

Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory
Committee - EES

712

Request to be heard?: Yes

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Organisation:

Affected property: [REDACTED] Bairnsdale, Vic., 3875

Attachment 1: Kalbar_Submissio

Attachment 2:

Attachment 3:

Comments: See attached Submission

Abstract

Kalbar and their consultants have systematically downplayed the significance of the locality as it is today. In doing such, they have devalued and debased the Natural assets to a point where, through technical sleight of hand they have portrayed the Project as an essential element to the landscape and the community.

Undertaking simplistic, scientific analysis skews the science to reveal biased outcomes; cost and value estimates are inaccurate, unfavourable data has been omitted; favourable data has been cherry-picked to create a rosy feeling among the people of the district and surrounds.

All aspects of the EES contain clear flaws that render the Project higher risk than is stated. Despite the EES's content's intent to demonstrate viability and many benefits, in reality, the direct, and the hidden indirect costs will result in a great loss to the taxpayer, environment, local community, and future generations who have been denied opportunity to have their voice. The consequences being too many future options being foreclosed.

There are many reasons to save the environment, there is only one reason to destroy it – short-term economics. As the Project is driven for the benefit of a select few, Kalbar's values are at odds with what constitutes a sustainable society:

- Morally and ethically, written into every religious scripture
- Legislatively, written into many State and Commonwealth Acts, ie. the Victorian Sustainability Act 2005 (Sec 4a)
- Strategically, written into too many strategic direction and policy documents, and
- Operationally, the proposed project is based on antiquated mining and land management prescriptions

We must not let short-term economic decisions isolate our ways of thinking or the evidence that without resource extraction we won't have sustainable industries. If we trash and liquidate these natural assets and the repair jobs fail – as they have over much of the world, the industry in question will be the bath water thrown out with the baby.

Introduction

I am writing from the position of local resident and father, down-stream and down-wind horticulturalist, environmental restoration practitioner. With my 30+ years of experience in the environmental / ecological agricultural business, the assertions that annoy me the most are 'it is safe, the impacts are negligible or acceptable' These are illogical assertions. The only answer that makes sense is 'It depends – on the alternatives available and on the benefits to be gained by making a certain decision'. This includes not liquidating natural resources, not destroying the environment, and forgoing some values to the benefit of others.

We are all part of the land, and as adults, we are only trustees holding this asset (the land at the Project site and beyond, to our whole planet) in trust for the next generation. As adults / trustees it is any parent's duty to leave more options, a good name, and the tools for the next generation to carry on their lives so they can reach their optimum and genetic potential. Kalbar and their consultants formulation of the EES for the proposed resource extraction project is the antithesis of prudent trustee.

Behind the façade of 'sustainable / socially required' proclamations, the underlying utilitarian-economic focus dominates. Linear thinking and linear scientific modelling and analysis undertaken by Kalbar and their consultants only touch on singular elements in a narrow time frame. It is mathematically impossible to model out past 5 years. The grossly incomplete knowledge combined with an unquestioning faith in the 'science' fails to address ecological realities in the foreseeable future. This is risky business.

Despite the vacuous rhetoric and a variety of rationales to support their claims from Kalbar and their consultants of espousing the essential needs to society for what they want to extract, the cornerstones of a healthy environment – soil, water, air, sunlight, and biodiversity will be the first casualties to fall. Such environmentally damaging actions are but a mirror reflection of the mentality with which we treat the region, ourselves, and one another. Kalbar wish to do this all in the frantic drive for short-term profits.

When examined holistically, the proposal has the potential for a range of significant environmental effects on key environmental assets, such as, the RAMSAR Listed Gippsland Lakes, local fisheries, native vegetation, threatened species, water environments, and a major fresh food growing area. It makes neither ecological or economic sense to destroy a landscape at put at risk eastern Victoria's environmental assets for the lowest value end-use.

When decisions are motivated and based on a short-term economic and political basis, they are never optimal for society. And as we have seen in the community, hidden political agendas have come to the fore, with decisions biased towards the select few who would 'win' at the expense of those that will lose. The bitter irony is that this behaviour has gone on through the history of the region and has contributed to the social problems we face today. Such environmentally damaging actions are but a mirror reflection of the mentality with which we treat the region, ourselves, and one another.

