

Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory
Committee - EES

216

Request to be heard?: No

Full Name: Jacqueline Hine

Organisation:

Affected property:

Attachment 1: Submission_Kalba

Attachment 2:

Attachment 3:

Comments: Please find submission attached

For the attention of: Inquiry and Advisory Committee

RE: The Fingerboards Mineral Sands Projects Environmental Effects Statement (EES)

Public submissions closing: 5.00pm on Thursday 29 October 2020

This submission is based on the primary concern that the Environmental Effects Statement (EES) is inadequate to ascertain the environmental impacts on matters of national significance (Ramsar wetlands; listed threatened species and communities; and migratory species) as it does not consider cumulative impacts.

I was fortunate enough to grow up on the banks of the Mitchell River inside Victoria's 'food bowl'. I moved away after high school but have returned every year in the subsequent 30 years. Over time I have noticed with increasing concern the declining health of the waterway and decreased numbers of native species as pressures from land clearing, invasive species, water extraction, extreme weather events and pollution increase. The original land clearing of the Mitchell River valley during colonial times was without doubt the single largest anthropological impact on the ecological system in the past. However remediation has been paltry to non-existent and numerous additional stressors continue to accumulate including the escalating impacts of climate change. Ecological systems are inherently interconnected and the health of the Mitchell River directly impacts the Ramsar wetland downstream.

How adequate is the risk assessment on an environmental asset if no consideration is given to other stressors also impacting on that asset? There is no evidence within the EES regarding attempts to ascertain:

- Existing stressors
- Foreseeable future stressors
- Current ecosystem resilience
- Models for sustainability thresholds across multiple stressors

Cumulative impacts are difficult to ascertain and assess. Companies are reluctant to incorporate impacts from activities over which they have no control and regulators find it extremely difficult to address using existing legislation. And yet the impacts on the natural assets do not delineate to proponents, activities or departments.

Socially it could be argued it's irresponsible to prioritise a 15 year project for Asian markets over perpetual sustainable domestic food production. The value of the Mitchell River Valley food production needs to be considered in the larger context of the state and country. Arable land and water supply are becoming increasingly rare commodities in a context of growing populations, urban development, climate change, increasing extreme weather events, clear-mining and pollution. The long-term value of these natural commodities cannot be understated and are almost impossible to remediate if they are lost.

The EES provided is not an independent environmental review – research and documents were paid for by the company. It is standard practice in industry to choose literature and wording carefully to support the proponent's case. It could be argued the governmental assessment is not neutral given the track record of successful approvals. State and Federal legislation in place to protect environmental assets has failed dismally in achieving their objectives when considering the state of the environment across their lifespans. The self-assessment approach with almost guaranteed approval has not had successful outcomes. The urgency to address cumulative impacts increases

unabated and the Fingerboards Mineral Sands project is a good example of where these matters need to be duly considered.

I urge the inquiry and Advisory Committee, along with the Federal Minister of Environment, to consider the cumulative impacts of **all** stressors on the matters of national significance and focus on outcome based thresholds for any approved activity.

I thank you for the opportunity to make a submission regarding this matter,

Kind Regards,

Jacqueline Hine