

Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory
Committee - EES

14

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

Full Name: Henk van Leeuwen

Organisation:

Affected property:

Attachment 1: Kalbar_EES_Submi

Attachment 2:

Attachment 3:

Comments: See attached Submission

Dear Inquiry and Advisory Committee members

This submission is in response to the Fingerboard mineral sands mine project EES.

I wish to highlight the inadequacy of the EES in regards to its lack of consideration of the **Precautionary Principle** which is particularly relevant here due to the proximity of the project to a crucially important and productive agricultural area and its precious water source, the Mitchell River. This river is unique in being the only major undammed river in Victoria with an unspoiled catchment. Therefore, it provides, not only the all-important agricultural water, but also unique ecological and biodiversity values. At the present time this is of even greater significance following last summer's disastrous bushfires.

My family and I have lived in the area for 10 years, after leaving Melbourne for this region's wonderfully clean and healthy environment, with its aesthetic attributes. As this mine would seriously diminish these values, I find this proposal deeply concerning. The perceived short-term financial benefits (limited and selective) do not warrant the wider and ongoing environmental, social and economic costs.

The Precautionary Principle is not adequately addressed regarding the following issues.

- The proximity of the mine is close to the location of **several** residences, farms and working environments. This clearly presents **unacceptable health risks** from airborne particles, such as dust and silica. These can travel long distances, given the windy conditions often prevailing in the valley. You have a duty of care to the community to prevent serious conditions, such as lung disease and cancer.
- The vegetable industry in the Lindenow Valley is a mere 500m downwind from the mine. Much of the agriculture comprises above-ground crops, therefore dust from the mine again presents a high risk of contamination and therefore human health. It would seriously impact on the **region's reputation as a provider of high quality, clean and green produce**. The adverse commercial consequences for the region are obvious.
- Water to irrigate these crops is provided from the Mitchell River. The mine being on the other side of the river on a tableland risks **contamination of the river**, further impacting on the crops, fishing, agriculture, the health of the rivers, and ultimately on the **important Ramsar-listed Gippsland Lakes with its significant tourist industry**.
- The tailings dam of 90 hectares (nearly 1 sq km) located on the tableland will contain **mine tailings waste and flocculants** which are most harmful to aquatic life. There is a stated risk of leaching from the dam. If there is a 1 in 100-year flood (the vagaries of climate change may increase frequency) , tailings waste & flocculants could be released into the creeks/rivers, harming aquatic life and aquifers. Despite many assurances in various EESs elsewhere of the presence of adequate prevention measures, there are **numerous examples of dam failures**. The risks of failure inherent in the dam's construction here also remain considerable and predictable.

- Over **3 billion litres of water are required by the mine annually for up to 15 years** (the maximum life of the mine) for processing and to control the huge dust problem. The impact of this on bores, aquifers and the Mitchell River is difficult to justify, given the benefits of such quantities if redirected to the horticulture industry with its extensive employment opportunities. The Woodglen Reservoir where domestic and commercial water is stored for the whole Shire is 3.5kms downwind from the mine. Contamination risks here are not addressed, as well as for those on tank water living near the mine.
- Kalbar Operations Pty Ltd has acknowledged there are **radioactive substances being mined, including rare-earths**. While below ground level and undisturbed these substances do not pose a health risk, however, dust is generated when they are excavated and crushed, whereby these materials are released into the environment thus posing further health risk. Again, this is deeply concerning.
- The commercial **secrecy of the analysis of the ore body** has prevented full disclosure and therefore the EES provides only limited information and potential risks to human/animal health remain unidentified. This lack of information is unacceptable.
- 13 square kms of land being mined requires **the removal of numerous trees and habitat, including over 700 large mature habitat trees**. Flora and fauna species are threatened, particularly since the summer bushfires. EES technical studies have not comprehensively surveyed the area to assess the full implications of threatened species and biodiversity. This introduces further uncertainty other than that reported in the EES. This habitat can never be replaced; **offsets are always unable to compensate** for such loss.
- With companies quickly losing interests once a mine is exhausted, proper **rehabilitation is rarely successful**. The risks of inadequate rehabilitation are always high when the mine goes into a 'care & maintenance' phase with the tailings dam and 19 dams on gullies/creeks being abandoned. Rehabilitation bonds have been shown to be grossly insufficient to cover costs.
- Local and State Governments need to recognise the **pre-existing residential and agricultural land use**, which did not envisage a mine (see e.g. Council's 'Lindenow & District Community Plan'). Noise from a mine operating 24 hours a day 7 days a week will be untenable and stressful, a problem that cannot simply go unheeded.
- **Aboriginal cultural heritage** sites are stated as being highly likely to be present and will be impacted. The destruction of artefacts and heritage will be unavoidable despite any mitigation measures.
- As noted, we came to this area because of its exceptional environmental, aesthetic and well-being qualities. The mine will **negatively impact on tourists and residents alike**.

- Finally, it is unacceptable to allow **compulsory acquisition of private land** to be used by the mine for infrastructure that is located **outside** the mining project boundary for water pipelines, bore pumps, bore field, roadworks, new powerlines, easements, rail siding and vegetation removal. Surely this should be part of the mine project area and therefore a matter for the EG Shire Council to assess?

I thank you for this opportunity to make my submission.

Yours sincerely

Henk van Leeuwen