

Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory
Committee - EES

899

Request to be heard?: No

Full Name: Sean Boulton

Organisation:

Affected property:

Attachment 1:

Attachment 2:

Attachment 3:

Comments: See attached submission

Submission

Please accept our submission regarding Kalbar's proposed Fingerboards mine below:

When my wife and I got a copy of the EES, conscious of the 40 day deadline for the lodgement of our response we began to read them immediately. When we reached the very important Risk Register We found that the print was far too small to be legible. I find it strange that Kalbar would have presented such an important risk register in this unprofessional way. They have obviously paid expensive consultants to provide detailed studies, management controls, maps and other documentation to 'prove' that the proponent will be able to manage the risks in the project to the environment and minimise the impacts to an acceptable level. It is concerning that if this very risky project is approved, our community assets will be in the hands of a company which apparently treats the community with so little respect that it rushes to release its EES, which it has had years to compile, without careful editing and checking. There has been no apology that I am aware of for the poor presentation of some sections or for the inconvenience it has caused many people in the community. In volumes 9 and 10 pages were upside down. Someone we know had complained to the CEO about this and was told that the pages were in the correct order so it should be OK to read. I and many others in the community cannot reconcile this offhand manner with a company that has made a written commitment in its bulletins to the community that it will 'treat people with 'dignity and respect'. There are many careless mistakes in the information in the EES such as the Fingerboards area being North of Dargo (SEI vol 13) which is absurd and should have been picked up by the people responsible for checking the information. It has led many here to an assumption that Kalbar has had reassurance that the project has already been as good as approved because of the number of jobs it claims to create.

We would like to express in our submission our opposition to Kalbar's proposal to locate a vast open cut mineral sands mine so close to the Mitchell River and the vegetable crops directly opposite the proposed mine site and extending downstream the entire length of the Lindenow Valley Flood Plain. We have not confined our response just to the information in the EES but with your permission we have taken this opportunity to give you a brief explanation of why so many people here have reacted negatively to Kalbar's project and to their interaction with the community. We do this because we believe that if the project is approved there will be little cooperation from most of the community to resolve much of the risk mitigation strategies which Kalbar appears to rely on them to do such as the help from the farmers with rehabilitation; the 'Community Fund' which relies on locals to help encourage social interaction; help from locals with the selection of biodiversity species and many more.

Community dissatisfaction with Kalbar became apparent at the meeting the proponent held at the Mossiface Hall in December 2014 when Rob Bishop, the CEO at the time announced that the proposed mine would not be at Mossiface

as first announced but at Glenaladale, (although they have retained their retention license over that area.) He told the meeting that there was nothing there but 'burnt blue gum trees, some sheep farmers and a few lettuce growers'. This arrogant sounding description of the multimillion horticulture industry offended the Glenaladale residents who had come to the meeting. They realised that the proponents had little understanding or knowledge of the area. Kalbar's inability to value and respect the contributions and opinions of people living in the areas surrounding the Fingerboards was also evident in their refusal to listen to the advice given by local farmers and residents who had lived in the area all their lives. At community meetings organised by both Kalbar and the community, long term landholders warned the succession of Kalbar CEOs about the dangers of East Coast Lows, about the location of Kalbar's meteorological station in a wind shadow area, about the severe tunnel erosion in the proposed mine site and the many years of trials conducted by Catchment Management and DELWP that would make successful rehabilitation impossible. They explained that the 2014 bushfires * had devastated the area which was still in a transition period of recovery, including the vegetation and wildlife. They warned about the likelihood of 'soil slumping' after soil disturbance in this area due to tunnel erosion and the probable impact of a lot more sediment entering the Mitchell River. The State Government had already provided thousands of dollars of funding to prevent erosion on the banks of all the creeks and waterways that flowed into the Mitchell River.

