

12.1.52 Representation 46 - Lloyd

From: [REDACTED]
Sent: Mon, 17 Jun 2024 21:15:41 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Subject: Abx bauxite mine at Reedy Marsh PA/24/0052 DL130 Bauxite Project.
Attachments: ABx Mine.odt, ABx Mine 2.doc

My submission is attached below, in two formats.
Sent by Peter Lloyd [REDACTED]

Jonathan Harmey,
General Manager
and The Planning Section
Meander Valley Council
Lyll Street
Westbury 7303

Expression of objections and concerns regarding the proposed Abx bauxite mine at Reedy Marsh PA/24/0052 DL130 Bauxite Project.

I wish to express my objections to the approval of the bauxite mine ("quarry") proposed for development near Porter's Bridge and River Roads, Reedy Marsh.

I live on Wadleys Road and the proposed site is 5 kilometres from my property. Myself and my partner have lived here for almost 10 years, moving from Launceston.

I first caution the Council to consider what will be allowed and likely to happen should the proposal be approved, and not simply accept non-binding, aspirational statements made by ABx. Without being too fanciful, we have good reasons to suppose the mine will operate based on the lowest costs and convenience to the company, and operations will not be restricted to the soothing, 'best case scenario' put forward by ABx.

AMENITY:

I begin by objecting to the proposal based on reduced amenity. Given the parlous state of Porters Bridge Road, which is often damaged and occasionally inaccessible, I feel it is likely mine traffic will have occasion to use River Road. These heavy vehicles will unquestionably be easily heard from my house, which was bought specifically for its quiet location. As they damage the road, which is inevitable, the noise will become worse. River Road is especially susceptible to potholing and collapse near the bridge at the Wadleys Road intersection, 40+ tonne B-doubles thumping over the damaged areas will make this much worse and be an expense to Council and an annoyance to residents.

The location of the mine is a wind-swept location high on a hill. Stripped of cover, and operating during fair weather, vast amounts of dust will be generated and deposited onto adjacent areas. As trucks will not have tarpaulins (they did not at ABx's Campbell Town site), this dust will be spread around roads and adjacent areas.

In short, noise, road damage, dust, and of course the dangers of more vehicles on these narrow roads will have direct negative impacts.

WILDLIFE:

B-Doubles operating on either road will be a threat to wildlife in the area. My own land harbours devils, spotted and eastern quolls, bandicoots and many other species. Wedge-tailed eagles are a common sight and parrots and rosellas, including the swift parrot, have been spotted occasionally. Trail cameras provide evidence of the presence of many of these animals. The area of River Road described above is usually a gauntlet of road kill, which will become worse. Devils are among the animals I have documented killed here, hit as they go for the road kill. (While I note ABx claims certain hours of mine operation, there are no guarantees and many heavy vehicle drivers prefer to operate at night).

These were healthy animals, and Reedy Marsh must represent some of the easternmost extent of healthy devil habitat. Given the animal has become practically extinct in the eastern half of the state, the Reedy Marsh area has particular significance as a devil habitat. Myself and other residents of this area really treasure our wildlife, and put great effort into preserving habitat in how we manage our land. The ABx development, *and the other developments that will inevitably follow if approved*, fly in the face of our efforts and the massive, wider devil preservation effort.

I have personally observed devil scats immediately adjacent to the proposed site in recent weeks... unfortunately I did not know of the mine proposal so did not document them. But devil roaming ranges mean the site must be habitat, now the plantation regrowth has taken hold. Whilst the site is indeed rehabilitated plantation, the new trees are large enough to be harbouring wildlife including rare species. I have not the least doubt further study would prove the presence of many species. It is entirely possible the mine will affect dens and/or bird's nests, either by direct impact or showering dust onto adjacent areas.

None of this is adequately dealt with in Appendix A of the proponent application/EER.

I am aware ABx proposes to use Porter's Bridge Road for mine access but as a non-binding agreement, other access routes are likely. The proponent admits access was considered via the forestry roads accessed via the intersection of Porter's Bridge and River Roads. If access becomes problematic along it's proposed easement, by weather or heavy vehicle damage, this second route would be preferred or may be the only option. ABx is not a well-financed company and will be obliged to be very cost-conscious in its operation.

Although outside the scope of the Council's considerations, I feel certain the proposal is for the smallest operation ABx can propose, to commence mining on the site, before later seeking approval for it's main game: a rare earths operation already being extensively prepared for the same site, and much more land adjacent. This operation will use an acid leach process, be much more vicious and environmentally damaging. I think it is important to emphasise that ABx is not welcome here not just because of concerns about its "quarry", but rather its grand plan for Reedy Marsh which is utterly objectionable on any level.

Council is surely obliged to express the opposition of myself and my neighbours, loyal ratepayers and contributors to this community, to this company which seeks so much but offers very little in return.

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Peter Lloyd



12.1.53 Representation 47 - Scicluna

From: [REDACTED]
Sent: Mon, 17 Jun 2024 21:30:59 +1000
To: "Planning @ Meander Valley Council"
<planning@mvc.tas.gov.au>; "assessments@epa.tas.gov.au" <assessments@epa.tas.gov.au>
Subject: Objection to PA\24\0052 (DL130)
Attachments: Objection to the Proposed Bauxite Mine.pdf

To the General Manager and the EPA,
Please find attached an objection to the proposed bauxite mine in Reedy Marsh, currently up for public comment - PA\24\0052 (DL130).
Regards,
J & E Scicluna



Monday 17th June, 2024

The General Manager
Meander Valley Council
PO Box 102
Westbury TAS 7303
planning@myc.tas.gov.au cc'd in assessments@epa.tas.gov.au

Objection to the proposed Bauxite Mine – PA\24\0052 DL 130

The following outlines a comprehensive objection to the proposed bauxite mine, located within 5km of many residential houses, the Meander River and adjacent to the Brushy Rivulet Reserve. It details the potential of significant risks to human health and negative impacts on local wildlife, soil, vegetation, waterways and infrastructure and the overall well-being of nearby residents and local communities. The evidence presented draws from academic research, environmental studies, and health assessments to substantiate the claims.

We also hold additional concerns not mentioned in this document, due to the challenges faced in putting together an objection at late notice with limited knowledge of the planning application and advertisement period, which include the potential for decreased property values and economic impacts to the community that rely on maintaining a pristine environment.

I. Impact on Road Infrastructure

We are concerned that the significant increase in heavy vehicle traffic associated with mining operations will have detrimental effects on road conditions, public safety, environmental quality, and the overall quality of life for local residents. The current proposal by The Abx Group will cause significant cost to Meander Valley Council and infrastructure works and roadside clearing. Ultimately, it will be the rate payers bearing substantial costs from a private entity, unlikely to widely contribute to the local economy.

The significant increase in heavy vehicle traffic due to mining operations will strain local road infrastructure. Roads not designed to handle such traffic can deteriorate rapidly, leading to increased maintenance costs and posing safety risks for all road users. This increased traffic can also contribute to higher emissions and noise pollution, further impacting the quality of life for local residents (Watkins et al., 2016).

1.1 Deterioration of Local Roads

The local road network is currently not designed to accommodate the substantial increase in heavy vehicle traffic that the mining operations will generate. According to Watkins et al. (2016), heavy vehicles, particularly those used in mining, exert a much greater load on road surfaces than typical passenger vehicles. This increased load accelerates wear and tear, leading to potholes, cracks, and other forms of damage. The rapid deterioration

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of road surfaces will necessitate frequent and costly repairs, diverting funds from other critical community needs and infrastructure projects.

1.2 Increased Maintenance Costs

The financial burden of maintaining and repairing deteriorated roads will fall on the local government and, by extension, the taxpayers. According to the American Association of State Highway and Transportation Officials (AASHTO), the cost of maintaining roads that experience heavy truck traffic can be up to four times higher than those used primarily by passenger vehicles. This will place an unsustainable strain on local budgets, potentially leading to higher taxes or reduced public services.

1.3 Safety Risks

The influx of heavy vehicles poses significant safety risks for all road users. Roads not designed to handle such traffic will have compromised structural integrity, increasing the likelihood of accidents. Heavy trucks have longer stopping distances and are more challenging to manoeuvre, particularly on roads that are narrow, winding, or in poor condition. Increased truck traffic also heightens the risk of collisions with passenger vehicles, cyclists, and pedestrians, potentially leading to injuries or fatalities. There are many cyclists, walkers and runners that regularly use the River Road – Exton loop for health and recreation.

1.4 Environmental Impact

The increase in heavy vehicle traffic will contribute to higher emissions of pollutants such as nitrogen oxides (NO_x), particulate matter (PM), and carbon dioxide (CO₂). These emissions degrade air quality, posing health risks to residents, particularly those with respiratory conditions. Moreover, heavy vehicles contribute to noise pollution, which can disturb the peace and quiet of residential areas, disrupt wildlife habitats, and negatively affect the overall quality of life for local inhabitants.

1.5 Quality of Life for Local Residents

The combined effects of road deterioration, increased maintenance costs, heightened safety risks, and environmental pollution will significantly impact the quality of life for local residents. Increased noise and air pollution can lead to health issues, while deteriorated road conditions and traffic congestion can cause delays and inconvenience for daily commuters. The aesthetic and recreational value of the community will also suffer, potentially reducing property values and deterring new residents and businesses from moving into the area.

Supporting Data and Case Studies

Case Study 1: A similar scenario occurred in the town of Ravensthorpe, Western Australia, where the commencement of nickel mining operations led to a dramatic increase in heavy vehicle traffic. The local roads, not designed to handle such loads, deteriorated rapidly. The local government faced substantial increases in road maintenance costs, which were ultimately borne by the community. Residents also reported a marked decline in air quality and increased noise pollution, affecting their quality of life.

Case Study 2: In Appalachia, USA, coal mining operations have similarly impacted local infrastructure. Studies found that roads in mining regions required up to 40% more maintenance compared to non-mining areas, with significant costs incurred by local municipalities. The heavy traffic also led to higher accident rates, reinforcing the safety concerns associated with increased heavy vehicle presence on inadequately designed roads.

1.6 Incomplete Planning Application

Whilst the above arguments are valid concerns, it can be argued that the Planning Application is incomplete, on the grounds that a crucial component, namely the traffic impact assessment has not been finalised. While it has been indicated that this assessment is underway, the absence of such critical information hinders a comprehensive evaluation and understanding of the potential implications of the proposed mine on traffic in the area.

It is imperative that all aspects of the planning application are complete and thorough to ensure that the impact on traffic, a key concern for residents and stakeholders, is adequately assessed and addressed. Without the traffic impact assessment, it is challenging to fully comprehend the potential consequences of the proposed development on existing traffic patterns, infrastructure, and safety measures required.

On this basis, we respectfully request that the planning application be deemed incomplete until the traffic impact assessment is provided and can be thoroughly evaluated. As concerned stakeholders, a complete and transparent review process is essential for the successful and sustainable development of our community.

2. Health Impact on Residents

2.1 Air Quality

Mining activities, particularly bauxite mining, inherently involves the disruption of large amounts of earth, which leads to the release of dust and fine particulate matter into the air. These airborne particles, often composed of silica, aluminium, and other harmful substances, can have severe consequences for the respiratory health of the local population. Particulates can be inhaled by residents living near mining sites or inadvertently settle onto surrounding land, contaminating resident's tank water supplies as this is the primary water source for locals, and their produce gardens.

Long-term exposure to mining dust has been linked to chronic respiratory diseases, cardiovascular problems, and other health issues. A study by Buxton & Fitzgerald (2007) found a direct correlation between long-term exposure to mining dust and increased rates of respiratory illnesses. Continuous exposure to poor air quality can weaken the immune system, making residents more susceptible to infections and other health issues, especially vulnerable populations such as children and the elderly.

In addition to dust, mining activities often release various chemical pollutants into the air, including heavy metals and volatile organic compounds (VOCs). These substances can further degrade air quality and pose additional health risks. Chemicals released during bauxite mining, such as aluminium oxide and silica, can be toxic when inhaled. These substances can exacerbate respiratory conditions and lead to long-term health complications. The combined exposure to dust and chemical pollutants can have cumulative effects, significantly increasing the risk of developing serious health conditions over time.

2.2 Water Contamination

The concern of water contamination cannot be overstated. Tank water continues to be the primary water source for most Reedy Marsh residents. The potential for pollutants to enter our water supply presents a significant health hazard. The airborne particulates generated from mining operations inadvertently settle onto surrounding land, roof catchments and garden produce. Long-term exposure to contaminated water can lead to serious health issues, including gastrointestinal illnesses, skin conditions, and other chronic diseases. The integrity of local water sources is crucial for the community's health, agriculture, and overall quality of life, making the risk of water contamination a paramount concern in the objection to the proposed bauxite mine.

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A study highlights that bauxite mining can lead to significant water contamination. The process produces dust and residues that include heavy metals and other harmful substances, which can settle in water bodies. This contamination affects soil fertility, aquatic life, and the safety of drinking water sources (Jordan, 2023).

2.3 Noise Pollution

Mining operations generate significant noise from blasting, processing, and heavy machinery. The introduction of a bauxite mine in our community presents several significant health risks associated with noise pollution. These risks are substantiated by numerous studies and should be a primary concern for the council when considering the approval of this project.

The noise from mining operations and increased heavy vehicle traffic can lead to stress, sleep disturbances, and other health problems for nearby residents. Continuous exposure to high noise levels has been associated with cardiovascular disease and hypertension (Stansfeld & Matheson, 2003).

Continuous exposure to high levels of noise from mining operations and the increased heavy vehicle traffic can contribute to elevated stress levels among residents. Chronic stress has well-documented negative effects on mental health, potentially leading to anxiety and depression. This is particularly concerning for vulnerable populations such as children, the elderly, and individuals with pre-existing mental health conditions.

3. Soil Degradation and Vegetation Impact

The proposed bauxite mine poses significant threats to soil health, vegetation, surrounding natural reserves, and local waterways with potential damages that necessitate serious consideration. The long-term ecological damage, loss of biodiversity, and impact on water resources present compelling reasons to reconsider the development of this mine. Bauxite mining involves the removal of the topsoil, which is essential for plant growth and maintaining soil structure, results in a loss of essential nutrients and microbial activity and processes like soil erosion, compaction, and contamination.. Research indicates that post-mining soil restoration is challenging and often incomplete, leading to long-term ecological damage (Ghose, 2004). Protecting the environment and the well-being of local communities should be prioritised over any short-term economic gains of mining.

3.1 Soil Structure

Mining activities disrupt the natural soil structure, leading to increased erosion and compaction. This erosion results in the loss of fertile topsoil, while compaction reduces the soil's ability to retain water and nutrients, making it less hospitable for plant life (Ghose, 2004).

3.2 Soil Contamination

The extraction process often involves the use of chemicals and can release heavy metals into the soil, leading to contamination. This contamination not only affects the immediate area but can also spread to surrounding ecosystems through water runoff.

3.3 Challenges in Soil Restoration

Post-mining soil restoration is notably challenging. Efforts to rehabilitate the land often fall short, leading to long-term ecological damage. Re-establishing the original soil composition and structure is difficult, and the process can take decades, during which the land remains barren and unproductive (Ghose, 2004). The surrounding land is reserves and agricultural land, being directly affected by mining operations.

4. Impact on Surrounding Natural Reserves and Rivers

Mining often leads to increased sediment and pollutants in local waterways. The Brushy Rivulet and Meander River could suffer from contamination, affecting both aquatic ecosystems and the quality of water for human use (Edraki et al., 2014).

4.1 Brushy Rivulet Reserve

The proximity of the mine to the Brushy Rivulet Reserve poses a significant threat to its ecological integrity. Increased pollution, both airborne and waterborne, can harm the delicate ecosystems within the reserve. Additionally, increased human activity can lead to disturbances in wildlife behaviour and plant growth (Harper et al., 2015). The Reserve and surrounding areas host diverse plant species. The loss of vegetation can lead to increased invasive species, further diminishing native flora (Koch & Hobbs, 2007).

- **Pollution:** Increased pollution from mining operations, including airborne dust and waterborne contaminants, poses a threat to the delicate ecosystems within the reserve. These pollutants can damage plant and animal life, disrupt growth, and lead to long-term ecological changes (Harper et al., 2015).
- **Human Activity Disturbances:** The increased human activity associated with mining can lead to disturbances in wildlife behaviour and plant growth. Noise, light, and physical presence can all have detrimental effects on the natural behaviours and health of wildlife in the reserve (Harper et al., 2015).

4.2 Meander River and beyond

The Meander River is crucial for local biodiversity and as a water source for the community, including irrigation scheme supply, irrigation, aquaculture, town water supply, stock and domestic use, and other commercial purposes (Dept of Primary Industries, Parks, Water and Environment, 2004 & 2016). Mining operations can lead to sedimentation and chemical particulates settling or runoff into the river, degrading water quality and harming aquatic life. The potential impact on platypus species that Deloraine and surrounding areas have become known for and which draws tourism that then supports local business (Mayer et al., 2007).

- **Sedimentation:** Mining operations often lead to increased sedimentation in nearby water bodies. This sediment can clog waterways, disrupt aquatic habitats, and degrade water quality, affecting both wildlife and human populations (Mayer et al., 2007).
- **Chemical Runoff:** The use of chemicals in mining can result in runoff that contaminates the river. This runoff can introduce harmful substances into the water, impacting aquatic life and making the water unsafe for human consumption (Mayer et al., 2007).

4.3 Water Table

The extraction processes involved in bauxite mining can lower the water table, impacting local wells and bore water supplies.

- **Lowered Water Table:** The extraction process often involves the removal of large amounts of water, which can lower the local water table. This reduction affects local wells and bore water supplies, which many residents rely on for their daily water needs (Anderson et al., 2008).
- **Consequences for Residents:** Lowered water availability can lead to severe consequences for local residents, including water scarcity and increased costs for water access. This issue can also affect local agriculture, leading to reduced crop yields and economic hardship for communities (Anderson et al., 2008).

5. Environmental Impact on Tasmanian Wildlife

5.1 *Tasmanian Devils (Sarcophilus harrisii)*

Tasmanian devils are critically endangered and face significant threats from habitat destruction. The proposed mine will lead to habitat fragmentation, making it difficult for these animals to forage and find mates, exacerbating the risk of Devil Facial Tumour Disease (DFTD). Studies have shown that habitat loss and fragmentation are major factors contributing to the decline of Tasmanian devils (Hawkins et al., 2006). If required, we have recently captured a juvenile Tasmanian Devil on security cameras in the Reedy Marsh area, indicating a breeding population in the immediate area.

5.2 *Wombats (Vombatus ursinus)*

Wombats are known for their extensive burrowing habits, which can be severely disrupted by mining activities. The noise, vibrations, and land disturbances from mining operations can cause stress and disorientation among wombat populations, leading to a decline in their numbers (Evans et al., 2016).

5.3 *Eagles (Aquila audax fleayi)*

The Tasmanian wedge-tailed eagle is listed as endangered, with habitat destruction being a primary threat. The mining operations will likely lead to disruption to nearby nesting sites and eagle nesting behaviour and reduce the availability of prey due to ecosystem disturbances, further endangering this species (Mooney & Holdsworth, 1991). There is a documented nesting pair of wedge-tailed eagles within 5kms of the proposed mine site, with recent breeding being observed in February 2024.

6. Corporate Governance Concerns

ABX Mining's history of questionable corporate governance, financial mismanagement, and lack of community engagement raises significant concerns about their suitability to operate a new bauxite mine. Their past behaviour indicates a potential risk of non-compliance with environmental and social responsibilities, which could have detrimental effects on the local community and environment.

6.1 *Financial Mismanagement and Questionable Business Practices*

ABX Mining has a history of poor corporate governance, as evidenced by their failure to honour a \$2.5 million debt to Tasmania's State-owned rail operator in 2015. This incident highlights significant issues in their financial management and business ethics. Additionally, ABX Mining has previously exploited legislative loopholes to avoid paying state royalties, further indicating a pattern of irresponsible behaviour. This history raises serious concerns about the company's ability to manage the proposed mining project responsibly.

6.2 *Trust and Transparency Issues*

The past behaviour of ABX Mining suggests a lack of commitment to ethical business practices and transparency. This undermines trust in their ability to adhere to environmental and social responsibilities. A company that prioritises financial gain over ethical standards is unlikely to implement necessary environmental protections and community engagement practices effectively.

