



21 December 2020

Mr Cameron Fitzgerald  
Managing Director  
Southern Rural Water  
PO Box 153  
Maffra, Victoria, 3860

Email: [REDACTED]

Dear Mr Fitzgerald

### **Fingerboards Mineral Sands Mine EES Inquiry**

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Thank you for your submission to the above Inquiry lodged on 27 October 2020.

The availability of water for a range of activities is fundamental to the proposal by the proponent, Kalbar Operations Pty Ltd (Kalbar). Your submission outlines a range of regulatory matters, as well as identifying further investigations that your organisation would require in making any water allocation decisions.

Many other submissions to the Inquiry raise concerns about the availability of water at the level envisaged, and the consequences if it was allocated, for natural systems and other current or potential users.

Kalbar indicate in the Environment Effects Statement (EES) that some 6,000ML of water is unallocated in the Mitchell River Catchment and that they propose to seek to utilise 3,000ML of that annually via winter fill take.

The Inquiry and Advisory Committee (IAC) is seeking information from Southern Rural Water as it prepares for the hearing that will now commence on Monday 15 February 2021.

On this basis, the IAC would appreciate written advice by **10am on Monday 18 January 2021** on:

1. The current baseline used by Southern Rural Water, and Victorian water authorities in general, to inform decisions about applications for water allocation, taking into account climate change impacts and the likely impacts of any emerging Government policy reforms, if any, about sustainable water allocations.
2. The expected consequences if any of the Gippsland bushfires for overall water runoff and groundwater recharge for catchments and aquifers relevant to the Fingerboards proposal.
3. Whether the current level of unallocated water available in the Mitchell River Catchment for allocation is still 6,000ML and if not, what the appropriate amount is.
4. Whether there have been any recent or proposed allocations from the 6,000ML unallocated component since the EES process commenced.
5. The number of days per year since January 2014, when passing flows at the Glenaladale gauge exceeded 1,400ML per day (trigger for winter fill take to occur - Mitchell River Basin Local Management Plan January 2014).
6. Shorter term and longer-term trends in aquifers and other groundwater sources potentially impacted by the Kalbar proposed groundwater drawdown.

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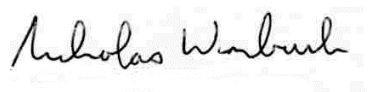
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7. Confidence levels that could be linked to a potential allocation of 3,000ML as sought by Kalbar. For example, will the Kalbar allocation have implications for other water take applications and users if the water allocation is not fully available due to seasonal or longer term variability.
8. How water allocation requests are settled, in a context where both surface water and groundwater sources are or appear to be close to being fully allocated. Are competing demands simply resolved through the water market or are there some protections built into the *Water Act 1989* (Vic) and associated operating policies to provide any long term confidence to existing high value water users?

These questions are of an exploratory nature and are intended to help inform overall understanding of the water allocation issue prior to the hearing commencing.

If you have any queries, please contact Amy Selvaraj at Planning Panels Victoria on [REDACTED] or [planning.panels@delwp.vic.gov.au](mailto:planning.panels@delwp.vic.gov.au).

Yours sincerely



**Nick Wimbush**

Fingerboards IAC Chair