

# Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory  
Committee - EES

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Request to be heard?: No

**Full Name:** Margaret Neal

**Organisation:**

**Affected property:**

**Attachment 1:** Margie\_EES.pdf

**Attachment 2:**

**Attachment 3:**

**Comments:** See attached submission

## **The community is concerned about the serious and irreversible environmental damage.**

The proposed Fingerboards mine will have a number of negative impacts on the immediate, surrounding and downstream environments. These include:

- altering the flows of the Mitchell River through diverting water from dammed gullies back to mine operations and destroying the capacity of the Fingerboards area to act as a gravel 'recharge' area
- siltation of the River when the inevitable floods wash the exposed sands downhill, negative impacts on aquatic biodiversity through siltation,
- leaching of flocculants, heavy metals and other contaminants into the Mitchell and Perry River system, and
- changes to groundwater levels through 'mounding' in and around the project area and decreased levels many kilometres further afield.

The company has already stated they will cut down many hundreds of mature trees that currently provide shelter for livestock and native animals and are an important support for biodiversity in the area. Offset requirements are inadequate and do nothing to rectify the damage done to our local environment.

In addition contaminated dust from mining can 'smother' vegetation, causing changes in photosynthesis and has been proven to lead to bioaccumulation of heavy metals in soil and pasture for many kilometres around minesites that can lead to elevated readings in livestock and native animals.

## **A changed environment**

- 1,675 hectares of which 1,100 hectares (11 square kilometres) is to be mined. The area being mined will be larger than the Hazelwood Mine, with no guarantee that rehabilitation will occur.
- Significant remnant vegetation will be removed including over 400 mature shade and habitat trees
- Destruction of EPBC (Federally listed) eco systems
- Destruction of crucial habitat for rare and endangered species
- Destruction of creeks and waterways
- Contamination of streams

- Adverse effects of the RAMSAR listed wetlands, Gippsland Lakes and heritage listed Mitchell River and Perry River systems
- Aesthetic destruction to the gateway to the Alpine and Mitchell River National Parks
- This will be an open-cut mine dug to a depth of up to 45m
- 200,000 metric tons Greenhouse gas emissions from the excavation and processing of this mine
- Dust contamination of pastures, crops and domestic and stock water is inevitable within several kilometres of any open-cut mine.
- Bioaccumulation of heavy metals in soils, pastures, crops and stock is a common problem with persistent dust contamination. Kalbar acknowledges it can't eliminate all the dust.
- Impacts from tunnel erosion, acid sulphate soils, sedimentation, landform instability – in view of previous studies/ trails, success is still not evident after 10 years following rehabilitation

## **Increase use of chemicals within the environment**

- Flocculants are used to settle clay but are toxic to aquatic life
- They will be used in high doses and will leach through the tailings dam to Perry River system

## **Impact on flora and fauna species within the area**

Flora/Fauna species recorded in area include:

- 9 rare or threatened flora species
- 10 species listed as rare or poorly known on Advisory List of Rare or Threatened Plant in Victoria.
- 2 national listed species (dwarf kerrawang, swamp everlasting)
- 2 state listed species (yellow wood, prostrate cone-bush)
- 42 rare or threatened terrestrial fauna species
- 11 native 2 exotic fish species- including Australian grayling, Flinders pygmy perch
- freshwater turtle
- platypus

Many of the local farming families have preserved large areas of native habitat on their properties for the last 150 years. These areas, including many ancient trees, will be totally destroyed. Some of these areas adjoin bush-land that links to the Providence Ponds Nature Reserve, one of only three sites in Victoria for the New Holland Mouse. Adequate surveys have not been undertaken to determine what species would be impacted.

## **RAMSAR Wetlands**

- These wetlands are bird life refuges and migratory routes for many species of birds they would be devastated by dust and increased sediment flows into Rivers
- How will the proponent manage the project area soils re potential adverse effects on hydrology and water quality, permeable gravel beds within the recharge areas?

