

26 February 2021

The Chair

Fingerboards Inquiry and Advisory Committee

C/- Planning Panels Victoria

**By email only:** [Fingerboards.IAC@delwp.vic.gov.au](mailto:Fingerboards.IAC@delwp.vic.gov.au)

Dear Mr Wimbush

**Fingerboards Environment Effects Statement – Response to Directions 3, 46 and other information**

1. We continue to act for Mine-Free Glenaladale Inc. (**MFG**).
2. We refer to the Inquiry and Advisory Committee's (**IAC**) Consolidated Directions dated 19 February 2021.

**Evidence on centrifuges**

3. We are instructed to advise that MFG intend to file extra evidence in response to the centrifuge issue. However, we will not be in a position to confirm the name and business address of our client's additional expert until 4pm today.
4. We are instructed to advise that MFG wish to file supplementary evidence in response to the centrifuge issue. Specifically:
  - a. Supplementary Statement of Associate Professor Matthew Currell (hydrogeology)
  - b. Supplementary Statement of Mr Roderick Campbell (economics)
  - c. Supplementary Statement of Dr Jess Drake (soils / rehabilitation)
  - d. Supplementary Statement of Dr Julia Jasonsmith (tailings)

5. We confirm that the Supplementary Statements will be limited to consideration of the centrifuge issue.
6. We are advised that, due to competing work commitments, Dr Drake and Dr Jasonsmith are unable to provide their Supplementary Statements addressing the centrifuge issue until 26 March 2021.

**Request for leave to file evidence late**

7. In view of the above, our client respectfully seeks leave to file the Supplementary Statements of Dr Drake and Dr Jasonsmith at the beginning of the week commencing 29 March 2021.

**Hearing timetable**

8. In response to Direction 46, we advise that the estimated hearing time required by MFG remains the same. Our client requires at least five days to speak to our clients' submissions and call evidence.

**Availability of experts and counsel**

9. We request that the following availabilities be taken into account in the preparation of Version 2 of the Hearing Timetable:
  - a. Two experts to be called by MFG are not available in the week commencing 24 May 2021;
  - b. Counsel for MFG is not available in the weeks commencing 17 and or 24 May 2021. Counsel for MFG is also not available on 10-11 June 2021.
10. Further to the above, and as foreshadowed at the Second Directions Hearing on 15 February 2021, we advise that Mr Rod Campbell has very limited availability. At this stage, Mr Campbell is available to appear in early May and may be available in late June. Accordingly, we respectfully request that Mr Campbell be scheduled to provide his evidence separately to the rest of the MFG case.

Please contact Nick Witherow [REDACTED] and Virginia Trescowthick [REDACTED] should you have any questions.

Yours sincerely

[REDACTED]

Nick Witherow  
Principal Lawyer  
Environmental Justice Australia

[REDACTED]

Virginia Trescowthick  
Lawyer  
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