Many of Kalbar's early press releases, interviews and articles in the newspaper aggrandised the size of the project rather than giving more realistic information about the project. A good example of this is the article in the Bairnsdale Advertiser on Friday 28th July 2017 in which the project is described in a series of superlatives as being 'one of 'the richest deposits in the world', 'world class', 'rated as one of the most economical and valuable underdeveloped mineral sands deposits in the world', 'the study demonstrates the project as a world class project', 'the deposit contains some of the highest grade of zircon in the world'.* This information attracts the readers' attention and might attract investors but withholds relevant details for those who will be affected by the project, such as approximate location of the mine, its dimensions, how it would source the water it would require and approximate duration of mining.

Kalbar seemed little interested in timely explanations to the public to further the community's understanding of the project in its preliminary stages. It seemed to be little interested in seeking a genuine understanding of the values, expectations, or dynamics of the community and seemed to be merely following a set script to win people's acceptance of, if not approval for, the project. They seemed to expect that the community would accept the project. complacently and not question the impacts on the environment or the many risk which they had sought to conceal. Their original map of the project area didn't even show the Mitchell River which made people begin to question whether this was deliberate so that no one would notice how close the project area was to the river and vegetable crops.

Another concern we have is the contradictory information the Community was given by Kalbar at the public meetings it organised. None of this initial information was ever prefaced with a statement that these figures were only a temporary assessment and could change as the project unfolded. There was actually little justification for some of these issues such as the number of truck movements or jobs. Each of the several CEOs offered a different figure for the number of jobs the mine would create, the number gradually increasing from 60 mine operators to 200 in the EES. The number of construction workers increased from 180 to 200 in the EES, the duration of the construction increased from 9 months to 2 years in the EES, the amount of water required went from 2-3 GI to 4-5GI and then back down to 3 GI in the EES, the number of truck movements was also increased from 20 to 80 (40 return trips). The size of the project area was increased and the location of the processing plant was moved closer to 9 residences - changes made without any prior consultation or explanation to the local residents who would be impacted by them. And now the community finds out without having had any prior consultation, that Kalbar is seeking approval to allow compulsory acquisition of private land outside the project area to be used by the mine for infrastructure that is located outside the mining project boundary for water pipelines, bore pumps, bore field, roadworks, new powerlines, easements, rail sidings. The only explanation given for any one of these changes was the decrease in water needed from 4-5GI to 3GI because Kalbar hoped to recycle the water. However in the EES it now appears that the 3 GI stated won't be sufficient and they will require even more for dust suppression and would seem to be in the process of applying to pump more than just winter fill water from the Mitchell River.

At community meetings Kalbar seemed reluctant to acknowledge community members' legitimate questions about the above changes and the reasons for them and the lack of consultation prior to the change. There seemed to be condemnation of community opposition on Kalbar's part rather than attempts to resolve issues of concern. On many occasions when people asked questions that were 'awkward' to answer, they glossed over the answer or gave a very evasive reply. In 2018-2019 Victor Hugo the current CEO attempted to 'gag' the community (letter in the Bairnsdale Advertiser) and prevent discussion about the project until the EES was released yet according to their stated policy in their bulletins and website, they 'encouraged' people to express their concerns and to ask questions, and their facilitating Consultant, Coffey told the community at a Kalbar organised public meeting on 25 July 2016 * that the proponent would include the public in the progressive stages of the EES process until it was released. Coffey's chairperson said at this meeting : ' I have mediated in many community disputes but have never seen a community as affected as yours'.

Kalbar always claimed to the community that it was 100% Australian owned. In 2020 however, it suddenly seemed that it was now 94% foreign owned. Challenged by people about this Kalbar hastened to say that was just an unfortunate mistake and although they weren't 100% Australian owned they

had a higher stake than only 5 or 6 %. The sudden change of name from Kalbar Resources Ltd to Kalbar Operations Ltd together with the change of CEO from Victor Hugo to Jozef Patarica, the sudden disclosure of the funding of 144 million from Appian Way- all prior to the release of the EES, has led to further distrust of the community in the proponent, in the legitimacy of its business as well as its business acumen and its accountability if things go wrong.