## **Groundwater**

- Little confidence that bores the company claims they will monitor are in fact monitoring the same aquifers for flow and water quality that are being used by other farm water users.
- Mounding and migration of groundwater from the backfilled tailings material along the mine path during operations will include chemicals, dust suppressants, radionuclides, sedimentation – how can they prevent these from entering the water table, creeks, streams, rivers, farmers dams, household water supplies?

## **Changed ecology of the rivers**

- If the mine is not stabilised and we have a large volume of rainfall which is a regular occurrence in “normal years” the sediment will impact both the Mitchell River and the Perry River systems. The Mitchell River is a hatchery for Black Bream and Graylings, it flows through the world-renowned Silt Jetties into the Gippsland Lakes. We cannot afford anything to compromise this recreational and commercial fishery and this outstanding tourist destination.
- The area proposed to be mined is 80m uphill of the Mitchell River and contain extremely fragile soils that readily dissolve in heavy rainfall events. They will fill the river with sediment, destroying the aquatic environment in both the river and the Gippsland Lakes. The Perry River’s unique Chain of Ponds is at risk.

- Recent research in the area shows occupation by Aboriginal people for more than 25,000 years. Local traditional owners are opposed to the mine for many reasons. They are concerned that the 'cultural' mapping done to date has been inadequate to capture the story of the people and the land and that their history will be destroyed before it has been 'revealed'
- Gunaikurnai people are the traditional owners of Gippsland. The Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC) represents Traditional Owners from the Brataualung, Brayakaulung, Brabralung, Krauatungalung and Tatungalung family clans, who were recognised in the Native Title Consent Determination, made under the new Traditional Owner Settlement Act 2010, the first such agreement under that Act.
- The GLaWAC Interim Position Statement (April 2019) states that:
- *the proposed mining operation will disturb and hurt the cultural connection of the Traditional Owners to the land, air and water that is part of the development area*

## Is the proposed mine the best way to stimulate the local economy?

The figures just don't stack up.

This mine will put our local economy and businesses at risk for the sake of a handful of jobs. While a few people may benefit (at the expense of the majority) the mine threatens existing successful and sustainable industries like the Lindenow Flats vegetable growing industry, dryland farming including sheep and beef cattle, and the tourism industry with the impacts on our rivers and the Gippsland Lakes. Glenaladale is the gate way to the Mitchell River National Park and the iconic town of Dargo in the High Plains.

Who pays for the damage to roads, the loss of the unique character of our area, the loss of biodiversity when so much of the landscape is razed. And how do you put a price on the impacts on the Mitchell and Perry Rivers, and the Gippsland Lakes?

## How will this project provide a net community benefit? What are the benefits to the local community and towns in the immediate, 5, 10 and 20 year time frames?

The Australia Institute shows the economic advantages of mining in rural communities is overrated

- Job numbers are seldom what mining companies claim they will be
- Rehabilitation is never completed
- Local towns are no better off when mining comes

### At risk :

- World-class food is grown in the rich fertile soils of the Mitchell River Valley.

- The industry is valued at more than \$150 million annually and employs up to 2,000 people.
- It supplies vegetables to fresh markets, fast food outlets, cafes, restaurants cruise ships and various businesses along the value-added product chain throughout Australia and overseas.
- The mine is located on a plateau only 500m from the Valley. Dust contamination of soil and vegetables is unavoidable and could destroy the clean green image of the industry.
- If the water the mine is demanding was redirected to growing vegetables more than 3 times the number of long-term sustainable jobs could be created.
- If the mine goes ahead the horticultural industry will have to compete with it for water and there is a high likelihood of loss of existing agriculture related jobs and the community's employment levels.
- This project equates to an elevated level of impact to the region's economy with a high level of risk

#### **Projected local jobs versus existing jobs:**

- Kalbar is claiming the Latrobe Valley as local even though it is 110 km from the mine site.
- 134 of Kalbar's 197 projected jobs are for contractors.
- Most mining jobs in Victoria are not well paid – with most operators getting little over \$25 an hour – little more than vegetable pickers currently get
- The proposed mine threatens many more sustainable jobs in local agriculture and tourism than the few by comparison mostly short-term jobs offered by the mine.
- It is likely that a company will take over Kalbar before mining operations begin (most likely Chinese – Kalbars has already employed a position of “VP” in China), if it is a Chinese Company experience the Pacific region has shown that they bring their own workers so there would be few jobs for locals.