6.3 Lack of Community Engagement

It is imperative that any development project, especially one with significant environmental impacts, includes comprehensive community consultation and feedback mechanisms. To date, ABX Mining has demonstrated a lack of dialogue with local residents. Effective community engagement is essential to address concerns, mitigate negative impacts, and ensure that the voices of those affected are heard and respected. The absence of such engagement reflects poorly on the company's commitment to social responsibility and undermines the legitimacy of the project.

7. Mitigation Measures and their Limitations

Whilst mining companies often propose mitigation measures such as noise barriers, restricted operating hours, and regular maintenance of machinery to reduce noise levels, these measures have limitations:

1. **Effectiveness of Noise Barriers:** Noise barriers can only reduce noise to a certain extent and are often less effective in completely eliminating the high-frequency sounds that travel longer distances.
2. **Enforcement of Operating Hours:** Restricting operating hours might mitigate noise pollution during certain periods, but it does not address the cumulative effect of noise over time.
3. **Maintenance and Compliance Issues:** Ensuring regular maintenance and compliance with noise reduction measures requires strict monitoring and enforcement, which can be challenging and costly. There is also a risk of non-compliance over time, especially if the regulatory framework is weak.

Conclusion

The proposed bauxite mine near the Brushy Rivulet Reserve presents numerous environmental, health, and infrastructural challenges. The negative impacts on local wildlife, soil, vegetation, waterways, and human health are substantial and cannot be overlooked. The documented risks to physical and mental health, coupled with the potential decline in quality of life and property values, provide compelling reasons for the council to reject this proposal. The council must prioritise the health and quality of life of its residents by denying the approval of this bauxite mine. The long-term benefits of maintaining a healthy, cohesive, and vibrant community far outweigh the short-term economic gains promised by the mining operation.

Thank you for considering our objections. We hope the council will act in the best interest of our community and environment.

Regards,

J & E Scidluna
Concerned Reedy Marsh landholders

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References

- Anderson, J., Hardy, L., Mason, D., & Tadesse, G. (2008). Mining and the Environment. Sustainable Development in Practice.
- Buxton, N., & Fitzgerald, D. (2007). Health impacts of mining: Implications for public health. Journal of Environmental Health.
- Department of Primary Industries, Parks, Water and Environment, 2016. *Meander River Catchment Water Management Statement*. June 2016.
- Department of Primary Industries, Water and Environment, 2004. *Environmental Management Goals for Tasmanian Surface Waters Meander River Catchment*. May 2004.
- Edraki, M., Baumgartl, T., Manlapig, E., Bradshaw, D., Franks, D. M., & Moran, C. J. (2014). Designing mine tailings for better environmental, social and economic outcomes: A review of alternative approaches. Journal of Cleaner Production.
- Evans, M. C., Watson, J. E. M., Fuller, R. A., Venter, O., Bennett, S. C., Marsack, P. R., & Possingham, H. P. (2016). The spatial distribution of threats to species in Australia. BioScience.
- Ghose, M. K. (2004). Effect of opencast mining on soil fertility. Environmental Monitoring and Assessment.
- Harper, R. J., Sochacki, S. J., Ritson, P., & Smettem, K. R. J. (2015). Biochar: implications for agricultural productivity. Soil Health and Climate Change.
- Hawkins, C. E., Baars, C., Hesterman, H., Hocking, G. J., Jones, M. E., Lazenby, B., & Mann, D. (2006). Emerging disease and population decline of an island endemic, the Tasmanian devil *Sarcophilus harrisii*. Biological Conservation.
- Jordan, 2023. Bauxite mining's negative effects on human and environment. *Fote Machinery*, [online] Available at: <https://www.ftmmachinery.com/blog/bauxite-minings-negative-effects-on-human-and-environment.html>
- Koch, J. M., & Hobbs, R. J. (2007). Synthesis: Is Alcoa successfully restoring a jarrah forest ecosystem after bauxite mining in Western Australia. Restoration Ecology.
- Mayer, T., Rochfort, Q., Borgmann, U., Snodgrass, W. J., & Millard, E. S. (2007). Geochemistry and toxicity of sediment porewater in a mining-impacted lake. Environmental Pollution.
- Mooney, N., & Holdsworth, M. (1991). The effect of disturbance on nesting wedge-tailed eagles (*Aquila audax fleayi*) in Tasmania. Tasforests.
- Stansfeld, S. A., & Matheson, M. P. (2003). Noise pollution: non-auditory effects on health. British Medical Bulletin.
- Watkins, K., England, M., & May, J. (2016). The impact of heavy vehicle traffic on road quality and safety. Transport Reviews.

12.1.54 Representation 48 - Lang And Taylor

From: [REDACTED]
Sent: Mon, 17 Jun 2024 21:48:47 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Subject: Letter of objections/concerns - PA\24\0052
Attachments: Letter to MVCouncil re Bauxite Mine opposition.pdf

Hi,
Please find attached a letter outlining our concerns with the subject development application for a Bauxite Mine at Reedy Marsh.
Thanks for taking our comments into consideration.
Kind regards
Ossie & Melissa

**The General Manager
Meander Valley Council
PO Box 102
WESTBURY TAS 7303**

17th June 2024

**PA\24\0052
DL130 Bauxite Project**

Dear Jonathan Harmey and Meander Valley Council,

We are writing with regards to the proposed Reedy Marsh DL130 Bauxite Project PA\24\0052. We object to this proposition for a number of reasons including the following areas of concern.

The amount of increased traffic, both along Porters Bridge Road and through the local areas including Exton and Westbury, is of grave concern due to its impact on local traffic. The condition of Porters Bridge Road is currently inadequate and will not cope with the proposed 70+ truck movements per day as indicated in the proposal. The Meander Valley Council will then be responsible for any road repairs which negates the suggested financial benefit to the community. The proponent's traffic report indicates that these truck movements will be a 400% increase on the current heavy vehicle movements along Porters Bridge Rd¹. The traffic report also indicates that this road is currently not at LGAT standards and there are multiple locations where the stopping sight distance is limited.

In a recent media interview on the Tasmanian Country hour on the 12th June 2024², Ian Levy from ABx advised that the main markets were an interstate location and a Hobart fertiliser plant. From the proposed mine site, the most direct routes to Hobart will be via Westbury, which is already experiencing an increase in traffic, including heavy vehicle traffic. At peak times, it can take several minutes now for the road to be clear and safe to cross in a vehicle or as a pedestrian. With the increased traffic flow, wait times will increase. The proponents traffic report also showed that between Exton and Westbury, Meander Valley Rd is not approved for carriage of Truck & Dog trailer combinations³.

¹ Section 2.3.1 - DL130 Bauxite Mine Traffic Impact assessment. – Current movements are 110 per day of which 17% are heavy vehicles.

² <https://www.abc.net.au/listen/programs/tas-country-hour/tasmanian-country-hour/103948778>

³ Section 2.5 DL130 Bauxite Mine Traffic Impact assessment.

Given that the Meander Valley council is seeking to revitalise the streetscape along the Meander Valley Road, it appears to be counterintuitive to support a proposal that would introduce more heavy vehicles along that thoroughfare a proposed SIX days a week. The traffic report indicates that this proposal's movements would be a 40% increase in heavy vehicle movements along Meander Valley Road.⁴ The current number of heavy vehicles already passing through Westbury impacts the amenity of so-called village living and its residents. An increase in traffic will further diminish the living conditions of local residents.

Another area of concern is that the proposed quarry is on a site with a priority vegetation overlay. While the proponent has noted that as a level 2 activity this proposal is exempt from the natural assets code. It is important to note that the priority vegetation is a patch of a dry ovata community. *E. Ovata* is an important habitat for the critically endangered Swift Parrot.⁵ It is also important to note that there is a Wedge-tailed eagle's nest within 2km of the development boundary, which is within the attenuation distance for open-cut, level 2 mining activities⁶. Additionally there is a further two Wedge-tailed eagle nest sites within 3km of the project boundary which may also be impacted.

The primary location of the quarry is mapped as having a land capability of Class 3 under the land capability classification system⁷. Under the *State Policy on the Protection of Agricultural Land 2009* this means that this development is on 'Prime Agricultural Land'⁸. Given that prime agricultural land is less than 4.5% of Tasmania's private land⁷ it is important to retain its availability for agricultural use. This development would lock out agricultural production for 20-30 years with minimal data available to determine the agricultural productivity of the land at the end of that time.

⁴ Section 2.3.2 DL130 Bauxite Mine Traffic Impact assessment. Current movements are 1830 per day of which 11% are heavy vehicles

⁵ <https://nre.tas.gov.au/conservation/threatened-species-and-communities/lists-of-threatened-species/threatened-species-vertebrates/swift-parrot>

⁶ Table C9.1 – Attenuation distances,

https://planningreform.tas.gov.au/__data/assets/pdf_file/0004/559759/Tasmanian-Planning-Scheme-State-Planning-Provisions-effective-20-July-2022.pdf

⁷ <https://nre.tas.gov.au/agriculture/land-management-and-soils/land-and-soil-resource-assessment/land-capability/the-land-capability-classification-system>

⁸

https://www.dpac.tas.gov.au/__data/assets/pdf_file/0019/10783/State_Policy_on_the_Protection_of_Agricultural_Land_2009.pdf

12.1.54 Representation 48 - Lang And Taylor

The future of Tasmanian farming, food security and employment within the agricultural sector is too important to endanger by the misappropriation of prime agricultural land. The future of living conditions for the people in the villages and locales impacted by this proposal is also too important to risk and once gone, will never be seen again. Obliterating history, tourism and the environment is not a future for the people of the Meander Valley, and goes against the desires of community members expressed in the development of the council's community strategic plan.

Thank you for noting our concerns and we await the council's decision on this proposal.

Ossie Lang & Melissa Taylor,



12.1.55 Representation 49 - Booth

From: [REDACTED]
Sent: Mon, 17 Jun 2024 21:55:39 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Subject: Submission PA/24/0052 DL130 Bauxite Project
Attachments: Kerin Booth Submission to MVC General Manager, 17Jun24.pdf

The General Manager
Meander Valley Council
Please accept my attached submission regarding the proposed Reedy Marsh mine.
Kind regards,
Kerin Booth

12.1.55 Representation 49 - Booth

The General Manager
Meander Valley Council
Re: PA\24\0052 DL130 Bauxite Project

I am writing to object to the proposed Reedy Marsh DL130 Bauxite Project PA\24\0052.

I believe that for large developments, such as this Bauxite Mine proposal, that are likely to have a heavy impact on the environment, roads and community, more time should be allowed through the Council and EPA planning process for community submissions in response to a development proposal.

The Abx Bauxite mine on the its website, includes the statement **“We only operate where welcomed and we apply best practices to restore any disturbed land to a better condition than we found it.”** Given the widespread community concern, clearly the company is not welcome and should not proceed with this development. I do not believe, that the proponents have a social license for this mining project based on (but not limited to) the following issues:

- Lack of economic viability based on past track record of the ABx company - please see article from The Tasmanian Inquirer, March 2020, linked below:
tasmanianinquirer.com.au/news/tasmanias-bauxite-mining-bubble-bursts/ which I have included an excerpt from:

“When Australian Bauxite, a company chaired by former Tasmanian Labor Premier Paul Lennon, sought approval for the \$16 million Bald Hill bauxite mine just outside Campbell Town in northern Tasmania, it claimed there would be up to 180 jobs created and hundreds of thousands of dollars in royalties could be paid into government coffers.

For the Tasmanian Government, there was also the prospect of increased revenue for Tasrail, the struggling state-owned rail freight company. For investors, there was the expectation that the project would deliver a solid cash flow to help launch a new Australian mining company, deliver a steady stream of dividends and boost the share price.

But none of the company’s upbeat claims have come to pass. There are currently no full-time jobs at the mine, the company hasn’t paid a cent of royalties to the State Government and Tasrail racked up a loss of just under \$2.5 million dollars.”

- The company clearly has a history of either a failed business case or no viable business case or provided misleading information. In any event, the Meander Valley Council must satisfy itself that the proponent has sufficient funds to carry out this proposed development. Lack of demonstration of economic viability may mean that the company will be unable to mitigate any damage they incur to roads, bridges or the environment, especially in rehabilitating the site after removing thousands of tonnes of material from this Prime Agricultural land. Prime Agricultural Land is a limited and finite resource. Destroying of Prime Agricultural land would be in breach of the State Policy on The Protection of Prime Agricultural Land. If Council decides, against strong community opposition, to approve the development, it should require a hefty bond to cover any damage to roads and environment.

12.1.55 Representation 49 - Booth

- There is a lack of community trust in the developer, ABx group, whose Chairman, a former Labor Premier, is still actively lobbying around the halls of our Tasmanian Parliament, giving at least a perception of undue influence on the Government by the developer.
- Porters Bridge Road is not suitable to carry the proposed large increase in heavy vehicles and the movement of heavy vehicles along this road and bridge will cause significant cost to the ratepayers.
- The proposed route from the mine for the heavily-laden trucks with dog-trailers is along our scenic Meander Valley Road tourist route. This will become a safety hazard for farmers, tourists and residents. As the heavy trucks swing out wide on the narrow bends, on-coming vehicles will be forced to move off the bitumen onto the road verges. And if trucks over-take slower moving passenger vehicles, cyclists or farm vehicles, this will also cause a safety hazard.
- Even a 5% increase in heavily laden trucks will likely cause more wear and tear on Council and State managed roads and verges and be a disruption to the small village of Exton and historic Westbury to the William St turn off and on to the Birrallee Road. There is a section of the road between Exton and Westbury, that is not rated as suitable for certain large trucks with dog-trailers. The increase of heavy trucks on our Meander Valley Road will place a heavy burden on taxpayers.



Image of truck being loaded at Abx Bald Hill mine, Campbell Town.
Ref ASX Announcement 16 June, 2020

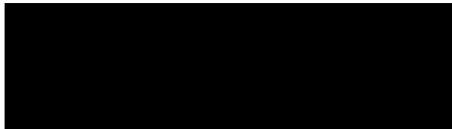
- The proposed road access onto Porters Bridge Road which, although existing, currently meets no standards and would require the destruction of **Critically Endangered Eucalyptus ovata forest** to meet a safe sight distance standard at the junction with Porters Bridge Road.
- The proposed Reedy Marsh DL130 Bauxite Project PA\24\0052 proposes the removal of a strip of natural forest directly adjoining the Brushy Rivulet Conservation Area, which supports Threatened and Endangered Species. Just recently a wholly protected **Endangered Tasmanian Devil** was sighted in Reedy Marsh. Land clearance is a nationally listed threatening process.

12.1.55 Representation 49 - Booth

- Recent environmental conditions (strong winds including 100km/hr gusts in recent times, extremely dry conditions and flooding, such as the big floods in October 2022) make it near impossible for the 'managed' mining waste (toxic dust and sediment run-off) to be kept on-site.
- Local flora, fauna (**including our Near Threatened Tasmanian Platypus species that are at risk of extinction**) and nearby riverine systems will be contaminated.
- I am concerned about the impacts of drainage and pollution from the site on the nearby relatively pristine stream of Brushy Rivulet and its biota.
- The removal of the proposed volumes of material will impact the surface and subsurface drainage into the Brushy Rivulet Conservation Area.
- Residential drinking water and private food supply (gardens, orchards, poultry) will be affected by wind-blown toxic dust (Aluminium is toxic to flora). The area has recently (and will continue to) receive high velocity winds. Dust suppression by water may be insufficient to avoid these risks to human health.
- Reedy Marsh is an important area of conservation with a wide range of native flora and fauna. It is a place for communities of long-term residents who appreciate nature and more recently arrived settlers purchasing small properties. A mine is incompatible with the Reedy Marsh community. A development such as this ABx mine will cause long-term stress on the community. People wishing to leave may find their property values are lowered due to the mine.

17/06/24

Kerin Booth



12.1.56 Representation 50 - R. Badcock

From: "Robin Badcock" [REDACTED]
Sent: Mon, 17 Jun 2024 22:14:25 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Subject: PA\24\0052,,DL130 Bauxite Project

To Meander Valley Council,

I would like to register my displeasure with the planning application by ABX for their mine at Reedy Marsh and effecting council owned roads. As a rate payer in MV I feel there is and will be significant damage to roads and a range of other upkeep requirements that council will have forced upon it that will directly affect the maintenance budgets of Council for the life of the mine. As a ratepayer I do not feel obligated to pay for damage that will take place with up to 80 truck movements per day with a GVM of up to 60 tonne. Further to my road concerns will be the safety of the general travelling public, cyclists and others whom might currently use this road or the proposed route of truck movements. This section of Meander Valley Rd and Porters Bridge Rd is already carrying increasing amounts of heavy vehicle traffic from local quarrying operations.

There are a raft of other reasons given by others that I would also consider noteworthy however I am not of a mind to object to issues of operations on private land provided there are no impacts to those who have land or residence in the surrounding area and the project operations are not deemed detrimental to the environmental values of community and legislative importance.

--

Regards,

Robin

Robin Badcock

[REDACTED]

12.1.57 Representation 51 - Rowe

From: "Rebecca Rowe" [REDACTED]
Sent: Tue, 18 Jun 2024 01:46:46 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Subject: DL130 Bauxite Project
Attachments: Objection Letter.rtf

To the General Manager,
Please find attached my letter to you and the EPA in regards to the proposed bauxite mine in Reedy Marsh. I request that I receive notification of your receipt of this letter also.
Regards
Rebecca Rowe

12.1.57 Representation 51 - Rowe

The General Manager

Meander Valley Council

PO Box 102

WESTBURY TAS 7303

PA\24\0052

DL130 Bauxite Project

I am writing to voice my concerns and objections to the proposed Reedy Marsh DL130 Bauxite Project, PA\24\0052.

To begin with the timeframe for review has been too short. There has been little to no public consultation by the proponents, or by council, and they do not therefore have a social licence to go forward with this mine development.

As a community - not only of Reedy Marsh but also to the broader communities of Deloraine, Exton, Birrilli and Westbury, we will be directly affected by the marked increase in heavy vehicles. Over 70 per day. Porters Bridge Road is not fit for purpose to carry this load and is already collapsing in areas, as well as not being wide enough for safe sight or passing by trucks and smaller vehicles.

Has council made any assessment of the viability of these roads or bridges prior to accepting the viability of this increase in traffic or industry? It will be the rate payers who will have to bare the brunt of the cost of improving these public amenities.

River Rd and Porters Bridge Rd also have a high recreational value to the residents of Reedy Marsh and Deloraine. There are bike riders (children and adults alike), walkers, joggers and the school bus daily on this road. Several times of the year there are also largely attended bike events that travel at least to the junction of Porters Bridge Rd and River Rd, if not further, and touring motorbikes also. The increase in heavy vehicles will destroy this access for community to community, recreation, and the health benefits that are currently enjoyed. This, I believe, is counter to council's ethos.

The proposed road access onto Porters Bridge Road which, although existing, would also require the destruction of the Critically Endangered Eucalyptus ovata forest to meet a safe sight distance standard at the junction of River Rd with Porters Bridge Road.

Reedy Marsh is an area known for its high value native biodiversity of both flora and fauna which is why Brushy Rivulet Conservation area exists. To my knowledge many animals already on the threatened list call this area, and a larger section of private conservation properties surrounding it, home. This list includes (but is not limited to) nesting eagles, the white goshawk, the Tasmanian devil, the masked owl,

12.1.57 Representation 51 - Rowe

the burrowing crayfish, the spotted quoll, betongs and the 40 spotted pardelote, the platypus and bandicoots.

As this proposed mine site directly neighbours Brushy Rivulet reserve there will likely be the removal of a strip of natural forest directly adjoining the Brushy Rivulet. This and the known toxicity of bauxite mines, coupled with extreme weather events of high winds in this region and frequent flooding, will be detrimental to this habitat and to the health of these already threatened species, as well as the impacts of altered subsurface drainage on the Brushy Rivulet Conservation Area and the contamination of all connected waterways to and including the Meander River. There will predictably also be a marked increase in the numbers of road kill occurring due to the high increase of heavy vehicles, which are recorded across Tasmania as being a large part of the death toll on roads of native wildlife.

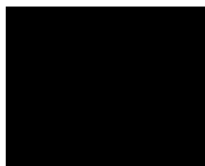
Recent environmental conditions (strong winds, flooding) make it near impossible for the 'managed' mining waste (toxic dust & run-off) to be kept on-site. As most residents in Reedy Marsh rely on rain water, there is concern also about residential drinking water (collected roof run-off) and private food supply (gardens, orchards, poultry) that will be affected by wind-blown toxic dust (Aluminium is toxic to flora and people). I feel that the practice of dust suppression by water will be insufficient to avoid these risks to human health. Aluminium has a strong link to diseases like altsimers and dimensia. Given that we often experience extremely high winds, this ABX open cut mine will almost certainly produce toxic bauxite dust that will become air born. Again it will be the residents that will bare and cover the cost of this mine both physically and financially.

