

Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory
Committee - EES

97

Request to be heard?: No - but please email me a copy of the
Timetable and any Directions

Full Name: Richard Ledger

Organisation:

Affected property: [REDACTED]

Attachment 1: Kalbar_Submissio

Attachment 2:

Attachment 3:

Comments: see attached

Richard ledgar [REDACTED] Peregian Beach Queensland 4573

Email: [REDACTED]

To: The Inquiry and Advisory Committee

I am a frequent visitor to the Bairnsdale region and am concerned that the proposed Fingerboards mineral sands mine will have a significant impact on the region.

Overview

The Fingerboards Mineral Sands Project as presented in the EES is deficient in a number of areas as explained below. The areas of main concern are water use, infrastructure, air pollution, impacts on endangered biological communities and socio-economic impacts. The Advisory Committee should also be concerned at the over-complication of the EES caused by multiple sections, tedious repetition and the sidelining of concerns expressed by independent reviewers and the community of the region. The EES is extremely difficult to examine due the multiple sections that address different aspects of the same subject. Instead of presenting a clear effects statement there is a burying of real concerns and an over-reliance on “this matter will be dealt with once the project design has been finalised”.

Specific Concerns

Water

Water is critical for the vegetable growing areas of the Lindenow valley. This mine draw down surface water from the Mitchell river, siphon off surface flows that would normally flow into the Perry and Mitchell rivers and taps into existing groundwater supplies. Based on the precautionary principle alone the estimated water requirements of this mine should be enough to question its viability. Water restriction are not uncommon in this region and future predictions of the impact of climate change indicate less rainfall and increased heat. While the ESS predicts that the mine will harvest sufficient surface water, that will not be the case if conditions such as occurred in 2018/19 are repeated in the future.

There are also some major deficiencies with the ESS with regards to groundwater modelling. There appears to be an oversimplification of the Coongulmerang Formation which could result in higher groundwater mounding. This will impact mine pit management and the stability of surface structures such as the water storage dams. This concern is exacerbated by uncertainty surrounding the permeability of the Balook Formation which underlies the Coongulmerang Formation, thus putting into question the rate at which water will seep through Coongulmerang Formation into the Balook Formation. This has major implications for mounding and subsequent groundwater flows into the areas outside of the mine footprint.

Infrastructure

The EES provides little or no information on how the numerous water management dams will be constructed, managed and maintained. Given that significant alteration to existing drainage lines during the life of the mine and subsequent rehabilitation the EES does not provide sufficient evidence to assure that no adverse impacts will occur.

Roadside vegetation makes a significant contribution to the protection of valuable ecological communities such as Gippsland Red Gum Grassy Woodland and Associated Native Grassland (listed as critically endangered under the EPBC Act) and the Forest Red Gum Grassy Woodland (of state significance). By the proponents own admission “*Any amount of removal would have a significant impact on this (these) ecological communitie(s)*”. Increased road use will result in road upgrades and maintenance with the consequence opportunity for weed species to be brought in via fill material. The ESS provides no actions to address invasive species and the development of additional roads along

side significant roadsides such as Chettles and Limpyer's roads just adds to the edge effect and opportunities for invasive species.

The EES provides no information on how vehicles and equipment brought on-site will be sterilised to ensure that cinnamon fungus (*Phytophthora cinnamomi*) is not brought onto the mine site and surrounding infrastructure corridors.

Air pollution

The mining of mineral sands will produce radioactive dust and while the EES states that dust suppression measures will be put in place, the reality is that dust will be created that will blow offsite and onto one of Victoria's premier vegetable growing areas. This will have a major consequence for the quality of produce from this area and have the potential to shut down growers if elevated levels are found in produce. This could have long term impacts on the region.

Impacts on biodiversity

As stated above mining infrastructure will impact on native vegetation. The EES states that offset areas will be established to replace the ecological communities that are destroyed. However, the EES does not state where these offsets will be established, how they will be established, the probability of success of re-establishing ecological communities and what is the fall back if the offsets are not viable. Endangered communities will be destroyed as a consequence of this mine, yet scant attention, apart from restating legislative requirements, is given to how there will be no loss of biological diversity as a consequence of this mine.

Socio-economic

In times such as these where COVID has resulted in job losses and economic hardships it is easy to look at quick fix solutions. However, the consequence of the mine will potentially cause job losses in the horticultural industry, reduce the tourism potential of the region and degrade the social amenity of the area. Increased truck and vehicle traffic mean more danger on normally quiet local roads, increased roadkill and increased infrastructure development (street lights, underpasses, haul roads, roundabouts) which detract from the peaceful rural character of the area. These impacts will affect peoples lives and livelihoods where other non-destructive job creation projects will not.

Conclusion

The EES while impressive in the sheer volume of pages is weak where important detail is needed to adequately assess the environmental effects of this mine. It is not sufficient the state that any problems will be dealt with at a later stage. Australia has a terrible history of poorly managed and rehabilitated mines that end up costing the taxpayer to fix.

The Fingerboards mine will impact on precious water resources of the region, have the potential to pollute a premier horticulture region and will destroy significant vegetation communities. The EES has failed to develop adequate information regarding the design of key water management infrastructure and has provided no overall assessment of community concerns.

Recommendation

That the IAC recommends that the Fingerboards Mineral Sands Project be deemed to be of sufficient environmental and socio-economic concern that that the project does not proceed.