

# Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory  
Committee - EES

# 455

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Request to be heard?: No

**Full Name:** Craig Kingston Bush

**Organisation:**

**Affected property:**

**Attachment 1:** Fingerboards\_final

**Attachment 2:** Fingerboards\_final

**Attachment 3:**

**Comments:** See attached submission

Dear Inquiry and Advisory Committee members,

We are writing this submission about the Environmental Effects Statement by Kalbar Resources for the Fingerboards mineral sands mine project, which we strongly oppose.

We are not anti-development or anti-progress. We both happily use mobile phones, and understand the need for rare minerals, including zircon and titanium.

Last year, Craig was very pleased to receive a [REDACTED] replacement, which works much better than its predecessor.

We kept an open mind about the proposed Fingerboards sand-mine until we took a tour of the proposed site and viewed for ourselves the diverse and beautiful natural wonders that exist in this locality. From small areas of rainforest to open redgum plains, plateaus to creeks and gullies, and to within 500 metres of the Mitchell River, source of irrigation for the hugely productive Mitchell Valley Riverflats, and prime source of drinking water for the Bairnsdale township.

### **Our property:**

We live in Fernbank near the Perry River and its chain of ponds, known as Providence Ponds, and have farmed in this and adjacent areas for 40 years.

It has always been our aim to leave our property and the surrounding ecosystems in a better condition than when we bought this property 27 years ago.

We have planted thousands of trees on our and other properties in the local area, have covenanted significant areas with Trust For Nature to protect and enhance natural diversity, and are committed members of the local Landcare group (Tom's Creek Landcare).

In this year's Queen's Birthday Honours, Craig was recognised for Services to Conservation and the Community of East Gippsland, with an Order of Australia Medal, largely due to his and Andrea's involvement in Landcare activities.

The centre of the proposed mineral sand mine would be about 17km due north of our property.

### **Tailings Dam:**

The proposed tailings dam for the sand mine is planned to be 90 hectares in size. It will contain mine tailings waste and flocculants, which are known to be harmful to aquatic life.

The tailings dam will be directly northwest of us, and just above the headwaters of the Perry River.

The damage it could do to the Perry River Chain of Ponds in the event of failure during a flood event or leaching, would be catastrophic. Both the Perry River and the neighbouring Mitchell River flow into the RAMSAR-listed Gippsland Lakes wetland, which is one of the area's biggest tourist attractions.

The local economy is directly impacted by the health of the Gippsland Lakes. In the past, when there has been a blue-green algae bloom in the Lakes, tourism has suffered significantly.

Imagine the tourism impacts if there was a tailings dam leak into the Gippsland Lakes!

We are not convinced that the risk of flooding or leaching of contaminants is a risk worth taking, or that the proponents can mitigate such a risk, without repositioning this dam.

From the West Gippsland Catchment Management Authority website:

*"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.*

*Chain of Ponds systems were once common across South-eastern Australia but are now very rare.*

*No fully intact Chain of Ponds systems are known to currently exist. The ponds have been affected by historic land clearing, stock access, weeds, pest animals, erosion and excavation for use as dams.*

*Since 2016, the WGCMA and partners have been working to protect and improve these Chain of Ponds with a range of agreements, works and initiatives."*

A great deal of work has been done in association with local farmers to fence off the Chain of Ponds so that grazing animals cannot pollute the waterways. The last thing we need is a tailings dam just above the Chain of Ponds to put the whole system at risk.

### **Water for the mine**

The proponents seek 3 billion litres of water annually for processing and to control dust. 2 billion litres of this will be sourced from the Mitchell River, and 1 billion litres will come from underground aquifers.

Having just survived a 3 year drought and having invested money in new bore pumps, we are very nervous about what draining another billion litres from the underground aquifers will do to underground water levels.

Is there provision in the Kalbar finances to pay farmers to replace bore pumps if and when underground water levels recede and windmills and bores run dry?

The Mitchell Valley is the food bowl of the local area. What impact will there be to that industry with the removal of 2 billion litres of irrigation water per year for 15 years?

Could the horticulture industry use that water more efficiently than an open-cut mine?

In its simplest terms, what is more productive: spraying water onto growing crops for human consumption, or spraying water onto dust, so that the dust doesn't blow away?