Finally, Deloraine and its districts have two main forms of income - agriculture and tourism and their associated industries. I believe that the proposed Reedy Marsh DL130 Bauxite Project will destroy Prime Agricultural Land which is in breach of the State Policy on The Protection of Prime Agricultural Land. Prime Agricultural Land is a limited and finite resource. This region has worked hard to keep businesses viable and its hub alive, and a large part of that is due to people wanting to visit and live in an area with access to clean air, native forests and animals, access to untouched wilderness and quality produce. These too are a limited and finite resource.

This open cut mine threatens all of this. We do not want to be a mining town.

17/06/2024

Rebecca Rowe



12.1.57 Representation 51 - Rowe

12.1.58 Representation 52 - Henderson

From: "Melody Henderson" [REDACTED]
Sent: Tue, 18 Jun 2024 08:00:55 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Subject: Objection to proposed Bauxite project
Attachments: Letter to MVCouncil re Bauxite Mine opposition 2.docx

Dear MVC

Please find attached my objection to the proposed Bauxite project in Reedy Marsh.

Kind regards Melody
[REDACTED]

**The General Manager
Meander Valley Council
PO Box 102
WESTBURY TAS 7303**

**PA\24\0052
DL130 Bauxite Project**

I wish to write a letter of objection concerning the proposed Reedy Marsh Bauxite project PA\24\0052. I have strong concerns that the proposal seriously endangers the well being of all inhabitants of the area and will place the immediate and broader community at risk on multiple levels. The lack of consultation with community and the lack of provision for safe and environmentally conscious management of the Bauxite project leave involved parties at risk of legal consequences in the future and constitute unethical and reckless management of the region and its precious resources and assets.

Outlined below are a number of issues relating to the proposed project which raise concern. They include but are not limited to the following.

In the proposal there is no adequate provision for improvements to infrastructure to allow for transport of mine materials from the proposed site. It is proposed that Porters Bridge Road will provide the main route with use also of a small private rd which was not established with commercial or heavy vehicle use in mind.

The proposed road access onto Porters Bridge Road which, although existing, currently does meet the standards for heavy vehicle use and based on the current plan would require the removal of Critically Endangered Eucalyptus ovata forest to meet a safe sight distance standard at the junction with Porters Bridge Road.

Currently porters bridge rd is already impacted by lack of maintenance following weather events and wear and is not fit for purpose to carry the marked increase in heavy vehicles. A significant increase in the amount of

heavy vehicles will only worsen the quality of the road creating increased costs for rate payers and increased risk of negative impacts and harms for wildlife and local road users.

The proposed mine site is situated in prime agricultural land and the proposed project will destroy the agricultural land rendering it no longer suitable for agriculture due to the impacts of bauxite extraction. This will constitute a breach of the state policy on the protection of agricultural land which is a limited and finite resource.

The proposed Reedy Marsh DL130 Bauxite Project PA\24\0052 proposes the likely removal of a strip of natural forest directly adjoining the Brushy Rivulet Conservation Area, this stretch of wilderness is documented as habitat to several endangered species. The clearing of habitat increases threats significantly for endangered and protected species. In this case including but not limited to swift parrots, Tasmanian devils, quolls, eagles, goshawks and numerous other protected species.

I hold concerns that pollution and drainage from the site will contaminate the nearby brushy rivulet and the ecosystem that exists there. The inhabitants of which includes the platypus which I have noted seems significant in the area drawing much tourist trade.

Recent and ongoing weather related phenomena (including flooding and strong winds) would render it highly unlikely that the managed mining waste (toxic dust & run-off) would be able to be contained effectively on-site. Surrounding ecosystems will be contaminated and negatively impacted. These same conditions would put residential water supply (rainwater roof collection) at serious risk of contamination.

Current evidence base literature details that Localities proximate to Bauxite extraction sites have a higher incidence of cancer and other health conditions amongst the population. The dangers of Bauxite extraction are well known and documented and the proposed project is more than likely to devalue the area and make it less desirable to live in and visit. This will negatively impact local homeowners and residents and also stakeholders in the nearby town of Deloraine. Given the proximity to waterways which feed into the local river systems the Bauxite extraction project has a strong likelihood of impacting regions further a field with bi products from bauxite extraction including but not limited to radium which increases mortality rates in fish and other aquatic life and is directly linked to higher incidence of cancers in humans.

With no local jobs as the project will only provide 14 jobs for existing Abx staff and will not employ local people. No substantial improvements to infrastructure and the very real threat of destruction of the ecosystem and several habitats for endangered species. The proposal promises no tangible benefits to community members and ratepayers and risks the ecological and personal wellbeing of all inhabitants.

My understanding from what I have read and researched is that Abx are not a financially stable company and the proposal will cost more than it will yield in profit. The Abx have already been recipient of numerous government bail outs and the likelihood that the mine will bring any great economic growth or strengthening to the area seems low especially when you consider the harms it would most likely cause ecologically socially financially and the human cost with reduced quality of life for ratepayers and increased health risks. The project if it goes ahead could destroy one of the last wild pockets of land in the area and the gains will not positively impact the local area in any tangible way.

If the proposal is a serious one due diligence should be followed and at the very least community members should be given more time to make submissions and to officially object to this project which would seriously impact our region and have long term consequences.

Thankyou for reading my submission, thanks

Kind regards

(18/6/2024)

(Melody Henderson)

[Redacted signature]

12.1.59 Representation 53 - Fraser

From: "Grenoch MFC" [REDACTED]
Sent: Tue, 18 Jun 2024 08:14:16 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Subject: Scanned image from MX-2651
Attachments: Grenoch MFC_20240618_081416.pdf

Reply to: Grenoch MFC [REDACTED]

Device Name: Not Set

Device Model: MX-2651

Location: [REDACTED]

File Format: PDF MMR(G4)

Resolution: 200dpi x 200dpi

Attached file is scanned image in PDF format.

Use Acrobat(R)Reader(R) or Adobe(R)Reader(R) of Adobe to view the document.

Adobe(R)Reader(R) can be downloaded from the following URL:

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<http://www.adobe.com/>

12.1.59 Representation 53 - Fraser

Jodi Fraser



The General Manager
Meander Valley Council
PO Box 102
WESTBURY TAS 7303

PA\24\0052
DL 130 BAUXITE Project

18/6/24

Dear Sir,

I wish to lodge objection to the proposed Reedy Marsh DL130 Bauxite Project.

As a long-term resident of the area I feel I have the right to have my voice heard and taken seriously.

I speak through concerns for many aspects of this proposal amongst them, worry for the wildlife of the area: the carnage on the roads around the proposed area is horrific, the hugely increased traffic flow will cause considerable higher deaths. The loss of habitat will drive the animals onto the roads and force them to seek homes in unsuitable areas.

The toxic dust from the mine will likely cause the increase of many respiratory and other ailments / diseases, of which the local area hospital and medical services are not equipped to cope with. Recent studies have also implicated Bauxite dust with the development of Alzheimer's disease. The dust has also been linked to painful skin conditions.

The area has seen increased winds of late, bringing the likelihood of further dust pollution to a greater area. I personally rely on rain-water tanks to supply all my water, having this source contaminated by toxic dust is of a huge concern to me.

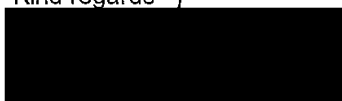
The roads are in no state for local traffic let alone the huge fleet of heavy vehicles required to transport the bauxite from the mine. The increased traffic from the industry in the area has already seen many near misses on the narrow, ill-repaired roads.

The constant banging and crashing from the current mines in the area already causes noise and disruption, destroying the peaceful ambiance of the area. To have another mine operating will increase this immensely.

The vehicles movements required to transport the minings will require heavy vehicle movements on an almost 24hr roster, causing further carnage on and to the roads, plus the ongoing noise pollution.

I trust my concerns will be taken seriously.

Kind regards /



Jodi Fraser

12.1.60 Representation 54 - Maddox

From: "David Maddox" [REDACTED]
Sent: Tue, 18 Jun 2024 08:12:35 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Subject: Objection to proposed Mine @ Reedy Marsh
Attachments: Maddox submission for ABx Mine- Reedy Marsh.docx

Please find attached my objection to proposed mine.
Regards David Maddox

**The General Manager
Meander Valley Council
PO Box 102
WESTBURY TAS 7303**

**PA\24\0052
DL130 Bauxite Project**

**Objection to ABx PA\24\0052 Proposed Bauxite “Quarry” for Reedy Marsh,
Tasmania (DL130 Bauxite Project)**

Introduction

I am writing to express my strong objection to the proposed ABx PA\24\0052 bauxite quarry project for Reedy Marsh, Tasmania. This submission outlines the significant environmental, social, and economic impacts that this project will have on the local community and the broader ecosystem. Reedy Marsh is a unique and ecologically sensitive area that requires preservation, not exploitation. Although the mine is proposed for a forest plantation area on Rural-zoned land, the immediate surrounds cannot escape the impacts of the operation. I will be highlighting the critical reasons why it should be reconsidered.

Environmental Concerns

1. Biodiversity Loss

Reedy Marsh is home to diverse flora and fauna, including several endangered and vulnerable species. The development of a bauxite quarry, and the follow-on projects proposed by ABx in its shareholder communications, poses a direct threat to these species' habitats. The destruction of native vegetation for road access, and the alteration of the landscape will have irreversible effects on local biodiversity. ABx undertakes to carry out mine rehabilitation but experience shows mining companies, even with good intentions, often lack the resources and will to rehabilitate sites, and in any case it is easy to escape such obligations.

Spending time on my own land, observation and the use of security cameras have revealed a multitude of wildlife on my land, much of it is within roaming range of the mine site and/or the access roads.

- **Tasmanian Devil:** An iconic and endangered species, the Tasmanian Devil's habitat will be severely impacted by mining activities.
- **Eastern Quoll:** Another endangered species, the Eastern Quoll relies on the habitat that Reedy Marsh provides.
- **Wedge-tailed Eagle:** The nesting sites of this vulnerable bird of prey are likely to be disturbed by quarry operations.

- **White-bellied sea eagles:** these birds, a frequent visitor, are a reminder that Reedy Marsh is an important passage for wildlife, and their presence here, though not well known, represents massive draw for tourists, that costs nothing and can last forever- if we manage the land properly.

The loss of habitat for these species cannot be mitigated adequately through offset measures, as the unique ecological conditions of Reedy Marsh cannot be replicated elsewhere. Reedy Marsh represents an important 'island' for these species, and, again, ABx may lack the resources to adequately mitigate its impacts.

My own land, a 25-acre bush block, is zoned 'residential' despite being very close to the mine site and access thoroughfares, which, if operational, make the 'residential' status ridiculous. There are very few tracts of continuous bushland that stretch from the Central Highlands to the north coast, and Reedy Marsh is a key passage.

While the origins of the outbreak of devil facial tumour disease remain a mystery, I do not think it is radical to suggest keeping mine run-off and the known carcinogens in bauxite dust away from wildlife is a good thing.

2. Water Resources

The proposed quarry poses significant risks to local water resources, both in terms of quality and quantity. The extraction process for bauxite involves considerable water usage and the dust raised has the potential to contaminate nearby water bodies. As my property is very close to the Meander Rive and I have seen the quality of this waterway decline over the years, the proposed mine is another impact the platypuses and other animals do not need. Key concerns include:

- **Water Contamination:** The use of chemicals in the mining process can lead to the contamination of local waterways, affecting both wildlife and human populations. Whilst the proposed bauxite quarry is mainly a problem for the dust created, future operations planned by ABx (the 'Deep Leads' metals mine) will certainly be far more polluting.
- **Water run-off:** The extraction process and removal of vegetation will lead to run-off, impacting the availability of water for local agriculture and domestic use.

The potential for acid mine drainage (AMD) in future operations further exacerbates these concerns, as it can lead to long-term environmental damage that is costly and challenging to remediate. ABx is certainly NOT welcome when it's mining plans are so extensive. I believe ABx is finessing the approval process by putting forward only the bauxite "quarry" at this time. It will clearly be a stalking horse for much more impactful future operations.

3. Land Degradation

Mining operations result in significant land disturbance, leading to soil erosion, loss of topsoil, and degradation of land quality. This not only impacts local agriculture but also disrupts the natural landscape, leading to increased susceptibility to natural disasters such as landslides and floods. Abx's proposal claims it will improve soil quality but its reasoning for this is specious, and obviously so.

Social and Economic Impacts

1. Impact on Local Communities

The development of the bauxite quarry will have profound effects on the local communities in and around Reedy Marsh. These impacts include:

- **Wildlife impacts:** Like many Reedy Marsh residents I manage my land to maximise its ecological value, as a haven for native species. This requires a great effort in weed management, fire mitigation and so on. An abundance of heavy vehicles and mine-associated dust will put back these efforts, harming and killing some native animals including endangered species such as devils, eastern quolls, swift parrots and others.
- **Health Risks:** Dust and noise pollution from the mining operations can lead to respiratory problems, and the contamination of drinking water with bauxite dust other health issues for the local population. The passage of very heavy vehicles will damage roads, a burden to ratepayers, and seriously endanger other road users.
- **Quality of Life:** The industrialisation of a predominantly rural and natural area will significantly degrade the quality of life for residents, disrupting the peace and tranquility of the region.

2. Economic Consequences

While proponents of the project may argue that it will bring economic benefits through job creation and increased local investment, these benefits are often short-lived and outweighed by long-term economic costs. The aspiration of ABx to employ locals among the small crew required is almost meaningless: workers with the skills needed are likely already employed at projects more viable than this one. Key considerations include:

- **Tourism Impact:** Reedy Marsh is a popular destination for nature-based tourism. There is short-stay accommodation available and some in the area also host travellers on a non-commercial basis. The industrialisation of the area will deter tourists, leading to a decline in tourism revenue. Most importantly, the potential of tourism is massive but if and only if we preserve the natural heritage values of Reedy Marsh, and doing so at every opportunity. While the plantation area adjacent to Porter's Bridge Road will remain what it is for now, if returned to native forest in the future the locality could be a massive, easily-accessed eco tourism wonderland, a boon for Deloraine and the Meander Valley area.
- **Agricultural Impact:** Local agriculture will suffer due to land degradation, and potential water and soil contamination as removed ore blows from trucks and the mine site itself.

Legal and Regulatory Concerns

1. Compliance with Environmental Laws

The proposed project must comply with various national and international environmental regulations. However, the scale of the environmental impact suggests that it may be challenging for the project to meet these legal requirements. Potential legal issues include:

- **Breach of Environmental Protection Laws:** The destruction of habitats and potential contamination of water sources may violate environmental protection laws designed to safeguard natural ecosystems. The mine site itself will inevitably be part of the range of multiple endangered species that live in the area, but other native species have some right of survival, too.
- **Failure to Adequately Assess Impact:** Inadequate environmental impact assessments (EIAs) that fail to consider the full extent of the project's effects could lead to legal challenges. The Council has taken some very odd viewpoints with regard to deciding the access via Porter's Bridge Road is safe, as this road is patently dangerous, narrow, twisting, with poor visibility (despite the proposed land clearing). The road is in no way designed for the battering it will receive from B-doubles and semi-trailers. Already the Council struggles to maintain the roads in Reedy Marsh, the mining operation will unquestionably leave residents contending with much worse roads in coming years. The Council recently approved an expansion of the Hazell Brothers quarry, and although local residents were not thrilled at all with the increased heavy traffic, in general we accepted the expansion of this long-established local business. ABx on the other hand, is mainland based with no presence in the local community, and it will only extract while offering the local area very little benefit of any kind.

Alternative Solutions

Sustainable Development

Rather than pursuing a bauxite quarry, investment in sustainable development projects that align with the ecological and social fabric of Reedy Marsh should be prioritised. Council must acknowledge that the mine proposal is to at least some extent opposed to these values, which quietly improve our community year on year, attracting workers and visitors, and providing income for local businesses. These could include:

- **Ecotourism:** Promoting Reedy Marsh as a destination for ecotourism can provide long-term economic benefits while preserving the natural environment.
- **Sustainable Agriculture:** Supporting local farmers in adopting sustainable practices can enhance food security and protect the land.

Conclusion

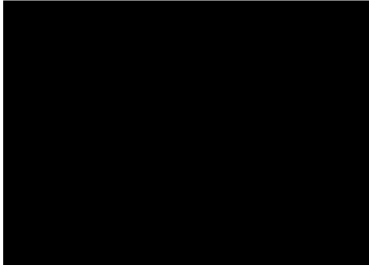
In conclusion, the proposed ABx PA\24\0052 bauxite quarry for Reedy Marsh, Tasmania, poses significant environmental, social, and economic risks that far outweigh any potential benefits. The unique biodiversity, vital water resources, and local communities' well-being are at stake. I strongly urge the Council to reconsider this project which does not align with the preservation of Reedy Marsh's natural and cultural heritage.

Rejecting this proposal will not only protect a precious ecosystem but also demonstrate a commitment to sustainable development and the well-being of current and future generations. Let us choose preservation over exploitation and ensure that Reedy Marsh remains a sanctuary for wildlife and a haven for its residents.

12.1.60 Representation 54 - Maddox

Thank you for considering this submission.

David Maddox



12.1.61 Representation 55 - A. And M. Mackinnon

From: [REDACTED]
Sent: Tue, 18 Jun 2024 09:15:30 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Subject: Objection to Bauxite Mine, Reedy Marsh
Attachments: Letter to GM re Bauxite Mine on Porters Bridge Rd 18Jun24.docx
Importance: High

Dear Sir/Madam,
Please see attached letter of objection re. the proposed Bauxite Mine on Porters Bridge Rd, Reedy Marsh. Please include in today's Council meeting.
Regards,
Alister & Marieke Mackinnon
[REDACTED]

18th June 2024

The General Manager
Meander Valley Council
PO Box 102
Westbury TAS 7303
planning@mvc.tas.gov.au

Re: PA\24\0052 - DL130 Bauxite Project

Dear General Manager,

We are writing in regards to the approval for a Bauxite Mine on Porters Bridge Road and would like to put forward our **strong objection and opposition** to this project proceeding, due to many reasons (but not limited to) such as:

- Environmental impact / pollution - Production of toxic airborne Bauxite dust. Aluminium dust is highly toxic to plants and people. It causes respiratory and cardiac problems and affects the whole food zone (see report on Bauxite mines in Malaysia)
- Tank water on neighbouring properties WILL be affected
- Pollution runoff impacts on surface water, streams and ground water. As it is a floodplain it will impact on the Meander River
- Impacts credibility of Meander Valley tourism values and reputation
- Potential impacts on land values
- In 2015 Midlands Council approved ABx's mining application on condition they upgraded the road. It never happened: <https://tasmanianinquirer.com.au/news/council-rejected-subsidy-pitch-from-mining-company-chaired-by-ex-premier>
- Unexplained: government business blocks release of information about mining debt write-off | Tasmanian Inquirer - \$2.5 million written off in Campbell Town - <https://tasmanianinquirer.com.au/news/unexplained-government-business-blocks-release-of-information-about-mining-debt-write-off/>
- River Road isn't wide enough and is already subsiding – repairs will be at ratepayers' expense
- The plantation is incorrectly zoned as Rural – this is Prime Agricultural Land compared to neighbouring farm and plantation – should be zoned Agricultural.
- Reedy Marsh important conservation area. Proposed site borders Brushy Rivulet Forest Reserve
- Noise pollution. Trucks on road & mine itself (quarries already noisy). Sound in bush travels far

Please let us know if you would like us to provide further detail.

Regards,

Alister & Marieke Mackinnon

[Redacted Signature]

12.1.62 Representation 56 - Morley

From: "Tori Morley" [REDACTED]
Sent: Tue, 18 Jun 2024 09:20:43 +1000
To: "Meander Valley Council Email" <mail@mvc.tas.gov.au>
Subject: Planning Application Objection

Planning Department MVC,
To whom it may concern,

As a local resident to Reedy Marsh I am writing to object to the proposed quarry :

Application: [PA\24\0052](#) - **Application Documents** [Part I](#), [Part II](#), [Part III](#), [Part IV](#)

Applicant: Pitt & Sherry obo ABx Group Limited

Property: 328 & 330 Porters Bridge Road, REEDY MARSH (CT: 214055/1, CT: 229773/1, CT: 148606/1) and Crown Land parcels, with vegetation clearance on 340 Porters Bridge Road REEDY MARSH (CT: 31918/1)

Proposal: Level 2 Activity – Extractive Industry (Quarry) – discretionary use, traffic generation.

