

# Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory  
Committee - EES

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**Request to be heard?:** No - but please email me a copy of the  
Timetable and any Directions

**Full Name:** Ebony Clark

**Organisation:**

**Affected property:**

**Attachment 1:** Kalbar\_letter.docx

**Attachment 2:**

**Attachment 3:**

**Comments:** see attached submission

Hi there,

My name is Ebony Clark. I am 24 years old and reside in my hometown of Bairndale. I am writing to you today to express my concern about the proposed Kalbar Mineral Sands Mine at Glenaladale, and I am sincerely hoping you will take my concerns, alike with so many other residents of East Gippsland, into consideration. My biggest fears about this mine relate to, among many other things, the destruction of the environment - particularly the damage to native flora and fauna, the impacts to our waterways (the largest inland waterway in the Southern Hemisphere) and disturbance of Aboriginal cultural heritage.

I would also like to preface this letter by stating I am in no way against mining as a whole and understand the need for these resources in our modern world, particularly the rare minerals required for technology such as smartphones and computers. I simply believe this is a totally inappropriate and inefficient development for our area and will have vast negative impacts for the wider community. For reference, consider the Coburn Heavy Mineral Sands Project in northern Western Australia, owned by Strandline Resources. While predicting a lower total yield than the Glenaladale mine (5.2m tonnes versus 8m tonnes), the Coburn HMS is proposed in a low risk, remote mining-focused area, where it is the main industry. We must also consider that Strandline Resources is a mining company with 20 years of experience in the mining industry, operating mines in both Australia and Tanzania. Kalbar Resources was established in 2011 and is primarily an investment company, with much less experience in the industry. They sold their only other venture, the Landak Bauxite Project in Indonesia, in 2012 after just two years of developing the site. Who is to say they won't do this again with the Glenaladale site? Kalbar already have already employed a position of "VP" in China, and extensive internet searches prove difficult in finding more information or credentials about the company which is very alarming.

We also must consider that 82% of impacted landowners in the area, and many others in the broader East Gippsland area, oppose this development and have never wanted it in the first place. After devastating bushfires in 2014, the people of Glenaladale feel like they have been dealt no empathy or consideration by Kalbar. This is demonstrated in excerpts from the Mine-Free Glenaladale website:

"While people were still in shock, burying animals and trying to reconstruct their lives a representative from Kalbar Resources arrived on fire impacted properties and wanting to do exploration drilling. This representative claimed he did not know a fire had occurred – "he was standing on burnt ground"...

This complete lack of sensitivity and understanding has been a hallmark of interactions since then...The socio-economic and health studies being done for the EES show they have little interest in the well-being of our local community and in fact most deliberately avoid looking at what we as a community will have to endure but only look at impacts more than 5 kilometres away."

East Gippsland is truly a special place, filled with picturesque scenery, rich biodiversity and fertile soils growing world-class produce for Victoria's food bowl. The area the proposed mine is to be built alone includes 9 rare or threatened flora species, 42 rare or threatened terrestrial fauna species, and 11 native and 2 exotic fish species, demonstrating the rich biodiversity in the area.

Kalbar themselves have stated in their EES Summary Report that they will clear 188.5 hectares of native vegetation, and are aware it is known habitat for the following animals:

- Grey-headed flying fox, which is listed as Vulnerable under the Environment Protection and Biodiversity Conservation Act, as a threatened species under the Flora and Fauna Guarantee Act and as Vulnerable on the Victoria Advisory List.
- Yellow-bellied sheath-tail bat, which is listed as a threatened species under the Flora and Fauna Guarantee Act and as Data Deficient on the Victoria Advisory List.
- Masked owl, which is listed as a threatened species under the Flora and Fauna Guarantee Act and as Endangered on the Victoria Advisory List.
- Emu, which is listed as Near Threatened on the Victoria Advisory List.
- Eastern long-necked turtle, which is listed as Data Deficient on the Victoria Advisory List.

The fact that there is such blatant disregard for the protection of our native flora and fauna is alarming. Many of the local farming families have preserved large areas of native habitat on their properties for the last 150 years. These areas, including many ancient trees, will be destroyed. Some of these areas adjoin bushland that links to the Providence Ponds Nature Reserve, one of only three sites in Victoria for the New Holland Mouse. While Kalbar has stated that this habitat is of low quality and better quality habitat is nearby, there is absolutely no consideration for the flora and fauna that will simply be wiped out during land clearing. Aside from the native environment, this is not even taking into consideration the impact this will have for the Mitchell River Valley vegetable growing industry. If going ahead as planned, the mine will be situated on a plateau 500m from the Valley. The world class produce here is grown to strict quality control measures, and the resulting dust contamination from the mine is threatening to completely destroy a sustainable agribusiness that has been in operation for decades, supplying food to people all over Victoria. Impacts from tunnel erosion, acid sulphate soils, sedimentation, landform instability could spoil this precious, fertile land forever. Is it worth potentially wiping out a sustainable, ongoing industry, that will create more jobs overall, for a mine with a 15 year life span that may affect the landscape forever? Let us consider that if the 3-4 gigalitres of water (at a minimum) required to operate the mine was redirected to growing vegetables, this would create more than three times long term, viable jobs.