- **The potential extent and magnitude of some effects are unclear, due to the uncertainty associated with key aspects of the project scope, the limited knowledge of the existing environment, the biased, inaccurate and skewed technical data.**
- **As Australians, mining to send raw materials overseas which we then purchase back from corporations who offshore their tax liabilities isn't in our best geopolitical interests.**

An EES process should enable an integrated assessment of a range of potentially significant and uncertain adverse effects, including consideration of some complex and inter-related terrestrial, aquatic and geotechnical aspects of the proposal. This hasn't occurred. A simple, traditional, linear assessment favoured by 'scientists / experts' of the major facets of the project have been addressed. At best, only tangible benefits have been measured. The intangible, interconnected externalities that are too difficult to measure are ignored and omitted. No amount of modelling can predict or put certainty into any assertions made in the EES. This demonstrates the EES is biased and flawed.

- **The general public have never been privy to the technical documents until this EES public review process. The only information publicly disseminated was carefully scripted propaganda in the form of 'information fliers'.**
- **Kalbar, their consultants, and the project disregards and forecloses many future options.**

Sadly, decisions based on precedent regarding resource extraction practices are now affecting all other land uses: air, water, carbon storage, climate modification, public amenity and recreation, tourism, fish, wildlife and the non-renewable resources in-situ themselves. With ever increasing energy and input prices, social pressures, variable ore grades, and now Sovereign risk and COVID-19, a mine of the future has to be vastly different to the 'mine of the past' described in the EES.

An examination of the Ecological and Economic fallacies

Ecological fallacy #1

- The project will have minimal impact to aquifers, local water catchments
- The project will create improved habitat for all creatures great and small
- The project will not be intrusive to the surrounds
- The project will provide prosperity, in perpetuity

Ecological reality #1

- The project does not contribute to the water cycle, it despoils it
- The project does not provide habitat, it destroys it
- The project does not add to the aesthetic of the area, it devaluates it
- The project does not facilitate social wellbeing – it depresses it

Biodiversity

This project will cause irreparable damage to the environmental integrity of the Site and its surrounds. We can't see much of this damage as it is too small to see, and too subtle to see. Also many negative effects don't get seen for many years. These biological legacies can take decades to repair, foreclosing options for future generations, when the resource extraction industry and people are long gone. The cost burden of the repair is then unfairly placed on future generations that have no say in things (as shown in community consultation – children and their views have been excluded).

- **This fallacious, vacuous rhetoric is simply a box-ticking exercise based on antiquated models. Claims of utilising 'best-practice' techniques, is simply a euphemism for 'industry minimum standard'.**

Simplifying diversity – flora, fauna, landscape, chemical, social; reducing it to the lowest common denominator.

- **What little remnant vegetation is left will be simplified and add to the homogeneity of the area.**
- **Open-cut mining is the most efficient, and in the short-term, the most cost-effective method of extracting desired mineral elements. It is also the most ecologically damaging, as is currently demonstrated in rare earth and mineral sand mines around the world.**

Ecological fallacy #2 The ecological effects of the project will be confined to the Site / mine footprint

Ecological reality #2 The Site / mine footprint is part of an interconnected whole

- **What little remnant vegetation is left will be simplified and add to the homogeneity of the area.**

Water

Water quality is highly affected as the entire resource extraction operation changes the way water moves through the landscape. For example, there is no vegetation to intercept and redirect precipitation, roads concentrate overland flow, changes in biochemical interactions with rainfall and the new, exposed soil horizons, concentrations of water the erode their way to freedom further into the catchments.

Conclusions based on analysis of water use and extraction by the consultants are sub-optimal on merit alone. Here are some salient points:

- Demand estimates are way out and do not allow for increased demand vs less supply in times of drought, nor extra demand from irrigators given assurances to access 'winter-flows'
- The studies completely contradict and ignore DEWLP's Gippsland Groundwater assessment report which states that every aquifer in the region is in serious decline of both quality and quantity
- 'Direct' impacts will have negligible effects to anything...but 'Indirect' effects do not rate a mention and pose more critical importance the functioning environment
- There has been no studies on the impacts of the sheer volume of freshwater removed from the system and how it will change aquatic conditions all the way into the ocean continually for the next 20 years, nor how it will effect fish lifecycles, and by extension local benthic and pelagic fisheries and the local \$200million / annum fishing industry?
- Grossly inaccurate flood history data – serious flooding occurred in 2016. Flood debris from as far as Dargo ended up in the Gippsland Lakes
- There has been no study of the effects on stygofauna and its influence on ecosystem health

Once this water is used in the mining operation, it is contaminated. It can't be used again for anything productive. Kalbar wants to take a valuable resource – water (which is part of the global commons, fresh, clean water is everyone's birthright), contaminate it, and keep adding it to the ground within the site, thereby further concentrating any pollutants. This is the lowest value use for the water. It is a poor moral and ethical choice, it's legal standing is arbitrary and capricious, it is strategically unsound, and operationally unsustainable.