Closes: Tuesday 18 June 2024

This quarry poses first and foremost a health risk to local residents on tank water with toxic dust settling into their only source of drinking water!

Not to mention the environmental impact! The noise alone, when there is already a quarry in Reedy Marsh will further impact wildlife and people!

Why must we still entertain these mines in such pristine places that do not contribute to our local economy, environment or health. Think outside the box, surely there are better locations or ways to garner these products without putting so many lives at risk and causing so many problems!

Yours, in the hope of the earth and the people,

sincerely,

Nathan and Tori Morley

Reedy Marsh
[REDACTED]

12.1.63 Representation 57 - Kachina And Griffiths

From: "Joy Kachina" [REDACTED]
Sent: Tue, 18 Jun 2024 09:41:56 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Subject: Bauxite Mining Proposal
Attachments: Letter to MVCouncil re Bauxite Mine opposition.pdf

Dear Sir/Madam
Please find attached our letter of objection to the Proposed Bauxite Mine in Reedy Marsh.
Thank You
Kind Regards
Joy Kachina and Mark Griffiths.

**The General Manager
Meander Valley Council
PO Box 102
WESTBURY TAS 7303**

**PA\24\0052
DL130 Bauxite Project**

I am writing to object to the proposed Reedy Marsh DL130 Bauxite Project PA\24\0052. I strongly feel that the proponents have no social licence to develop this project based on (but not limited to) the following issues.

Porters Bridge Road is not fit for purpose to carry the marked increase in heavy vehicles. It is already collapsing and the movement of heavy vehicles along with this substandard road will cause significant cost to the ratepayers.

The proposed road access onto Porters Bridge Road which, although existing, currently meets no standards and would require the destruction of Critically Endangered Eucalyptus ovata forest to meet a safe sight distance standard at the junction with Porters Bridge Road.

I believe that it will destroy Prime Agricultural Land which is in breach of the State Policy on The Protection of Prime Agricultural Land. Prime Agricultural Land is a limited and finite resource.

The proposed Reedy Marsh DL130 Bauxite Project PA\24\0052 proposes the likely removal of a strip of natural forest directly adjoining the Brushy Rivulet Conservation Area, which will support Threatened Species. Land clearance is a nationally listed threatening process.

Recent environmental conditions (strong winds, flooding) make it near impossible for the 'managed' mining waste (toxic dust & run-off) to be kept on-site. Local flora, fauna and nearby riverine systems will be contaminated. I am concerned about the impacts of drainage and pollution from the site on the nearby relatively pristine stream of Brushy Rivulet and its biota, including the iconic platypus, as well as the impacts of altered subsurface drainage on the Brushy Rivulet Conservation Area. Our local platypus would be greatly

12.1.63 Representation 57 - Kachina And Griffiths

impacted due to the toxic waste that would be inadvertently washed into their habitat/waterways.

Residential drinking water (collected roof run-off) and private food supply (gardens, orchards, poultry) will be affected by wind-blown toxic dust (Aluminium is toxic to flora). The area has recently (and will continue to) receive high velocity winds. I feel that the practice of dust suppression by water will be insufficient to avoid these risks to human health.

18th June 2024

Joy Kachina



12.1.64 Representation 58 - McNicol

From: "Bruce Graeme McNicol" [REDACTED]
Sent: Tue, 18 Jun 2024 10:51:29 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Subject: Bauxite mine

The General Manager
Meander Valley Council
PO Box 102
WESTBURY TAS 7303

17 June 2024

PA\24\0052
L130 Bauxite Project

I am writing to object to the proposed Reedy Marsh DL130 Bauxite Project PA\24\0052. I object to this project based on (but not limited to) the following issues:

The location of this proposed quarry will destroy prime agricultural land (a limited and finite resource) which is in breach of the state policy on the protection of prime agricultural land.

The proposal indicates the likely removal of a strip of natural forest directly adjoining the Brushy Rivulet Conservation Area, which currently supports threatened species including the Swift Parrot. Land clearance is a nationally listed threatening process, and moreover is one of the top global contributors to

climate change. Meander Valley Council should be protecting forest cover wherever possible to contribute to

achieving nett zero emissions by 2050 or earlier.

Recent weather events, including strong winds, and flooding, make it nearly impossible for mining waste (toxic dust and run-off) to be kept on-site. Local flora, fauna and nearby riverine systems will inevitably be

contaminated, despite promises and claims to the contrary.

I am concerned about the impacts of drainage and pollution from the site on the nearby relatively pristine stream of Brushy Rivulet and its ecosystems, including the platypus, as well as the impacts of altered subsurface drainage on the Brushy Rivulet Conservation Area.

The proposed road access onto Porters Bridge Road which, although existing, currently meets no standards and would require the destruction of critically endangered Eucalyptus Ovata forest to

12.1.64 Representation 58 - Mcnicol

meet a safe sight distance standard at the junction with Porters Bridge Road, for 78 truck with dog-trailer

movements per day. Some of these roads are not built for 60 tonne loads! Such heavy vehicle movements

on narrow substandard roads, and the impact of noise and dust (despite the assurances) on nearly residents,

will inevitably diminish their peaceful lifestyle and wellbeing. This dust and noise will be for a totally unacceptable six days per week.

For these reasons, I urge the council to reject this development application.

Yours Sincerely

Bruce McNicol



12.1.65 Representation 59 - Linda Wasserfall

From: "Linda Wasserfall" [REDACTED]
Sent: Tue, 18 Jun 2024 10:58:04 +1000
To: "Planning @ Meander Valley Council" <Planning@mvc.tas.gov.au>
Subject: PA\24\0052 DL130 Bauxite Project
Attachments: Linda Wasserfall.pdf

The General Manager
Meander Valley Council
PO Box 102
WESTBURY TAS 7303
PA\24\0052
DL130 Bauxite Project
Enclosed please find my representation.
Thank you
Linda Wasserfall
[REDACTED]

NAIVASHA

- dream your next escape -

Linda Wasserfall



13 June 2024

To the General Manager
Meander Valley Council

PA\24\0052
DL130 Bauxite Project

Dear Sir

I'm writing in regard to the proposed Bauxite Mine on Porters Bridge Road, Reedy Marsh.

As a local tourism operator (we run Naivasha Cottage and Naivasha Tiny House) we make a living off the unspoilt bush area we live in. In the past 12 months we've had 339 different groups (866 people) stay for a total of 594 nights. We have guests from Tasmania, the mainland and all over the world. A big drawcard is the quiet bush location, and guests often comment on it.

SAFE WATER and CLEAN AIR:

We're very concerned that the proposed mine will negatively impact our business. We went to Campbell Town to see the mine site there. We spoke to a local resident (5km from the site) who said the mine there caused a lot of dust.

We use rain water for our home and business, and we're very concerned about our rainwater as Aluminium is very toxic. We're also worried that it will affect the local plant life. Enclosed please find a report on toxicity from a Malaysian bauxite mine.

<https://iopscience.iop.org/article/10.1088/1755-1315/682/1/012040/pdf#:~:text=Contaminated%20water%20that%20contains%20aluminum,and%20bone%20diseases%20%5B3%5D.>

Here is an extract from par 2.1:

The environmental issues of mining activities include water, and *soil pollution due to dust and leaching* [3]. Soil pollution or soil contamination can occur because waste products during the mining process are absorbed into the soil. The soil's unbalanced pH will affect agricultural activities, including destroyed *agricultural products or unsafe crops*, which eventually leads to economic

210 WADLEYS ROAD, REEDY MARSH TAS 7304 0401 450 821 NAIVASHAESCAPES.COM.AU ABN 7735 369 7433

Document Set ID: 1942728
Version: 1, Version Date: 18/06/2024

problems. Contaminated water that contains aluminium hydroxide, iron oxide, and heavy metals can harm our health. Aluminum is a neuro-toxin and has been linked to Alzheimer's and bone diseases [3].

Meanwhile, iron oxide in bauxite can potentially cause iron overload upon chronic ingestion, leading to *gastrointestinal symptoms, hepatic disease, cardio-myopathies, diabetes, and hyperpigmentation* [3].

Here is an extract from UKGBC (UK Green buildings company)

<https://ukgbc.org/our-work/topics/embodied-ecological-impacts/aluminium/>

Contamination and pollution of soil and water

Large quantities of bauxite tailings, also known as red mud, are stored in open-air dams, requiring large areas of land. Due to their alkalinity and salinity, bauxite tailings present a severe threat to wildlife and ecosystems. In the event of dam failures, these tailings spread over vast areas with hazardous ecological impacts, as demonstrated by many past incidents. In addition, heavy metals present in red mud can accumulate in the food chain. *Dust and particulate matter released during mining can have adverse effects on the respiratory systems of nearby humans and animals.*

I realise that ABx is planning to rehabilitate the land, but while they're mining there will be a lot of dust. The pit and the uncovered stockpile of bauxite will cause dust. (According to the 2019 ABx Limited annual report, 120 000 tons of bauxite was stockpiled on site). This will continue for 20 years!

NOISE

When we bought this property in 2011, one of the main appeals was that we can't hear the highway. All we hear is nature. Since the Walter's quarry opened last year, we hear constant machinery, which is quite upsetting.

The bauxite mine will have an accumulative effect. They will be using excavator, loader, haul truck, mobile screen, diesel generator, bulldozer, mobile crusher, service truck and other vehicles. This is of huge concern to us because the sound travels in the clear bush air.

ROADS:

Another concern we have is the road use.

ABx Traffic Impact Assessment doesn't add up. It says under 2.3.1

Porters Bridge Road is expected to carry approximately 110 vehicles per day², of which 17% are heavy vehicles.

This doesn't make sense. If there will be 110 vehicles a day and 78 of them are trucks to and from the mine, that cannot be 17% but rather 71%. Further, the footnote says:

FOOTNOTE 2 Based on traffic counts completed by Council in 2015. These were increased to 2023 volumes based on an annual compounding growth rate of 1.9% discerned from historic traffic growth at Station 2025255, and accounting for the estimated daily delivery rate of the Porters Bridge Road Quarry, as detailed in the 2097 P/M Porters Bridge Road, Exton Traffic Impact Assessment.

This doesn't seem right. Surely 1.9% annual growth rate is not accurate here. Walters trucks have presumably not been included. And neither have the new mine's trucks been included. So the road traffic will be A LOT higher than that.

Point 2.3.1 continues:

While Porters Bridge Road does not provide any shoulders, centreline or edge line, it does provide an approximately 0.5m wide verge on both sides of the road at various locations. *While the verges aren't suitable for being driven over on a regular basis, they are suitable for a vehicle to slow down and traverse on to allow an oncoming vehicle to pass.*

Due to the dense vegetation along the road combined with the horizontal and vertical geometry of the road, there are multiple locations in which *stopping sight distance (SSD) is limited.*

Overall, the *road width along Porters Bridge Road currently does not comply with the LGAT Standards Drawings (TSDR02-v3) requirements for a road carrying similar vehicle volumes and heavy vehicle percentage. The SSD along the road also does not comply with contemporary requirements.* However, given the existing operation and available crash history along the road, the road is considered to operate safely and efficiently.

In my experience, truck drivers are generally under time constraints and are not likely to pull off the road to allow small vehicles to pass. They're generally under pressure to get where they're going in a rush. I assume the trucks from the mine will be the same, and the 110 small vehicles using the road daily will need to pull off the road for the 78 large trucks coming their way. This is a recipe for disaster.

These 78 trucks are also likely to damage the road due to the weight of their loads. It would only be fair for the mine to upgrade the road at their own expense (not the taxpayers) before they start mining.

As for the road operating safely and efficiently, that is without the 78 added mining trucks daily. Porters road is very windy and has dappled light because of the trees and there is lots of wildlife – this is a recipe for disaster if the road is not widened.

ROADKILL:

The EER says on page 52 under the heading Marsupial Carnivores:

In accordance with the Tasmanian Devil Survey Guidelines and Management Advice for Development Proposals (DPIPWE 2015a), roadkill mitigation should be implemented if a development is Projected to increase the rate of roadkill by more than 10%. Both the Tasmanian devil and quolls (Spotted-tailed and Eastern) are mainly nocturnal, hence the concern is primarily if DL130 will result in a substantial increase in traffic between dusk and dawn which will not be the case.

According to ECOTas, *even if DL130 was to generate an increase of greater than 10% in daytime traffic*, there is little evidence that this would lead to an increase in the rate of roadkill of devils, and quolls. The risk of this increase is probably negligible due to the narrow roads and topography within the Project Area as well as Porters Bridge Road naturally limiting the speed of any vehicle. Furthermore, most, if not all vehicle movements will be during daytime hours.

The working hours of the mine and the trucks is 7am-5pm. In winter especially they will then be driving at dawn and at dusk. We have seen devils and wombats (as well as pademelons and bennetts etc) out and about during those hours. This will surely lead to an increase in roadkill. Furthermore, the phrase "*even if DL130 was to generate an increase of greater than 10% in daytime traffic*" is misleading because there very clearly WILL be more than 10% increase in traffic. According to their faulty calculation 17%, but more likely over 70% increase.

HABITAT:

The mine will be backing onto the Brushy Rivulet Conservation area. This area is frequented by devils, quolls, swift parrots, blue wing parrots, bettongs, among other rare and endangered species. I spoke to David Schaap (Tasmanian Devil Program Head Keeper, who lives in Deloraine). He says Devils have been released in the area in the last few years. To get a current status of the population, "you'd really need to do a survey. Setting up trail cameras on some bait (fresh meat) and looking for scat samples. I know that there are devils around just from my anecdotal observations". Devils (and other endangered and protected wildlife) who live in the neighbouring conservation area would range and feed over the mining site that is currently under forestation and they would be impacted by mining.

CONCLUSION:

As far as we can tell, this mine will not bring anything positive to the area – it won't bring jobs to the area. (only 12 employees) It will not be looking after the roads – this will be from taxpayers' pockets. It will not be bringing profits to the area.

What it will cause is a very unhappy community, polluted air and water and sound pollution. This will impact our lifestyle, our business and our beautiful wildlife and environment. Therefore I strongly object to this mine.

On the ABx "About Us" page the state: "We only operate where welcomed". They are NOT welcome here.

Thank you for taking the time to review my representation. I look forward to hearing back from you.

Kind regards

Linda Wasserfall

12.1.66 Representation 60 - Plumpton



Document Set ID: 1942758
Version: 1, Version Date: 18/06/2024



Document Set ID: 1942758
Version: 1, Version Date: 18/06/2024

12.1.66 Representation 60 - Plumpton

From: "Bernard Plumpton" [REDACTED]
Sent: Tue, 18 Jun 2024 11:02:37 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Subject: Submission regarding Planning Application: PA\24\0052 DL130 Bauxite Project
Attachments: Quoll.jpg, owl.jpg, Porters Bridge Rd New Nest Form 2024.pdf

Hello,

My Name is Bernard Plumpton, and I live at 135 Emu Bay Rd Deloraine. I have a professional background based in land management as a Forester and Fire Management Officer. I am raising my concerns about the Natural Values Assessment prepared for the proposed Bauxite mine at Reedy Marsh. As a Forest Practices Officer, I am concerned that the standards I would be expected to meet in preparing a Forest Practices Plan are not being met by this proposal, particularly concerning the management of threatened fauna. My concerns are detailed below:

Wedge-tailed eagle

Page 28 of the Natural Values Assessment states:

"Nest RND #193 is located ca. 540 m to the southwest of the Porters Bridge Road/access road intersection (Figure 12). This nest was last reported in Sep. 2010 as "in poor condition and has sagged. No recent addition of material and no eagles observed"; there have been no further reported observations of this nest post-2010. There are no further known wedge-tailed eagle nests within 1,000 m and any known nests are at least 1.7 km from the study area".

This information needs to be corrected. In June 2024, a new eagle nest was located at 478279mE, 5405903mN. The nest is in good condition and measures approximately 1m deep and 90cm wide (see attached raptor nest report). The nest will require management during the eagle breeding season. The new mine road will introduce a new level of disturbance to the nesting birds and increase the likelihood of abandonment.

The natural values report also states: *"The modelled potential nesting habitat surrounding the study area is marginal (Figure 14a) due to the very intensive land management of the study area and surrounds. No further nests were located during the current survey.*

The Forest Practices Authority Threatened Fauna Adviser recommends that in this situation: ***Conduct nest searches in all areas of potential nesting habitat within and adjacent to the operation area outside the management constraint period and prior to operations commencing if they have not been searched in the previous 2 years. The management constraint period is July-Jan inclusive in most years, July-Feb inclusive in late season years. The FPA or NRET will notify all planners as early in the season as possible if the season is late. As a minimum, the search area should cover all potential nesting habitat within 500m of the operation area or 1km line-of-sight of the centre of the planning unit, whichever is the larger area. Ideally the search should also include all areas of potential nesting habitat within 1km line of sight of the boundary of the operation area. Searches should only be carried out by those who have gained competency in eagle nest searching/activity checking following attendance at a course approved by NRET (e.g. current FPA/TSS course) and must be undertaken in accordance with the FPA/NRET guidelines in FPA Fauna Technical Note 1".***

Adjacent to the intersection of the mine access road and Porters Bridge Rd, the nesting habitat quality is very good and needs to be searched, as does all potential habitat surrounding all the development.

Marsupial Carnivores

The natural values report states: *"It is noted that plantations can provide denning habitat, depending on its history, management and status (e.g. presence of windrows and the like). Detecting such dens is challenging without camera and live trapping, sometimes combined with radio-tracking. Furthermore, the main disturbance (mining) areas are entirely cleared land and managed for high rotation plantation*

12.1.66 Representation 60 - Plumpton

forestry and in this regard, potential den sites are presently limited. In our opinion, provided that the proposed mining activities are restricted to the areas indicated, these species should not be deleteriously affected by the proposal".

I challenge the assertion that "den sites are limited." Plantation windrows provide significant potential habitat for these species. Camera and live trapping surveys are required to determine how these species use the development area and that possible destruction of dens may occur.

Casual roadside observations

On the weekend of June 15-16, I walked several segments of Porters Bridge Rd to determine what threatened fauna species may be using the area. At location 478614mE, 5405682mN, I located the carcass of a spotted-tailed quoll. At 477521mE, 5407969mN, I found the carcass of a masked owl. Photos are attached. This was a simple assessment of roadkill conducted over a short period (<1 hour) but indicates that this area provides suitable habitat for numerous threatened species. Several wedge-tailed eagles were observed flying, one of which showed aggressive behaviour towards other birds. This included pot-hooking and rapid diving with wings raked back.

The mine development proponents must conduct further threatened species surveys and ensure that the known sites are managed in accordance with best practice.

If you have any questions or require more information, please call me on 0418 116 803.

Regards

Bernard Plumpton

12.1.66 Representation 60 - Plumpton



12.1.66 Representation 60 - Plumpton



Nest number and name (Office use only):

Raptor New Nest Form

THIS FORM CAN BE USED AT ANY TIME WHEN A NEW RAPTOR NEST IS LOCATED.

The details documented on this form must be either entered into the [Natural Values Atlas](#) (NVA) or alternatively sent to the FPA, via the Raptor Notifications Database, who will upload records to the NVA for validation. New nest records should be lodged with the NVA or FPA as soon as possible after being located.

