

# Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory  
Committee - EES

# 889

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**Request to be heard?:** Yes

**Full Name:** Timothy Hamilton

**Organisation:**

**Affected property:** [REDACTED], Woodglen; [REDACTED], Iguana Creek; [REDACTED]

**Attachment 1:**

**Attachment 2:**

**Attachment 3:**

**Comments:** See attached submission

## Proposed Fingerboards Mineral Sands Project

### Public Submission on the EES

Dear Inquiry and Advisory Committee members,

I would like to make a submission to express my points of concern about the proposed Fingerboards Mineral Sands Mine (FMSM) which relates to the low grading of risk of several key issues and provision of superficial information in the Environmental Effects Statement (EES).

I only began to take a genuine interest in Kalbar's pursuit to get approval for the FMSM in the past 2-3 years when it became apparent an EES would be documented for what many advisors say is then fait accompli. I knew of Rio Tinto's previous exploration interest in area and when they abandoned and sold out it made perfect sense to do so. The proposed site is not your ideal demographic location to operate a mine despite what riches lie beneath the lay of the landscape. The Glenaladale region has a micro climate that is variable and uniquely unpredictable, and it has a flow on effect as to what happens on the Mitchell River flats.

My family home at [REDACTED] is not identified in Fig 5.1 in the Socioeconomic Impact Assessment report despite there being designated sensitive receptors R40, R41 & R46 on the very same road and in the same northerly alignment as R15, R16, R29 & R42 which puts us directly in the front of prevailing south westerly winds that will blow over the proposed project area and future expansion mining expansion areas.

Our family has a direct line to one the original Lindenow settlers John Whitebourne and I am fortunate to now be farming on land held in our family since selected in 1911 at [REDACTED] Glenaladale. As mentioned my own family live at [REDACTED] and also own farming property at [REDACTED]. Our family farm operation in total is 196 Ha in size, we have two water irrigation licences and a irrigation bore licence and the majority of farm income is generated from growing vegetable bean crops over the summer growing season and tend to a self replacing beef production herd of 80 breeders throughout the year. The breeders being primarily situated on property owned at [REDACTED] Glenaladale.

Our family concerns relates to the following points .

## **WATER.**

**Groundwater** - The proposed groundwater bore field is of concern mainly because the regulator Southern Rural Water really has no hard and fast data on the connectivity of the various regional aquifers. There a VCAT transcripts whereby SRW opposed a irrigation bore licence application in Lindenow on the grounds of connectivity to the Latrobe Valley aquifer and others. Then subsequently changed tac and allowed a Local Gov't body organisations application to proceed in the Woodglen area on the grounds there wasn't connectivity.

Over the past four years the Woodglen aquifer from discussion with bore licence holders there has clearly been unprecedented reliance on groundwater and it has been stressed. Water levels have dropped and some higher saline levels than normal are being detected.

When making this known to SRW they were dismissive of this observation on the grounds it couldn't be true because it contradicts the models and we didn't have professional technicians record what we were hear say observing.

The models SRW operate from need to be revisited. There are enough concerned licence holders to be willing to participate in an actual practical test pumping experiment to place actual physical pumping extraction against the theoretical figures models to see how they concure in the current status quo before Kalbar be given a conditional licence.

**Runoff** – The proposed Project area is requiring some 21 dams to be constructed to prevent water shed runoff. This works well to contain water until the dam reaches max holding capacity.

We have rain events which stem from the devil in the making called East Coast Lows. The impact of such events will cause serious overflow and ultimately run off into the Mitchell River and depending on the chemical suppressants used on site to mitigate dust and run off from overburden and tailing zones there will be visual discoloration and turbidity of water in the Mitchell River.

I am pretty sure if this proposed project area were located up stream of the East Gippsland Water ,Glenaladale Pumping station it would not be favourably assessed.



## **DUST.**

Dust is a given in our district. It is has known to be said Lindenow was originally named Windenow and the old timers got sick of replacing the wind blown damaged W that would break in two and nailed a V into position to look like a L .

The initial Air Quality monitoring was conducted on site alone and discretely sited in a relatively benign location. Some of the initial results released at Public meetings were alarming in that we had PM2.5 levels in natural state over EPA guidelines.

There is nothing more disheartening as a farmer facing up to a day and days of strong winds. The dust brought to bear is unfortunately part and parcel of the natural landscape and farming practices have changed quite considerably to minimise effects for self interests and of others we neighbour.

The proposed Project area is one I have not seen cultivated. It's a total no brainer to resist such practice due to wind swept consequences.

Having a FMSM will be akin to having a portion of our region in dire drought like conditions in relation to the worst of worst ground cover retention practices. Farmers over in the Bengworden district on like soil type with centre pivot irrigation infrastructure really struggle to suppress dust and choose carefully when to cultivate and crop ground .

I have genuine concerns for the health of my family and self ,knowing I potentially will have a neighbour that despite best intentions to mitigate the impact of their dust. It will be a me problem that I am going to have to constantly monitor to be fully aware of the dangers it poses and have to be accepting of the consequences with no apparent recourse for compensation to the life changes we are going to face over the next 15-20 yrs.