Our community also believes that there is a high probability that Kalbar will sell the mine if it wins approval like they did with the only other mine they proposed and won approval for in Indonesia and which they then sold to an Asian Consortium(Kalbar website). When Rob Bishop, the first CEO was asked if he would put in writing that the company wouldn't sell the mine he refused, explaining that Kalbar Resources Could at any time be the subject of a takeover by another mining company (said at Community 'drop in' session at the Glenaladale Hall organised by Kalbar in 2015).

One of Kalbar's team who apparently also worked for Coffey used our community, without our knowledge or agreement, in a case study which she presented at the 16th Annual Mineral Sands Conference on the 15th March 2016 to demonstrate how to win a Social License for a mining project.* The community members in the photos had not given permission for their photo to be used in this way and many of the community felt belittled by this case study.

It is apparent to community members who have attended both the Kalbar and Community organised meetings that the information given by the proponent is often misleading. One of the best examples of this in is the case studies they present in which they compare the successful mining and rehabilitation results of mines they say are comparable in environmental 'sensitivity' to the Fingerboards mine. For example in an attempt to justify an open cut mine in an agricultural area, reference is made to the Wemen mine near Mildura. But the comparison is misleading because unlike the Fingerboards mine site the country there is flat and sandy with an average rainfall of 330mm, the highest daily rainfall recorded being 83mm with the area recording more than 25mm of rain on an average of only 1.5 days a year. The physiography of the area allows no run off with excessive rain percolating into the groundwater. The mine there had a lifespan of 3 years with a footprint measured on Google Earth of some 240 acres and the depth was minimal compare to the almost 50 metre depth of the Fingerboards mine. Compared to the 1675 hectare project that Kalbar proposes for the Fingerboards, this Mine is not a legitimate comparison. As well as this, the vegetable grown was carrot which grows underground unlike the cauliflowers broccoli and lettuce etc crops of the Lindenow Valley exposed to dust and pollution.

Kalbar claims that the tailings of their mine present no environmental damage or safety hazard. In its Referral to State Government Kalbar admits that 'some seepage into the shallow groundwater system may be expected which may discharge to nearby waterways potentially impacting water quality of the

6am - 6pm

nearby environment'. Kalbar has cited the tailings dam at Capel in Western Australia. But what is conveniently left out and therefore misleading is that the tailings dam at Capel leaked manganese and sulphate salts into the groundwater, a fact which the mining company responsible readily admits will take up to twenty years to repair. Most of the other mines Kalbar makes comparisons with are not as big, deep, or of as long a duration as the Fingerboards. None overlook a vast vegetable growing area and the topography is dissimilar the ground being relatively flat and level and easy to rehabilitate. The rainfalls are also higher making rehabilitation more possible and many mines in W.A. only operate 6-6pm so that the noise won't disturb the residents' sleep. This is not the transparency we would expect from information given to us about the project.

In the EES Kalbar quite honestly admits that some workers in the vegetable growing enterprises might leave to work in the mine because of the higher wages but this is likely to be menial, untrained work which is likely to be temporary during the construction period. There is no mention however of the risk of workers exiting jobs in the agriculture and horticulture industries due to the high risk of contamination of crops from airborne dust blown by strong gusts of wind and containing Silica, monazite and other pollutants as well as possible contamination to the Mitchell River water only several hundred metres from the mine site.

It is obvious to us from the consultation period before the release of the EES and from the information in the EES itself that Kalbar has no affinity with our area and is prepared to present biased facts that progress its own interests to the detriment of those of our community. It is trying to convince our State Government representatives to place its trust and confidence in a company and project that entails so many inherent risks and potentially disastrous impacts to the environment of one of the most beautiful and visited parts of Victoria and even of Australia, and on the economy and welfare of the people in East Gippsland. Even the desperately needed jobs as a result of the Covid impacts do not justify approval for this mine.