SPECIES (indicate if you are uncertain of the species): wedge tailed eagle - <i>Aquila audax</i> subsp. <i>fleayi</i>	
OBSERVER(S) NAME AND CONTACT DETAILS: Bernard Plumpton: bernp_5@live.com	
DATE WHEN THE NEST WAS LOCATED: 16/06/24	TIME WHEN THE NEST WAS LOCATED: 15:00pm
HOW WAS THE NEST FOUND? eg. during pre-logging search, during forestry operation, etc. Ground search while trying to relocate nest #193.	
HAD THE AREA BEEN PREVIOUSLY SEARCHED? give detail or attach nest search form from previous search Yes. There are numerous records of nest #193 being inspected, but not since September 2010.	
LOCATION OF NEST: Nearest feature (according to 1:250 000 map series): Porters Bridge Coordinates: 478279mE 5405903mN GPSed? YES If yes to above, GPSed from: Ground Accuracy (m) 10m	
NEST TREE SPECIES: Eucalyptus obliqua	
NEST CONDITION AND/OR SIGNS OF APPARENT USE: e.g. note what nest characteristics are present including eggs, birds, droppings, nest material, prey, etc.? Nest in good condition with fresh sticks and brown leaves. Nest is approximately 90cm wide and 100cm deep. The nest tree is a live tree and approximately 40m tall. The nest is located in the main fork of the tree approximately 30m from the ground. Two wedge tailed eagles were seen nearby.	
DISTANCE OF NEST FROM HUMAN ACTIVITIES: forestry, recreation, roading, building, etc.? A proposed bauxite mine will use an access toad within 600m of the nest. A quarry is located 1.4km to the north west and farmland 400m to the south east.	
Will you submit this new nest data to the Natural Values Atlas? (circle). If NO, the FPA will submit this information to the NVA.	<div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;">YES</div> <div style="border: 1px solid black; padding: 2px;">NO</div>

12.1.66 Representation 60 - Plumpton



General view of nest tree and surrounding habitat

12.1.66 Representation 60 - Plumpton



Close up of nest

12.1.67 Representation 61 - T. Badcock

From: "tara Badcock" [REDACTED]
Sent: Tue, 18 Jun 2024 11:49:38 +1000
To: "Jonathan Harmey" <jonathan.harmey@mvc.tas.gov.au>; "Planning @ Meander Valley Council" <planning@meander.tas.gov.au>
Subject: Attn Jonathan Harmey- PA/24/0052 DL130 Bauxite Project
Attachments: Bauxite Mine objection letter.pdf

Dear Jonathan Harmey,
Please find attached my submission regarding the PA/24/0052 Bauxite Mine project proposed by ABx Group for Reedy Marsh/Exton accessing via Porter's Bridge Road.
As there is no cutoff time for submissions by the 18th June 2024 (today), I assume it is by close of business on this day?
I hope my submission has made it in time, given the very short submission period offered to the general public!
Yours sincerely
Tara Badcock

12.1.67 Representation 61 - T. Badcock

SENDER:

TARA BADCOCK



17 June 2024

Jonathan Harmey
MVC General Manager
PO Box 102
Westbury, Tasmania 7303

Dear Jonathan Harmey,

I am writing to express my objection to the Bauxite Mine Development Proposal for Reedy Marsh, based upon several important criteria which I do not feel have been honestly nor thoroughly acknowledged and considered.

The dishonestly termed "DL 130 Bauxite Project", Planning Application: PA\24\0052 has been proposed as a 'quarry' site yet is in fact being planned as an open-cut, extractive bauxite mine with a proposed duration of 20 years of operation by ABX Group and export objectives mainly outside Australia. The ABX Group are miners and the proposal is to create a new mine in Reedy Marsh/Exton, an area dominated by land owners who seek a rural living or rural lifestyle.

The ABX Group are a company who do not pay council rates and the land upon which the proposed mine is to be located is currently owned by Forico, who pay a low level of rates, according to publicly available information. The Forico land consists of basalt soils which are more highly sought after for use as prime agricultural land, due to the fertile nature of the mineral-rich soil structure. As noted in the project proposal the designated mine site land is not being classed as prime agricultural land, as I assume it has been locked into growing radiata pine softwood 'crops' for some time, thus excluding the land from potential prime agricultural usage.

My understanding is that there are policies in place within Tasmania protecting prime agricultural land from being commandeered for uses other than farming, which is why I'm assuming the planning application being for a 'quarry', is a sneaky way of appearing to be operating an agricultural-adjacent business whilst in practice, operating a destructive mining operation which will adversely impact our local community, the land upon which it seeks to operate, the surrounding conservation forested areas and Brushy Lagoon Conservation Reserve- a vital local environmental asset protecting threatened species of flora & fauna.

As a resident of Exton, I am alarmed to see within the planning application "DL 130 Bauxite Project", that an expected substantial increase in heavy vehicular traffic will be almost 80 trucks a day passing through Exton, via Porter's Bridge Road. Porter's Bridge Road is a narrow country road subjected to near-annual flooding and with a narrow bridge across the Meander River which does not meet

12.1.67 Representation 61 - T. Badcock

regulation capacity for such an increase in heavy traffic. The more recently built-up and sealed section of Porter's Bridge Road connecting to Exton/Meander Valley Highway does not reach down the the bridge and does not have traffic safety railings either side to prevent traffic from sliding down the soft gravel built-up sides should any vehicle stray too close and the road itself is considered as not fit for purpose, as noted in the Traffic Impact Assessment document supplied by Pitt & Sherry. In this Traffic Impact Assessment appendix 2.3, under '2.3.1 Porter's Bridge Road' it states that 'Porter's Bridge Road is expected to carry approximately 110 vehicles per day, of which 17% are heavy vehicles'; which given the proposed ABx Group mining operation cites their use of 78 truck and dog trailer combination movements per day actually equates to 70.9% heavy vehicle traffic.

Additionally the increase in heavy vehicle traffic through the village of Exton will put pressure on current local traffic flow, which is already abundant with mixed Agricultural, truck and car traffic (spectrum of which may not be recorded by and in addition will place stresses on the integrity of housing foundations through the constant vibrations such heavy vehicles cause on the roads. There has been a notable recent increase in gravel truck traffic through Exton via Porter's Bridge road by Walters, the business operating a gravel quarry near the bridge. The increase in this kind of traffic has social impacts in our village in terms of altering the desirability of Exton as a family friendly location, affecting property prices and discouraging residents from exercising themselves and their pets along 'quiet rural roads' where there is much less risk of being hit by traffic.

Having previously resided near Chudleigh for some years, we were able to hear the mining operations at the Graymont (Tasmania) Pty Ltd, Mole Creek Limestone Quarry where controlled explosions and crushing machinery were in action. The large De Bruyn's trucks and tankers which transported the Graymont (Tasmania) Pty Ltd products travelled along Mole Creek Road day and night causing constant vibrations which would rattle our house's windows and shake the whole building each time. I'm so glad I moved away!

It is galling to think that local residents' rates will be used to maintain roadways for a mining company, ABx Group, who do not pay rates, do not contribute anything to the local community and who actively seek to extract what they want for profit and export. In the undesired event of this proposed mine proceeding, ideally there needs to be a certified and committed agreement by ABx Group to contribute to road maintenance and necessary upgrades along Porter's Bridge Road and Porter's Bridge.

There is concern under Planning Application, PA\24\0052 about the impacts of drainage and pollution from the proposed ABx site on the nearby relatively pristine stream of Brushy Rivulet and its biota, including the iconic platypus and the Listed species, the green and gold frog. The detrimental impacts on amphibians and other aquatic species including Listed species has not been adequately considered in the Environmental Effects Report (EER), for DL130. Also very concerning are the adverse impacts under Planning Application, PA\24\0052 of altered subsurface drainage on the Brushy Rivulet Conservation Area, which again has not been adequately discussed or investigated in the EER for DL130. Should the mine proceed, there would also be catchment and water quality impacts, especially on the Brushy Rivulet, which must be regarded as a Class One stream, provides habitat for the iconic platypus, and the Endangered Green and Gold Frog and which clearly is in quite a good condition, and bordered by

12.1.67 Representation 61 - T. Badcock

significant Forest and with a mostly protected headwater. I maintain The Brushy Rivulet should not be degraded by ABx. The EER highlights impacts on streams from the proposed mine.

Importantly, the Brushy Rivulet Conservation Area seems free of phytophthora, also known as root rot, which is one of the top 100 invasive species impacting biodiversity in Australia & is listed as a key threatening process under the Environmental Protection & Biodiversity Act 1999, a disaster for agricultural land. A mine in this location uphill of the reserve could change that favourable situation and then introduce this disease to the adjoining Brushy Rivulet Conservation Area public reserve. Additionally a thorough assessment of endangered Wedgetail Eagle nesting sites and other monotreme & marsupial habitat impacts has not been thoroughly addressed in the EER. As native wildlife habitat destruction and land clearing across Tasmania continues to increase annually, many community members & organisations are dedicated to protecting as much of the remaining local EPBC Listed Critically Endangered Eucalyptus ovata forest & vegetation as possible for future generations & the overall health and well-being of our natural forested environment (the lungs of the planet!)

I believe the overall, incremental impacts of ABx Group's bauxite mine in its proposed location and as laid out in the planning application will cause harmful environmental changes over time, undesirable road and traffic impacts, noise and dust pollution as well as altering the desirably peaceful nature of the Exton rural area (as already personally observed with the increase in Walter's gravel truck traffic exiting Porter's Bridge road onto the Meander Valley Highway), with little or no? recompense for the community and environmental protection concerns.

Sincerely yours,

Tara Badcock

12.1.68 Representation 62 - Owens, Martin And Mcglone

From: "Debbie Owens" [REDACTED]
Sent: Tue, 18 Jun 2024 11:54:45 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Cc: "Bob ??" [REDACTED]; "Rebecca Martin"
[REDACTED]
Subject: Objection to Planning Application PA/24/0052 DL130 Bauxite Project, ABx Group Limited
Attachments: Objection PA 24 0052.pdf

The General Manager
Meander Valley Council
PO Box 102
Westbury TAS 7303
18th June, 2024
PA/24/0052

DL130 Bauxite Project - ABx Group Limited

Please find attached a joint Objection document in relation to the above Planning Application.

We are all residents of Deloraine - whilst we do not live in Reedy Marsh, we strongly feel that the proposed Bauxite mine should be of a concern to all Meander Valley residents. We cannot see that the proposed mine would benefit Meander Valley in any way whatsoever.

Aside from residential, environmental and flora and fauna concerns, the mine would be a scar on an otherwise beautiful native landscape. ABx's appalling track record with the Bald Hills mine near Campbell Town should not be forgotten in any decision making process.

Given the short amount of time given to respond to the application and the fact that the EER is 81 pages, there was not enough the time to address all areas of concern. However, in general, it should be noted that the EER responses leave a lot to be desired.

A question for the Council with regards to roadworks. Will ABx in any way be contributing to road works required attributed to the use of trucks and dog trailers along any of the roads within Meander Valley. As rate payers we strongly oppose any monies to be spent in any way to support ABx's project should it be successful.

Given awareness of Porters Bridge Road, there is no doubt that it will not withstand the number of proposed trucks (78) travelling to and from the mine site daily. We are concerned that at some point, the hauling trucks and dog trailers will need to use an alternate route - along River Road into Deloraine. It is a concern that there was no reference in the EER to an alternative route should Porters Bridge Road be unusable.

Regards

Debbie Owens

[REDACTED]

Rebecca Martin

[REDACTED]

12.1.68 Representation 62 - Owens, Martin And Mcglone

Robert McGlone



Debbie Owens

Rebecca Martin

Robert McGlone

18th June 2024

Objection to: PA/24/0052
DL130 Bauxite Project, Abx Group Limited

This is a joint objection to address a selected number of concerns in relation to the Environmental Effects Report (EER) prepared by Abx Group Limited.

Though our concerns are many, given time restraints and the size of the EER document, the objection will be concentrating on Section 3. Part C – Potential environmental impacts. Specifically 3.1 Air Quality and 3.9 Environmental impacts of Traffic

Section 3.1 Air Quality.

3.1.2 Air Quality - Potential Impacts

The first 2 paragraphs correctly state the safety impact of dust in relation to health, roof-collected water supplies and vegetation. What it does not specifically mention is the impact bauxite dust can have on waterways and hence any wildlife species that inhabit or are reliant on that waterway. The third paragraph correctly states that winds within the proposed mining area are of varying strengths and can occur from all directions relatively frequently. The fourth paragraph refers to Figure 9 and lists 4 potential sources of dust:

- *Dust generated on site by mining plan operations including bulldozers, excavators, loaders, trucks, crushers and screens*
- *Wind erosion of disturbed ground surfaces including disturbed topsoil, shallow surface excavations and material stockpiles*
- *Dust generated by vehicles traveling on unsealed roads in the vicinity of the Project Area;*
and
- *Engine exhaust emissions of fine particulates from vehicles and equipment*

Page 1 of 5

3.1.3 Air Quality - Management

Concerns from bullet points:

- bullet point one *'Excavation of topsoil will not be undertaken during periods of extended dry, windy weather'*. Why does this not include all mining plant operations that generate dust as listed in first dot point from 3.1.2 (as shown in italics above)
- bullet point 2 *'Most soils require at least 30% ground cover to prevent wind erosion. Where practical a minimum of at least 50% ground cover will be maintained across a given resource area during mining operations. Where this is unachievable, soils will be stored in locations protected from wind and other forms of erosion and in a configuration that keeps the soil viable during storage'*. What determines 'where practical' with regards to 50% ground cover. Where on the site will soils be stored protected from wind given that wind occurs in varying strengths and can occur from all directions ?
- bullet point 4 *'Haul roads including the main site access road, stockpiles and crusher drop points will be watered whenever required to prevent dust generation by vehicles. A water cart will be kept permanently on-site during campaigns. Watering will be commenced immediately whenever dust generation is observed by the site managers'*. What accountable measures are in place to ensure watering occurs. Surely it should be done as a matter of course daily. Watering as needed via observation by a site manager(s) is not a sufficient response.
- bullet point 6 *'Water for dust suppression will also be source off-site at the TasWater fill-point in Deloraine or Westbury. Water may alternatively be sourced from nearby landholders if an agreement is reached. Potable water will be transported onto site via tanker and stored in holding tanks, which could be supplemented by building roof runoff collection'*. What route will tankers take to transport water from the TasWater point in Deloraine to the project site ? How many water deliveries are expected over the course of a 3-4 month campaign?
- bullet point 8 *'Rehabilitation will be carried out progressively during the extraction with a maximum of 2 ha of operational area within a pit at any one time. The 10 ha of service areas will also be managed for dust suppression by the use of water carts during dry periods'*. What checks are in place to confirm rehabilitation is progressively occurring ?
- bullet point 10 *'Vehicle exhaust emissions will be minimised by ensuring that all equipment is properly maintained and operated'*. Does the maintenance check cover both on-site equipment and the contracted hauling truck and dog trailers ?
- bullet point 11 *'Outside of campaign the Site Manager will monitor weather conditions and visit the site regularly to ensure any dust generated will not cause environmental nuisance. If weather conditions are likely to cause dust emissions, mitigation measures (such as watering haul roads with a water cart) will be implemented'*. How often is 'regularly' and what measures will be used to determine environmental nuisance? Given that the site will be outside campaign times more than during, this is a very vague response and does not give any confidence that dust will be controlled during those times.

Other air quality concerns:

- As the site is not operational on any day after 5:00 pm, how will dust minimisation occur overnight during windy conditions? Will bauxite be stockpiled overnight awaiting despatch the next day ?
- How can we be sure that trucks will be covered when hauling the bauxite off-site. We have heard anecdotally that not all trucks leaving the ABx Bald Hills site in Campbell Town were covered.
- Where in the Pitt & Sherry air quality management responses, have all the requirements of the Tasmanian Environment Protection Policy (Air Quality) been adequately considered. From the Environment Protection Authority Tasmania:
The environmental values to be protected under the Air Quality EPP are:
 - *the life, health and well-being of humans at present and in the future*
 - *the life health and wellbeing of other forms of life, including the present and future health, wellbeing and integrity of ecosystems and ecological processes*
 - *visual amenity*
 - *the useful life and aesthetic appearance of buildings, property and materials*

Section 3.9 - Environmental Impacts of Traffic

3.9.2 - Potential Impacts

Concerns:

- Para 1 *'The overall traffic volumes on Porters Bridge Road and Meander Valley Road in the vicinity of the proposed mine site are expected to increase by 112 vehicles per day during the mining stage of the proposed bauxite mine'. Is 'mining stage' one and the same as 'campaign time' ?*
- Para 2 *'Approximately 78 trucks and dog trailer movements are expected per day (i.e a total of 39 trucks per day coming to site and leaving with a load) when the quarry is operational. Site access and egress is to be evenly dispersed throughout operating hours'. How is 'evenly dispersed' going to be managed. Evenly dispersed over the period equates to 1 truck either coming or going along porter bridge road approx. every 15 minutes over the 10 hour period from 7:00am to 5:00pm Monday to Friday and one truck either coming or going along porter bridge road approx. every 11 minutes from period 8:00am to 4:00pm on a Saturday. The coming and goings of trucks would surely rely on need – i.e there is product needing to be trucked out.*
- Para 3 *'The impact of traffic generated by the proposed development is minimal during both the AM and PM peak hours and throughout the day, particularly given workers will travel to and from the site outside of peak hours. The maximum vehicles per hour set to access or egress the site is approximately 23 and will occur between 6:00am and 7:00 am and between 5:00pm and 6:00pm, Monday to Friday, and between 7:00am to 8:00am and between 4:00pm and 5:00 pm on Saturdays'. Are haulage trucks included in the morning count of 23 ? If not, what vehicles does that number represent ?*
- Para 4 *'Traffic will create some noise and dust. Traffic was included in the noise model which did not exceed acceptable limits for receptors. Similarly, dust from traffic is likely to be minimal as vegetation lining the roads will reduce the spread of dust'. This will depend on the wind, the speed of the trucks and whether the trucks are covered sufficiently.*

- Para 5 '*If not managed appropriately, flora and fauna impact due to traffic and increased road use include:*
 - *Sedimentation into waterways, which may impact aquatic flora and fauna*
 - *Potential to impact native fauna through roadkill; and*
 - *Impact to vegetation along roadsides through road upgrades.'*

3.9.3 Management

Concerns from bullet points

- Bullet point 1 '*Ensuring only minimal upgrades to roads occur (filling potholes, minor trimming)*' From reading the proposal, it appears that this statement only refers to the access road (from Porters Bridge Road) into the mining site. Porters Bridge Road is not of a standard to handle the high volume of traffic during campaign periods let alone haulage trucks and dog trailers. There will undoubtedly be road works required at various times. Will Porter Bridge Rd roadworks resulting from the estimated 112 vehicles per day be at ABX's expense? Will the haulage trucks be using River Road into Deloraine if Porters Bridge road is temporarily unusable due to road works, or at any other time during campaign periods?
- Bullet point 2 '*Use of sediment fences around waterways*' What measures are in place to ensure sediment fences are performing as expected throughout both on and off campaign times?
- Bullet point 3 '*Maintain current road drainage conditions*' Once again, what measures will be in place to support this statement? Will road drainage be maintained during off campaign periods?
- Bullet point 4 '*Limiting cartage to and from the Project Area to within daylight hours*' Does 'daylight hours' refer to first light to last light or sunrise to sunset? E.g. there can be up to 30 mins difference between first light and sunrise. If referring to sunrise and sunset, does this mean that trucks both to and from the mining site will be restricted to seasonal sunrise and sunset times? What are the boundaries in reference to 'to and from the project area'? In section 3.4 natural values, 3.4.2 Potential Impacts, Threatened Fauna, Marsupial carnivores, para 4 it states '*Furthermore, most if not all vehicle movements will be between daylight hours*'. Is this statement referring to all vehicles including trucks? If so it is in contradiction to Bullet point 4.
- Bullet point 5 '*Limiting vehicle speed between dusk and dawn*' Dusk and Dawn is defined as sunrise and sunset. What speed will vehicles be restricted to? Where will this be applied? How will this be monitored? Wildlife is at greater risk during this time.
- Bullet point 6 '*Educating and training drivers onsite regarding safe driving practices*' This response also requires further detail. How will this education and training be presented to all drivers and what exactly will it cover? I would think that the drivers from the contracted hauling company will be aware of safe driving practices including. Education and training does not guarantee safe driving practices will be adhered to.

Other concern noted while reading the EER:

- Executive summary para 2 – '*The bauxite is extracted by shallow surface excavation and does not require any blasting.* 3.7.2 Environmentally hazardous materials – Potential Impacts '*Blasting is not planned to be carried out and no explosive materials will not be stored on site*'. Does the statement '*is not planned*' leave the door open for blasting to occur should it be required?

In General:

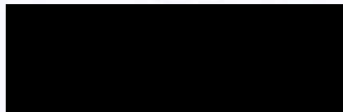
- It is concerning and disappointing that the majority of the air quality and environmental impact of traffic management responses appear to be nothing but bare minimum tick box confirmation statements with no detail and commitment behind them. After reading the EER it would appear that this approach is standard across all responses.
- We cannot see that the Bauxite mine will in any way benefit the community of Reedy Marsh and the surrounding Meander Valley. In fact, given the lack of level of detail and commitment in the management responses we firmly believe that the bauxite mine will be a scar on the environment and beautiful landscape of Meander Valley.
- ABx Group state on their website that they only operate 'where welcome'. They are not welcome in Reedy March.

