



HOUSE OF REPRESENTATIVES STANDING COMMITTEE ON PRIMARY INDUSTRIES
**Inquiry into factors shaping social licence and economic development outcomes in
critical minerals projects across Australia**

Strengthening Social Licence and Regional Economic Outcomes in Australia's Critical Minerals Sector

Submission by Gippsland Critical Minerals Pty Ltd

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Acknowledgment of Traditional Owners

We acknowledge the Gunaikurnai People as the Traditional Custodians of Country that encompasses the proposed Fingerboards Project area. We pay our respects to their Elders past and present and recognise their enduring connection to the land, waters, culture, and community.

We are committed to working in partnership with First Nations people.

Executive Summary

Australia's critical minerals ambition is well-established in policy. Its delivery depends on efficient regulatory pathways capable of translating that ambition into approved, operating projects within viable timeframes.

Gippsland Critical Minerals (GCM) submits that the single most consequential improvement available to Australia's critical minerals regulatory framework is the formal recognition of structured community engagement undertaken prior to exhibition, allowing communities to be consulted earlier and for longer, engage with experts, with genuine opportunities to influence project design before formal technical assessment begins.

The argument is straightforward. When impacted communities are identified and engaged early in a project's development, before design parameters are fixed and before formal exhibition, the Environmental Effects Statement (EES) or equivalent assessment document reflects a project already shaped by community input. Key concerns have already been interrogated, community voices heard and, where possible, challenges resolved.

Formal assessment then becomes what it should be: rigorous technical assessment of a design already tested against community expectations. It is proof of concept, not simultaneous concept and proof.

The current model asks something unreasonable of communities. A 30-day public exhibition period, anchored to thousands of pages of technical documentation, places an unfair burden on communities to read, comprehend and respond to highly technical material within a timeframe that precludes meaningful engagement.

This is not genuine community participation, it is procedural compliance. GCM's recommendations address this structural flaw by moving engagement to the earliest stages of project development, enabling project design to respond to community input before positions harden and regulatory processes become adversarial.

GCM presents this submission not as advocacy for a particular project outcome, but as a practitioner with documented, measurable outcomes and a working model.

The Fingerboards Project in East Gippsland is the evidence base: a critical minerals and rare earths mineral sands project that responded to an unsuccessful 2021 assessment, is being fundamentally redesigned through structured and extensive community engagement, and now enters formal EES assessment carrying a materially different risk profile, and a measurably different community relationship.

Community opposition to the project has declined from 35 per cent in 2021 to 28 per cent by late 2025 (RedBridge). Support has stabilised at 44 per cent. Critically, 27 per cent of surveyed residents strongly support the project, compared with only 12 per cent who strongly oppose it. GCM's community trust rating (45 per cent) is effectively on par with that of the principal organised opposition group (47 per cent).

These movements are not coincidental; they are the direct result of structured engagement conducted before formal exhibition that demonstrably changed the project.

In February 2026, the project received Commonwealth Major Project Status. In the same period, the Victorian Minister for Planning confirmed a new EES, explicitly recognising the redesigned proposal as materially different from the 2021 version.

The project is listed in the Australian Government's Critical Minerals Prospectus. It carries a \$295 million investment, approximately 700 direct jobs (400 FTE's in construction and 300 ongoing), will generate more than \$180 million in state royalties over its expected 22 year life, and a projected global supply contribution of approximately 7.1 per cent of heavy rare earth oxides and 7.2 per cent of zircon (Adamas Intelligence 2025).

GCM respectfully offers five policy recommendations to embed this model within Australia's national critical minerals regulatory framework:

Recommendation 1: Formal Recognition of Pre-Exhibition Engagement

That Commonwealth and State regulatory frameworks formally recognise documented, auditable, pre-exhibition community engagement.

Recommendation 2: National Community Engagement Standards Framework

That the Commonwealth, in collaboration with States and Territories, develop a National Community Engagement Standards Framework for critical minerals projects.

Recommendation 3: Risk-Based Sequencing of Approvals

That regulatory frameworks enable risk-based sequencing of approvals for critical minerals projects that have demonstrated pre-exhibition structured engagement to the required standard.

Recommendation 4: Government Leadership on Public Information

That Commonwealth and State governments take a direct role in providing accurate, accessible public information on technical matters that recur across critical minerals project assessments.

Recommendation 5: Investment in First Nations Engagement Resources

That the Australian Government consult with the First Nations communities to assist in the coordination of incoming consultation requests across concurrent projects.

The Fingerboards Project

GCM is developing the Fingerboards Project in East Gippsland, Victoria, one of Australia's largest undeveloped mineral sands deposits containing zircon and rare earth elements identified as nationally critical.

The deposit's composition, assessed by Adamas Intelligence, has a higher relative concentration of NdPr oxide (as well as Dy and Tb oxide) than MP Materials' Mountain Pass mine in the U.S. – the world's second most productive rare earth operation.