#### **Impact on local and regional tourism:**

- Tourism contributes \$294 million to East Gippsland's economy, attracting 1.138 million visitors to the region increasing annually. Real and perceived impacts will affect its attractiveness as a tourism destination.
- The Gippsland Lakes is already under threat from decreasing flows and increasing salinity affecting fish stocks and other recreational pursuits. They will not be able to tolerate

reduced flows from the Mitchell and existing shallow aquifers, or the threats of siltation from mine run off.

- The Fingerboards Loop, one of the iconic bicycle rides in Gippsland, will not longer be viable due to the dangers of so many B Double trucks using the local roads.

### **Impact on rates, property prices and personal wealth**

- Mining companies do not pay rates
- For every else around mines, property values are estimated to decrease by 30% making it difficult to sell properties within the immediate area both residential and farming enterprises.
- Because of the reduced values, banks will lend less against those properties than previously and require higher deposits on loans for people wanting to buy in to mining areas.
- Balmoral (in Western Victoria where Iluka had a mineral sand mine) has the third lowest income per capital in Victoria \$29,573 – Glenaladale currently stands at \$37,198

### **Mining companies do not pay their way:**

#### **Compensation**

- Only **directly impacted** landowners will be compensated in accordance with the Mineral Resources (Sustainable Development) Act 1990.
- Neighbours and others impacted are not compensated for the loss of amenity, impacts on existing businesses, loss of access to water, pollution of air, soils, livestock and domestic water supplies
- How are we going to be compensated for the loss of many hundreds of mature shade trees – not just loss of the visual amenity but the loss of contribution to habitat and biodiversity, and the loss of farms to provide shelter trees for livestock?

#### **Infrastructure costs**

- Too often mining companies rely on undisclosed government grants or support for infrastructure upgrades, that money could go to far more sustainable projects and employment

- The true cost of road widening, roundabouts and damage to rural roads, and the highway must be included
- Who is going to pay for the power upgrade needed
- Are Kalbar expecting government grants for their water storage dams
- Are they expecting grants for water supply pipes?

### **Utility requirements will increase emissions**

- 3000-kilowatt hours' power supplied from electricity grid (early stages of construction use diesel generators)
- Water requirements 3 to 4 gigalitres annually (minimum and in competition with irrigators)
- Greenhouse gas emissions – 200,000 tonnes of CO<sub>2</sub> per annum
- Minerals mined are a non-renewable resource using large amounts of fossil fuels

### **Post Mining -Rehabilitation or the lack of it :**

- Despite what Kalbar say, mineral sands miners do not 'rehabilitate as they go'.
- Iluka said they would at Douglas but when prices rose, they were allowed to dig everything up as quickly as possible and not rehabilitate. In 2012 the community was left with a 14km\*1km open scar that has still not been properly rehabilitated.
- The mineral sands mine at Kulwin near Ouyen closed in 2012 but will be another 13 years before it is rehabilitated.
- Rehabilitation of mine void – abandoned mines all over Australia leave the tax payers to pay the cost of rehabilitation and ongoing environment problems
- Impacts from tunnel erosion, acid sulphate soils, sedimentation, landform instability – previous studies/ trails show success is still not evident 10 years following rehabilitation
- Tailings dam failure, seepage and overflow
- Contamination of fish habitat and changed aquatic ecosystems
- Continuing impact on availability of surface and ground water
- Potential contamination of soil, water and air
- Destruction and loss of viable agriculture land
- Vegetation loss including large established shade trees



- Too often mining companies are allowed to walk away and leave taxpayer to pay to clean up the mess “ *The Benambra mine so far has cost taxpayers over \$7m trying to prevent highly poisonous waste discharging into the river and surrounding environment.*”

