

26 July 2021

The Chairperson
Fingerboards Inquiry and Advisory Committee
C/- Planning Panels Victoria

By email only: Fingerboards.IAC@delwp.vic.gov.au

Dear Mr Wimbush

Fingerboards mineral sands mine project – Without Prejudice Comments on environmental management and planning documents

1. We continue to act for Mine-Free Glenaladale Inc. (**MFG**) in the Environment Effects Statement (**EES**) process for the Fingerboards Mineral Sands Project (the **Project**).
2. We refer to your letters of 18 June and 19 July 2021, seeking without prejudice comments on the draft environmental management and planning documents. We also refer to the letter to the IAC from White & Case Lawyers dated 19 July 2021, enclosing the further amended Incorporated Document and Consolidated Mitigation Register.
3. We enclose our client's without prejudice comments on the:
 - a. Incorporated Document; and
 - b. Consolidated Mitigation Register
4. We note that the Proponent has not circulated a further updated Environmental Management Framework (**EMF**) and or draft risk treatment plans. Accordingly, our client is not in a position to review or provide further without prejudice comments on those documents.

Please contact Nick Witherow (nick.witherow@envirojustice.org.au) and Virginia Trescowthick (virginia.trescowthick@envirojustice.org.au) should you have any questions.

Yours sincerely



Virginia Trescowthick
Lawyer
Environmental Justice Australia