention post 2020 summer bushfires. These animals have had substantial areas of their range burnt. Grey Headed flying foxes are a vital keystone species that cannot afford to lose any more habitat within East Gippsland.

The extent of the decline of Victoria's biodiversity is severe, directly threatening the ability of this keystone species, the Grey-headed Flying Fox to roost, find food, and survive. Logging, bushfires, industrial scale landscape-wide burns and drought resulting from land clearance and climate change have reduced the availability of food for this species to the extent of causing an east coast mass starvation event in 2019. Each year extreme heat is increasing and killing thousands of flying foxes. These threats to Grey-headed flying foxes are a threat to biodiversity because east coast forests rely on flying foxes for effective reproduction.

We are watching Grey-headed flying-foxes go extinct. We have deep concerns for the wider implications of the health and sustainability of natural forests in this region, and the entire east coast if the GHFF are removed from the landscape, or they become unable to travel across the landscape as foraging areas become more fragmented and less reliable.

It is in this climate, coming out of recent drought followed by unprecedented bushfires in Eastern Australia and unprecedented destruction of native vegetation and fauna, *we strongly oppose Kalbar's proposal to build a mine in this location in East Gippsland.*

Friends of Bats and Habitat Gippsland believe that Kalbar's proposed mine will cause unacceptable and irreplaceable environmental and cultural damage.

We believe this mine will make a big hole that will create a cultural and environmental dead zone within one of the most culturally and environmentally fertile regions of East Gippsland.

The Mitchell River in Bairnsdale is home to a Grey-headed flying fox colony of national significance. The proposed mine site contains mature eucalypts and native vegetation assemblages that provide a vital food source for Grey Headed flying foxes foraging out of the Bairnsdale colony.

The mine proposes to remove around 200 ha of native vegetation This constitutes significant areas of 11 highly significant native vegetation communities, most of them of them critically endangered, vulnerable or depleted and already fragmented.

We don't believe that this area can tolerate removal of any more native vegetation and the vulnerable and threatened flora and fauna these significant communities support.

Gippsland plains redgum grassy woodlands are some of Victoria's most threatened and fragmented endemic ecosystems.

The Gippsland plains redgum grassy woodlands are some of the state most iconic and beautiful fragments of fertile land that once made this colony rich. These are sites of some of the earliest colonial occupation of what became known as Gippsland. These were rich fertile plains for Gunnai Kurnai people and they were fertile plains for the white people who made fortunes here running cattle and sheep. These plains are also sites of brutal massacres of Gunnai Kurnai people.

The Gippsland ecological community of Red Gum Grassy Woodland and Associated Native Grassland represents *one of Victoria's most threatened and fragmented endemic ecosystems.* The ecological community was formerly widespread across the central Gippsland plain, but now less than five per cent of its original extent remains. Most known remnants are small—under 10 hectares— and comprise isolated fragments surrounded by a mostly cleared, agricultural landscape.

In 2009, the federal environment minister listed the Gippsland Red Gum (Eucalyptus tereticornis subsp. mediana) Grassy Woodland and Associated Native Grassland as a critically endangered ecological community.

In 2009, the Threatened Species Scientific Committee found that this ecological community is critically endangered because it:

- has undergone a very severe decline in extent
- has a very restricted distribution
- faces continued threats, and
- has undergone a very severe reduction in its integrity.

Temperate grasslands and grassy woodlands are among the most under-represented ecosystems in Australia's conservation estate and are recognised nationally as among the most threatened vegetation types.

The Gippsland Red Gum Grassy Woodland and Associated Native Grassland provides habitat for many native plants and animals. At the national level, at least 14 plant and animal species that may be found in or near the ecological community are listed as nationally threatened under the EPBC Act.[1]

Since 2009 there has been further decline in these ecosystems. We cannot afford to lose any more critically endangered and vulnerable plant communities with the associated threatened and vulnerable fauna and invertebrate life these endangered communities support. We do not believe that offsets can address this loss.

The mine and surrounding area is a Cultural landscape

Temperate grasslands and grassy woodlands are ecological communities that contain numerous plants of cultural significance to Gunnai Kurnai people. This includes a variety of edible orchids, lilies, tubers, grains and grasses. Many of these plants are themselves rare and or threatened and/or endemic. Many of the plants found in these communities are state and federally protected under FFG and EPBC Acts.

The impact on people, First Peoples, and ecosystems, is that the already remnant areas of these threatened ecosystems could entirely collapse, and with them the ability of human cultures to care for country and community.

