

# Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory  
Committee - EES

# 705

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**Request to be heard?:** Yes

**Full Name:** John Alistair Bryce Mailer

**Organisation:**

**Affected property:**

**Attachment 1:** 201028\_Alistair\_

**Attachment 2:**

**Attachment 3:**

**Comments:** Dear Inquiry and Advisory Committee members, Attached please find my submission concerning the EES for the Fingerboards mineral sands mine project.. I strongly oppose the Kalbar mining project for many reasons, a summary of which is provided in the attachment. In addition to my objection to the project proposal itself , in regard to the draft Planning Scheme Amendment, it is unacceptable that the project proponent be allowed to compulsory acquire private land to be used by the mine for infrastructure that is located outside the mining project boundary. Thank you,  
Alistair Mailer

1. The EES does not compare the project site with alternative sites in Victoria that may have less environmental and other impacts. It appears that no-one is asking this question. Is there be a better location in Victoria with mineral sands deposits which would achieve the same mining production objectives, but without the significant local impacts identified in the EES ?
2. The EES does not compare the project's projected use of the precious local water resource, with other possible alternative uses. It appears that no-one is asking this question. Could the annual 3GL proposed to be taken from the Mitchell river and aquifers be put to better use, which could give rise to more local employment without the attendant environmental and other impacts ? How much will Kalbar be paying the local community for its proposed water offtake ?
3. The EES has been prepared by the proponent, using consultants engaged and paid for by the proponent. These consultants are not independent and their views can only be considered as being potentially biased in favour of the proponent. Many of these consultants make a profession out of providing advice to project proponents, and they may not wish to blot their copybook by making too critical an assessment for the proponent.
4. The engagement by DELWP of independent peer reviews for the water, air quality & rehabilitation aspects of the proponents EES studies is welcome. It is not clear, however, why the other EES subjects have not also been peer reviewed e.g. traffic & transport, agricultural & horticultural, human health, noise & vibration etc. etc. and so these other sections of the EES remain in the 'biased' category. It is also not clear why the proponent's responses to the peer reviews which have been made, have not subsequently been assessed & published by the DELWP consultants.
5. Although the project life has been stated at 15 - 20 years, if the economics towards the nominal end-of-life were favourable i.e. mining of additional mineral sands would be profitable, then the applicant would most likely request an extension. As to what constitutes a viable operation will always be dependent upon the situation at the time. However, the possibility of mine life extension should be a consideration in the EES, including an assessment of the sensitivity of any approval to such an extension of the mine life.
6. One of the main project claims is that the mining of heavy mineral sands is necessary to enable the manufacture of important materials to meet societal needs. However, the benefit for facilitating provision of these end products should be offset against the disbenefit of the environmental and other impacts, not only at the local level at Fingerboards (and surrounding areas) but also at the overseas plant that will process the concentrates shipped from Australia. The overall benefits (if there are any) must be offset against the overall disbenefits of the project.
7. The project proposes to ship a heavy-mineral-sands concentrate to an overseas destination for further processing into refined heavy metal products. This overseas processing will inevitably result in production of a toxic waste stream which will require local overseas disposal, as has happened with similar situations e.g. in Malaysia. In effect, the toxic waste disposal problem is being shipped overseas, not unlike what has been happening with Australia's recycling/waste materials. Just as shipping the waste/recycling problem to someone else's back yard is now considered unacceptable practice, so Kalbar's proposal should be similarly regarded.
8. Although further processing of the heavy-mineral-sands concentrate does have potential waste disposal problems, this should not preclude this processing from taking place here in

Australia, even here at Fingerboards, with the generation of further economic benefits to the local economy. If such processing can't be carried out here (or would be more expensive) because of local environmental regulations, then the proponent should not be permitted to ship the problem to a location with a less-environmentally friendly regime i.e. to pass the buck to another country which, in all probability will have less stringent environmental controls. Will Kalbar take responsibility for the eventual waste stream, or simply wash its hands of that difficult problem ?