Signed:



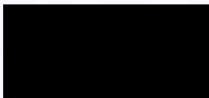
18-6-24

Debbie Owens



18.06.24

Rebecca Martin



18.6.24

Robert McGlone

12.1.69 Representation 63 - Woodward

From: "Annemaree Woodward" [REDACTED]
Sent: Tue, 18 Jun 2024 12:00:42 +1000
To: "Jonathan Harmey" <jonathan.harmey@mvc.tas.gov.au>; "Planning @ Meander Valley Council" <planning@meander.tas.gov.au>
Cc: [REDACTED]
Subject: Objection to Bauxite Mine Development Proposal for Reedy Marsh - the Planning Application, PA\24\0052
Attachments: AW - OBJECTION to DL130 and PA.24.0052 17-6-2024.pdf
Importance: High

Dear General Manager,

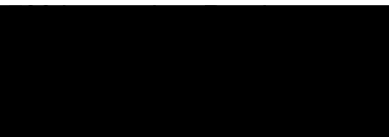
Please find my objection to PA\24\0052 attached.

Please keep me informed.

Annemaree Woodward,

Aeolia
[REDACTED]

Annemaree Woodward
Aeolia



17 June 2024

Jonathan Harmey,
General Manager
and The Planning Section
Meander Valley Council
Lyll Street
Westbury 7303

By email to: jonathan.harmey@mvc.tas.gov.au

By email to: planning@meander.tas.gov.au

Objection to Bauxite Mine Development Proposal for Reedy Marsh, “DL 130 Bauxite Project”, - and the Planning Application, PA\24\0052

I am a resident and a long-term (50years) landowner and resident ratepayer of Meander Valley Council and I have lived in Reedy Marsh for over twenty years.

This objection sets out my concerns about this proposal.

The ABx Group Limited, terms its proposed Reedy Marsh mine “a quarry” and calls it the “DL 130 Bauxite Project” but ABx Group Limited is an absentee corporate speculator with a proposal to start up a mine to extract bauxite in Reedy Marsh, whilst, I understand it looks for investors in the project.

Reedy Marsh is home to land owners and residents who wish to continue to live a peaceful life in this long established rural lifestyle area.

The land currently targeted by ABx is classified and mapped as Class 3, (where Class 1 is the best and Class 7 the least good soil from a productivity point of view). All land in Classes 1 to 3 is considered as Prime Agricultural Land and should be protected under the Protection of Agricultural Land Policy (PAL).

The locality of Reedy Marsh is quite a large area, north of Deloraine and Exton It's within the Meander Valley Council local government area and has a variety of land uses and zones, including two secure Conservation Areas – over 4,000 Ha on public land (zoned Environmental Management) and numerous reserves on private land (mostly zoned particular purpose, natural living Larcombes Road), a substantial land area of Rural Living Zone (the main area), Rural Zone land, and Agricultural Zoned land.

The rates revenue gained by Council and the expanding growth in land-use terms is rural lifestyle and resident landowners, with small rural holdings, to which Reedy Marsh is well suited.

The likely impacts on the neighbourhood amenity of the area, is not included in the EER for DL130.

Reedy Marsh has around 200 residents with something in the vicinity of 80 to 90 homes. Population growth together with building of new homes is ongoing.

The Tasmanian Planning Scheme left the Rural Living Zone in Reedy Marsh with a minimum Lot size at 15 hectares. This was intentional, limiting the scale and intensification of most zones across Tasmania.

The predominant land use in Reedy Marsh is Rural Lifestyle and the people who live here provide a diverse range of skills and occupations for the benefit of the local area, the region and Tasmania as a whole.

The rural lifestyle of Reedy Marsh has led to the conservation of important native habitat and residents pay a high Municipal Rates contribution. This could not be said for The ABx Group Limited or Forico on whose land the speculator seeks to establish a quarry – or is it a mine? - to extract poor quality bauxite.

In 2012 local residents and landowners made it abundantly clear that ABx is not welcome in our area by objecting to an application it made at that time for an exploration licence for bauxite.

The ABx Group Limited does not have a social license to develop bauxite mines in Reedy Marsh.

ABx states:

“The ABx Group Limited endorses best practices on agricultural land, strives to leave land and environment better than we find it. **We only operate where welcomed.**”

The ABx Group Limited or ABx4 has not consulted with the Reedy Marsh community since 2012 when the residents made it abundantly clear that ABx and mining are not welcome here.

I strongly object to Planning Application, PA\24\0052 for the following reasons.

Planning Application, PA\24\0052 includes the proposed destruction of Prime Agricultural Land, in breach of the State Policy on The Protection of Prime Agricultural Land. State Policies constrain all RMPS legislation, including EMPCA.

The proposed likely removal of a strip of natural forest directly adjoining the Brushy Rivulet Conservation Area, would deprive Threatened Species of vital habitat. Land clearance is a Nationally Listed Threatening Process under EPBC Law, which would trigger a referral to the Commonwealth for a Controlled Action.

I consider there is the strong likelihood, if this bauxite mine proceeds, that The ABx Group Limited (or some other mining company) might at some later stage, seek to expand its bauxite mine into the Brushy Rivulet Conservation Area within the Environment Management Zone at some stage, having used this “quarry” or open cut mine as a foot in the door, so to speak.

A precautionary approach suggests that mining within the vicinity of the public reserve is inappropriate.

The proposed private road access onto the Council maintained Porters Bridge Road, the access which although existing, under Planning Application, PA\24\0052, currently meets no standards and would require the clearance and destruction of EPBC Listed Critically Endangered Eucalyptus ovata trees/forest/vegetation in order to attempt to provide a safe sight distance at the

junction with Porters Bridge Road for users of the public roadway. This clearance would also impact on Threatened Species. This proposal would trigger a referral to the Commonwealth for a Controlled Action because it is important foraging habitat for the Critically Endangered Swift Parrot with suitable nesting habitat nearby.

The proposed clearance of Eucalyptus ovata forest for road intersection purposes onto Porters Bridge Road should not go ahead.

Porters Bridge Road is a very pleasant, scenically attractive, Council maintained road with retained vegetation on both sides of the road combined with an absence of power lines. This scenic amenity is prized and should be protected. Porters Bridge Road is not 'fit for purpose' to carry more heavy vehicles as proposed by Planning Application, PA\24\0052. It is almost certainly not safe now. The road pavement is collapsing under current traffic loads and the movement of more heavy vehicles, currently proposed by The ABx Group Limited Group, would cause significant cost to the ratepayers. Already the amount of wildlife killed on the Porters Bridge Road is high and disturbing. More heavy traffic can only make matters worse in this regard. Porters Bridge Road was never designed for significant heavy vehicle traffic.

It is expected that a Wedge Tailed Eagles' nest and a Masked Owl's nesting hollow would likely be found in the adjoining Brushy Rivulet Conservation Area. The Reedy Marsh area is a stronghold for both Wedge Tailed Eagles and Masked Owls. Wedge Tailed Eagles are Threatened Species and are regularly sighted across Reedy Marsh. More land clearance and extractive development would further impinge on their habitat. The Reserve adjoining the proposed bauxite mine is habitat for other Threatened and Listed Species.

The proposal would impact drainage and cause pollution on the nearby relatively pristine stream of Brushy Rivulet, its tributaries and its biota, including the platypus and the Listed species, the Green and Gold Frog. The deleterious impacts on amphibians and other aquatic species including Listed Species has not been adequately considered in the EER for DL130.

There could also be alteration to subsurface drainage on the Brushy Rivulet Conservation Area. This has not been adequately discussed or investigated in the EER.

The Brushy Rivulet Conservation Area seems free of phytophpera. A mine in this location uphill of the reserve could change that favourable situation and then introduce this disease to the adjoining Brushy Rivulet Conservation Area public reserve.

A mine, with its abundant noise and dust, adjoining the Brushy Rivulet Conservation Area, would inevitably mar visitor experience to the reserve. Reedy Marsh Conservation Area, Brushy Rivulet Conservation Area and numerous private conservation reserves are a major component of the location. The Reedy Marsh community has made a genuine attempt to conserve nature and especially the Threatened Species, which are obviously present in this locality. The local community conscientiously and diligently pursues protection of nature. I consider that mining would be deleterious to those precious values.

The ABx Group Limited has previously operated a small open cut bauxite mine near Campbelltown from about 2012 until about 3 years ago, it would seem a period of about 8 or 9 years. So bauxite mining is obviously not in any way a continuous, essential or ongoing business activity for The ABx Group Limited. It

may be that Councillors could seek an inspection of the Bald Hill site that could demonstrate how The ABx Group Limited treats the land.

Last but not least mining in Reedy Marsh is likely to adversely affect property values in Reedy Marsh.

Conclusion

I reiterate that the interstate, speculative, mining company ABx Group should already know their proposal is not accepted and that they are not welcome.

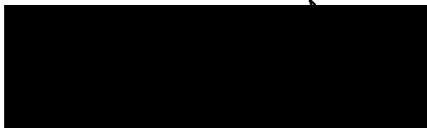
The ABx Group Limited does not have a social license to develop bauxite mines here in Reedy Marsh. They came with a proposal in 2012 and many residents of Reedy Marsh and Weetah opposed their exploration license. They were not welcome then and they are not welcome now.

This Planning Application, PA\24\0052 development qualifies as a Controlled Action under EPBC law because the The ABx Group Limited Group has proposed to clear a Critically Endangered ecological community. This Controlled Action can be initiated by writing to the Minister for the Environment, Tanya Plibersek now. I call upon both the Meander Valley Council and the Environment Protection Authority to refer this matter now, seeking it be treated as a Controlled Action.

Meander Valley Council has the power to reject this Discretionary Development Application, Application: _PA\24\0052 ,.

I therefore I respectfully request both Meander Valley Council and the Environment Protection Authority to reject the Planning Application PA\24\0052 from The ABx Group Limited, for the reasons I have outlined in my objection.

Yours sincerely

A large black rectangular box redacting the signature of Annemaree Woodward.

Annemaree Woodward

12.1.70 Representation 64 - Poulton

From: "Linda Poulton" [REDACTED]
Sent: Tue, 18 Jun 2024 12:38:08 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Subject: PA\24\00052
Attachments: 20240618_123603.PDF

Dear MVC,
I attach a representation in relation to the above planning application.
Kind regards,
Linda Poulton

Linda Poulton

18 June 2024

Jonathan Harmey
General Manager
Meander Valley Council

Via email: planning@mvc.tas.gov.au

Dear Mr Harmey,

Proposed Reedy Marsh Bauxite Mine

I write to object to PA\24\0052 which is an application for an extractive industry at Reedy Marsh (the **Application**).

The following are the grounds of my objection:

Road and traffic impacts on Porters Road

As noted in the applicant's Traffic Impact Assessment at page 63 of the Application, the road width of Porters Bridge Road does not comply with the LGAT Standards Drawing Requirements for a road carrying similar vehicle volumes and heavy vehicle percentage. It **assumes** that the road will be safe and efficient based on the **existing operation** and available crash history of the road.

This is an entirely unacceptable conclusion to draw, given that the operation proposes to use Truck and Dog trailer Combinations which will have a disproportionate impact on other users of the road and will add to the degradation of the road.

If the road requires upgrades or modifications solely as a result of the operation, this should not be done simply to satisfy the operations of a non-resident/non-ratepaying, commercial user.

In addition, other maintenance and upgrade projects on the Council's schedule should not be shunted aside to satisfy the needs of one commercial user who is not even a landowner in the municipality.

Porters Bridge Road

I am concerned that Porters Bridge Road is not fit to carry the heavy vehicles and their loads that are proposed in the Application. Porters Bridge Road would most likely require upgrading and such an exercise should not be borne by the ratepayer and prioritised over other municipality needs.

12.1.70 Representation 64 - Poulton

Road and traffic impacts on Meander Valley Road

Meander Valley Road is used heavily by local traffic wishing to avoid the main highway to travel between the town centres of Westbury and Deloraine.

On page 63 of the Application at point 2.3.2, it misleadingly states that "Meander Valley Road is approved for Truck and Dog Trailer Combinations". This misleading statement is only corrected on the following page where it is made clear that "Meander Valley Road, between Westbury and the Bass Highway on-ramp for Meander Valley Road has not been assessed for Truck and Dog Trailer Combinations".

On other words, Truck and Dog Trailer Combinations are not approved for use between Westbury and the Bass Highway on-ramp for Meander Valley Road.

As matters currently stand, the Applicant would not be able to use this portion of Meander Valley Road as a proposed traffic route for Truck and Dog Trailer Combinations.

It would need to persuade State Roads to deem this section of Meander Valley Road appropriate for this use.

As a frequent user of Meander Valley Road, I would be concerned at increased usage of that road by heavy vehicle traffic, particularly involving Truck and Dog Trailer Combinations.

The Application should not be approved if this is the proposed route for traffic from the operation to Bell Bay.

Yours sincerely,



Linda Poulton

12.1.71 Representation 65 - Graham

From: "Margaret Graham" [REDACTED]
Sent: Tue, 18 Jun 2024 13:27:53 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Subject: PA\24\0052 DL130 Bauxite Project OBJECTION Margaret Graham
Attachments: MNG Signed Objection to Bauxite mine 18.06.2024.pdf

Planning Staff
Please find my objection to the Bauxite mine in Reedy Marsh.
I would appreciate an email to confirm that it has been received and noted.
Thank you
Margaret

**The General Manager
Meander Valley Council
PO Box 102
WESTBURY TAS 7303**

**PA\24\0052
DL130 Bauxite Project**

I am writing to object to the proposed Reedy Marsh DL130 Bauxite Project PA\24\0052.

Reedy Marsh is regarded by residents, such as myself, to be a rural lifestyle area and I am very concerned that our chosen way of life will be strongly affected by this mine.

There are many vital areas of concern for me.

I have spent much of my time since we moved to Reedy Marsh planting trees, shrubs, etc to beautify my property. This is an area where high velocity winds blow.

Residential drinking water coming from our roof to our tanks will certainly be affected by wind-blown toxic dust. We use our tank water for drinking, washing and watering. I am concerned that water suppression at the site will not be an adequate method to protect my family's health.

Recent environmental conditions (strong winds, flooding) make it near impossible for the 'managed' mining waste (toxic dust & run-off) to be kept on-site. I believe that there will be local contamination of the surrounding land and waters.

I am concerned about the impacts of drainage and pollution from the site on the nearby relatively pristine stream of Brushy Rivulet. The Brushy Rivulet and its tributaries are lovely and habitat to many amphibian species.

Local flora and fauna are at risk. The reserve adjoining the proposed bauxite mine is habitat for Wedge-tailed Eagles and Masked Owls. The mine would impinge on their habitat and put them at risk. We would be adding another layer of danger for these precious animals.

12.1.71 Representation 65 - Graham

Many animals in the Brushy Rivulet Conservation Area such as the Endangered Green & Gold Frog are likely to be affected. Surely, we can all agree that it is not acceptable to put one of my favourite Australian animals, the platypus, at risk.

The proposed Reedy Marsh DL130 Bauxite Project PA\24\0052 proposes the likely removal of a strip of natural forest directly adjoining the Brushy Rivulet Conservation Area, which will support Threatened Species. Land clearance is a nationally listed threatening process.

Bordering the proposed mine area is significant forest.

I strongly object to the destruction of Critically Endangered Eucalyptus forest which would need to be cleared to adapt old roads and make new roads safe for local residents and the heavy vehicles. These roads would also destroy prime agricultural land which is a limited and final resource and protected by law.

The roads leading to the mine are not constructed to carry heavy vehicles. The increase in traffic is sure to lead to more dust and a decrease in property values in the direct area. The upkeep on Porters Bridge Road, and the new roads needing to be constructed, will be costly for all ratepayers in this area.

These are two houses on either side of the current road proposed to be the entry for the heavy vehicles. Other farmhouses are local to the proposed bauxite mine area. They will all bear the brunt of the dust, noise and loss of property values. All Reedy Marsh residents are concerned about these issues.

Although I do not live very close to the proposed mine, our rural environment is already affected by local noise and dust. Reedy Marsh should be a quiet residential area.

Tourists come to seek the rural serenity and beauty of Tasmania. Why would any tourist rent in the area of Reedy Marsh or visit the Brushy Rivulet Conservation Area? If they did, then all they would hear is a bauxite mine with crushers and heavy machinery.

Industrial noise is not what we need at Reedy Marsh and I ask that the Council be diligent in protecting our way of life. After all, this is why we chose to live here.

12.1.71 Representation 65 - Graham

A refusal by Council would be the best outcome in my opinion and ask the Council which was elected to represent its citizens now consider mine in this most vital matter.

18 June 2024

[REDACTED]

Margaret N Graham

[REDACTED]

12.1.72 Representation 66 - Howard

From: "Ian Howard" [REDACTED]
Sent: Tue, 18 Jun 2024 14:01:14 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Subject: objection to DL130 Bauxite Project PA\24\0052

To whom it may concern,
Please find attached, my letter as described above.

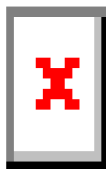
 [Bauxite mine objection letter- howard](#)

Cheers,
Ian Howard.



"If you want to build a ship, don't herd people together to collect wood and don't assign them tasks and work; but, rather, teach them to long for the endless immensity of the sea". Anon

"Creativity is allowing yourself to make mistakes. Art is knowing which ones to keep." Scott Adams.



**The General Manager
Meander Valley Council
PO Box 102
WESTBURY TAS 7303**

**PA\24\0052
DL130 Bauxite Project**

I am writing to object to the proposed Reedy Marsh DL130 Bauxite Project PA\24\0052. I feel strongly, the proponents who claim “We only operate where welcome” have no social licence to develop this project and I outline some of the issues below. I am sure many others in the Reedy Marsh area will add to my list of concerns. It is my belief that this mine is not welcomed by the broader Reedy Marsh community.

Porters Bridge Road is narrow, winding and not fit for purpose to carry the significant increase in heavy vehicles safely. It is already failing under the weight of current traffic. Upgrade costs should not be borne by rate payers.

Related to the above, I hold safety concerns for residents and other road users, tourists, bike riders and walkers, with the increased heavy vehicle traffic on a road not designed for such vehicles.

The proposed mine site is listed as Prime Agricultural Land which is in breach of the State Policy on The Protection of Prime Agricultural Land. Prime Agricultural Land is protected for the production of food and is a limited and finite resource.

The increasingly strong winds and frequency of flooding in the area will make the management of mining waste increasingly difficult, if not impossible. As there is no reticulated water in Reedy Marsh, the residents rely on rain water collected from roof runoff. I have great concerns for the continued quality and safety of that essential water supply with an open cut, bauxite mine in the vicinity. Likewise, I have concerns over the safety of the private food supplies grown in the area, vegetable gardens, orchards, livestock etc. I see no economically viable method of eliminating wind and water borne contaminants from the mine site such that these systems will be reliably protected. I fear that the common practice of dust suppression by water will be unable to guarantee the safety of residents' food and water supply. These are basic human rights and no development should be allowed that will put them at risk.

18/06/2024

Ian Howard,



12.1.73 Representation 67 - Van Amstel

From: "nick van amstel" [REDACTED]
Sent: Tue, 18 Jun 2024 14:13:06 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Subject: PA\24\0052 - Representation
Attachments: PA_24_0052 NVA.pdf

Dear Mar Harmer,
Attached please find my submission regarding PA\24\0052.
Please confirm receipt of this email.
Regards
Nick van Amstel

12.1.73 Representation 67 - Van Amstel

General Manager
Meander Valley Council
PO Box 102
Westbury
TAS 7303

18 June 2024

Planning Application PA\24\0052 – DL 130 Bauxite Project

Dear Mr. Harmey,

I only recently became aware of ABx's planned bauxite mining operation at 328 and 330 Porters Bridge Road on 1 June 2024 when the Meander Valley Council advertised Planning Application PA\24\0052.

The closing date of 18 June 2024 for submissions provided very little time for anyone with concerns to properly inform themselves of the details of this significant initial development, its potential impacts and potential to be expanded substantially.

Having considered the planning application I am writing to register my strong objection to the bauxite mine proposed by ABx and described in PA\24\0052.

My concerns, objections and comments are set out in Attachment 1 to this letter which follows the structure of the Planning Application and attached supporting documentation.