The proposed mine area includes 536 hectares of culturally sensitive area within and adjacent to the proposed mine footprint. This proposed mine area contains scarred trees and unmapped cultural heritage sites. Within the proposed mine footprint, Skull Creek and associated swamp is a known massacre site that should be left alone, the land rehabilitated.

800 old trees predating white settlement are culturally significant and irreplaceable. These trees support Gunnai Kurnai totems and animals, including birds, lizards, bats, possums, insects, fungi and water. These trees supply shelter, food, warmth, clothing, transport and tools.

The removal of around 800 mature hollow bearing, habitat supporting eucalypt trees, many of them redgum, redbox and ironbark is unacceptable.

Australia is in the middle of a faunal extinction crisis. Currently, nearly every single species that depends on hollow bearing trees for survival is under threat of extinction.

[1] Gippsland Red Gum Grassy Woodland and Associated Native Grassland. A nationally threatened ecological community, Environment Protection and Biodiversity Conservation Act 1999 Policy Statement 3.22

The mine proposal says that these hollow dependent species will just move somewhere else. There is no-where to move to. It takes around 170 years to grow a hollow in a redgum or a redbox tree.

Mature trees are homes for homes for a range of hollow dependent and migratory birds and resident birds and bats.and produce exponentially more blossom and nectar as they age. Redgums are notoriously hard to grow once they've been removed. It can take up to 40 years for a planted eucalypt, to even start to produce blossom and nectar, and it takes 170 years to grow a hollow. We will not see these hollow bearing trees replaced, in our own, or our children's lifetimes.

The mature Gippsland redgum and redbox trees that this mine will destroy are the oldest living things that remain on this fragmented landscape, they are a living link that amounts to tens of thousands of years of tree years. If each tree is only 200 years old, and many are much older, that is the destruction of 160,000 tree years. This is irreplaceable destruction of the oldest living species left in this landscape. These old trees have antibodies, and survival knowledge, built over centuries - child trees growing up under this parent tree benefit from all its knowledge of survival and thriving.

While there are still old trees, the landscape has the potential to rehabilitate. Removal of this vegetation and digging up the ground in mining processes will make it almost impossible to ever rehabilitate. Once these networks of plant communities and the fauna they support are gone, they are gone forever.

Unacceptable loss of vital links in the blossom and nectar resources of Gippsland

The 800 mature trees that will be destroyed, within the proposed mine footprint are predominately Gippsland Redgum and Redbox, with some ironbark. These trees provide vital links in diminishing nectar and blossom resources of East Gippsland.

When these mature eucalypt trees are flowering, they become bottlenecks for a whole range of nectar dependent species such as migratory and resident birds, insects, moths, possums, micro-bats and Grey-headed flying foxes.

Ironbark trees provide the *only* native blossom resources in Gippsland during winter and removal of ironbark trees and the winter blossom resources will create unacceptable gaps in vital winter food resources for a whole range of species.

Bairnsdale has a Grey-headed flying fox colony of national significance. The 800 mature eucalypts provide a vital and food source for Grey Headed flying foxes foraging out of Bairnsdale. Grey Headed flying foxes are a species vulnerable to extinction and are one of the 113 animal species identified as the highest priorities for urgent management intervention post 2020 summer bushfires. These animals have had substantial areas of their range burnt. Grey Headed flying foxes are a vital keystone species that cannot afford to lose any more habitat within East Gippsland.

We don't believe it is possible to offset these 800 mature hollow bearing trees.

Damage to the underground water due to mine activity and removal of old trees and native vegetation

Red Gum Grassy Woodland and associated wetland communities exist in this location because of abundant natural underground water systems. Removing the vegetation and mining this area will damage the underground aquifers and the surrounding areas will dry out. Remaining and adjacent vegetation and the species this vegetation can support may be lost beyond the mine footprint.

Water Security Concerns

We have grave concerns for the underground water present in the swamps and redgum communities within and around the proposed mine footprint. We are concerned the underground aquifers will be damaged by mine processes. Damaging the aquifers, will affect the area beyond the proposed mine footprint.

We are concerned that damage to the underground aquifers will dry out the adjacent land, streams and swamps.

We are concerned that the mine area drains into significant water catchments of the heritage listed Mitchell River and are concerned about toxic run off into the waterways and ultimately the Gippsland Lakes.

We have grave concerns for the proposed tailings dam on the Perry River, leaking in Victorias last remaining chain of ponds and then on to the Gippsland Lakes.

We have grave concerns about the effects of removing so much water for mine operations from the Mitchell River, underground aquifers and the reduced flow effects on stream and lakes ecology.

It is irresponsible to threaten water security in this region.

Pollution

We are concerned about dust, light and noise pollution and 24-7 traffic from the proposed mine. Dust travels far, contamination and health risks are real concerns.