The RISK REGISTER

An analysis of Kalbar's risk assessment as it is written in the EES would suggest that the project has some risks but that they are all manageable and would have minimal impact on the environment and the community in and near the project area. Only 20% of the 172 risks listed are 'HIGH' and only 6% are identified as 'MAJOR'. It is surprising that Kalbar can actually identify the level of risk when the EES reveals that the impact and mitigation of many of the 'risks' can only be determined once there has been consultation or cooperation with the community or industry bodies, or relevant expertise on the matter can be sourced.

Kalbar made many attempts to 'gag' the community and prevent it from voicing its opposition claiming it was a vocal minority drowning out a silent majority who supported the project - which was farcical considering the vast

number of people who opposed the project. We were repeatedly told that all the answers would be in the EES with detailed explanations and information. It is frustrating now to see that there are still many unresolved issues to be dealt with before we can really properly identify and assess both the risks and the mitigation strategies proposed.

SEAN BOULTON

ETSURO BOULTON

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2014 FIRE



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LOSS OF STOCK 2014 FIRE



* Photo of one of the bigger vegetable growers - taken from newspaper. Interview with him on the ABC and on other media. Full interview recorded on site below. He expresses his fears of negative public perception of vegetables and produce grown in close proximity to a mineral sands mine.



[https://www.abc.net.au/news/rural/2014-12-17/gippsland-farmers-dubious-about-co-existence-with-mining-project/5972546?](https://www.abc.net.au/news/rural/2014-12-17/gippsland-farmers-dubious-about-co-existence-with-mining-project/5972546?utm_source=abc_news&utm_medium=content_shared&utm_content=mail&utm_campaign=abc_news)

[utm_source=abc_news&utm_medium=content_shared&utm_content=mail&utm_campaign=abc_news](https://www.abc.net.au/news/rural/2014-12-17/gippsland-farmers-dubious-about-co-existence-with-mining-project/5972546?utm_source=abc_news&utm_medium=content_shared&utm_content=mail&utm_campaign=abc_news)

However a comparison with these Western Australian sites against Kalbar's proposal exposes some interesting facts.

| MINE | LIFE Years | DEPTH Meters | PROJECT AREA Ha | VEGETATION LOSS Ha | WATER REQUIREMENTS Gl/Yr |
|---------------------|---------------|-----------------|--------------------|-----------------------|--------------------------------|
| Fingerboards | 20 | 40 | 1440 | 242.7 | Up to 5 |
| Yalyalup | 4.5-5.5 | | 894 | | |
| Wonnerup | 4 | | | | |
| Wonnerup Nth | 5 | | | | |
| Wonnerup Sth | 1.5 | | 165 | | |
| Tutenup | 5-6 | 15 | 232 | | 2.5 |
| Waroona | 4 | | 184 | 21 | 2 |
| Keysbrook | 6.5-8 | 2-5 | 1366 | 182 | 1.8 |
| Yarloop | 1.5 | | 19.7 | 2.7 | |
| Dardanup | 3.5-5 | 14 | 301 | 36.5 | 1.09 |

Kalbar claims it compares favorably to other mineral sands mines and can be rehabilitated as successfully but a closer look at the specifications shows huge differences in

life of mine, the depth, size etc



Fingerboards 'world class'

The preliminary feasibility study for the Fingerboards Mineral Sands project has resulted in the project being rated as one of the most economical and valuable undeveloped mineral sands deposits in the world.

The results have been confirmed by leading, independent specialists to demonstrate the economic feasibility of the project at Glenaladale, proposed to be developed by Kalbar Resources.

At the Fingerboards, Kalbar has defined a large, rich deposit of mineral sands, which includes zircon, titanium and other minerals used in technology, communications, manufacturing and many consumer products.

