

Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory
Committee - EES

887

Request to be heard?: Yes

Full Name: Anita Hallett

Organisation:

Affected property:

Attachment 1:

Attachment 2:

Attachment 3:

Comments: See attached submission

Dear Inquiry and Committee Members,

This is a submission in response to the Environmental Effects Statement (EES) for the Fingerboards mineral sands mine project, produced by Kalbar Operations. I am totally AGAINST this mine for several reasons outlined below, but particularly because of the need for enormous amounts of water; the resultant effects on existing bores and irrigation enterprises; dust contamination on people, animals and a very valuable local vegetable industry; contamination to domestic, livestock and irrigation water; contamination to several rivers and the Gippsland Lakes; major public health risks caused by radioactive substances and silica in dust generated by mining activities; and a number of other issues.

I believe the risks from this mine greatly outweigh potential benefits of the mine.

I have lived over 40 years on a commercial farm, about 20km south-east of the proposed mineral sands mine. We have a lot of wind from the northwest, so we will be significantly affected by the contaminated dust from the mineral sands mine blowing over our property. This will contaminate our drinking water, our dam water, our bore water, our pastures, the wool we produce and the vegetables we grow. We have a daughter who teaches at the Lindenow Primary School, and a grandson who attends the Kindergarten in Lindenow. I fear for the health issues they will be exposed to if this mine goes ahead, as Lindenow is only a short distance from the mine.

The areas around the mine are prime agricultural land, producing extremely valuable products such as vegetables, milk, beef, wool, prime lambs, wine, cropping and fruit crops. The area is known for its exceptional "clean, green image", and top quality produce. East Gippsland is also well known for its pristine rivers, its native vegetation, abundant wildlife, attractive farming landscapes, and is consequently a major tourist destination.

During the process of mineral sand mining radioactive substances are excavated and crushed. There are enormous amounts of radioactive dust generated, and ultrafine silica particles, which CANNOT be all controlled. This type of dust travels a long way, in various directions depending on the prevailing winds at the time. Contamination and health risks directly to humans, their water and their food are serious concerns.

*I would like to point out that there is a serious conflict of interest when a mining company wanting to start a mineral sands mine is required to do the Environmental Effects Statement (EES). **There is no way such a report will be unbiased, as a negative report would never be tabled.** Such an important report should be carried out by an independent authority. I do NOT trust the information provided in the EES because many details are missing, such as exactly what analyses the laboratory was asked to do. Full disclosure of all analyses, and all real and potential health risks to people, animals and food MUST be requested by the Panel.*

I believe the mine will have numerous permanent negative effects on many of these things that local people hold so dear, as outlined below.

Competition for Water Reserves & Ground Water Diminished

- This mine will initially be using 3 Gigalitres (3 billion litres) per year for up to 15 years to process the sands and control dust. There have been reports that this will increase to between 6 -9 Gigalitres annually. This is an enormous amount of water to come from where?? *More questions need to be asked about increasing demands for water as the mine increases production.*
- If the mine is allowed to access groundwater, this has enormous ramifications for most of the farming properties around. A lot of properties in the area, including ours, rely on stock and domestic bores to provide an essential water supply for our domestic use, plus water for our livestock. *If our existing bores run dry, put in at our own cost, WHO PAYS?*
- The local aquifers are already oversubscribed. Farmers are currently unable to get new or increased water licences, let alone irrigation licences. This sand mine requires massive amounts of water. *How can Mining Companies suddenly get access to vast quantities of water, when farmers cannot?*

Contamination from the Tailings Dam

- The mine tailings dam is supposed to be 90 hectares, which is almost one square kilometre. This dam will contain flocculants and mine tailings waste. These are listed as being harmful to aquatic life (and consequently any person eating contaminated fish, or person swimming in contaminated river or lake water).
- The location of this dam will be on higher ground, and the EES states that there is a risk of leaching into both the Perry and Mitchell Rivers.

