

Supplementary Submission – 484

Our community has been faced with the prospect of the mine for more than six years. It has been an exhausting, confusing, and infuriating process where we have tried to gather as much information as possible to work out what is going on, signed up for updates, attended information days and meetings, have been assured that the TRG would be examining all aspects of the project and have been constantly told by Kalbar 'It will be in the EES' and.

When the EES was released – in great haste – we had two months to try to digest more than 11,000 pages of documentation that was often conflicting and at all times based on such limited and questionable data inputs that all the consultants disclaimed any responsibility if the information provided to them by Kalbar was incorrect. Notwithstanding, and with as much good faith as possible, I spent every night and all weekends for those two months reading the documentation and attempting to respond to it in an informed manner.

Come the actual hearing any faith I had in the process has been shattered. I feel abused, disrespected, and incredibly saddened to think that this is the best Victoria has to offer in terms of environmental assessments approvals. To think that I completely wasted two months of my life, gave up everything in that time, neglected my family and suffered quite serious health problems as a result, to now find that the goalposts have changed and we have to go through a similar process again. However this time there have been changing goalposts, dribs and drabs of conflicting, untested information with even less scientific and technical basis than before and a clear message from the IAC that only the proponent matters in this process. Violated does not even begin to describe the feelings I have about it.

I was astounded to see the IAC accepted the inclusion of centrifuges as a mere moderation of the project rather than a transformation and absolutely appalled that the IAC has chosen to allow Kalbar to focus only on the centrifuge option and to avoid scrutiny of the TSF as a result.

Earth Resources have recently released updated guidelines to Work Plans and Work Plan Variations. Those guidelines, mean that if Kalbar is granted a mining licence on the basis of use of centrifuges it can immediately apply for a work plan variation to revert back to the use of a TSF. The guidelines will enable that to happen through an administrative sign off and without any opportunity for public or professional scrutiny. The precedent has been set across Victoria and communities such as those living around the Douglas Mineral Sands Mine are exposed to things such as massive radioactive waste dumps that were never discussed in the EES process or considered when the original mining licence was issued. Kalbar must have done a lot of fist pumping when the IAC made its decision to restrict discussion to centrifuges. Is the IAC panel aware of what it has condemned our community to?

While the quality of the original EES documentation highlights significant problems with the TRG (and in fact failures to identify issues and concerns that should have been obvious, e.g. water balance) at least it appeared to provide some level of scrutiny of Kalbar's proposals and permitted the relevant agencies to discuss and investigate contentions and seek more information where needed. Whilst that process has failed the community as there was no opportunity for input or questions (and Council representation is likely to have been about getting around planning permit hurdles rather than the operations and impacts of the mine) at least it provided some interrogation of – often fanciful – ideas from the proponent.

By presuming that the centrifuge option can be adequately dealt with in the panel process, the panel enabled the proponent to avoid any proper scrutiny of what is in fact an experiment on a landscape

scale that could have very dangerous consequences and unknown impacts (either short or long term) on the environment, the economy and the community.

With those comments in mind, I have found it incredibly difficult to keep up with the constant stream of tabled documents and trying to work out which ones were relevant. While the community has had the March 26, 12:00pm deadline for supplementary submissions, Kalbar has been allowed to ignore their March 12th deadline for relevant documentation, to put it in in disjointed dribs and drabs, even to the extent of submitting a more than 150 page document on the 25th March – one day before the community ones were due. Attempts to get information from Kalbar via email were like pulling teeth.

I have a number of concerns about the use of centrifuges that have not been addressed in that documentation.

1. Their use in mineral sands mines is experimental and untested.
2. They are necessary because Kalbar is trying to work out how to process WIM sands with high slimes content (anything from 21-25% compared to the Donald Mine slimes of 16%)
3. Kalbar (and the TRG) failed to identify the mistakes in the original water balance calculations to the extent that an extra 2GL of make up water would be needed if the original plans (with the TSF) were used.
4. Even with centrifuges the solids from fine tailings are still only 65% - the cake might be 'spadeable' but it is not workable.
5. The coarse tailings are only 65% solids too
6. Kalbar have given no indication of how fine tailings water content will be reduced to the level required to be used effectively in filling the void.
7. The project, based on publicly available information, is economically unviable. The centrifuges will add significantly to those costs – not just in terms of capital (including foundations, housing, administration (IT, etc), but also in terms of operating costs. (It seems that Kalbar will be chasing State and Federal funding to get it up?)
8. Why hasn't the IAC required Kalbar to meet the EES scoping requirements in relation to Resource Development that imply a business case to determine economic viability and hence best use of resources?
9. The centrifuges power needs add more than 50% to what are already very high. Kalbar say they are in discussions with Ausnet and they may build their own 66kV line to meet those needs. Where are the costings for that. What happens to the power supply of the rest of the community if they instead just rely on the existing line?
10. Noise levels have been understated by Kalbar. Centrifuges will add significantly to those. Their noise submissions indicate they don't want to be held to account by EPA requirements but want instead to take a pragmatic approach. What mechanisms are in place to protect to the people, livestock and native fauna. Kalbar is only saying it will take note of complaints, not that it will do anything about it.
11. The centrifuges need flocculents at a massive rate for millions of tonnes of fine tailings. That hasn't been done before in a mineral sands mine. Why are they being allowed to experiment with the Fingerboards?
12. Nobody knows enough about the toxicity of flocculents to predict what will happen when the tailings are in the pits. Will they break down, will they seep through to the groundwater, what effect will they have on aquatic life?

13. Kalbar (and Landloch) indicate the fine tailings will impede water flow through the ground. What happens if they act like a cement or plastic sheet. What happens to the adjoining land – especially if it has been weakened as a result of mining?
14. What work has been done to show the effect of increased spills from process water and other dams as a result of the use of the centrifuges?
15. The revised rehab plan gives information that conflicts with other reports regarding the positioning of fines (others say mixed with coarse sand, whereas this says mixed with overburden and placed closer to the surface). It also gives conflicting information about how deep beneath the surface they will be. Depth might be enough for pasture roots but will have a big impact on ability of trees to grow.

I have many other questions in relation to centrifuges but no time to add them here as 12pm is looming.

Joanne Eastman