My overarching concern is the manner in which ABx has conducted itself in preparing the Planning Application. ABx has evidently been planning for the mining operation over many years but has not made any attempt to get a social licence for the planned mine from the Reedy Marsh community that will be negatively impacted by its planned mine. I strongly believe that ABx has no social licence to proceed with its proposed mine at Reedy Marsh.

As a direct result of ABx and its consultants not communicating and engaging with the Reedy Marsh community there are numerous concerns that I have that have not been considered and/or effectively mitigated in the documentation accompanying the Planning Application.

Key concerns which are detailed further in Attachment 1 include:

1. ABx's proposed mining operation and truck and dog traffic would result in a 5-fold increase in heavy vehicle traffic on Porters Bridge Road and increase the likelihood of road crashes with high and extreme consequences during the proposed 20-year mining operation.
Porters Bridge Road is not designed for the proposed truck and dog trailer traffic and this increase in heavy vehicle traffic would also accelerate the degradation of this road and dramatically increase road maintenance requirements.

12.1.73 Representation 67 - Van Amstel

These impacts of ABX's proposed mine can be mitigated by redesigning and upgrading Porters Bridge Road for truck and dog trailer traffic for a minimum design life of 20 years. However, it is ABX's mining operation that would make this upgrade necessary and therefore ABX should be responsible for all costs associated with such an upgrade. I cannot see any justification for Meander Valley Council and its rate payers paying for upgrading Porters Bridge Road to mitigate the impacts and risks caused by ABX's mine.

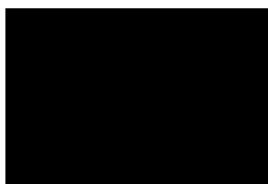
2. Environmental concerns relating to noise, air quality and threatened and endangered animal species.
3. The submitted documentation makes numerous unsubstantiated claims such as:
 - "Over time, it is likely that land quality will be improved."
 - "The proponents have an excellent record of rehabilitating quarry sites."
 - "ABX has completed the rehabilitation of Bald Hill mine to better than pre-mining value."
 - "We (ABX) only operate where welcomed."

If these claims are to be considered as part of the Planning Application ABX should be required to provide supporting evidence.

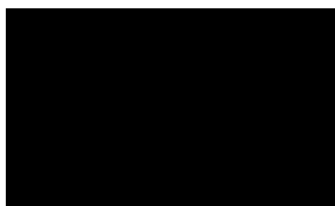
Whilst I am submitting my response to Meander Valley Council my understanding is that Council will forward my concerns and comments on the Environmental Effects Report to the EPA for its consideration. Please let me know if any further action is required of me.

In summary, I am strongly opposed to ABX's bauxite mine at 328 and 330 Porters Bridge Road, Reedy Marsh as described in its Planning Application PA\24\0052.

Kind regards



Nick van Amstel



Attachment 1.

Report to Support a Planning Permit Application:

3. Proposal

Paragraph 6:

“If successful, land quality may be improved.”

Question:

How will land quality be improved by putting stockpiled soil back? The proponent should substantiate the claim that land quality may be improved.

6.8 Rural zone

6.8.1 Zone purpose

“20.1.1 To provide for a range of use or development in a rural location:

(d) minimises adverse impacts on surrounding uses.” (Page 18)

Comment:

ABx’s mining and crushing operation will have adverse impacts due to noise, dust and traffic generated.

ABx’s proposed mining operation is inconsistent with the purpose of the zoning and will have significant negative impacts on the Reedy Marsh community, environment and values.

“20.1.3 To ensure that use or development is of a scale and intensity that is appropriate for a rural location and does not compromise the function of surrounding settlements” (Page 18)

Comment:

ABx mining and crushing operation will have adverse impacts due to noise, dust and traffic and negatively impact the business of tourist and visitor accommodation providers and property values.

7. Conclusion (Page 29)

Comment:

Despite its claims to have consulted with stakeholders the proponent, ABx has not informed or consulted with the Reedy Marsh community with the possible exception of immediate neighbours. Until the Planning Application was advertised the Reedy Marsh community that would be most negatively impacted was kept in the dark regarding ABx’s mining plans.

Given its contempt for the Reedy Marsh community ABx is not welcome and does not have a social licence for its proposed mine in Reedy Marsh.

Traffic Impact Assessment:

1.1 Project Background (Page 1)

ABx's "paramount corporate policy:

"We only operate where welcomed."

Comment:

ABx hasn't even introduced itself to the Reedy Marsh community that its planned mine will impact and should therefore desist from making claims that it only operates where welcomed and retract these claims from its Planning Application and supporting documents. The Reedy Marsh community has not welcomed ABx to Reedy Marsh.

2.3 Surrounding Road network

2.3.1 Porters Bridge Road

Page 5 – Paragraph 3

Comment:

Although not major users of Porters Bridge Road a school bus picks up and drops off school children along the road and it is also popular with motorcyclists and cyclists.

Page 6 - Paragraph 1:

"While Porters Bridge Road does not provide any shoulders, centreline or edge line, it does provide an approximately 0.5 m wide verge on both sides of the road at various locations. While the verges aren't suitable for being driven over on a regular basis, they are suitable for a vehicle to slow down and traverse on to allow an oncoming vehicle to pass."

Comment:

This assessment is considered unacceptable from a road safety perspective.

Page 6 - Paragraph 3:

"Overall, the road width along Porters Bridge Road currently does not comply with LGAT Standards Drawings (TSD-R02-v3) requirements for a road carrying similar vehicle volumes and heavy vehicle percentage. The SSD along the road also does not comply with contemporary requirements. However, given the existing operation and available crash history along the road, the road is considered to operate safely and efficiently."

12.1.73 Representation 67 - Van Amstel

Comment:

This assessment is considered unacceptable from a road safety perspective.

2.3.2 Meander Valley Road – Page 6

“Meander Valley Road is approved for use by Truck and Dog Trailer combinations.”

Comment:

Porters Bridge Road is not designed for, or suitable for Truck and Dog Trailer use. ABx, the proponent of the mine is proposing using Porters Bridge Road for truck and dog trailers to travel between its mine site and Meander Valley Road. ABx should therefore be upgrading Porters Bridge Road to the required standard to mitigate the increased risks its mine traffic will cause at its own cost.

2.7 Road safety – Page 10

2.7.1 Crash history

Comment:

The 5-fold increase in heavy vehicle traffic to nearly half of all Porters Bridge Road traffic as a result of the proposed ABx mine will significantly increase the risk of crashes with high to extreme consequences. Effective mitigation of this significantly increased risk will require much more than pothole repairs; Redesign and construction of Porters Bridge Road for 2-way truck and dog trailer traffic would be an effective mitigation and ABx should be entirely responsible for this cost to mitigate the significantly increased risk of a crash due to its proposed mining operation.

3.3 Vehicle access and circulation

3.3.2 Heavy vehicles

1st paragraph – Page 12:

“All heavy vehicles will exit the site via the existing all weather internal road:”

Question:

Is the internal road sealed? If not, how will mud being tracked on to the public Porters Bridge Road be prevented? 78 truck and dog trailer movements a day on an unsealed road during wet weather is expected to generate mud.

2nd paragraph – Page 12

“The routes may also vary slightly in the vicinity of Porters Bridge Road based on similar factors (Timeliness, location of road works etc.)”.

Question:

Is River Road being considered for use by ABx?

River Road has similar issues to Porters Bridge Road. The geometric design (Width, poor visibility, stopping sight distances, blind rises and corners) of River Road is also not adequate for the mine’s truck and dog

12.1.73 Representation 67 - Van Amstel

trailer traffic. If River Road is used this would result in truck and dog trailer traffic through Deloraine town centre the impact of which has not been considered.

4. Transport Assessment

4.1.1 Traffic Impact Assessment

4.1.1 Traffic Generation – Page 14

Comment:

ABx's mining operation would result in an additional 78 Truck and Dog Trailer combination movements per day which is equivalent to a 5-fold increase in heavy vehicle traffic on Porters Bridge Road.

4.1.6 Traffic impact – Page 19

Porters Bridge Road

"Based on the development, overall traffic volumes on Porters Bridge Road are expected to Increase from approximately 110 to 222 vehicles per day (as of 2023)."

Comment:

Whilst these are still low volumes it is likely that every day there will be numerous cases of truck and dog trailers passing oncoming truck and dog trailers and other vehicles on a road that does not meet current design requirements.

4.1.7 Road safety – Page 19

"As the existing road width along Porters Bridge Road currently does not comply with the LGAT Standards Drawings and the SSD along the road also does not comply with contemporary requirements, there is an increased likelihood of safety issues as a result of the additional traffic generated by the proposed development."

Comment:

The mine's traffic will result in a 5-fold increase in heavy vehicle traffic and a significant increased risk of a high or extreme consequence crash which is directly attributable to the mining operation if approved. i.e. the increased risk is caused by the mine and its operation and therefore the mine should be responsible for mitigating the increased risks and negative impacts it would be causing. The cost of mitigating this risk should not be borne by Meander Valley Council and its rate payers.

In considering the risks of crashes consideration also needs to be given to the school bus, cyclists, motorcyclists and runners that are also regular users of Porters Bridge Road.

Table 9 Risk Analysis - Porters Bridge Road Page 22

Comment:

Non-compliant road width – The risk of a head on collision with a heavy vehicle is considered almost certain within the life of the mine, with serious to fatal consequences with a high to extreme rating. (One movement every 2 to 3 minutes makes the likelihood of vehicles meeting along Porters Bridge Road very likely.)

ABx's proposed mine and the truck and dog trailer traffic it generates would cause a large increase in the risk of a crash with severe consequences on Porters Bridge Road. As the proponent of the mine ABx, not Council should be responsible for mitigating increased risks and the cost for implementing mitigatory measures including the upgrading of Porters Bridge Road to a standard that is safe for its truck and dog trailer traffic.

Multiple locations with limited SSD – The risk of a head on collision with a heavy vehicle is considered almost certain within the life of the mine, with serious to fatal consequences with a high to extreme rating. (One movement every 2 to 3 minutes makes the likelihood of vehicles meeting along Porters Bridge Road very likely.) Truck and dog trailers will traverse into the opposing travel lane at curves. The existing crash history reflects current and historic traffic. The near doubling of traffic numbers with an almost 5-fold increase in heavy vehicle traffic would be expected to significantly increase risks from the current low level to high or extreme without effective mitigation. ABx, not Council should be responsible for mitigating increased risks and the cost for implementing mitigatory measures including the upgrading of Porters Bridge Road to a standard that is safe for its truck and dog trailer traffic.

Potholes – Porters Bridge Road was not designed for trucks and dog trailers. The nearly 5-fold increase in heavy vehicle traffic will cause damage requiring repairs and significantly reduce the life of the road.

4.1.7 Road safety – Page 25

First paragraph:

"Should recommendations outlined above be implemented, it is anticipated that the residual level of risk along Porters Bridge Road will be low which is consistent with the level of risk currently present on Porters Bridge Road."

Comment:

Porters Bridge Road will require significant upgrading to effectively mitigate the additional risks to road users resulting from the almost doubling of traffic with a nearly 5-fold increase of heavy vehicle traffic. The increased traffic risks on Porters Bridge Road above the current low level are entirely due to the traffic that would be generated by ABx's mine.

The proposed mitigation measures would not be necessary without the ABx mine traffic and therefore it seems reasonable that ABx should be responsible for the entire cost of the Porters Bridge Road upgrades required to provide a safe public road link between its mine and the Truck and Dog Trailer Combination Road Network at Meander Valley Road. It seems equally unreasonable that Meander Valley Council and its ratepayers should be responsible for the cost of these road upgrades.

4.2 Site access requirements – Page 26

4.2.2 Sight distance assessment

Comment:

This section of the report only considers and reports on sight distances at the site access and signage at the Meander River Bridge but omits any assessment or comment on sight distances between the Meander River Bridge and site access. This is considered a significant omission from the assessment that should be addressed.

6. Conclusion – Page 42

4th bullet:

Comment:

Porters Bridge Road was not designed for the truck and dog trailer traffic that would be generated by the ABx mine if approved. Road width and Stopping Sight Distances are inadequate on this road in particular north of the Meander River Bridge. With an estimated 78 truck and dog trailer movements a day generated by the ABx mine there will be numerous occasions every day when a truck and dog trailer meets another vehicle approaching from the opposite direction. The other vehicle could be anything from a passenger vehicle, bicycle, motorcycle, school bus to another truck and dog trailer. Given the planned 20-year life of the mine there is a very high likelihood that without significant road design improvements a crash with high to extreme consequences will occur. It is also most likely that a Reedy Marsh resident will be a victim of such a crash.

The report notes the crash history to date and has assessed the present risk of a collision as very low and subject to implementation of the mitigation measures in Table 9 assesses the mine related traffic will not significantly impact the safety or operation of the surrounding road network. The benefits of the proposed mitigation measures are not disputed, but the cost of these measures should be the responsibility of the party increasing the road crash risk, namely ABx. Meander Valley Council and its rate payers should not be responsible for the cost of delivering the measures to mitigate the increased risk caused by ABx's mining operation.

To put this into context, as a listed company ABx would be expected to be seeking to maximise profits from the proposed Reedy Marsh bauxite mine. Avoiding costs associated with development of the mine and transferring responsibility for these to others such as Meander Valley Council and its ratepayers would assist ABx to increase and maximise its profits.

Environmental Effects Report:

2. Part B – Proposal description – Page 12

2nd paragraph –

Comment:

The potential for future expansion should be noted when considering the current Planning Application and EER. It is considered prudent to adopt a conservative assessment of impacts resulting from the current planning application as there is potential for the magnitude of these impacts to increase and extend over a larger area.

Table 4: DL 130 Bauxite Project proposed activity

Infrastructure – All weather haul road – Page 16

Question:

How will the risk of mud being tracked on to a public road (Porters Bridge Road) be managed? Will the haul road be sealed?

2.6 Location and title information Page 27 (191 of 375)

Table 7 DL 130 location and title information

Proposed mining lease – Page 28 (192 of 375)

“The potential impact area is 136 ha and as such this is the basis of this EER and technical studies”

Comment:

The impacted area is much larger than 136 ha. Noise, traffic and dust impacts on the environment and community extend much further than this 136 ha area and have not been considered.

The EER is considered incomplete without proper consideration of impacts beyond this 136 ha.

2.7 Rationale for proposal and alternatives – Page 28 (192 of 375)

2.7.2 Alternatives

Comment:

Similarly to the Fingal Rail alternative most Reedy Marsh residents and landowners do not support the proposed ABx mine. The non-resident owner of the proposed mine site is an exception.

ABx is not welcome in Reedy Marsh and does not have a social licence for its proposed mine.

3.1 Air quality – Page 36

3.1.3 Management – page 38

Comment:

Bauxite mines are characterised by the red dust that covers the surrounding landscape. Excavation, screening and crushing operations will generate dust, however with the exception of the location of the

crusher and loader the report provides little information on how dust generated by these activities will be effectively managed.

Roof top collected rainwater is the main source of water for most Reedy Marsh residents and any threat of contamination of drinking water needs to be properly and seriously considered. An opinion, instead of a scientific assessment of the risk of contaminating Reedy Marsh resident's drinking water is not sufficient for this potential health risk.

The EER is considered incomplete without providing necessary detail on how dust generated by the primary mining activities will be managed and giving proper consideration of air quality impacts beyond the mine.

3.3 Noise emissions – Page 42

“Noise emissions from the Project are not likely to cause environmental harm or adversely affect nearby residents.”

Comment:

I am concerned that my amenity will be adversely affected by noise emissions from the proposed mine. The assessment has not considered the noise increment and effect thereof on my property and the accommodation business conducted which relies on the tranquillity of the area.

Although it is stated in the EER that “Noise emissions from the Project are not likely to cause environmental harm ...” this has not been assessed. The Brushy Rivulet Conservation Area is home to numerous threatened and endangered animal species and is immediately north of and shares a boundary with the proposed mine. In the absence of a proper assessment, it is considered extremely unlikely that the mine will have no negative impacts on the fauna in this Conservation Area.

The EER is considered flawed and incomplete without a proper assessment of the impact of mine generated noise on fauna, in particular threatened and endangered species.

3.4.1 Existing environment

Threatened fauna – Page 50

Comment:

The EER claims that there are no records of threatened fauna within the Project Area and that no evidence of any threatened species was detected during the survey.

This does not mean that the proposed mine will have no impact on threatened species.

The EER is considered flawed and incomplete without a proper assessment of the impact of mine operation on fauna, in particular threatened and endangered species beyond the immediate Project Site.

Page 69

5. Part E – Public and Stakeholder communication

4th bullet

Comment:

ABx's engagement with the Reedy Marsh community has been virtually non-existent, limited to possibly one or two immediate neighbours. The entire Reedy Marsh community is likely to be negatively impacted

by ABx's proposed mine if approved. This mine will generate significant noise and large and heavy-duty traffic on a road that was not designed for and is used by many Reedy Marsh residents.

4. Part D – Summary of Proposed Management Measures

Table 11 - Summary of Proposed Management Measures

Air Quality Page 65

Comment:

The assessment has not considered dust generated by excavation, sorting, crushing during campaigns. These activities will generate fine dust especially if operations are conducted during the dry summer and autumn months.

Noise emissions Page 66

Comment:

No consideration of how noise from the worst noise generator, the crusher can be mitigated.

Natural values – Page 66

Comment:

No consideration of impacts of mining operations such as noise on threatened fauna. As a minimum it would be expected that impacts of noise on threatened fauna in the adjoining Brushy Rivulet Conservation Area would have been assessed.

Environmental Impacts of Traffic – Page 68

Comment:

The existing Porters Bridge Road is not designed for or suitable for the truck and dog trailer traffic generated by the proposed mine. ABx's proposed mitigation measures do not address the significant increased risk to existing road users of the additional mine generated traffic. Porters Bridge Road is not designed for truck and dog trailer traffic. Filling potholes and minor trimming will do very little to mitigate the additional risks to road users resulting from the ABx mine traffic.

5. Part E – Public and stakeholder communication (Page 69)

Comment:

The EER was written in August 2023 for Council and EPA review. ABx claims to have already begun engaging with key communities and individuals and to have undertaken a letterbox drop to the "surrounding residence".

Please request ABX to provide details including which residents and when and what they were advised. ABx has made no attempt to The Reedy Marsh community. Based on the number of concerned Reedy Marsh residents that attended a community meeting ABx has failed to engage with the surrounding community and cannot claim to only go where it is welcome. It appears that ABx considers engaging with its immediate neighbours is all that is required, not the broader negatively impacted community.

Appendix A – Natural Values Assessment

Comments: - Refer comments provided above.

Appendix D – Traffic Impact Assessment

Comments: - Refer comments provided under Planning Application above.

Appendix E - Stormwater Management Plan

4.3 Sizing of critical elements – Page 5

4.3.1 Sediment Basin

2nd paragraph

Question:

What chemical treatment is proposed to precipitate sediments? What is the fate of this chemically treated sediment?

Appendix F - Noise Impact Assessment

Executive Summary – Page 1

Paragraph 4

“On this basis it may be concluded that nearby residents will not suffer from environmental harm or have their amenity adversely effected (sic) by noise emissions from the proposed mine.”

Comment:

The amenity at 126 Farrells Road is expected to be adversely affected by noise emissions from the proposed mine. The assessment has not considered the noise increment and effect thereof on this property and the accommodation business conducted which relies on the tranquillity of the area.

5. Mitigation measures – Page 7

Question:

The crusher will generate most noise, yet there is no specific mitigation for this operation. Have bunding, or other noise containment measures around the area where rock crushing is planned been considered to mitigate noise impacts from this activity which has the highest sound power level of 120.2 dB(A) (Table 1.)?

6. Conclusions – Page 7

“On this basis it may be concluded that nearby residents will not suffer from environmental harm or have their amenity adversely effected (sic) by noise emissions from the proposed mine.”

Comment:

Noise emissions from the proposed mine are expected to be significantly above current background noise levels at 126 Farrells Roads and this will have a significant impact on current amenity. The assessment has not considered the noise increment and effect thereof on the tranquillity I enjoy on my property and the accommodation business conducted which relies on this tranquillity.

12.1.74 Representation 68 - Higgins

From: "barry higgins" [REDACTED]
Sent: Tue, 18 Jun 2024 14:23:13 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Subject: Proposed Reedy Marsh Bauxite quarry/mine
Attachments: Letter to MVCouncil re Bauxite Mine opposition.docx

Please find attached my Letter of Objection to the proposed Reedy Marsh Bauxite quarry / mine.

a receipt (email ok) of this letter would be gratefully appreciated.