- The Mitchell River in particular is prone to substantial floods. In the last 30 years there have been major floods in June of the years 1990, 1998, 2007, 2012 and 2016. The East Gippsland Catchment Management Authority are predicting flooding in the Gippsland Lakes will likely become more frequent and to higher levels as a result of rising sea levels and likely changes in rainfall characteristics associated with climate change. This sea level increase, while variable across the Gippsland Lakes, is estimated to be more than 0.8 metres for Lakes Entrance by 2100. *EGCMA (2017) East Gippsland Floodplain Management Strategy, East Gippsland Catchment Management Authority, Bairnsdale.*
- If the water level in the Gippsland Lakes is going to be increasing, then floodwaters coming down the Mitchell River will reach much higher levels, and take much longer to drain into the Lakes system.
- *Higher flood levels in the Mitchell River will cause tailings waste and flocculants to be released from the Tailings Dam into creeks/ivers. Dam failure will be far more likely due to erosion.*

Aquifer, Ground Water, Woodglen Reservoir, River and Gippsland Lakes Contamination

- This is one of the most serious issues, because **any contamination of groundwater in this area means the end of farming here.** Farming in our area is TOTALLY reliant on access to good quality groundwater.
- The Perry River is a major recharge for the Boisdale Aquifer which supplies a lot of farms with their drinking water, as well as water for livestock. It is also the sole source of drinking water for the City of Sale, plus several other towns around the area. *Any contamination of groundwater will put the health of these people at serious risk, both short & long term.*
- The source of the Perry River is just near the proposed sand mine site, so contamination by dust containing radioactive substances and silica coming from the mine will definitely be getting into this vital groundwater aquifer.
- The sand mine will be located right next to the Mitchell River, one of the few pristine rivers in the Gippsland area, and the source of drinking water for the City of Bairnsdale plus several other smaller towns. Contamination of this river is inevitable by dust, and by flood events that occur frequently along this river. While the EES talks about precautions that would be taken to prevent flooding and contamination, they would be grossly insufficient in large floods, which are rarely correctly forecast by the Bureau of Meteorology.
- The Mitchell River is a very significant source of water flowing into the Gippsland Lakes and wetlands, which are protected by the International Ramsar Convention on wetlands. Any contamination in the Mitchell River and the Perry River will end up in the Lake system, with significant repercussions to the health of local people and visitors using the Lakes for recreation.
- The Woodglen Reservoir stores water for domestic and irrigation purposes for the whole East Gippsland Shire. It is located 3.5km downwind from the mine site. *Contamination of the water in this reservoir is inevitable.*

Detrimental Effects on the local Vegetable Industry

- The vegetable industry in the Lindenow valley is a multimillion dollar industry, and a major employer for the Lindenow and Bairnsdale area. Between 25-35 semi loads of vegetables are trucked to Sydney and Melbourne every day.
- This industry is located next to the Mitchell River, and the vegetable crops are irrigated from this river.
- Contamination of the vegetables is inevitable both by dust blowing over the area, and from contaminated irrigation water.
- Pickers work in open paddocks, and their health would be at risk by being exposed to contaminated dust blown on prevailing winds from the mine area. *What are the longterm effects on people's health from being exposed to the contaminated dust?*
- Contamination of vegetables will seriously affect their quality, and possibly cause the industry to become unviable. *Why would you put a multimillion dollar industry, employing large numbers of people directly and indirectly, at risk by allowing development of a contentious mineral sand mine?*
- If the 3 Gegalitres of water proposed for use by the mineral sands mine were allocated to the horticulture industry, the number of jobs created in the local area would be 3 times as many the mine proposes to provide.
- Kalbar Operations is an overseas company that already has plans to sell the mineral sands mine as soon as it gets permission to start mining. Any buyer would also be an overseas company, with profits taken out of Australia. *Doesn't it make more sense to give the water allocation to local vegetable growers, who will provide 3 times more jobs here locally, and the profits stay here in Australia??*

Mine will be too close to where many families live, farm, work and attend school and kindergarten

- Both the Lindenow Primary School and the Lindenow Kindergarten have substantial numbers of pupils. The children attending these institutions will be in the direct path of dust blown from the mine on prevailing winds. Their drinking water from the Mitchell River will be contaminated by dust and “accidental” spillage from the mining ponds.
- The number of houses and people living close to the mine has always been deliberately under-reported by Kalbar.
- Most homes collect rainwater to use as domestic drinking water. Contaminated dust will collect on the rooves of their houses, and will be washed into their drinking water. *The potential health risks to these people has NOT been extensively looked at.*