We are concerned dangerous dust from the proposed mine will contaminate the nearby vegetable growing industry.

We are concerned dangerous dust from the mine will impact the town of Bairnsdale as prevailing winds travel towards the town from the mine area.

We are concerned of contamination to the Woodglen Water Reservoir where domestic and commercial water for Bairnsdale and surrounds is stored just 3.5kms downwind from the mine.

We are concerned that people in the community dependent on tank water living near the mine are at risk of water contamination.

The mine is too close to where many families live, farm and work. There is the potential for health risks in the future such as lung disease from breathing dust.

We are concerned chemicals and contamination from mining process will contaminate underground water and flow into the Gippsland Lakes

It is irresponsible for the Government to put the community at risk.

Trauma for the community

This mine proposal has caused a lot of trauma and uncertainty in the community and has created a lot of work for a lot of people to have to justify basic their human rights to live where they want to live, to expect clean air, water and protection of the natural environment.

Species of special importance

The Gippsland Red Gum Grassy Woodland and Associated Native Grassland provides habitat for many native plants and animals. At the national level, at least 14 plant and animal species that may be found in or near the ecological community are listed as nationally threatened under the EPBC Act. Note that other species may be listed as rare or threatened under Victorian environmental laws.

Species listed under the EPBC Act, as of May 2010, found in or near the Gippsland Red Gum Grassy Woodland and Associated Native Grassland.

Animals

Lathamus discolor
(swift parrot)
Endangered

Anthochaera phrygia.
(regent honeyeater)
Endangered, migratory

Litoria raniformis
(growling grass frog)
Vulnerable

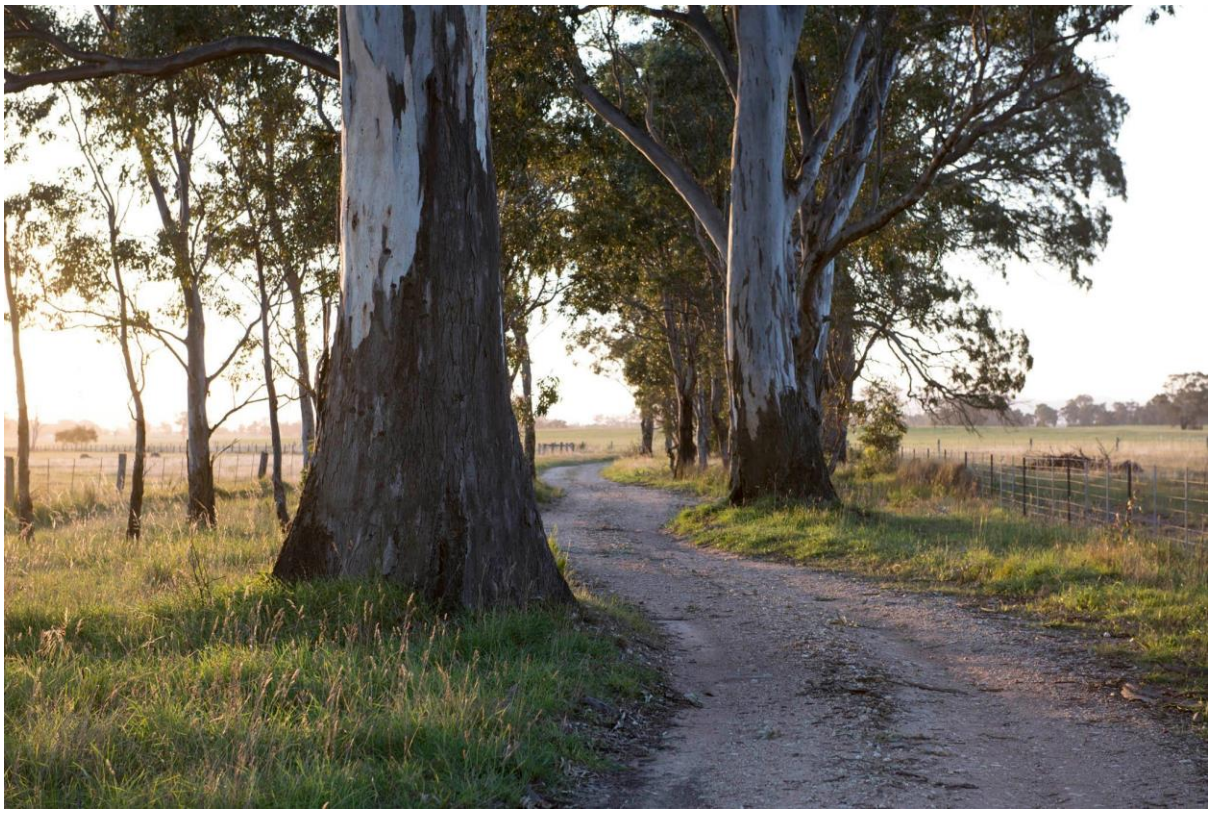
Dasyurus maculatus maculatus
(south-eastern mainland population)
(spot-tailed quoll)
Endangered