When different chemical elements are exposed to each other (such as deep soil horizon elements and the air / rainfall/ overland water flow / deep soil seepage – air – soil chemical elements) a chemical reaction occurs. This produces different chemical compounds. This basic scientific tenet has been ignored in the EES. This omission is serious, because:

- These new compounds are unknown
- Their behaviour in the existing and surrounding ecosystems is unknown
- These chemicals behaviour in an interconnected ecosystem that flows into the RAMSAR Listed Gippsland Lakes and ocean is unknown
- The effect on the reproductive health of flora and fauna, beneficial insects for agriculture, humans – the elderly, immune compromised, children, the unborn foetus is unknown

Such negligence on behalf of Kalbar and their consultant is capricious and demonstrates that the EES is biased and flawed.

- **It forecloses the water's potential option value for 20 years / in perpetuity, in the face of serious climate change.**
- **Over-pumping groundwater not only depletes the resource but also tends to draw chemical contamination towards bores / aquifers**
- **The EES fails to acknowledge that the Mitchell and Perry Rivers' and their tributaries, are a sinuous, continuum of habitats that transport water and all its ingredients, both good and bad, downstream while recognizing neither human boundaries nor human measures for its containment—as every major toxic substance spill has abundantly demonstrated.**
- **Clean, fresh water is part of the global commons. Access to clean, fresh water is everyone's birthright**

Air

The preponderance of evidence says that if you're adding heavy metals, dioxins and the like that will recombine with synthetic fertilisers and other agricultural biocides, then have these distributed around the landscape, you're playing Russian roulette with food supply and food security. In addition to what these re-combinations, introductions, releases, and additives are doing to the water passing through the soils to which they were exposed.

What if the project fails, breaches any pollution mitigation measures, or runs amok, as they so often have around the world? Kalbar has frequently stated that they will be responsible for rectifying any damages, this rarely happens – as also demonstrated around the world (Exxon Valdez, Deepwater Horizon, Brazil, Ok Tedi, this list goes on). A prudent operator would demonstrate this basic risk management from the beginning.

- **Air is part of the global commons. Clean air is everyone's birthright.**
- **It does not make sense to introduce and release toxic materials, at whatever level of toxicity, to the atmosphere, water and land that is producing our food and fibre**
- **There is no evidence of insurance disclosure in any risk management statements**

Noise pollution

Kalbar and their consultants make an admission that there will be noise, but no different to the surrounding agricultural area. The stated effects to wildlife is that they will most likely avoid the area and move away – to where? What about the wildlife already there? There has been no studies of the impacts of noise to insects. There is much literature on the benefits of insects to agriculture. What Kalbar and their consultants perceive is that such lifeforms have no value. A practitioner of ecological and/or holistic agriculture would state otherwise. Such perturbations have a high potential of disrupting agriculture outside the project footprint.

Disappointingly, additional noise from the shift work of all of the full time staff from their points of departure to the site, the extra freight trains all the way to their destination (Melbourne) every second day for the next 20 years have not been evaluated.

Ecological fallacy #3 Kalbar and the consultants stated view that any fauna affected by noise will simply move elsewhere, and any EPBC Listed species will frequent the area to use habitat resources.

Ecological reality #3 On a still night a person with attuned hearing can detect a pobblebonk frog over 3 km away. How is it that 1000s of horsepower of heavy plant and equipment won't make any detectable audible noise from outside the mine footprint?

With all of the 'science', this simple experiment will let anyone know if there will be any 'noticeable' noise pollution

Experiment: before, during and after mining. NOTE: you can apply this to any form of disruptive activity.

- Go to a Site (Nature), away from human created noise and listen to Nature. Is there any human noise to punctuate the quiet (on a continuum of human noises and natural noises). Then go into the city / town centre and listen to humanity. Is there any sound of Nature punctuating it? Then go to where human created sounds and Nature blend. What punctuates what? Or does it blur together in such a way that little stands out as unique without intense concentration on each of our behalf.
- What makes you feel more at ease?