The Industrialisation of the landscape & Disruption to Local Communities

- This area is zoned agricultural and lifestyle areas, NOT industrial.
- The considerable noise, dust and light pollution will be present 24 hours a day, 7 days a week, 365 days a year. It never goes away. This will be extremely stressful for local people who live and work in the area.
- Valuations on existing properties will fall, due to people not wanting to live close to a working mine.
- A Mineral sand mine requires upgrading of access roads, drill pads and processing equipment, Bore pumps and pipelines, waste ponds and water treatment sites, new powerlines, easements, upgrading of rail sidings, and large scale removal of vegetation. It will profoundly change the rural nature of the areas where it is allowed to become established.
- The initial increase in jobs while the mine is set up will NOT last. Once the mine is operating, there will only be a very small number of ongoing jobs. Specialised tradespeople are rarely sourced locally, they are brought in from other areas. Local communities expecting to benefit from jobs growth and increasing demand for the local services sector will be very disappointed.
- **A lot of the land required for the mine infrastructure is actually located OUTSIDE the mining project boundary. Apparently private land needed for this infrastructure will be taken by COMPULSORY ACQUISITION.** *How can this be allowed??? Why is it not in the mine project area???*

Contamination of Other Local Products

- This is an area that is well known for having lots of extreme winds. Depending on the time of year, winds from the west, south-west and north-west would spread contaminated dust over vast tracts of land causing contamination of pasture, and water in dams used for livestock and irrigation purposes. Quality of other food products, eg. milk, beef, lamb, wool, grapes, fruit, grain and fodder crops, will be adversely affected.

Destruction of the Brand Gippsland

- Having a mineral sands mine anywhere in Gippsland will tarnish the region’s image as a clean, uncontaminated producer of fine food. Once lost, the “Clean Green” image for our products is gone forever.
- We cannot ask premium prices for our products if consumers do not have a positive image of the area.

The Livestock Production Assurance (LPA) Program & National Vendor Declarations (NVDs)

The following information is taken directly from the Meat & Livestock Australia (MLA)’s website:-

- *The Livestock Production Assurance (LPA) program is run by the Meat & Livestock Australia (MLA). It is a pledge by farmers that the meat from their farm has been produced safely. An LPA accreditation means a farmer stands by what they sell.*
- *When a farmer ticks the box on their National Vendor Declaration form, they are guaranteeing their on-farm practices meet LPA requirements. Their tick must be backed up by accurate farm records.*
- *As industry’s on-farm food safety program, LPA meets the stringent requirements of domestic and export markets, providing assurance of the safety of Australian beef, lamb and goat meat.*
- *The LPA National Vendor Declaration (LPA NVD) is the main document behind Australia’s meat and livestock food safety reputation.*
- *LPA NVDs are required for any movement of stock – to processors, to saleyards or between properties if they have different Property Identification Codes (PICs).*
- *When an LPA NVD is signed, the producer is sharing information on livestock history and declaring compliance with all LPA requirements.*

- LPA NVDs have two purposes: 1) In completing and signing the LPA NVD, the seller provides the buyer with a guarantee relating to the food safety status of the animals they are purchasing. 2) The LPA NVD enables livestock movements to be traced if necessary
- Producers who become LPA-accredited commit to carrying out specific on-farm practices in order to fulfil their responsibility to produce safe red meat. LPA covers on-farm practices in five key areas:

A) Property risk assessments

Producer responsibility: To minimise the risk of livestock being exposed to sites that are unacceptably contaminated with persistent chemicals or physical contaminants

B) Safe and responsible animal treatments

Producer responsibility: To ensure animal treatments are administered in a safe and responsible manner that minimises the risk of chemical residues and physical hazards

C) Stock foods, fodder crops, grain and pasture treatments

Producer responsibility: To minimise exposure of livestock to foods containing unacceptable chemical contamination and guarantee livestock are not fed animal products

D) Preparation for dispatch of livestock

Producer responsibility: To ensure livestock are fit for transport and minimise the risk of stress and contamination of livestock during assembly and transport

E) Livestock transactions and movements

Producer responsibility: To ensure traceability requirements, with respect to treatments or exposure to food safety hazards, have been fulfilled for all livestock movements - between farms and feedlots, and including to slaughter and live export.

N.B. How can farmers fulfil their LPA-accreditations?