"The study demonstrates the Fingerboards Mineral Sands Project as a world class project, and is the result of years of work by Kalbar staff and contractors, many of whom are East Gippsland locals," Kalbar managing director, Neil O'Loughlin, said.

"The deposit contains some of the highest grades of zircon in the world, and is relatively shallow, making it cost effective to develop and relatively easy to rehabilitate.

"This project would enable the production of approximately eight per cent of the global market for zircon, making it a project of global significance," he said.

Laboratory tests have shown that the ore is low in clay, which

reduces water consumption, and makes slurring and processing easier.

Zircon recovery is around 93 per cent, in line with industry standards and tests undertaken by Kalbar and by potential customers shows the zircon is high quality, and ceramic grade, making it desirable to key markets.

The project, if approved, is expected to generate an average of \$150m in revenue each year over the life of the project.

Much of this is expected to stay in the local economy through direct employment and further jobs created in support industries and the general community.

The project is anticipated to employ 250 people during construc-

tion and create about 110 local jobs during its 20-year operation.

"In a job-strapped local economy, these are significant employment numbers. We still have a long way to go with the project approvals, but from an economic perspective, the project would be a major investment in the region and a boost for the local economy," Kalbar regional manager, Chris Cook, said.

A detailed socio-economic study is being carried out as part of the environment effects statement for the project.

Kalbar is well advanced on its bankable feasibility study, which is the final economic study before an investment decision is made, subject to approvals.

Sample of the type of article which Kalbar put in the newspaper to advertise and promote the project.

Case study – Glenaladale Mineral Sands Project

com

- Establishing effective stakeholder engagement
- Foundation for establishing a social licence to operate



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Glenaladale
used as a
Case Study
by Kalbar
employee
unknown
the Comm

Glenaladale Mineral Sands Project

coffe
A NEW NECESSARY

- Glenaladale Deposit (25 kms NW Bairnsdale)
- Discovered in 2002 by Rio Tinto
- 2.7 Bt resource
- Fingerboards Mine
- Community has little or no knowledge of mineral sands or mining

Active opposition



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This
Photo
of some
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Mine-free Glenaladale took its plight to Parliament House on Wednesday as it continues its #StopKalbar campaign, which aims to put a halt to the proposed mineral sands mine at Glenaladale. (7/5)

Campaign taken to parliament

Mine-free Glenaladale took its #StopKalbar fight to Melbourne's Parliament House on Wednesday, more than 100 people opposed to the mine putting forward their case to the State Government and Minister for Planning, Richard Wynne, as to why the Fingerboards project should not see the light of day.

Parliament steps were covered in bright orange as a petition with 4500 signatures was tabled by Greens MP for Brunswick, Tim Read.

in orange and three wheelbarrows of broccoli and carrots," Mr Read said.

"I was very impressed that they had gathered 4500 signatures and organised this very effective event. I hope the planning minister pays close attention and this mine doesn't go ahead."

Mine proponent, Kalbar Resources, is in the final stages of preparing an Environment Effects Statement (EES) for submission to the Department of Environment, Land, Water and Planning (DELWP) and last night discussed

information evening in Lindenow. (Details to follow in Monday's Advertiser.)

Kalbar chief executive officer, Dr Victor Hugo, is concerned Mine-free Glenaladale has been delivering "misleading" statements, including the number of jobs that could be at risk due to radioactive and highly toxic substances and the percentage of directly impacted landholders.

"The technical studies conducted as part of the EES have determined that the ore, tailings and overburden are not considered radioactive under

regulations. We have also not found levels of metals or other chemicals, which could be considered as highly toxic substances," Dr Hugo said.

"Whilst Kalbar Resources encourages public discussion and respects the right of community members and groups to voice their opinions about the project, we believe that factual evidence presented through the EES process is a more reliable basis for decision-making than the unsubstantiated claims that are being made by anti-mining

Community Opposition



Signs like this at entrance and exits to, Bairnsdale and on peoples gates