

# Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory  
Committee - EES

# 535

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Request to be heard?: No

**Full Name:** William Alexander Grant

**Organisation:**

**Affected property:** [REDACTED]

**Attachment 1:** EES\_response\_WA

**Attachment 2:**

**Attachment 3:**

**Comments:** SEE ATTACHED SUBMISSION

**RESPONSE TO THE  
FINGERBOARDS MINERAL SANDS PROJECT  
ENVIRONMENT EFFECTS STATEMENT**

**To the Inquiry and Advisory Committee members**

As a resident of East Gippsland for over 40 years, a property owner, farmer, and a tourism operator, the proposed mine will not be compatible with our businesses or our lifestyle. Our property is situated across the river from the Lindenow Valley.

The Mitchell River National Park is assigned the IUCN Category 11 (National Parks) of the United Nations List of National Parks and Protected Areas, in recognition of the area's outstanding values and its importance as a part of our heritage.

The Park has significant indigenous and cultural geological sites, rainforest communities of National Biogeographical significance, rare and threatened fauna and flora species and threatened vegetation communities. The Mitchell River is Heritage listed.

The proximity of the proposed mine and processing plant would have adverse effects on the Mitchell River National Park and the Mitchell and Perry River systems, which flow into the RAMSAR listed Gippsland Lakes and Wetlands.

The proposed mine site is situated at the gateway to the Mitchell River National Park, the Alpine National Park and the Dargo High Plains - high volume tourist areas.

I feel the proponent cannot guarantee that there will be no adverse effects on the river systems and the RAMSAR listed Gippsland Lakes.

The tranquillity and landscape values of the area will be impacted by the mine.

**History of Mining in East Gippsland**

Mining Legacy in East Gippsland

Mining in East Gippsland has left a legacy of environmental damage and has proven to be unsustainable.

Gold mining has caused erosion and arsenic and mercury contamination of both soil and water and contributed to siltation of streams e.g. sand slug in the Tambo River.

Gold dredging has led to the disruption and destruction of stream ecosystems.

Copper Mining – The Stockman mine at Benambra was uneconomic and unsustainable and continues to pollute the environment.

- The Stockman mine only operated for 4 years instead of the 20 years proposed in the EES
- The tailings dam was constructed on a waterway at the head of the Tambo River and destroyed 90% of a 22 ha rare sphagnum swamp, which is now listed under the FFG Act and the EPBC Act.
- State Government investment totalled \$5.8 million, this included road works and dam construction, unpaid royalties and project facilitation.
- The company forfeited the \$350,000 bond. When the mine ceased operation it left behind a tailings dam containing 700,000 tonnes of toxic material leaking acid and heavy metals into the Tambo River.
- The Department of Primary Industries rehabilitated the site at a cost of almost \$7 million.
- Due to the tailings dam design failure the EPA released emergency discharges from 1999 to 2006 totalling 300 ML. This was contaminated water from the tailings dam which entered the river system.
- Heavy metals in the discharge were well above the ANZECC limits.
- The tailings dam is now a flow through system having replaced the evaporative system which failed. Following heavy rain it spills into the tributary of the Tambo River.
- The rehabilitated tailings dam wall is still leaking at a rate of 86,000 litres a day polluting streams with copper, cadmium and zinc.

There is no guarantee that the proposed Glenaladale mineral sands mine will be both economically and environmentally sustainable. A tailings dam which is proposed to be built on the headwaters of both the Mitchell River and Perry River systems is inappropriate.

## **Risks**

The radioactivity of the mineral sand once disturbed poses an unacceptable risk to the East Gippsland community. The proponent has failed to properly identify the risks to human health, the agriculture and horticulture industries. The East Gippsland water storage dams are situated 3 kilometres north of the project area. This water storage supplies all towns

east of Walpa to Nowa Nowa and the coastal communities of Metung, Paynesville and Lakes Entrance. Stock and rural water supplies, in the form of tanks, and the local environment including all aquatic systems are also at risk from contaminated dust.

The effects of the mine on agriculture, horticulture, tourism and land prices should be subject to an independent review.

The horticultural industry in the Lindenow Valley is worth more than \$150 million, supplying both the domestic and international markets. This industry employs up to 2,000 people directly. The horticultural industry requires zero levels of contamination; any risk from dust from the mine could destroy this entire industry and create mass unemployment in the area.

The proponent cannot guarantee that contamination will not occur in any form.

Tourism is a multi-million dollar industry in East Gippsland. Locally tourism businesses include Coonwarra Farm Resort (hosting many school groups and private functions over the year), boutique B & Bs, camp grounds, cafes, hotels and horse riding. The Mitchell River National Park attracts recreational activities such as white water rafting, kayaking, bird watching, bushwalking and camping; all boosting the local economy.

Dust, noise and any contamination to the waterways and Gippsland Lakes will affect visitor numbers and consequently impact on the local economy.

### **Biodiversity**

The Glenaladale area was severely burnt in 2014; the ecosystems within the project area are still recovering and are now in transition.