9. The EES lacks any assessment of the overall 'cradle-to-grave' consideration for the materials & products concerned. There is no overall life-cycle assessment of the benefits & disadvantages of mining, manufacture, use & recovery of the important materials concerned. The proponent is merely trying to make the easy profit by producing just the concentrate without taking responsibility and paying for the full complement of risks and environmental impacts.
10. The EES only considers Greenhouse Gas (GHG) emissions for the construction and operational stages of work at the Fingerboards site, plus emissions from the transportation of the concentrate to the shipping port. There is no mention of GHG emissions from shipping the concentrate from the Port of Melbourne to an overseas destination, nor of the GHG emissions from the further processing to refined products at destination. Consideration of Scope 3 emissions in the EES has been limited to the off-site transport of the HMC to the first delivery point. The proponent has thus taken a very narrow view of the environmental impact of the project, and of their responsibilities. The proponent has put its collective head in the sand, pretending that these other scope 3 emissions don't exist.
11. The EES estimates that more than 1 million tonnes of CO<sub>2</sub> equivalent will be discharged over 17 years. For a project commencing in 2021, this would take end-point to close to the year 2040. The EES gives no consideration to the scientifically recognised need to reduce global emissions CO<sub>2</sub> as soon as practical, and to target zero emissions by 2050. There is no mention of any requirement, or indeed willingness, to possible mitigation and/or minimisation of the project's GHG emissions over the life-time of the project.
12. At least 50% of the project's predicted GHG emissions are expected to be sourced from operation of diesel generators and mining machinery. No consideration appears to have been given to any requirement that mining machinery could be electrical rather than diesel driven. Large-scale mining operations by the big iron ore miners in the Pilbara are already using electrically-driven haulage trucks, with the benefit of reduced usage of fossil fuels, reduced atmospheric emission of pollutants, and reduced ambient noise levels.

A sympathetic proponent would (and should) require the use of best available technology for its mining operations at the Fingerboards site, that would minimise fossil-fuel usage, minimise GHG emissions (including CO<sub>2</sub> & N<sub>2</sub>O), and minimise noise emissions from the proposed 24-hour day operations.

Further, with the switch to heavy electric vehicles, and combined with the other 50% of emissions from project electricity use, it is clear that the proponent should purchase clean & green electricity off-take from a large-scale solar/wind/battery electricity generating operation, preferably located in the Gippsland region.

13. The EES GHG assessment report has stated that Australia has set an *ambitious* (my italics) target (under the Paris Agreement) to reduce its emissions by 26-28 % below 2005 levels by 2030. The author of the report has merely spouted federal government spin on the present paucity of government policy. Scientific opinion both in Australia & overseas considers that such a target is far from ambitious, and even if all of the nationally determined targets set as part of the Paris Agreement were met, this would still result in global average temperatures rising by more than 3°C above pre-industrial levels. So, Kalbar considers the 26-28% reduction as ambitious!! Such an assessment reveals

that Kalbar has failed to realise the seriousness of the present existential global warming emergency when assessing the consequences of the project's GHG emissions.

14. The EES GHG assessment report claims that, in calculating the magnitude of CO<sub>2</sub>-e emissions, that the value for the GWP for methane should be only 21 tonnes. It is recognised that emitting methane will always be worse than emitting the same quantity of CO<sub>2</sub>, no matter the time scale; how much worse depends on the time period used to average out its effects. The Intergovernmental panel on Climate Change's 5<sup>th</sup> Assessment report from 2013 says that methane heats the climate by 84 times more than CO<sub>2</sub> when averaged over 20 years – the approx. time period for the Kalbar project. The Proponent has clearly chosen, for some reason, to minimise calculated GHG emissions for the project period.
15. The proponent, in its EES, has failed :
  - a. to make any commitment to a reduction in GHG emissions over the life of the project;
  - b. to set targets for reduction in GHG emissions;
  - c. to provide any climate change risk scenarios analysis over the life of the project, and assess what, if any, resilience the mining operations would have in the event of dangerous climate change conditions occurring and
  - d. to acknowledge and assess any probable exposure to physical risks resulting from more extreme weather & climate conditions occurring during the life of the mining project.
16. The Inquiry and Advisory Committee may well take the view that some of the above considerations have not been included in their 'Terms of Reference'. This should not, however, preclude provision of advice (in their report to the state government) in regard to the issues raised i.e. that these wider considerations should form part of an environmentally responsible overall assessment by the Planning Minister of Kalbar' project.
17. It is hoped that consideration of the issues raised might encourage the Inquiry and Advisory Committee to recommend that the project not proceed.

Alistair Mailer 29 October 2020