- How do farmers assess the Property Risks & Chemical Contamination issues of their own farms when mining companies do NOT have to disclose what chemicals they are using during the extraction process, or the exact mineral content in the dust blowing over their farm?
- How does a farmer know if his pastures have been chemically contaminated by radioactive substances and silica particles? **If livestock are grazing on contaminated pastures unbeknown to the farmer, how is he expected to fill in his NVDs properly, when he does NOT even know what chemicals and radioactive substances are in the dust blowing over his farm?** *If there is a comeback on the farmer for contamination, who pays?*
- *What are the consequences for public health if a farmer unknowingly sells contaminated livestock, and the contaminated meat slips through into the food chain? What are the consequences for our export markets if contaminated meat is sent overseas?*
- *Who pays when there are Biosecurity breaches?*

Impact on Tourism

- Tourism is a major contributor to the local economy in East Gippsland. Many tourist based businesses have been hit hard by the double whammy of massive bushfires in 2019/2020, followed almost immediately by shutdowns due to Covid 19.
- The majority of tourists come to East Gippsland to enjoy the pristine rivers and lakes, natural bushland and attractive farming areas.
- Tourists will be put off by the industrialisation around the mining site and its infrastructure requirements, and also by the degradation of the river and lake systems due to contamination from the mine.

Victorian Government Guidelines

- The Victorian State Government has planning guidelines in place to preserve prime agricultural land. Gippsland has some of the best agricultural land in Australia, and the vegetable industry in the Lindenow valley is a major producer of vegetables for both Victoria and interstate. The Government should not put at risk the water aquifers, the rivers and Gippsland Lakes system, the agricultural production and the liveability that are the hallmarks of country Victoria by allowing a short-term mineral sand mine that would have devastating long term effects on the health and welfare of local residents, and the extensive "clean green" produce that comes from this area.
Why would this be put at risk? This is a serious conflict of interest.

In summary, I would like to stress some points I have made:-

1. Contamination of aquifers, groundwater, dams, rivers and the Gippsland Lake System is inevitable, both through dust and contamination from the tailings dam.

How can the Panel allow a project to go ahead that will have such serious and long-term consequences on public health, welfare of livestock, safety of our food, and welfare of wildlife and aquatic animals?

2. Serious health effects, particularly long-term, of contaminated dust on people living and working in areas within a 100 kilometre radius of the mine.

The Panel needs to seek out a lot more detailed information from professional medical experts about the effects on people's health after short and long term exposure to radioactive substances and silica.

3. A lot of the land required for the mine infrastructure is actually located OUTSIDE the mining project boundary. Apparently private land needed for this infrastructure will be taken by COMPULSORY ACQUISITION.

a) How can this be allowed???

b) Why is it not in the mine project area???

4. The Livestock Production Assurance (LPA) Program & National Vendor Declarations (NVDs)

a) How does a farmer know if his pastures have been chemically contaminated by radioactive substances and silica particles?

b) If there is a comeback on the farmer for contamination, who pays?

c) What are the consequences for public health if a farmer unknowingly sells contaminated livestock, and the contaminated meat slips through into the food chain?

d) What are the consequences for our export markets if contaminated meat is sent overseas?

e) Who pays when there are Biosecurity breaches?

The Panel must address all these issues and advise the Government to have relevant legislation in place to protect farmers if the mineral sands mine is to go ahead.

5. Kalbar Operations is an overseas company that already has plans to sell the mineral sands mine as soon as it gets permission to start mining. Any buyer would also be an overseas company, with profits taken out of Australia.

Doesn't it make more sense to give the water allocation to local vegetable growers, who will provide 3 times more jobs here locally, and the profits stay here in Australia?? No risk to people's health, the waterways or the environment.

6. The Victorian State Government has planning guidelines in place to preserve prime agricultural land.

This area is zoned agricultural and some lifestyle, NOT industrial. Some of the best agricultural land in Victoria would be seriously put at risk if this mine is approved. This is a serious conflict of interest by the Government.

This Inquiry and Advisory Panel has a Duty of Care to all the local community, and the people we supply food to, to NOT increase public health risks, especially from cancer and lung disease caused by silica, by allowing this mineral sands mine to go ahead.

I would also like to ask the Panel these questions:-

1. Would you allow a mineral sands mine industrial development next door to where you live?
2. Would you want yourself and all your family to be exposed continually to contaminated dust and water?
3. Would you want your animals and your food and your water exposed to this contamination?
4. Would you want your livelihood, in some cases worth multimillion dollars, put at risk by this mine?
5. Would you want to be forced off your land and out of your home by such a development?
6. Do you want to be responsible for contamination of pristine rivers, vital groundwater supplies and the iconic Gippsland Lake system?

Thank you to the Panel for the opportunity to make this submission.

Yours sincerely,
Anita Hallett.