## HORTICULTURE.

The RMCG Horticultural Impact Assessment really does read as though it was compiled by a consultancy group of last resort .

Trivial information such as Table 5.4 referencing ABS statistics for Bruthen - Omeo giving a gross value of vegetable production of \$62.5 M.

I can quite using my own production figures from 2015/16 and conservatively extrapolate them and realistically summarise a gross vegetable production value of \$130M

Misinformation in Fig. 1. A gross lack of factually highlighting areas land use. What was highlighted could have been more correctly labelled as representing a singular variety of crop grown. Not the whole area of vegetables grown, very far from it.

Vegetable production has expanded onto the foothill plateaus above the Mitchell River flats in the past 10-15 yrs and this was not shown at all.

The consensus of risk from the report was a grading low risk. You cannot seriously make recommendation on someone else saying if hopefully our practices work things will be okay

I would very much like them to actually prove it.

There needs to be in my view **Base Line studies** conducted. Arsenic levels we were told at a public meeting is very high in the core samples tested.

Why is my soil not being testing for heavy metal levels before mining ?

Why has there been no control testing in hothouses of vegetable crops grown in our district and subjecting them to simulated exposure to dustings from the core samples and MRL testing conducted.

New Zealand Food Safety have in recent years been concerned enough about heavy metals such as Arsenic to have studied there effects on leaf vegetables in particular and concluded exposure does raise MRLs.

## **CONCLUSION.**

I personally have no angst against Kalbar . They are simply playing on edge with rules and guidelines set in place to allow the house to win.

I hope you on the panel are able to clearly digest what is at greater risk here and for what.

For a 10,000 page report to have taken nearly four years to compile and only be given 40 business days to respond in submission is worthy in itself to oppose.

If anything I hope you are able to instil greater accountability and grounds for compensation like no other project like it, because behind all the written text is a project that poses real threats to existing communities and agricultural enterprises that were none of there doing.





28 October 2020

Tim Hamilton

Weeroona Farm Produce

Woodglen VIC 3875

To Whom it May Concern,

Re: Letter of Support for Further Third-Party Environmental Impact Assessments

Australian Organic Limited (AOL) is the leading peak body for the Organic Industry in Australia, a member owned not-for-profit organisation protecting and promoting the future of the Australian Organic Industry.

As a proud supporter and advocate for organic farmers, we take seriously issues brought to us by our members. We have been made aware of a proposed mining project by Kalbar Operations Pty Ltd, the Fingerboards Mineral Sands Project.

Members of AOL have highlighted concerns regarding the potential harm this operation may pose to their Certified Organic status; their ability to operate their day to day business; and environmental damage both locally, domestically, and globally. Concerns held by AOL members are in relation to the continuance of their Organic Certification as a result of the construction and operation of the aforementioned project. Issues such as potential for contamination caused by airborne dust particles, water pollution from run-off and availability of irrigation water among other concerns.

The National Standard for Organic and Bio-Dynamic Produce (2016) requires organic operators to implement strategies to prevent contamination of their produce. Such contamination is not limited to pesticides or synthetic fertilisers, but also includes the prevention of heavy metal, microbial, or other materials which should simply be absent from our food. Our members operating in this area who have, over many years, been producing high quality food for Australians are gravely concerned about the proposed project.

Australian Organic Limited is not opposed to mining. We see sustainable and economically feasible primary production activities such as mining as significant contributors to the prosperity and wellbeing of all Australians. Farming, and mining, are among the most important productive and profitable industries in Australia. Therefore, ensuring only economically, environmentally and socially sustainable farming and mining operations are approved, is of the utmost importance.

We support Australia's strong environmental regulation at Federal, and State level. We commend the Victorian Department of Environment, Land, Water and Planning (DELWP) and Kalbar Operations Pty Ltd for clearly communicating the opportunity for submissions to be made by the public, via the Engage Victoria website. However, we are concerned that some very relevant and likely effects of this project may not have been adequately considered and discussed in the Environmental Effects Statement prepared and submitted by Kalbar Operations Pty Ltd.



We implore the East Gippsland Shire Council, Wellington Shire Council, the DELWP and EPA, and ultimately the Minister for Planning to apply all relevant and appropriate scrutiny to the EES, the Works Approval Application (WAA), and the Planning Scheme Amendment (PSA), to ensure that the best decision is made for the future of Australia.

We also note that the published Terms of Reference for the Fingerboards Mineral Sands Project Inquiry and Advisory Committee (IAC), specifically provides an opportunity for the committee to seek additional specialist expert advice related to agriculture and rural land use; and social impact assessment. We urge the IAC to indeed seek such expert advice on the true cost to the agricultural community in this area, should this project proceed.

We hereby express our support for further environmental impact assessments to be conducted by an independent third-party body.

Yours sincerely,



Niki Ford  
CEO Australian Organic