

29 April 2021

By Email

To

Amy Selvaraj
Senior Project Officer
Planning Panels Victoria
Fingerboards.IAC@delwp.vic.gov.au

Dear Amy

**Fingerboards Mineral Sands Project Inquiry and Advisory Committee (IAC)
Supplementary submission of East Gippsland Shire Council (Submitter 716) – Centrifuges**

We continue to act for East Gippsland Shire Council (**Council**) in this matter.

We refer to:

1. our letter to the IAC dated 30 March 2021;
2. the Ausenco *Review of Centrifuges for Tailings Dewatering* dated 29 March 2021 (**Ausenco Review**);

which we filed together as comprising Council's supplementary submission in relation to the use of centrifuges in the Project.

Ausenco has since informed us of the existence of a "commercial conflict" having arisen in relation to the work it was engaged to undertake on behalf of the Council. We are informed that the conflict arises in circumstances of Ausenco, through one of its wholly own subsidiaries, currently completing work for an entity which is ultimately the 100% owner of the Fingerboards Mineral Sands Project. Ausenco has confirmed that, other than its involvement carrying out work on behalf of Council, Ausenco has not been involved with the Fingerboards Mineral Sands Project.

Until that information was received, the Council had understood Ausenco to have satisfied itself that no such conflict existed.

At the time of confirming the existence of the conflict, Ausenco (unsolicited) provided the enclosed *Review of Centrifuges for Tailings Dewatering – Amended* dated 21 April 2021 (**Amended Ausenco Review**).

The Amended Ausenco Review identifies further information, which had not been considered in the preparation of the Ausenco Review, as relevant to the conclusions reached in the Ausenco Review and referred to in our letter dated 30 March 2021.

In particular, the Ausenco Review highlighted that technical risks required further work to validate, summarised as follows:

- a) The centrifuge sizing, performance and materials characterisation should be validated/confirmed:
 - i) supported by additional centrifuge testwork (considering variability);
 - ii) confirming ultrafines recirculation within the process;
- b) The design for co-storage of fine and coarse material should be confirmed; and
- c) The water balance based on the above should be confirmed.

The Amended Ausenco Review identifies further information including further material filed by the Proponent and sourced by Ausenco itself, which, Ausenco considers, together presents:

- strategies, a work plan, risk assessment and future documents (i.e. fine cake dumping operational procedure) for co-storage of fines, coarse and overburden;
- a strategy and risk assessment to address water mounding through tailings monitoring and surveillance;
- an updated site wide water balance including centrifuges, and confirmation that the site water balance and water management regime including groundwater and surface water quality is currently underway to support centrifuging of fine tailings;
- confirmation that runoff from stockpiles will be captured and managed, and addressed during detailed design.

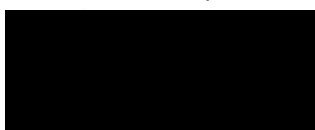
Ausenco further informs us that there is no connection between the commercial conflict and the preparation of the Amended Ausenco Review.

On that basis, the Council will not rely upon the absence of information identified in the Ausenco Review as indicated in our letter dated 30 March 2021, save to the extent that it will rely on those matters in respect of which the Amended Ausenco Review continues to identify a need for further work. The Council will continue to submit that uncertainties in the Proponent's material (including as reviewed by the Amended Ausenco Review) are significant in the context of the IAC's task.

In circumstances of the Council's expressed reliance on the Ausenco Review, we consider it appropriate and in keeping with our duty to the IAC to provide this clarification and the Amended Ausenco Review to the IAC and the parties.

If you have any queries, please contact me.

Yours sincerely



Darren Wong
Principal

