

2 August 2021

Mr Nick Wimbush
Chair of the Fingerboards Mineral Sands Project Inquiry and Advisory
Committee
Planning Panels Victoria
1 Spring Street
Melbourne Victoria 3000

By email: Fingerboards.IAC@delwp.vic.gov.au

Dear Mr Wimbush,

Fingerboards Mineral Sands Project – updated environmental management and planning documents

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

We refer to your letters dated 18 June 2021 (Tabled Document 521) and 19 July 2021 (Tabled Document 687) seeking Kalbar's final position on the environmental management and planning documents.

Kalbar has updated the following draft documents in response to the comments from other parties:

- the Environmental Management Framework (**EMF**);
- the consolidated Mitigation Register; and
- the Incorporated Document.

Kalbar has focussed its response on these three documents because they establish the approach to managing environmental issues of the Project, and envisages them being a focus of the IAC's report and Minister's assessment. Kalbar has had regard to the draft risk treatment plans in responding on the three documents listed above, but has not updated them. This is because the draft risk treatment plans are technical documents in the nature of management plans that will evolve during detailed design of the Project and further consultation with Earth Resources Regulation.

Enclosures

EMF

Please find enclosed both a 'tracked changes' and 'clean' version of the draft EMF that presents Kalbar's final position.

Mitigation Register

Given the evolution of the proposed mitigations over the course of the EES process, we thought it would be useful to update the table of 'colour coded responses' previously provided (Tabled Document 696), with Kalbar's further changes and comments made in response to comments from other parties. Please find enclosed the updated table, together with both a 'tracked changes' and 'clean' version of the consolidated Mitigation Register.

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Incorporated Document

Please find enclosed both a 'tracked changes' and 'clean' version of the draft Incorporated Document, together with a table that briefly explains Kalbar's responses to the comments from other parties.

Also enclosed is a copy of DELWP's native vegetation removal report dated 29 July 2021 and the accompanying excel spreadsheet, which provides the basis for the amount of native vegetation clearance and the corresponding offsets set out in clause 6.7.7 of the draft Incorporated Document.

Yours sincerely,

[Redacted signature]

Tim Power
Partner

[Redacted contact information]

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