

12 March 2021

By Email

Mr Nick Wimbush  
Chair, Inquiry and Advisory Committee - Fingerboards

Attn: Amy Selvaraj

Dear Mr Wimbush,

### **Fingerboards mineral sands project**

We continue to act for Kalbar Operations Pty Ltd (**Kalbar**).

We enclose with this letter:

- TN 013, which provides our client's response to RFI No. 2 of the Committee's Requests for Information dated 11 December 2020; and
- a cross-referenced table as required by Direction 59(c) of 29 January 2021.

Please also find enclosed with this letter our client's responses to the following Directions made on 19 February 2021:

- Direction No. 29 – TN 014, which responds to the Committee's Requests for Information on centrifuges. Please note this does not include a response to RFI C11, as this is still in preparation. We expect to be in a position to provide this early next week;
- Direction No. 60 – our client's reply to the legal submissions made by MFG dated 5 March 2021. No reply is made to Council's submissions as those submissions expressly did not respond to Tabled Document 141; and
- Direction No. 64 – our client's updated EES submissions summary table. To be clear, this document is our client's summary of the matters raised by submitters in their written submissions. If submitters believe there are matters that are missing from the summary, then they can address the Committee on those matters at the hearing.

Finally, we also enclose:

- an amended work plan for the project to recognise the use of centrifuges and the removal of the tailing storage facility. Amendments to the form of the work plan exhibited with the EES are in track change; and
- updated risk management and treatment plans, which our client has updated in track change to reflect the recommendations of its experts as set out in TN 013. Please note that the updated rehabilitation plan is still in preparation and we expect to be in a position to provide it very soon.

---

White & Case  
Level 32, 525 Collins Street  
Melbourne VIC 3000  
Australia

GPO Box 2756  
Melbourne VIC 3001  
Australia

T +61 3 8486 8000

ABN 17 847 592 731

[whitecase.com](http://whitecase.com)

Mr Nick Wimbush  
12 March 2021

Please do not hesitate to contact us if you have any questions.

Yours sincerely,



**Tim Power**  
Partner



Senior Associate



encs.

cc: Mailing List