Transport

The rail option – The envisaged scenario is comprehensive enough and addresses the activity. However, it fails to analyse the gross weight of the trains and carriages and the load bearing capacity of the track gauge. Strong anecdotal evidence sourced from industry insiders regarding the same strategy for freighting ore from the Benambra mine indicated the cost of track upgrades to the tax payer was in excess of \$60 million, and that was only to Pakenham. the train still has to go through Melbourne. This omission is a major oversight.

The road option

The envisaged scenario is comprehensive enough and addresses the activity. However, there has been no consultation with those residents and inhabitants that reside along the route. For example, nobody asked the local school of what they think about all of the truck movements past the school. This demonstrates that Kalbar will impose its views, values and needs over everyone else. The fact that it hasn't been properly recognised by the consultants indicates the EES is incomplete, biased and flawed.

No cycle routes have been considered, nor has cyclist or pedestrian safety

- **There is no analysis undertaken that considers any impacts from the transport of the mined material through all of the locales from the project site to its destination.**

Environmental valuations / Offsets

The Offset requirements stated in the EES are flawed in every aspect. These are some salient points:

- The initial requirement has been underestimated due to more destruction than has been modelled to actually occur
- The initial offset assessment is suspiciously low both in quantity and quality required. Studies undertaken by the consultants were curiously undertaken when any biological values would be low.
- The consultants in question have since been removed from DELWPs preferred supplier list for talking jobs down to get development approvals
- The price estimates for the offsets are outdated and seriously undervalued
- Some available offsets do not qualify for the sites geographical position
- Market valuation metric suffers from perverse distortions that keep the offset values unsustainably low – which leads to non-compliance and undermines the system

Ecological fallacy #4 Any native vegetation that will be destroyed can easily and readily be countered by first and third party offsets

Ecological reality #4 We did not design the environment that will be liquidated, so we don't have a 'blueprint' or a 'parts catalogue and maintenance manual' with which to understand and repair it. Nor is there a service department in which the necessary repairs can be made. Therefore, we cannot afford to liquidate the Natural assets that are the blueprint, parts catalogue, maintenance manual and service department.

Non-visual characteristics and their values throughout the EES are absent.

- Soundscape: birds, wind, trees, insects, water
- Touchscape: textures of bark, feel of bushes and foliage, the coolness of flowing water
- Smellscape: the perfumes of plants in the spring, the tang of ozone after rain

This is important with the myriad of intimate interactions between people and Nature where a sense of place and wellbeing evolves.

Outdated and sub-standard environmental studies undertaken by low-tier consultants fail to recognise current changes to environmental laws. There are over 700 plant and animal species that have been allocated Critically Endangered Listing under the FFG Act based on globally accepted assessment standards.

The ecological communities at risk will further suffer cumulative damage until they collapse – certainly at a local level, and will contribute to the same at a regional / State level. This is flawed morally, ethically, legally, strategically, and operationally.

- **Due to the downplaying, discounting and biased nature of data in the EES, environmental valuations are reduced to the lowest common denominator, effectively justifying the wholesale liquidation of any Natural Capital that exists**

The visual amenity

Its' all based on modelling – optimum growth rates of trees and vegetation.....doesn't reflect the reality – in fact, most revegetation projects in the region are a failure. Ironically, the revegetation prescription is no different to what has failed and been failing for the last 3 decades.

There is a great desire to reduce / hide the visual impact....out of sight, out of mind, no one will see what really goes on.

You just can't replace big, old trees

There is no consideration of other viewing areas, ie. a local farmer with their favorite spot in the paddock. Kalbar's level of community sensitivity is related to their and their consultants view of the primary function of the land – which is deriving an existence from grazing.

No tourists have been considered on the beautiful views

- **The indigenous community, farmers and many other people have deeper connections to the land**

Agriculture and horticulture

Soils

Considering it may take 100 years to form 1mm topsoil, aeolian forces can remove this in a matter of minutes. The loss of 1mm of topsoil is estimated at 14t/hectare. Winds of only 5kmh is enough to get fine soil and dust particles airborne. This is quite substantial over the exposed area of the mine footprint.

Ecological fallacy #5 Post mining agricultural restoration will bring the pastures back to a productive capacity at, or better levels than pre mining.