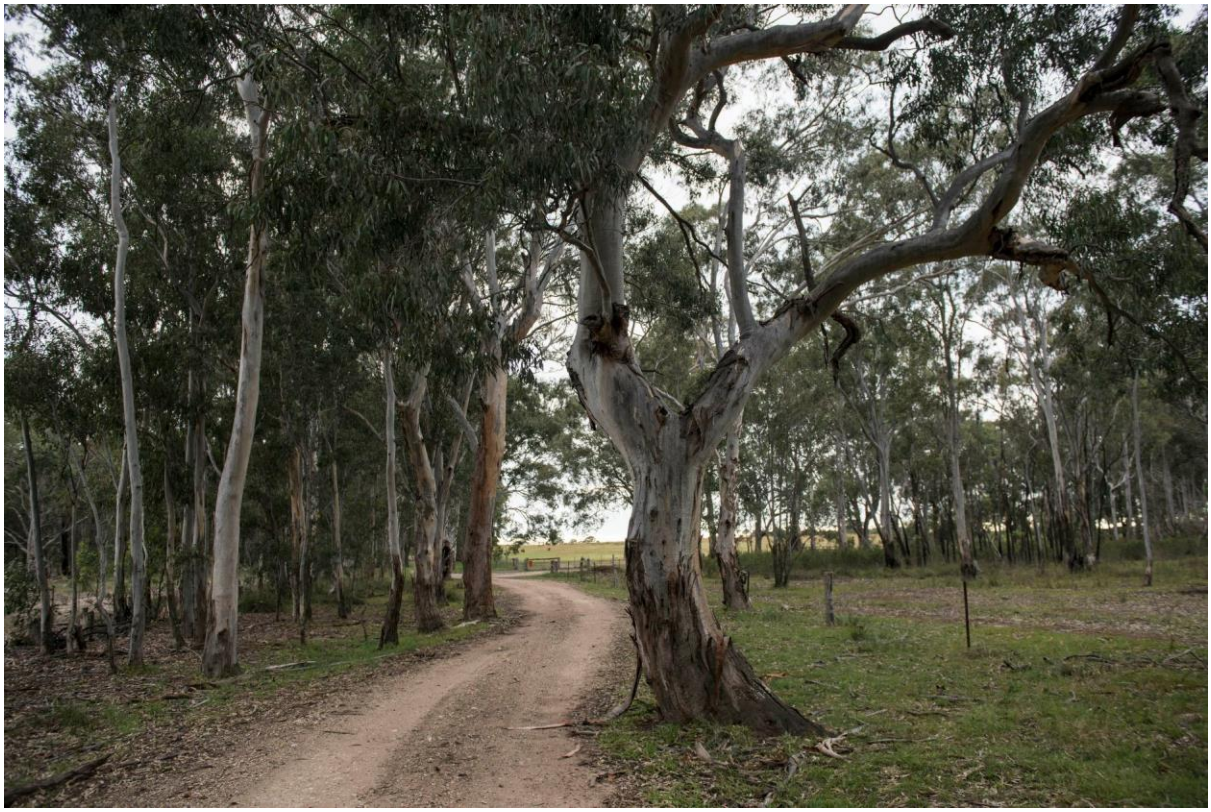
Isoodon obesulus obesulus
(southern brown bandicoot)
Endangered

Above: Gippsland Red Gum Grassy Woodland and Associated Native Grassland. A nationally threatened ecological community, Environment Protection and Biodiversity Conservation Act 1999 Policy Statement 3.22

Above and below: Eucatlyptus teretecornis, subsp mediana, Gippsland Forest Redgum Gippsland Red Gum Grassy Woodland and Associated Native grasslands that will be destroyed

Eucatlyptus teretecornis, subsp mediana, Gippsland Forest Redgum in flower and within the proposed mine footprint





Within the proposed mine footprint. Above: Eucalyptus teretecornis, subsp mediana, Gippsland Forest Redgum. Below: Golden diuris orchids in remnant grasslands on the railway line

Within the proposed mine footprint. Above: Chocolate lilies in roadside remnant grasslands.

Below: Sugar glider found in this old redbox tree 20-10-2020. There were also different species of microbats taking insects around the trees.