## How will this mine affect our community

- This is a highly inappropriate location for a mine, near where people live, work and children go to school
- Experience from other Communities impacted by mining indicate – a demise in population, reduction in the numbers of children attending local schools, decrease in residents supporting sporting activities, decline in available Community members to support essential service groups (fire brigade, Community working bees)
- More than 50 people live within one or two kilometres of the mine site and will experience
- Hundreds of people live with 5km
- All will be exposed to health threatening noise and dust levels
- All will be exposed to increased road danger due to 60 tonne B Double trucks using local roads 24 hours a day
- Those reliant on bore water for stock or irrigation will be competing with Kalbar for supplies

## Livelihoods

- Potential destruction of our sustainable agri-food businesses: dairying, beef cattle production, wool and fat lamb production, wool, cropping, vineyards, vegetable packaging and processing – these industries could be under threat
- Contamination and destruction of the aquifers (groundwater) and surface water.
- Mine could wipe out many more jobs in the horticultural industry than they create for their workforce
- Competing for water resource with other users
- Vegetables on the Mitchell Valley Flats are produced under strict quality assurance systems with zero tolerance of impurities. The proponents will not guarantee their mine would not compromise this? Instead we are told ‘if it happens you can always try to sue us’
- The ice in which the vegetables are packed is produced from water sourced from the Mitchell River. Same river that will be impacted by the mine.

- The bulk of the vegetables produced on the Mitchell Valley Flats are not washed (e.g. broccoli). Any vegetables that are washed are washed in river water. In most plants dust becomes entrained in the plant and cannot be washed out – contrary to Kalbar’s statement
- Because of the high elevation of the mine, the prevailing N/W winds will carry radioactive dust over vegetable flats and fouling surrounding animal pastures
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## Dust

- The mine is on a plateau that catches a lot of wind. Contaminated dust will travel for many kilometres affecting everyone in its path
- The dust from the mine is not normal ‘dust’ – it contains many dangerous products including radioactive materials and at least four known carcinogens
- Mines in other areas report clogged downpipes requiring regularly cleaning, problems with drinking water (larger the surface area the higher the percentage of contamination with dust and radiation)
- Most households rely on tanks water for domestic use and have **no** other option for their water supply
- Solar panels covered in dust will lower efficiency for electricity production
- Respirable Crystalline Silica Dust – Carcinogenic Category 1, invisible dust – causing silicosis
- Dust emissions will come from – Soil stripping, stockpiling, ore removal, processing, transportation of ore and wind erosion

## Noise

- Mine is situated on an elevated plateau and noise will carry through the valley (tonal qualities of repetitive project-generated noise) and be more prevalent with variable weather and wind direction.
- Noise sources -Traffic to and from mine site, Heavy Mineral Concentrate transport, Mobile plant and equipment, Mobile plant and equipment servicing and repair, Mining Unit Plant, Wet Concentrator Plant, Concrete batch plant.
- Diesel generators used in the interim before mains power available

- Where these mines have operated in other areas, locals who lived over 7 kilometres away talked about the noise of the processing units being like a machine gun going off in your back yard.
- Noise be heard up to 15 km which is Shannon Waters Estate including, Lindenow, Lindenow South, Walpa, Glenaladale, Fernbank
- Large machinery and processing plants will emit vibration constantly
- How can you protect native animals and livestock from this continuous noise?

- **In summary , there is far too much risk for this mine to go ahead in this location**

- **to currently viable industries (vegetables, sheep, cattle, horses)**
- **to the water replenishment, natural filtering, availability and quality of water in the Mitchell river catchment**
- **to the future health of the well known Gippsland Lakes and RAMSAR listed wetlands**
- **to the successful tourism and eco tourism in the East Gippsland region**
- **to the total destruction of Gippsland GunnaiKurnai Cultural Heritage**

The EES provided by Kalbar is missing or has not adequately addressed many issues associated with the effects of the mine and does not meet a number of the scoping requirements set out by the minister.