

2 February 2021

**By Email**

**To**

Amy Selvaraj  
Senior Project Officer  
Planning Panels Victoria  
Fingerboards.IAC@delwp.vic.gov.au

Dear Sir/Madam

**Fingerboards Mineral Sands Project Inquiry and Advisory Committee**

We continue to act for East Gippsland Shire Council (**Council**) in the above matter.

In accordance with the Committee's directions dated 29 January 2021, we attach a without prejudice marked-up version of the incorporated document to form the basis of discussions should the IAC not support the Council's primary submission that the project should not be approved.

The draft Environmental Management Framework (**EMF**) provides direction at a very high level. The proposed measures will be important to ensure that the proponent delivers the benefits and protections identified in the EES material including the creation of the identified jobs within the community and delivering the required infrastructure and capital works at the cost of the proponent.

Council considers that the EMF should include the proposed mitigation measures, but the measures need to be amended to include greater specificity and quantifiable standards. However, it is not possible for Council to provide these details and standards, in an informed and objective way, in advance of receiving and hearing the evidence of the parties.

We note that it remains unclear how the proponent proposes to acquire Council or State roads for its purposes. Accordingly, it is not presently possible to appropriately prepare mitigation measures to address these issues beyond what is proposed in the EMF.

If you have any questions, please contact me.

Yours sincerely



Darren Wong  
**Principal**