Yours sincerely,

Barry Higgins

(Below is a sample letter that could be used to submit an objection.

Pls amend where necessary)

- Select one or more issues from below and send to the below address.
- Individualising/ rewording the selected issue(s) will have greater impact
- Selecting issues that contain objections based on both road & environmental points may be strategically better
- You can either email, post or hand deliver your representation.
- The email address is planning@mvc.tas.gov.au

**The General Manager
Meander Valley Council
PO Box 102
WESTBURY TAS 7303**

**PA\24\0052
DL130 Bauxite Project**

I am writing to object to the proposed Reedy Marsh DL130 Bauxite Project PA\24\0052. I strongly feel that the proponents have no social licence to develop this project based on (but not limited to) the following issues.

Porters Bridge Road is not fit for purpose to carry the marked increase in heavy vehicles. It is already collapsing and the movement of heavy vehicles along with this substandard road will cause significant cost to the ratepayers.

The proposed road access onto Porters Bridge Road which, although existing, currently meets no standards and would require the destruction of Critically Endangered Eucalyptus ovata forest to meet a safe sight distance standard at the junction with Porters Bridge Road.

I believe that it will destroy Prime Agricultural Land which is in breach of the State Policy on The Protection of Prime Agricultural Land. Prime Agricultural Land is a limited and finite resource.

The proposed Reedy Marsh DL130 Bauxite Project PA\24\0052 proposes the likely removal of a strip of natural forest directly adjoining the Brushy Rivulet

12.1.74 Representation 68 - Higgins

Conservation Area, which will support Threatened Species. Land clearance is a nationally listed threatening process.

Recent environmental conditions (strong winds, flooding) make it near impossible for the 'managed' mining waste (toxic dust & run-off) to be kept on-site. Local flora, fauna and nearby riverine systems will be contaminated. I am concerned about the impacts of drainage and pollution from the site on the nearby relatively pristine stream of Brushy Rivulet and its biota, including the iconic platypus, as well as the impacts of altered subsurface drainage on the Brushy Rivulet Conservation Area.

Residential drinking water (collected roof run-off) and private food supply (gardens, orchards, poultry) will be affected by wind-blown toxic dust (Aluminium is toxic to flora). The area has recently (and will continue to) receive high velocity winds. I feel that the practice of dust suppression by water will be insufficient to avoid these risks to human health.

(Date)

(Your Name)
(Your Physical Address)

12.1.75 Representation 69 - Moore

From: [REDACTED]
Sent: Tue, 18 Jun 2024 14:35:50 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Subject: ABX planning PA\24\0052
Attachments: The General Manager MVC.docx

Dear Mr. Harmey,
Please see attached document.
Regards,
Malcolm Moore

12.1.75 Representation 69 - Moore

The General Manager,
Meander Valley Council
P.O. Box 102
Westbury. Tas. 7303

Attention – Jonathan Harmey

Re – Extractive Industry (Quarry)

I have owned and operated the adjoining farm to the proposed development for over 35 years. I have read the planning application by Pitt and Sherry and my concern is dust. The material to be mined is clay based and as it dries makes considerable dust generated during screening and stockpiling material. Due to the ebbs and flows of the resource industry the stockpile heaps may sit for long periods of time prior to being carted to the port increasing the likelihood of increased dust levels. The mining lease area has no water on it. Do the applicants have a plan for dust suppression with watercarts or a sprinkler system and where is the water likely to come from?

Over the summer months we can see the need for constant irrigating and feel this may have been overlooked in the planning application.

Our concern is based on the Bald Hill project at Campbell Town which resulted in material stockpiled for prolonged periods of time which created a problem for close residents and we are less than a kilometre from the proposed site.

Malcolm Moore

On behalf of M.H. & R.J. Moore

18th June, 2024

12.1.76 Representation 70 - Elkin

From: "peter elkin" [REDACTED]
Sent: Tue, 18 Jun 2024 14:38:59 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Subject: PA/24/0052
Attachments: sub p elkin re abx.pdf

to: general manager
meander valley council
please find attached my submission to the application by ABx in Reedy Marsh.
thanks
peter elkin
[REDACTED]

Peter Elkin

17.06.24

General Manager
Meander Valley Council
P.O. Box 102
Westbury Tas 7303
General Manager at: planning@mvc.tas.gov.au

re: PA\24\0052

I hereby object to the suggestion by ABx to stripmine in my neighbourhood of Reedy Marsh.

Further, I object to the small amount of time given to respond to this proposal, when the proponents have had years. Further, I object to the lack, indeed absence, of prior and current consultation by ABx as to their intentions, especially considering their knowledge of the local community's likely interests in such activities in Reedy Marsh.

Reedy Marsh is populated overwhelmingly by residents who appreciate the quiet rural setting that native forests and scattered low activity agricultural activities provides. A 20 year continuing bauxite stripmine would break this social community understanding and significantly undermine the districts amenity, and ABx foreshadows the likely future expansion beyond 20 years and beyond the current scope of this proposal. I note that this suggested project is in direct sight from my property. I am unaware of any community support for this venture.

It is astounding that ABx would consider using Porters Bridge Rd., yet for the stated reason that it is their cheapest option. This road is totally unsatisfactory for the suggested uses, destructive of roadside amenity and valued vegetation, unsafe and challenging for the community, and likely expensive for Council. There may have been only a few reported accidents on this stretch of road, but cars have been forced off the road and there have been many near misses unreported. It is not a solution to propose that cars be able to move off the road when faced with a truck. To claim that as some trucks already use part of this road it is ok to have many more, is akin to someone already uncomfortably sharing a small bed welcoming many more bedfellows. There are obvious alternative accesses to the east directly onto the trucking approved Birralelee Rd., which would avoid such issues but weren't seriously countenanced, if at all.

It should have been proposed to leave intact all remnant and naturally establishing native forest patches, especially those contiguous or closely related to similar patches. To claim that important habitat will only be removed out of season, is akin to demolishing homes and gardens while residents are away on excursions.

Consideration of the impacts on climate should have occurred, including longterm disruption and delays to the drawdown of carbon by plantation trees, especially those already established, or alternative land uses.

The degradation of soils has been improperly glossed over by the proponents.

Due to the short time allotted to me to respond to this proposal, I am at this stage unable to even outline further objections to this proposal. I suggest further time be allotted, and that ABx withdraw their application pending community consultation, else the proposal as it stands be rejected entirely.



Peter Elkin

Document Set ID: 1943163
Version: 1, Version Date: 18/06/2024

12.1.77 Representation 71 - Eyles

From: [REDACTED]
Sent: Tue, 18 Jun 2024 15:49:15 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Subject: Mining objection
Attachments: Letter to GM re Bauxite Mine on Porters Bridge Road (17th June 2024) - Copy.docx

We as a family that farm near by are sending in our objection to the mine please contact us if you need any more information concerning this matter on 0408130202.

12.1.77 Representation 71 - Eyles

The General Manager
Meander Valley Council
PO Box 102
WESTBURY TAS 7303
planning@mvc.tas.gov.au

17th June 2024

PA\24\0052
DL130 Bauxite Project

Dear General Manager,

I am writing regarding the approval for a Bauxite Mine on Porters Bridge Road and would like to put forward my objection and opposition to this project proceeding.

Please let me know if you would like me to provide further detail.

Regards

Sharon and Stephen Eyles and family

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GENERAL MANAGER
MEANDER VALLEY COUNCIL
PO BOX 102
WESTBURY. TAS. 7303

PA/24/0052
DL 130 BAUXITE PROJECT

Index No.		PA/24/0052	
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RCVD	18 JUN 2024	MVC	
Action Officer	BS	Dept.	ERS
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I AM WRITING TO OBJECT TO PROPOSED REEDY MARSH DL 130 BAUXITE PROJECT PA/24/0052. I STRONGLY FEEL THE PROponents HAVE NO SOCIAL LICENCE TO DEVELOP THIS PROJECT BASED ON (BUT NOT LIMITED TO) THE FOLLOWING ISSUES.

PORTERS BRIDGE ROAD

RIVER ROAD LINK TO DEGRAINE

ROADS NOT FIT FOR ANY INCREASED TRAFFIC FROM MULTI GROUP AXLE COMBINATION HEAVY VEHICLES, ON A DAILY BASIS.

THE ROADS ARE LOW LEVEL STANDARD INFRASTRUCTURE ROADS. AND ANY ROAD UPGRADES WILL BE VERY COSTLY, AND LOSS OF VEGETATION, NEEDED TO WIDEN ROAD ALL AT THE COST OF TAX PAYERS.

I BELIEVE THAT IT WILL DESTROY PRIME AGRICULTURAL LAND WHICH IS IN BREACH OF THE STATE POLICY ON THE PROTECTION OF PRIME AGRICULTURAL LAND. PRIME AGRICULTURAL LAND IS A LIMITED AND FINITE RESOURCE.

PROPOSED DL 130 BAUXITE PROJECT PA/24/0052 PROPOSES THE LIKELY REMOVAL OF A STRIP OF NATURAL FOREST DIRECTLY ADJOINING THE BRUSHY RIVULET CONSERVATION AREA WHICH SUPPORTS THREATENED SPECIES. LAND CLEARANCE IS A NATIONALLY LISTED THREATENED PROCESSES.

-2-

RECENT ENVIRONMENTAL CONDITIONS (STRONG WINDS, FLOODING MAKE IT NEAR IMPOSSIBLE TO MANAGE MINING WASTE (TOXIC DUST & RUN OFF) TO BE KEPT ON SITE. LOCAL FLORA, FAUNA AND NEARBY RIVERINE SYSTEMS WILL BE CONTAMINATED.

I AM CONCERNED ABOUT THE IMPACTS OF DRAINAGE AND POLLUTION FROM SITE ON THE NEARBY RELATIVELY PRISTINE STREAM OF BRUSHY RIVULET AND ITS BIOTA INCLUDING THE ICONIC PLATYPUS, FRESH WATER LOBSTER AND FISH.

ALTERED SUBSURFACE DRAINAGE ON THE BRUSHY RIVULET CONSERVATION AREA.

RESIDENTIAL DRINKING WATER (COLLECTED ROOF RUN OFF) AND PRIVATE FOOD SUPPLY (GARDENS, POULTRY, ORCHARDS) WILL BE AFFECTED BY WIND BLOWN TOXIC DUST (ALUMINIUM OXIDE DUST IS TOXIC TO FLORA AND HUMAN HEALTH). THE AREA HAS RECENTLY AND WILL CONTINUE TO RECEIVE HIGH VELOCITY WINDS.

I FEEL THAT THE PRACTICE OF DUST SUPPRESSION BY WATER WILL BE INSUFFICIENT TO AVOID THESE RISKS TO HUMAN HEALTH.

I AM A FARMER WITH IN 2 KM OF THE MINES PROPOSED SITE. IN WHICH SKY LINES THE MORNING SUN FROM WHERE OUR FAMILY FARMER FARM IS SITUATED AND IN DIRECT VIEW. OUR ANCESTORS HAVE FARMED THIS REEDY MARSH AREA AND FARM FOR 4 TO FIVE GENERATIONS.

15-06-24

CHARLIE CHALLIS

GRAHAM + MARGARET BROWN



17TH JUNE 2024

Index No. PA\24\0052	
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EO	OD

GENERAL MANAGER
MEANDER VALLEY COUNCIL

REGARDING PA\24\0052

DEAR SIR/MADAME

WE ARE WRITING TO OBJECT TO PA\24\0052 ON THE GROUNDS OF LOSS OF AMENITY ON OUR PROPERTY FROM QUARRYING ACTIVITY, EXCESS TRUCK TRAFFIC ON OUR WINDING COUNTRY ROADS AND ENVIRONMENTAL DAMAGE LIKELY TO BE CAUSED IN OUR LOCAL AREA

ABX WROTE TO US IN DECEMBER 2012 INFORMING US IT IS ABX POLICY TO ONLY "GO WHERE WE ARE WELCOME"

WE DO NOT WELCOME THEM IN OUR AREA. NOW 12 YEARS LATER THEY ARE BACK, GOING BACK ON THEIR WORD.

YOURS SINCERELY

M. B. B. GRAHAM/BROWN





AUSTRALIAN BAUXITE LIMITED
ASX:ABZ

19th December 2012

Mr & Mrs G & M Brown
PO Box 227
Deloraine Tasmania 7304

Regarding: EL16/2012

Dear Mr & Mrs Brown,

Thank you firstly Mrs Brown for your time on the phone and agreeing to meet me in Deloraine. I am sorry to hear that you became unwell and were unable to make our meeting.

Australian Bauxite Limited is comprised of a group of people that have mostly either grown up on the land or are from rural or regional communities. We have an understanding of people's lifestyle desires and we respect their wishes to continue their activities without major impact from external sources.

It is also Australian Bauxite's company policy to only "Go Where We Are Welcome" as we have deep respect for the Landowners rights and wishes.

If you have any further questions or if I can be of any further assistance please don't hesitate to contact me on my mobile number as shown below.

Yours faithfully
Australian Bauxite Limited


Paul Glover
Relationships and Logistics
Mobile: 0419 012 243
Email: pglover@australianbauxite.com.au

AUSTRALIAN BAUXITE LIMITED
www.australianbauxite.com.au
e: corporate@australianbauxite.com.au

ABN 14 139 484 885
ASX : ABZ

Level 2 Hudson House 131 Macquarie St
Sydney NSW 2000 Australia
P: +61 2 9251 7177 F: +61 2 9251 7500

Department of Infrastructure, Energy and Resources

MINERAL RESOURCES TASMANIA

Enquiries Tenement Administration
Ph (03) 6233 8407 Fax (03) 6233 8338
Email info@mrt.tas.gov.au Web www.dier.tas.gov.au
Our Ref 13DNG018.3:SM EL16/2012



16 May 2013

Mr & Mrs G & M Brown
PO Box 227
DELORAINES TAS 7304

Dear Mr & Mrs Brown

EXPLORATION LICENCE APPLICATION EL16/2012

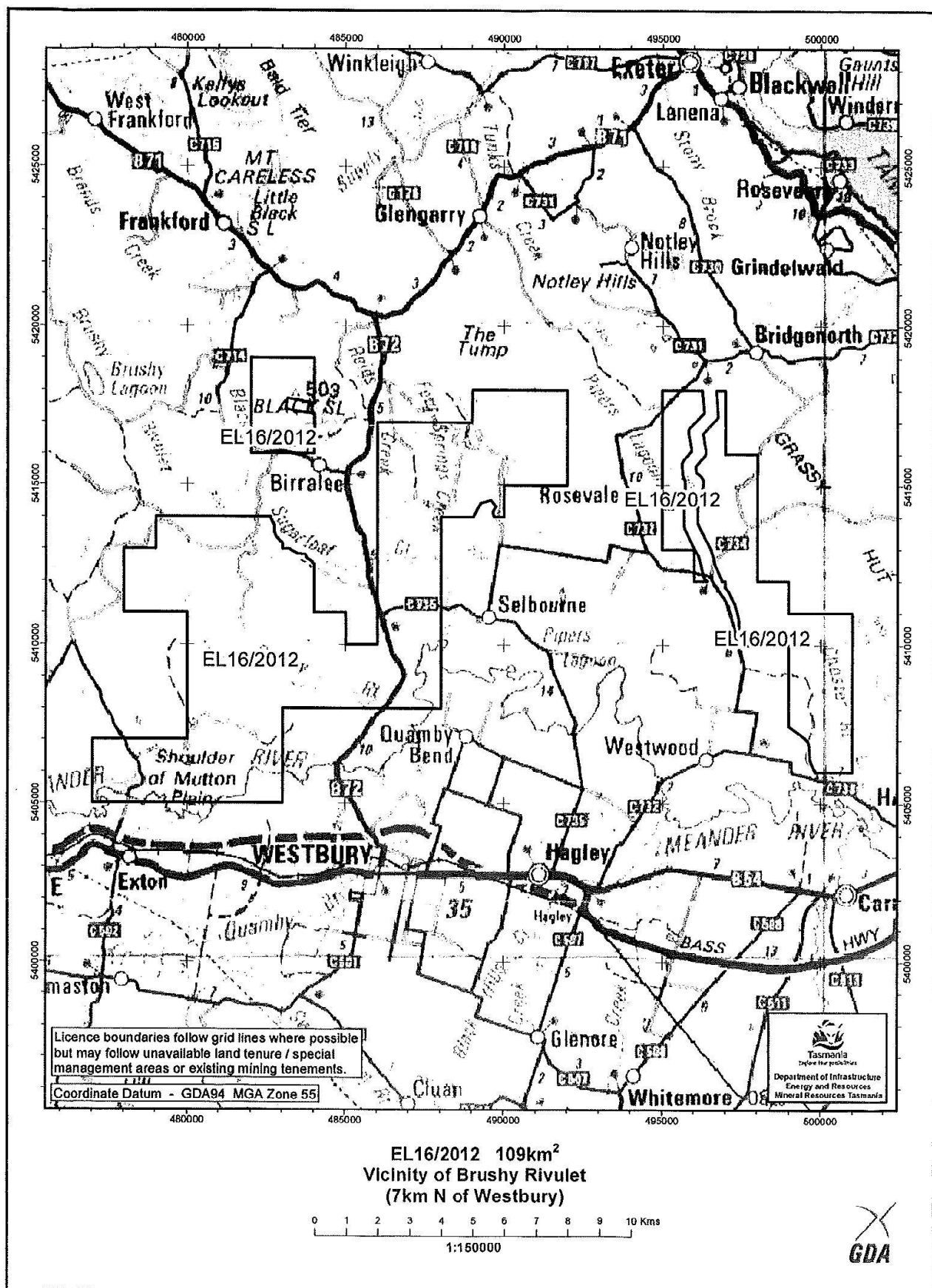
I refer to your objection to the above exploration licence application lodged by ABx4 Pty Ltd at Brushy Rivulet.

Following consultation with various landowners in the area the applicant, ABx4 Pty Ltd, has decided to reduce the size of its application in line with recognised community concerns. A map of the revised area is attached for your reference.

If you have any questions regarding this matter please contact this office.

Yours sincerely


David Geer
ACTING MANAGER
TENEMENT ADMINISTRATION



12.1.80 Representation 74 - A. And R. Mackinnon

From: "Rosie Mackinnon " [REDACTED]
Sent: Tue, 18 Jun 2024 15:54:04 +1000
To: "Planning @ Meander Valley Council" <planning@mvc.tas.gov.au>
Subject: DL130 Bauxite Project Re PA\24\0052
Importance: High

Dear Mr Harmey,

We are very concerned about the possible approval for a Bauxite Mine on Porters Bridge Road. If this is approved we have grave fears of further exploration east of this site in the future . This agricultural region in the Meander valley contains high quality soils that will produce continual income for both landowners and the community.

After numerous negotiations with ABx we forwarded an objection for exploration to Mineral Resources Tasmania in January 2024. .

Further concerns are as follows:

- Environmental impact / pollution - Production of toxic airborne Bauxite dust. Aluminium dust is highly toxic to plants and people. It causes respiratory and cardiac problems and affects the whole food zone (see report on Bauxite mines in Malaysia)
- Tank water on neighbouring properties WILL be affected
- Pollution runoff impacts on surface water, streams and ground water. As it is a floodplain it will impact on the Meander River
- Impacts credibility of Meander Valley tourism values and reputation
- Potential impacts on land values
- In 2015 Northern Midlands Council approved ABx's mining application on condition they upgraded the road. It never happened: <https://tasmanianinquirer.com.au/news/council-rejected-subsidy-pitch-from-mining-company-chaired-by-ex-premier>
- Unexplained: government business blocks release of information about mining debt write-off | *Tasmanian Inquirer* - \$2.5 million written off in Campbell Town - <https://tasmanianinquirer.com.au/news/unexplained-government-business-blocks-release-of-information-about-mining-debt-write-off/>
- River Road isn't wide enough and is already subsiding – repairs will be at ratepayers' expense
- The plantation is incorrectly zoned as Rural – this is Prime Agricultural Land compared to neighbouring farm and plantation – should be zoned Agricultural.

12.1.80 Representation 74 - A. And R. Mackinnon

- Reedy Marsh important conservation area. Proposed site borders Brushy Rivulet Forest Reserve

We therefore object in the most strongest terms to this proposal. It must not be approved.

Please acknowledge this email

Regards

Andrew and Rosie Mackinnon