We must also consider the effects of this mine on East Gippsland's waterways, notably the Mitchell River and Perry River systems. The Mitchell River alone supplies about 30% of water to the lakes system, and according to the Land Conservation Council Rivers & Streams Special Investigation 1990, "It is an important example of the large-scale biological systems that were once widespread in south-eastern Australia." The Mitchell River was listed as a Heritage River in 1992. A notable feature of this waterway, as any resident in East Gippsland would know, is it is prone to flooding during heavy rainfall. The mine is proposed to be situated just 80m uphill of the Mitchell, and contains very fragile soil which falls apart in heavy rainfall - this will cause sediment and potentially toxic substances to run into the river, which will have a devastating impact on aquatic life. Turtles, Platypuses and 11 native fish species reside in this area, including a very large population of Australian Grayling which is listed as a vulnerable species by the DSE and has a high conservation value. This contaminated runoff will run through some of East Gippsland's most iconic and precious natural wonders, including:

- The internationally significant Mitchell River silt jetties, moving through into Lake King

- The Perry River's unique chain of ponds
- Gippsland Lakes RAMSAR site - part of migratory routes and refuges for many bird species

Additionally, an ancient spring fed waterhole on the site, once turned into one of 14 dams, will permanently change the ecological flows of the Mitchel River. While the health of everything that relies on this water source is under threat, the Gippsland Lakes system is a major tourism destination in Victoria, contributing \$294 million to East Gippsland's economy by attracting 1.138 million visitors to the region. How would the region survive if we could not continue not only this industry, but the commercial fishery operations? We have just witnessed how the 2019/2020 Black Summer bushfires decimated the local economy by slashing summertime tourist numbers, and how hard this has been for many local businesses, made worse by the COVID-19 pandemic. Imagine if this was taken away from our region forever? It is very likely that real or perceived impacts will affect our viability as a tourist location, and we cannot afford anything to compromise this in an already struggling region.

Finally, we must act on the proposed mine to retain important Aboriginal cultural heritage sites. Almost no consideration has been given to East Gippsland's traditional custodians of the land, the Gunaikurnai people, who have resided in the area for more than 25,000 years and have a Native Title right over public land in the proposed site. Kalbar has themselves stated in the EES Summary Report that the site includes a scar tree listed on the Victorian Aboriginal Heritage Register, three recorded Aboriginal sites and 68 previously unrecorded surface stone artefacts. They are also fully aware that there is the highest potential for more unknown sites to be uncovered in the construction of the mine, and all of the registered and recorded Aboriginal cultural heritage sites will be impacted through ground disturbance and the extraction of ore. Local Gunaikurnai populations are publicly against the mine, notably as they feel the cultural mapping performed of the site has been insufficient and their history will be destroyed before it is discovered. The Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC) represents Traditional Owners from the Brataualung, Brayakaulung, Brabralung, Krauatungalung and Tatungalung family clans, who were recognised in the Native Title Consent Determination, made under the new Traditional Owner Settlement Act 2010, the first such agreement under that Act. The GLaWAC Interim Position Statement in April 2019 states:

"Aboriginal people are part of their country and they have a deep spiritual connection and responsibility to care for country. The proposed mining operation will disturb and hurt the cultural connection of the Traditional Owners to the land, air and water that is part of the development area."

The blatant disregard for our First Nations people in pursuit of profits is appalling, particularly in a region that experienced some of the worst bloodsheds of Aboriginal people in Australian history. Kalbar have not fulfilled the scoping requirements set out by the Minister for the Fingerboard's Mineral Sands Project EES March 2018, and technical reports do not provide a clear integrated analysis of the extent and importance of existing cultural heritage affected by the proposal or permanent loss to those significant heritage values and associated connections.

In summary, I beg of you to please consider the serious and irreversible environmental, health, economic and cultural impacts the Fingerboards Mineral Sands Project will have on Glenaladale, the Gunaikurnai people and the wider East Gippsland community if it goes ahead. Please help us stop this mine. We are so lucky to live in one of the most fertile, rich and beautiful places in Australia, and we are on the precipice of having this all taken away from us. I dream of my future

children one day having an abundant childhood amongst the bush and in the water just like me and my brother did. We cannot afford another repeat of the mine at Benambra, which so far has cost taxpayers over \$7m trying to prevent highly poisonous waste discharging into the river and surrounding environment. Our livelihoods are at stake.

Yours sincerely,

Ebony Clark



I acknowledge the Gunaikurnai, Monero, and the Bidawel people as the Traditional Custodians of the land that encompasses East Gippsland Shire.

I pay my respects to all Aboriginal and Torres Strait Islander people living in East Gippsland, their Elders past, present and emerging while acknowledging that sovereignty was never ceded.