

# Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory  
Committee - EES

# 773

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

**Full Name:** Evan Miller

**Organisation:**

**Affected property:**

**Attachment 1:** Fingerboards\_EES

**Attachment 2:**

**Attachment 3:**

**Comments:** see attached submission

Dear Inquiry and Advisory Committee members,

I am writing this submission to strongly oppose the proposed Fingerboards sand mine project in East Gippsland. I have serious concerns about the environmental risks to the Gippsland Lakes, the massive amounts of water that will be drawn from a heritage river and aquifer; the destruction of Gunaikurnai cultural heritage; and the broad loss of biodiversity across the project site.

I have lived in East Gippsland for a decade and feel a deep connection to the area where I have chosen to raise my family. I live on river frontage and understand how changing environmental conditions, like those scientists tell us to expect due to changing climatic conditions, can drastically affect the health of the riparian zone and the entire catchment.

The mining proponent Kalbar Operations Pty Ltd has acknowledged there are over 3 billion litres of water (3GL) required by the mine annually for up to 15 years (the maximum life of the mine) for processing and to control dust. Just how big is the dust problem if such a massive amount of water is to be diverted to mitigate it? And what will the impact of this be on bores, aquifers and the health of the Mitchell River and Ramsar listed Gippsland Lakes? According to irrigation data, if the 3GL of water was redirected to the horticulture industry, 3 times more jobs could be created than proposed by the mine. And what of the Gunaikurnai Traditional Owners rights to water for cultural values? Shouldn't we be respecting the deep time cultural lore of the First Custodians over the relatively short term profits of a self-interested few?

Given that Kalbar has not disclosed the full analysis of the ore body, I have concerns about the risk of contamination from radioactive dust, across Country and into the water system. What exactly was the laboratory asked to test and why has that information not been released? Such lack of transparency does not breed confidence in either the proponents, or the information provided in their EES. Given the Mitchell River is the main water source for over 22,000 residents and is used to irrigate the vegetable industry in the Lindenow Valley, how much is the government willing to risk? I don't want to risk eating contaminated vegetables or see an industry that employs so many locals be forced to close; so why is the information not transparent within the EES documentation? What are the real dangers to human health.

I ask the Panel to ensure that information regarding the lab results is fully disclosed and carefully examined; the risks are too great to pass over on good faith or process.

In 2010, the State entered into a Recognition and Settlement Agreement with the Gunaikurnai Traditional Owners of Gippsland, the first in Victoria. I understand that the Gunaikurnai are firmly against the Fingerboards mine proposal and yet have little legal recourse to stop it. The Cultural Heritage Act is supposed to protect the deep history and culture of Traditional Owners and yet from what I read of the EES, I have no faith that Kalbar will be held to account to ensure the protection and repatriation of any and all artefacts found. The EES acknowledges that unknown Aboriginal cultural heritage sites are highly likely to be present and will be impacted. These sites are not unknown, the Gunaikurnai know them well. It is shameful that GLaWAC were not engaged to undertake the initial cultural heritage assessments on the project site? If the proponent

was interested in a truly transparent process why would they not use the people who have the best knowledge of the landscape? Artefacts, scar trees, burial sites; Gunaikurnai Elders know that these are all present across the project site. Given the massive scale of excavation, it will be impossible to avoid the destruction of artefacts and heritage. This is unacceptable. The proponents mitigation measures will not avoid the obliteration of cultural heritage.

I also hold reservations about the ecological surveys undertaken by the proponent. With 13 square kms of land being mined, there is expected to be widespread loss of vegetation and habitat including over 700 large mature trees. There are known populations of threatened fauna and flora within the project site. The EES technical studies have not comprehensively surveyed the area to know the full ramifications of what is at risk which could mean more loss than reported in the EES. The landscape of the area will never be replaced; Gunaikurnai cultural heritage will never be replaced. Offsets will never be able to address this loss.

Finally, I find it unacceptable to allow compulsory acquisition of private land to be used by the mine for infrastructure that is located outside the mining project boundary. Water pipelines, bore pumps, bore field, roadworks, new powerlines, easements, rail siding and vegetation removal, why weren't these included as part of the mine project area? Why isn't this a matter for the East Gippsland Shire Council to determine?

I do not believe that this project has social licence beyond those with a financial stake in the proponent and I recommend it not be approved.

I thank you for your time and this opportunity to make this submission.  
Evan Miller