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From: June Haviman [REDACTED]
Sent: Friday, 5 February 2021 3:02 PM
To: Fingerboards Inquiry and Advisory Committee (DELWP)
Subject: Kalbar EES Reponse check.
Attachments: IAC Response Check. # 556.docx

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**Fingerboards Mineral Sands Project Environment Effects Statement Inquiry and Advisory Committee
Direction No. 26 — EES submissions summary 7 January 2021**

ACTION: Please email your amendments to Amy at: Fingerboards.IAC@delwp.vic.gov.au

Dear Amy,

Thank you for this opportunity to check the EES response by Kalbar.

Kind regards

June Haviman

Fingerboards Mineral Sands Project Environment Effects Statement Inquiry and Advisory Committee Direction No. 26 — EES submissions summary 7 January 2021

ACTION: Please email your amendments to Amy at: Fingerboards.IAC@delwp.vic.gov.au

Submission 556.

1.09 Radiation / heavy metals

NEW ADD. Concern. At each stage of separation, radiation / heavy metal levels increase (and toxicity) along with targeted Heavy Minerals. Refer # 556. page 2. Para 4.

Issue 3. Add # 556. Refer Page 5, para 1. 13. Appendix.

Issue 5 Add # 556. Refer Appendix. GHS Hazard Statements, environ hazard to aquatic life.

Issue 6. Add #5 56. Refer Appendix. GHS Hazard Statements, environmental hazards.

Issue 7. Add # 556. Refer page 8 para 2. Other toxic elements also increase in concentrations in the WCP.eg. (Pb), arsenic (As), Zinc (Zn), Manganese (Mn), Magnesium (Mg), Vanadium (V) and Niobium (Nb), Page 4,

NEW ADD Concern at failure to disclose elevated radiation levels TENORM, e.g., **Uranium to 400 ppm. Thorium to 300 ppm.** Refer -# 556, Page 8. Para 2, page 4. Para 1.

Issue 10. Add # 556. Page 13. Appendix includes multiple GHS health hazard warnings.

NEW. ADD. Concern for 60,000 tonnes Monazite – become available to human exposure and to the biosphere. Refer # 556. Page 6. Para 1.

NEW. ADD. Concern. Residual 95% soil plus 3 GI water are all mixed and contaminated by heavy metals within the WCP, to extract just 5% HMC. Refer # 556. page 7. Para 8.

2.12 Horticulture/agriculture

Issue 12. Add # 556. Page 4 - Para 2. Kalbar has presented HIL-A (ppm–residential) levels of undisturbed soil. These levels are redundant with open-cut excavation.

2.15 Human health

NEW. ADD. Concern for omission of safety GHS pictograms and health Hazard statements of mineral toxicants. Refer #556. Appendix. Page 16. Section 2.

Issue 1. Add # 556. Appendix details the GHS Health concerns. Page 13.

2.16 Rehabilitation

NEW. ADD. ## 556. Concern. it is un known who will be responsible for remediating the contamination of water and land resources and the Gippsland lakes network.

NEW. ADD It is unknown how Kalbar’s compliance will be monitored. # 556. page 10.

NEW. ADD Concern. The level of penalties for contamination is unknown. # 556. page 10.

2.20 Tailings management

Issue 1. Add #556. Refer page 7

NEW ADD. New global standards in the management of tailings were released in August 2020. GLOBAL INDUSTRY STANDARD ON TAILINGS MANAGEMENT. UNEP. AUGUST 2020
<https://globaltailingsreview.org/global-industry-standard/> Refer # 556. Page 7. Para 4.

NEW ADD. Concern. 'A gradual increase in production from a rate of 500t/hr and increase to a capacity of 1,500t/hr or 12Mt/year' ... so too greater volumes of water will be needed. Refer #556. Page 7. Para 2.

NEW ADD Concern. 'Approximately 300,000litres per hour (L/hour) of water is expected to be lost from the system. Only 65% of the water in the tailings stream will be recovered' – Kalbar EES. Refer #556. Page 7. Para 3.

2.21 Kalbar's track record and experience

NEW ADD. Concern. Mineral identities with their elevated radiation and toxicity levels have been omitted, and so place investors, authorities and the region at risk. refer # 556. Page10. Para 2.

NEW ADD. Kalbar is not a 'fit and proper person to hold the licence' in view of its use of invalid data and questionable statements. Refer # 556. Page 10. Para 1.

New. ADD. The failure in disclosure is a manipulation of information. Referral to the Ethical Investors Advisors and to the Financial Services Council (FSC) for investigation is warranted. Refer # 556. page 6 para 4.

2.22 EES process

NEW ADD Concern. Commercial laws with severe penalties for false information to be applied equally to mining operatives. Refer #556. Page 10. Para 1.

Issue 3. Add # 556. Refer page 10. Last para.

Issue 8. Add # 556. Refer page 10. Last para.

Issue 10. Add # 556. Refer page 6. Para 4. EES process does not include independent review.