

Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory
Committee - EES

672

Request to be heard?: No

Full Name: Kristen Grant

Organisation:

Affected property:

Attachment 1: Fingerboards_Sub

Attachment 2:

Attachment 3:

Comments: See attached Submission.

Dear Inquiry and Advisory Committee members,

I am writing this submission about the EES for the Fingerboards mineral sands mine project, proposed in East Gippsland. I am opposed to this mine in the proposed location because I think the impacts to the environment, and the people and industry in the surrounding area will be significant and unacceptable. I have the following concerns:

Open cut mines and associated haul roads and processing produce significant noise, dust and light pollution. For this reason they are usually located in unpopulated areas away from potential sensitive receptors. The proposed Fingerboards mine will run 24/7 and is to be located where people are living and farming. I don't believe the proposed mine can/will be managed without impacting the surrounding area and people. Dust noise and light often have greater impacts on people than models or estimates predict. I have personally witnessed noise and light pollution when hiking in a national park nearby to an iron ore mine in Western Australia and it is very real, particularly for 24/7 operations such as the proposed Fingerboards mine.

The mineral sands that Kalbar propose to mine contain radioactive material which has the potential to migrate offsite in dust, surface water and groundwater. Are the types and quantities/concentrations of these materials adequately understood to properly assess the risks? Will this radioactive material effect the health of organisms in the surrounding environment, livestock on farms, the health of people living nearby and collecting rainwater for drinking? Will this radioactive material impact on the local vegetable growing industry?

The EES predicts that groundwater mounding will occur underneath the tailings dam as a result of seepage from the tailings dam into the alluvial/surface aquifer. The EES suggests this alluvial aquifer is perched on top of a confined aquifer. The alluvial aquifer is strongly linked to the nearby Mitchell River via recharge and discharge. Given this, is there a risk of the alluvial aquifer becoming contaminated with tailings seepage (heavy metals, radioactive material, salts, etc) and migration offsite and impact on the Mitchell River and local groundwater and springs in the area? Also is the groundwater in the alluvial aquifer expected to remain contaminated from tailings seepage underneath the mine site after site rehabilitation at end of mine life?

EPBC listed habitats will be destroyed by the proposed project, and offsets are proposed to compensate for this loss of important habitat. It is proposed to use a combination of offset credits and offset locations/land. There is a history of poor management/use of offset credits by the government and offsets are often ineffective in preservation of habitat types destroyed by projects such as the proposed Fingerboards mine. There still seems to be a significant amount of uncertainty around potential offset sites/habitats in the EES. What is the proposed offset package and management plan? I don't have confidence in protection of endangered flora, fauna and vegetation communities through the use of offsets, as is proposed for this project. This landscape will be lost for a very long time and is unlikely to recover to what it was/is.

The risk of impacts to GDEs by groundwater mounding was reviewed in the EES, however the risk of impacts from mine dewatering was not mentioned in relation to GDEs. Is mine pit dewatering expected to be part of the proposed mine? If so, have the potential effects of this on the alluvial aquifer been assessed, and the subsequent effects on GDEs?

The proposed surface water management strategy proposes substitution of natural runoff with stored water extracted from the Mitchell River and/or groundwater from the deeper confined aquifer. The substitution or offset of flows is an engineering solution to attempt to reduce environmental effects, however it is focused only on volume of flows and does not assess or discuss water quality. Water is proposed to be released from the large water storage dam on the mine site, which is filled from the river and/or from the deeper groundwater aquifer. The quality of the water from a large dam stored for extended periods will be very different from natural rainfall/surface water runoff. Temperature, dissolved oxygen, dissolved salts, turbidity, nutrients, etc will be vastly different? Very cold water or water with low dissolved oxygen could negatively impact on downstream aquatic ecosystems. I don't believe water quality has been adequately considered in the EES.

Uncertainty and assumptions are inherent in modelling and predicting effects on the natural environment and processes. This EES is based on models and predictions of possible impacts of planned mining activities, such as impacts to groundwater. Natural systems, aquifers, geological formations and deposits have significant variability and complexity that cannot always be modeled accurately, and impacts may be very different in reality than predicted. Even something as simple as the mine life can change if the mine changes ownership, mineral prices fluctuate and production is decreased or the mine is placed into care and maintenance for periods of time, or owner or operator goes into receivership. Is adaptive management or intervention proposed for the proposed project if actual impacts and effects are greater than modeled or predicted. What assurances could the government give to the community, and will bonds be adequate for possible impacts greater than modeled and predicted? Bonds for mines have often historically been grossly inadequate to cover remediation and rehabilitation and monitoring costs if left to the government to deal with. I am concerned that this proposed mine could become another environmental problem left to the government and community to deal with down the track.

It is unacceptable to allow compulsory acquisition of private land to be used by the mine for infrastructure that is located outside the mining project boundary for: water pipelines, bore pumps, bore field, road works, new power lines, easements, rail siding and vegetation removal. Why wasn't this part of the mine project area? Why isn't this a matter for the EG Shire Council to determine?

I would like to thank the panel members for the opportunity to make this submission.

Regards

Kristen Grant