

I make the following points in relation to the general approval process:

- Kalbar swamped members of the Community with a 10,000+ EES document, already an unreasonable obligation for lay people to respond to a highly technical document when it is actually the Government's (as a representative of the people) obligation to do that on behalf of the people.
- Those community members then spent thousands of hours trolling through the EES, with a large part of that effort related to the proposal to use tailings dams and the environmental implications of that choice.
- The original submissions to the EES made it very clear by weight of numbers that the Community overall is totally opposed to this mine, with the only submissions in favour of it being from parties who stand to directly gain financially if the mine is permitted, hence their submissions are tainted.
- Once Kalbar sensed the extent of opposition to the mine overall, and specifically to the tailings dams, the IAC – incorrectly in my view – allowed them to append that variation to the EES rather than requiring the entire proposal to go back to full restart of the EES with review by all relevant Government authorities since it was such a substantive change.
- This decision by the IAC denies the community the time to properly respond to the centrifuge variation, and the deadline of March 26<sup>th</sup> for supplementary submissions is even more unfair to the community when Kalbar is permitted to table the *Mine Rehabilitation Plan* less than 24 hours from when the supplementary submissions are due. This denies the community any level of natural justice and those allowing such an outcome to arise should be condemned in the very strongest terms.
- The Victorian Government through this process is exhibiting a complete lack of moral compass and the entire approval process is clearly heavily biased against the local communities and in favour of the selfish individuals who are prepared to risk someone else's environment for their personal gain.

In relation to the centrifuge proposal:

- Since the IAC has determined not to consider the tailings dam option, the community now has no assurance from Government that any reversion by Kalbar back to the tailings dam option would require complete resubmission of the EES from the starting point, and therefore such a reversion would not be subject to rigorous scrutiny should it reappear.
- The centrifuge proposal will result in the injection of thousands of tonnes of organic chemicals into the subsoil in the pit backfill, and there is no currently available information as to the fate of those organics over time, whether they remain fixed, become mobile, move in the ground water or degrade into more mobile molecules, over the following 10, 20 or 50 years.
- These chemicals are toxic to aquatic species and are being mixed into the soil in massive quantities upstream of a critical water body, being the RAMSAR listed Gippsland Lakes.
- Since the centrifuges cannot operate without large quantities of flocculant chemicals, the fate of these chemicals over the long term must be known with certainty before such a process is permitted to occur. There are numerous examples in Victoria already of industrial chemical pollution transferring to ground water and polluting rivers and waterways many many years after the cessation of the industrial activity.