

# Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory  
Committee - EES

# 520

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Request to be heard?: No

**Full Name:** Rebecca Lamble

**Organisation:**

**Affected property:**

**Attachment 1:** Submission\_to\_th

**Attachment 2:**

**Attachment 3:**

**Comments:** See attached submission outlining my concerns.

Dear Advisory and Committee Members,

This is a written submission regarding the Environmental Effects Statement for the proposed mineral sands mine at Glenaladale.

I am strongly opposed to the development of this mine by the mining proponent Kalbar Operations Pty Ltd, principally on the grounds it is unsuitable in scale and type in the proposed location and is out of character for the surrounding land use.

I have concerns about its proximity to the:

- highly significant Perry River chain of ponds downstream of the proposed mine
- healthy Mitchell River National Park (and the impact on tourism and local environment)
- drinking water supply to Bairnsdale, the main regional centre of East Gippsland
- 'critically endangered' Gippsland Plains Grassy Woodlands which is already subject to incremental biodiversity loss – nb. the absence of *in situ* flora and fauna surveys used to inform the EES (only desktop studies have been carried out) is not good enough
- significantly important fruit and vegetable growing industry on the Lindenow flats and unknown implications of fine particle deposition from the prevailing westerly winds
- known and unknown cultural heritage sites and artefacts and the potential for irreversible damage (no longer acceptable in 2020)
- RAMSAR listed Gippsland Lakes

The following is an outline of my concerns:

- **Employment**

The main beneficiaries of this development would be shareholders who are most likely not local. According to analysis of irrigation data if the 3GL pa of water proposed for the mine was redirected to the horticulture industry, three times more jobs could be created.

- **Water contamination**

A tailings dam 90 hectares in size is proposed and will contain mine tailings waste and flocculants which have warnings on safety data sheets about being harmful to aquatic life. The mine simply would be out of character for the current land use in the proposed location.

Located above both the Perry and Mitchell Rivers there is a stated risk of leaching from the dam. The risks to the biodiversity loss could be significant (is it understated?) to the Perry River Chain of Ponds system. "The Chain of Ponds within Providence Ponds, the Perry River and their tributaries are a unique waterway and form one of the most intact systems in Victoria." Source: <https://www.wgcma.vic.gov.au/our-region/projects/protecting-our-ponds>

In addition, the proximity to the receiving waters of the Mitchell River and RAMSAR listed Gippsland Lakes during a flood appear to have been inadequately addressed and incorrectly categorised as 'low' risk in the EES. Can you confirm independently? And there are no details in the EES for the dam's construction so how can the risk of failure be deemed 'low'?

In my opinion the risks in the EES are down played regarding the potential for the river being contaminated, impacting on the crops, fishing, agriculture, the health of the rivers and the Gippsland Lakes a very important Ramsar-listed wetland underpinning the lifestyle and economy of East Gippsland as 'Naturally Magic.'

- **Cultural Heritage**

Undetermined Aboriginal cultural heritage sites are stated as being highly likely to be present. Given the excavation down to 45 meters in depth, it will be impossible to avoid destruction of artefacts and heritage. Again an unacceptable situation in 2020. What are the opinions of the local indigenous elders?

- **Public health uncertainties**

The full laboratory analysis of the soil/mineral/ore samples have not been revealed in the EES, therefore there is a lack of information to adequately inform a risk analysis. Kalbar Operations Pty Ltd has acknowledged there are radioactive substances to be mined including rare-earths. In Victoria and Australia there aren't EPA guidelines for some rare earth elements which could be potentially mined, and therefore there is no best practice to use as a guide. This is also a legal loophole as some rare earth elements are potentially carcinogenic and have guidelines internationally, but not locally so there is no yardstick to measure them against. Another oversight in this day and age.