Ecological reality #5 Soils cannot be repaired or 'rehabilitated' by any means, no matter how much money is spent

How much dust could potentially blow off the exposed soils of the site? per day? How many tonnes could potentially head downwind and how far could it blow? Has this been researched? If not, why has no research been done? If so, what are the results?

Ecological fallacy #6 The site's only future use is low-productivity grazing that can have a definitive economic value ascribed to it

Ecological reality #6 The site is able to support many high-value agricultural enterprises depending on the desire and ambitions of the landholder at any given time

Narrow crop residue analysis, limited to a few leafy vegetables. It ignores the down-stream and down-wind agriculturalists. There has been no effort to research the effects on other crops such as, pecans, apples, pears, apricots, peaches, nectarines, cherries, avocados, lemons and limes.

- **There has been no effort to research the effects on down-stream and down-wind agricultural enterprises that will suffer the effects of the project.**

Cultural heritage

The tangible and intangible Cultural Heritage values in the project area have been totally disregarded. This typifies the Australia-wide attitude at present. These values of cultural, archaeological, and historic significance are important to not only those with indigenous heritage, but also are a significant cultural, archaeological, and historic asset to all Australians. It would be a great travesty to knowingly and willingly destroy such artefacts.

- **The insensitivities demonstrated towards the Cultural Heritage of the area are morally inconsistent to all people who have a great attachment to this land.**

Socio-economic

Resource extraction jobs are based on environmental destruction. To be economically viable, productivity of each worker / mechanisation unit needs optimal material to extract. Therefore the only focus will always be on obtaining the resource in the lowest cost-of-production attainable.

A frequent argument proponents of resource extraction use to justify their position is jobs; and jobs fuel the local economy. Interestingly, in the continual corporate drive for profits, industries are always on the lookout to replace high-cost workers with lower-cost technology wherever possible. The unwelcome result is fewer jobs than promised.

- **Widening of the prosperity gap correlates with increased crime and policing costs**

Ecological fallacy #7 Resource extraction provides sustainable, expanding employment

Ecological reality #7 'Rape and run' resource extraction mentality does not provide dignified, meaningful work

Ecological fallacy #8 Resource extraction is necessary to compete in the global economy

Ecological reality #8 Corporate resource extraction interests impose their short-term economic objectives on local communities which result in degraded environments, and degraded local communities.

With the 'promise' of the economic benefits from local jobs, there will be those governmental and agency individuals that will ensure 'cheap' resources that can be taken in massive amounts by the least-cost means, transported for processing to any place that has ready workers and benevolent terms.

Kalbar and their consultants promote the spin-off benefits to perpetual increasing property prices, and good rental increases which is 'good' for the greater community. There has been no analysis done on the effect of these increases on those who are of a low economic demographic, of which this region has a high proportion.

There has been ample socio-economic studies compiled about this region dating as far back as the 1960s. All show decline. The depletion and degradation caused by the failure of Nature to provide fundamental services has caused it. This is nothing new in the history of humanity. The 3 pillars of society since settlement – mining, logging and farming have facilitated the impoverishment of the quality of life for local residents, the people of Victoria, Australia, the planet, and so on

Any good parent's duty is to leave more options to the next generation. Kalbar and their consultants mining Project will foreclose options.

- **When communities are stripped of their resources, they inevitably collapse**

Economics

With the 'promise' of the economic benefits from local jobs, there will be those governmental and agency individuals that will ensure 'cheap' resources that can be taken in massive amounts by the least-cost means, transported for processing to any place that has ready workers and benevolent terms.

There is no doubting the 'back of the envelope' figures to support the income potential of the project are very attractive. However, as external costs and liabilities have been omitted from any analysis, the whole-of-cost liability soon takes the shine off the project, unless you are a direct beneficiary of the after tax (if any) profits. Many of these beneficiaries have no connection with the community

Powerful new extractive technologies whose correspondingly extensive damage to ecosystems is seldom given a monetary value. After richer ores are exhausted, skilled mining companies can now level and grind up whole mountains of poor quality ores to extract the materials desired. But while technology keeps ahead of depletion providing what appear to be ever cheaper materials only appear cheap because the stripped landscape and mountain of toxic tailings spilling into rivers, impoverished communities and their eroded indigenous cultures with all the consequences they leave in their wake, are not factored into the cost of production. **(externalities)**

Such a waste is currently rewarded by deliberate distortions in the marketplace in the form of subsidies to industries that extract raw materials from the earth and damage the biosphere. As long as that damage goes unaccounted for, as long as virgin resource royalties and prices are maintained at artificially low levels, it makes sense to continue to use virgin materials rather than reuse resources discarded from previous products.

