

# Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory  
Committee - EES

# 764

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Request to be heard?: No

**Full Name:** Lorraine Watt

**Organisation:**

**Affected property:**

**Attachment 1:** Submission-Kalbar

**Attachment 2:**

**Attachment 3:**

**Comments:** 123

## **Submission: Kalbar Mineral Sands Mine, Glenaladale**

### **Surface Water Availability**

A major concern I have with this project is the amount of surface water Kalbar have modelled will be available to mitigate the invasive dust off the project site. Kalbar have admitted that the dust will contain many toxics including radionuclides. Kalbar have used rainfall data over a 117-year period (1900-2017) to work out the average mean for the project's surface water model, Section 6.1.1 p40,

*“simulates water management scenarios using 117 years of historical rainfall, using daily time steps.” “Water is transferred across the site from water sources (e.g. rainfall and external water sources) to water storages and elements representing mining processes based on pre-determined rules and transfer rates.”*

Why did Kalbar not include recent drought information even to 2019?

Why did Kalbar use data over such a long period of time?

My conclusion was that Kalbar was trying to use rainfall data that created a greater mean average than will exist over the next 20 years. Department of Environment, Land, Water and Planning (DELWP) have numerous recent documents that guide rainfall data collation with 1975 – present being a greater representation of rainfall.

*(DELWP (2020) Long-Term Water Resource Assessment for Southern Victoria (2020)*  
[https://www.water.vic.gov.au/\\_data/assets/pdf\\_file/0025/457126/DELW0146\\_LTWRA\\_OverviewReport.pdf](https://www.water.vic.gov.au/_data/assets/pdf_file/0025/457126/DELW0146_LTWRA_OverviewReport.pdf)

*DELWP (2016) (Guidelines for Assessing the Impact of Climate Change on Water Supplies in Victoria FINAL, December 2016 V7.0*

[https://www.water.vic.gov.au/\\_data/assets/pdf\\_file/0014/52331/Guidelines-for-Assessing-the-Impact-of-Climate-Change-on-Water-Availability-in-Victoria.pdf](https://www.water.vic.gov.au/_data/assets/pdf_file/0014/52331/Guidelines-for-Assessing-the-Impact-of-Climate-Change-on-Water-Availability-in-Victoria.pdf)

The significance of a potential misrepresentation of actual rainfall data and surface water availability is reflected in Appendix A006 App A, *Conceptual Surface Water Management Strategy and Water Balance*, “*Rainfall and runoff are crucial parts of the Project Water Management System.*”

The data appears to be deliberately misleading as Kalbar consultants quoted the DELWP (2016) recommendations but not the first recommendation which includes using data from 1975 – present and then, if an alternative baseline data is to be used, to include the comparison. The importance of surface water modelling is the dependence of all surface rainfall runoff to balance the water cycle with one being, to maintain dust. How can Kalbar manage the significant dust that will be produced by their operations and truck movement if there is not enough water captured to allow this?

The consultant's conclusion (Katestone) that their modelling of potential dust raised from the mine will be within acceptable limits relies on there being enough surface water to manage dust based on the adoption of mitigation measures described in Table 13 of their report (Appendix A009).

However, that data to model this, Katestone: (Appendix A009), has relied heavily on their onsite monitoring station to determine wind speeds which is not fully exposed to wind. The full impact from being exposed to dust from prevailing westerlies, drought conditions and a fully operational mine cannot be determined by this station which again means modelling is misleading.

### **Business intentions**

When reviewing Kalbar's business operation, it would appear they do not have any capital to commence mine operations nor any funds for security, insurance or, the all-important rehabilitation bond.

### **About Kalbar Resources**



Kalbar was established in 2011 to develop the Landak Bauxite Project in Kalimantan, **Indonesia**. After successfully discovering significant bauxite resources and on-selling the project, Kalbar embarked on an extensive search to find another project in line with its strategy to develop high grade, low capital mining projects that can service China's growing demand for "new bulk" ores.

The comment above shows Kalbar admitting to 'on-selling' and 'to find another project in line with its strategy' (LinkedIn 2016) and the following from the Director's Report. A snip from the Directors Report below, (ASIC Document No. 7EAQ64645 lodged 25/10/2019) reveals this company does not have a cashflow to commence operations so it is questionable whether Kalbar have the financial capacity to undertake this project.

#### *Results of Operations*

*The Company's core business is exploration and project development. The Company's only income is derived from interest on cash holdings and rebates received from research and development. The loss of the Company for the financial year amounted to \$5,296,952 (2018 loss of \$3,187,636).*

Worst is the ASIC Kalbar 2015-16 annual report -Document No. 7E8480026, p2 states

*"Kalbar proposed to Southern Rural Water (the water regulator in Gippsland) to use a portion of the mine void for water storage for the local irrigators. The federal government granted \$660k to study the viability of this project and two alternatives as part of the Lindenow Water Security Project. If the project proves feasible, it will have access to \$2b of federal government funding."*

My democratic position is that I do not want my taxes to fund this mine under the guise of some sort of water storage facility post rehabilitation that may not even prove feasible.

### **Conclusion**

Companies such as Kalbar exist solely to profit from on-selling to other companies to start the complete destruction - obliteration - of "someone else's backyard". That "backyard" currently has its own established eco-system - wildlife, wildlife habit and biodiversity - which Kalbar nor any other company it on-sells to will ever be able to replicate even when they attempt to do so during the rehabilitation part of the project. This amounts to rape and plunder of the proposed mine area as our forebears did when they first arrived in Australia.

The latter had no idea of the devastation they would cause but Kalbar is quite aware of the devastation of the environment which would ensue as a result of the proposed mineral sands mine. They should be held accountable by rejection of all relevant permits and licences required for mining at the Fingerboards Mineral Sands Mining Site.

Lorraine Watt