The area is renowned for strong winds throughout spring and summer, and we are doubtful that any amount of water could successfully suppress dust over a large open-cut mine.

The eastern edge of the proposed mine is only 500 metres upwind of one of many vegetable farms in the Lindenow Valley. We like our broccoli and lettuce to be free of radioactive dust, and I suspect most other consumers do too!

### **Compulsory Acquisition**

We understand that sections of private land outside the mine area will be compulsorily acquired for mine infra-structure, such as bore-sites and vegetation removal, but don't understand how this land is not counted within the mining project boundary.

As landholders ourselves, we fear for fellow landholders whose lands are well outside the official mine project area, but are still compulsorily-acquired. The impact on them will be significant, with little or no advantages.

For instance, a landholder who has a percentage of his/her farm compulsorily acquired for infrastructure works, is at a disadvantage to someone whose whole property is compulsorily acquired, as the latter person can theoretically relocate to another area.

### **Jobs**

Kalbar claims that the mine will directly employ 200 people. This is clearly of interest in an area where employment for young people particularly is scarce. Support within the community (where it does exist) is predicated on that figure being accurate.

If the main role of the mine is to "dig it up, sort it out, and send it off", we respectfully suggest that the majority of work would be for truck drivers and operators of large machinery. Many open-cut mines seem to be favouring un-manned, automated heavy machinery, where one person oversees and operates many vehicles, so we doubt the accuracy of the job projections.

If the accurate figure of full-time jobs was more like 50, rather than 200, how much support would there be locally for such a massive disruption to the local landscape?

### **Ore body**

While at first glance it might seem that just digging up sand and removing the valuable elements, then returning the rest from whence it came, might seem a relatively risk-free procedure, we understand that some of the liberated substances are likely to be radioactive.

Whilst underground, these pose no threat, but when exposed, we are concerned about the threat they pose to human health. The EES is unclear about the full analysis of the ore body underneath the ground. This information needs to be fully disclosed, so that we understand the risks to human health.

### **Cultural heritage**

The Fingerboards is close to the Den of Nargun, a place of great significance to the local indigenous people.

From the Bataluk Cultural Trail website:

*"The Den of Nargun is a place of great cultural significance to the Gunaikurnai people, especially the women."*

*Traditionally Gunaikurnai men were not allowed down to the Den of Nargun or the Woolshed Creek valley. Gunaikurnai men respected this traditional law and still do today. Please treat this place with respect.*

*Stories were told around campfires about how the Nargun would abduct children who wandered off on their own. The Nargun could not be harmed with boomerang or spears. These stories served the dual purpose of keeping children close to the campsite and ensuring that people stayed away from the sacred cave."*

We are concerned that there are cultural sites within the proposed mine site that are not yet properly investigated or documented. These will be lost in any open-cut mining operation.

### **Take a drive. Have a look for yourselves**

We strongly recommend that the Advisory Committee members do what we did, which was to tour the proposed mine site with locals who know their way around the area, see the beauty, the topography and the extent of the area which is to be mined, then try to visualise how the topography would be changed, with up to 40 metres of overburden to be removed, then re-deposited, and the area "rehabilitated".

Our greatest fear is that the mine will be allowed to proceed (after all we need rare earth minerals for our technologically-advanced society, and jobs are important), then when the easy money has been made, and its value is diminished, with the owners having moved on to another project, that it is left in a "care and maintenance" mode; with a tailings dam just above a fragile chain of ponds system and 19 dams on gullies and creeks abandoned, and productive farming land turned into waste land due to loss of precious topsoil and mature trees to hold the topsoil together.

Can a rehabilitation bond ever be sufficient to cover such an eventuality?

Are committee members confident that the proponents are good enough corporate citizens that this could never happen?

What is the likelihood that the current proponents on-sell the asset after gaining approval for the mine? Will the next owner be a better or worse corporate citizen than the current proponents?

### **Thankyou**

We appreciate being given the opportunity to make a submission to the panel.

This is a massive project which will change this area forever, if it goes ahead. We do not want to tell our grandkids that we knew the project was planned, but did nothing about it.

We trust that the panel will take our perspective and those of others in the area into account before making their recommendations.

Regards,

Craig and Andrea Bush

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