Ecological fallacy #9 Mining projects bring great wealth to local communities, providing many tripple-bottom line benefits

Ecological reality #9 Any inputs to the operation benefit distant businesses and economies. When this occurs, local communities are manipulated for someone else's benefit. This is rogue economics.

Royalties paid to the government for a one-off opportunity – because mining is a non-renewable activity, are arbitrary and can be manipulated in a way so as to minimise the value of resource extracted. This is a common practice in the industry. Back-of-the-envelope figures supported by quotations from the CEO at a community engagement meeting suggest that taxes and royalties may be less than 1% of gross income. It would be highly likely that the governments cost to administer this project wouldn't be covered, thus the State is operating at a loss; a loss that can never be regained or recovered.

Ecological fallacy #10 Open cut mining is the most efficient way of extracting a resource

Ecological reality #10 This form of resource extraction only considers short-term resource use economics, not long-term socio-environmental economics

- **By ignoring externalities, economic arguments are flawed**
 - **Approval of the Project creates the short-term, myopic situation of stealing the future, selling it in the now, unfairly placing the repair costs and burdens on the future generations and calling that good socio-economics.**
 - **The misapplication of technologies and skewed data leads to ludicrous claims and goals of perpetual economic benefit and growth from a finite resource. This is biophysically impossible.**
 - **There are many reasons to protect the environment – there is only one reason for liquidating it....short-term economics**
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Human health

A simplistic, linear analysis of the recalcitrant elements and their effects on a narrow sample of lifeforms discounts the actual synergistic impacts and effects that would manifest. There are some incredibly basic uncertainties that haven't been addressed. Some are:

- The biodegradability of toxic outputs
 - The toxicity of these outputs on THE local ecosystems, not some random study from the other side of the world
 - The toxicological effects of the likely recombination's of the mines outputs and the chemicals present down-stream and down-wind of the mine, if they could become more toxic
 - How these toxic outputs and combination's enter and move through the food-chain
 - How biodegradable are these recombination's
 - The biophysical effects of exposure to the local lifeforms
- **Simplistic desktop analysis and rudimentary tests on lettuce and broccoli do not factor in the infinite number of 'real' variables and actualities. This is too hard, therefore gets ignored**

Rehabilitation and closure

Maintaining and enhancing [opposed to destroying and diminishing] biodiversity is a central concept in modern conservation. The imperative of Site protection ensures that landscape and environmental processes are resilient as possible. Resiliency / stability equates to adaptability which allows biological communities the greatest opportunity to adapt to new and changing environmental conditions.

Ecological fallacy #11 Environmental repair after open-cut mining provides healthy future environments that enable reintroduction of Listed species, increases in quality and extent of habitat, and reconstructs complex habitat. Any infrastructure can be safely decommissioned and there will be no ongoing environmental issues.

Ecological reality #11 We can plant trees and provide 'nest boxes', but we can't piece back together 50m of soil horizons that fulfil original ecosystem processes. We can't replace 450 + year old trees. The catastrophic impacts and disruptions on the environment are permanent. There is no example on how the landscape will function after it has been turn upside down, or had the desired minerals extracted from it. An analogy would be 'if you removed 5 elements from your blood and manipulated your body to exclude them forever, how would the rest of your body react?'

- **Anyone can identify destructive land management practices. You don't have to be a landscape ecologist to recognise bad landscape management anymore than you need to be a doctor to recognise ill health. If mining looks bad, it is bad.**

All any environmental repair actions do is help heal inappropriate human modifications. The ecological integrity of the site will be altered and/or destroyed forever. What is also an ongoing challenge is that any repair efforts take place in biological systems we do not fully understand on top of the influences of climate change.

We did not design the environment that will be liquidated, so we don't have a 'blueprint' or a 'parts catalogue and maintenance manual' with which to understand and repair it. Nor is there a service department in which the necessary repairs can be made. Therefore, we cannot afford to liquidate the Natural assets that are the blueprint, parts catalogue, maintenance manual and service department.

- **This is blatant economically motivation extinction. What little remnant vegetation is left will be simplified and add to the homogeneity of the area despite what fanciful claims have been stated.**