Who pays down the track for the public health cost and losses to the fruit and veg growing industry resulting from fine dust particulate contamination? Would the mining company be exempt itself from this responsibility where no EPA guidelines exist, and therefore would public money be used to cover the costs for damages? Bairnsdale already has a very high cancer rate. What studies have been undertaken into the prevailing westerly winds linking cancer to depositions already from fine particulates (such as from the Latrobe Valley or agricultural pesticides) and now from the proposed mineral sands mine? I don't want to sound alarmist or against mining development, but there are too many questions for a mine proposed for this landscape.

- **Culture of development**

The whole planning process in Victoria and Australia is geared towards the culture of working how to approve a development proposal to make it happen – and not questioning if it is the right development in the first place. Planning in Victoria generally works within the boundaries and existing rules to enable a development to proceed. But can you please ask, is this development type (i.e., mining) appropriate for this location and at this scale? To what extent is the planning lense a 'development at all cost' lense?

This leads to the fact East Gippsland Shire Council's 'Lindenow & District Community Plan' did not foresee a mine in that area, and Government needs to recognise the pre-existing residential and agricultural land use.

I have grown up and lived in East Gippsland for most of my life. Having left to attend university and return to raise a family in Bairnsdale, I am unable to put a value on the local environment in and around the Mitchell River National Park. During this year and living with covid our family has undertaken many valuable trips to this area. With each visit the carpark at the Den of Nargun has been full to bursting. A mine of this scale and in this location is incompatible with the vision of supporting new and existing eco-tourism opportunities. Who wants to visit a local B&B which overlooks a mine site? This is not alarmist and is genuinely on the cards!

It is also unacceptable to allow compulsory acquisition of private land to be used by the mine for infrastructure to be located outside the mining project boundary (i.e., for water pipelines, bore pumps, roadworks, new powerlines, easements, rail siding and vegetation removal). Why wasn't this part of the mine project area? Why isn't this a matter for the East Gippsland Shire Council to determine? I am fully of the opinion if the

community were informed of the public land acquisition proposed it would not pass the pub test.

- **Water volumes**

This East Gippsland region has just suffered a long drawn out drought. Priority access to this water for the mine over agriculture would be incompatible with community expectations.

Have you verified if this mine could potentially use as much water as the entire township of Bairnsdale and surrounds, supporting a population of 20,000? The Woodglen drinking water storage is very close to the mine site and is the main water supply for Bairnsdale and surrounding towns. Bairnsdale is the major centre for the shire, so any implications to the drinking water would reach beyond the town.

The latest CSIRO modelling (2019) under a medium and high emissions scenario predicts a 10% decline (median) in rainfall over the next 10 years, and we have already locked in more hotter days. The EES does not take into account the future availability of water, or the very real likelihood of catastrophic floods. The weather is predicted to become more extreme – more drying and droughts, and paradoxically more flooding rains and storm surges. The EES has downplayed the risk as ‘low’ and demonstrates another example of why this proposal should be scrutinised.

- **Native vegetation**

The proposal is for 13 km<sup>2</sup> of land to be impacted, which will include the removal of native vegetation and habitat including over 700 mature trees. Some of the flora and fauna are only just being discovered and catalogued. No on-ground studies (only desktop) have been undertaken by the EES to map the flora and fauna in this area, which occurs on the critically endangered ‘Gippsland Plains.’ This would be another example of incremental loss to this unique ecosystem, the biggest threat to its survival.

In closing, I am concerned the mining company Kalbar Operations Pty Ltd has no history of mining enterprises. The company has already changed ownership within the last few years. What mechanisms will be used to enforce regulations and compliance? The deceit tactics already used are cause for concern. Two further examples:

1. the company have used photos from a Western Victorian farm in the local media to “showcase” agricultural land restoration/rehabilitation implying they have done an exemplar job - these photos were actually of land which the farmer himself undertook at considerable expense and effort to restore. The farmer showed me the newspaper advert and the photos of his farm.
2. In the EES the number of houses near the mine has been under-reported, and therefore is another example of using inaccurate or inadequate data to make an informed decision. This is an appalling oversight and attempt of misrepresenting the facts.

Thank you for the opportunity to make a submission to the EES consultation.

Yours sincerely,



Rebecca Lamble