Independent long term comprehensive monitoring is necessary to determine species abundance and distribution. Surveying by Ecology Heritage Partners employed by Kalbar barely mentioned the effects of the 2014 fire on species distribution and numbers. They also ignored the drought conditions and the seasonality of species in their survey reports.

EPBC and FFG listed species and ecosystems need protection from any mining disturbance or road construction. Ancient red gum paddock trees should be protected for their biodiversity value. They provide shade, roost and nest sites as many have large hollows. These trees cannot be offset by seedlings. Often offsets do not and cannot reflect the value of the species which are to be removed.

Existing vegetation in steep gullies not only prevents erosion but is habitat for many species and provides protective corridors.

Desk top surveys are often incomplete and unreliable, as information on fauna and flora species can be out of date and will not reflect the true status of species within a location.

The Victorian Biodiversity Atlas is not up to date and not dependable, with many species observed by locals never being recorded on the VBA.

Any contamination of waterways and disruption to aquifers will affect aquatic species and migratory birds.

It is therefore essential that the proponents adhere to Australian International obligations for migratory species.

### **Water**

The 3-4 gigalitres of water necessary for the mine project I feel is understated.

Water extraction from the Mitchell River is unacceptable as it will increase the salinity levels in the Gippsland Lakes causing problems with fish breeding grounds, erosion and the wetlands.

Groundwater extraction will affect agricultural bores. Stock water supplies are filled from bores with shallow aquifers, any disruption and contamination of the aquifers from mining would cause great hardship for landholders.

The proponents has stated in the EES that drawdown will occur in the aquifers following groundwater extraction

In 1997-8 the Mitchell River stopped flowing, the proponent has no contingencies if this occurs during the life of the mine.

### **Health**

The physical and psychological effects of mining on human health are well documented. Noise and vibration from machinery 24/7 365 days a year is a serious health risk especially to rural residents who are used to peace and quiet.

Many of the contaminants in the dust from the mine will be carcinogenic. The proponent has not demonstrated that the mine will not impact on the health and wellbeing of the community.

### **Social Land Use and Infrastructure**

A mine of this size and duration will have enormous consequences on the social, land use and infrastructure in the area.

The proponent has no social licence in the area. In the EES documents some of the information the company supplied was simply incorrect. Also the company portrayed the area as degraded and unproductive.

Just weeks after the devastating fire of 2014 the company approached the landholders. At that time the community was reeling from shock, extremely vulnerable and trying to rebuild lives. The fire burnt 6,500 hectares, destroyed 3 houses, hundreds of livestock, 500 kilometres of fencing and other farm infrastructure.

The proponent has shown very little compassion for this community.

### **Cultural Heritage**

The area has a rich cultural heritage with many sites of significance for the local Gunai Kurnai people. The Den of Nargun in the Mitchell River National Park, the Bataluk Trail plus many archaeological sites in the Fingerboards area, the Mitchell River flats, Moulin Creek and Iguana Creek.

An ancient red gum on the Dargo Road has branches joined which form a marker for the route travelled by aboriginal people.

The mitigation measures outlined in the EES are unacceptable.

### **Rehabilitation**

Rehabilitation of the mine site may be unachievable and extremely costly due to the dispersive soils and lack of topsoil in the project area.

Open cut mining around the steep gullies will cause erosion and siltation of the river during abnormal rain events. These heavy rain events can occur at any time of the year (We have experienced 75 ml of rain falling in 10 minutes. It was so intense there was very little oxygen in the air and no grass to be seen with sheets of water covering the landscape.) The 1990 flood was also memorable with 450 ml of rain falling in the catchment over a few days.

With climate change influencing these extreme weather events the proponent will not be able to control these effects of extreme weather on their mining operation.

The Glenaladale area has serious problems with tunnel erosion due to the dispersible soils. In recent years an attempt to rehabilitate these eroded sites has been undertaken by Government departments. The rehabilitation has been very costly and has proved to be unsuccessful.

The proponent stated at one of the community meetings that 200 hectares of the EPBC listed Red Gum Plains Grassy Woodlands would be replanted to its original condition as part of the site rehabilitation. This has never been attempted on this scale before. If this is successful there has been no mention of who is to look after it into the future.

Many of the species in these EPBC listed EVCs have specific symbiosis with fungus and mycorrhiza also with specific insects for pollination. The mechanical disturbance by the

mining operation would destroy these vital elements necessary for species survival and re-colonisation post mine.

It takes many years to restore the land to its original level of agricultural production. Soils take many decades to replenish fertility after any disturbance. With very little topsoil available to cover the landscape it makes rehabilitation even more difficult.

### **Conclusion**

The Kalbar proposed Mineral Sands Mine is totally inappropriate in this location, posing too many risks to the community and region.

Many mining activities in the past have been unsustainable and uneconomical, the Victorian regulatory authorities having failed to protect the community and environment from adverse affects of mining.

If the proposed mine goes ahead bonds need to sufficient to cover not only future rehabilitation but also any environmental, social and economic loss to the community.

I thank the panel for the opportunity to make this submission.

William Grant