At current projected production rates, Fingerboards is expected to produce annually 200 tonnes of heavy rare earth oxide (DyTb), representing approximately 7.1% of global supply; 1,800 tonnes of light rare earth oxide (NdPr); and 75,000 tonnes of zircon, representing about 7.2% of global supply.

GCM is majority Australian owned and managed, with investment backing from UK-based Appian Capital. It is also one of the few critical minerals and rare earths projects with no Chinese ownership or offtake arrangements, a strategic distinction of growing global significance.

The project operates under Retention Licences renewed in 2024 that require GCM to meet 77 conditions and milestones, representing an unusually high level of government oversight and reporting.

These conditions reflect the history of the previous Fingerboards proposal and the priority placed on ensuring the redesigned project proceeds with robust environmental safeguards, clear and measurable community engagement, active stakeholder consultation and a structured approach to community benefits.

GCM recognises the value of this approach. Establishing clear expectations early in the planning and design process helps ensure engagement is meaningful, transparent and capable of informing project design.

In 2025 alone, GCM expended more than \$18.7 million to meet and exceed its Year 3 milestones, progressing project redesign, environmental baseline studies, early community benefits and a structured community engagement program.

Central to this progress is a comprehensive redesign of the project, undertaken in direct response to community and stakeholder feedback.

The redesigned project reduces the project footprint, strengthens environmental protections, eliminates above-ground tailings, extends mine life, and significantly improves community outcomes across a range of key design elements, as outlined in the table below.

GCM Design Changes – 2021 vs Redesigned Project

Design Element	2021 Proposal	Redesigned Project	Change
Smaller mining & separation plant footprint	1,297 ha	951 ha	27% reduction, with up to 80% reduction

			in impact on native vegetation
Ore mining rate	1500 tonnes per hour	900 tonnes per hour	40% reduction with less dust and noise
Mine life	15 years	+22 years	Less dust and noise in any one location
Tailings management	Above-ground tailings dam; Perry Gully filling	Below-ground, in-pit co-disposal	No above-ground tailings, no centrifuges
Buffer to Lindenow Valley horticulture	Mining within 600m of LVHA	1.5 km mining-free buffer from Mitchell River established	Mitchell River corridor excluded from mining – buffer zone more than doubled.
Mining in Perry, Simpson & Lucas Creek Gullies. Tailings in gully	Included	Excluded	No mining in gullies.
Rail-first logistics	Potential public road trucking	Private road haulage and new rail siding for offsite transport	Less trucks and improved regional rail freight access
Fingerboards Intersection and local roads	7.6km multiple road relocations and Fingerboards intersection relocated	1.5km single temporary road relocation and historic Fingerboards intersection preserved	Less impact on local roads and sites of local significance, as well as EVC's in road verges
Rehabilitation approach	Limited progressive rehabilitation and focus on return to native vegetation not current farming use	Prioritising return to current farming use. Smaller voids allow for accelerated backfilling	Faster land rehabilitation and restoration
Water strategy	5.0 GL/year sourced from Mitchell River.	3.0 GL/year, multi-source including recycled water, legacy dam infrastructure handed to community	Diversified water supply and stronger regional water security

Social License Challenge

Community engagement in Australian resource projects typically intensifies ahead of formal assessment, reaches its peak during the public exhibition period, and is then adjudicated through the statutory assessment process. This sequence creates three structural challenges.

First, it positions communities primarily as reviewers of completed designs rather than participants in shaping them. A community invited to comment on thousands of pages of Environment Effects Statement documentation within a statutory exhibition window is not meaningfully involved in the development of a project. It is responding to a proposal that has already been designed.

This distinction matters. When community members disagree with a completed design, their only available avenue is objection. In many cases the disagreement arises from uncertainty or a sense that concerns have not been heard earlier in the process.

Second, late-stage community input is structurally constrained. By the time a project reaches formal exhibition, major engineering decisions have been made. Environmental modelling has been completed. Impact assessments have been prepared and regulatory documentation submitted.

At that point, substantive design change becomes difficult. Modifying a project can require new modelling, revised environmental studies and amended regulatory submissions. The practical incentive for proponents is therefore to defend the existing design rather than redesign it.

Over time communities observe this dynamic and conclude that engagement does not materially influence project outcomes. In that environment organised opposition groups often fill the space that genuine early engagement might otherwise occupy.

Third, the content and structure of formal assessment processes can unintentionally reinforce adversarial dynamics. Environmental assessment documentation focuses on identifying and managing potential impacts. Instead of positive overall outcomes public exhibition then invites debate on those impacts in a highly adversarial forum

When proponents and organised opponents meet for the first time at the exhibition stage on contested design questions, the conditions for prolonged and expensive assessment processes are established. Public debate can become highly polarised

The costs of this dynamic are borne most heavily by regional communities. Extended timelines, public conflict and uncertainty can affect social cohesion and delay the economic opportunities that responsible projects may bring.

These dynamics are not the result of any particular regulator or regulatory framework. They are structural features of a model that sequences community engagement after design and during formal assessment. The policy challenge is therefore not regulation, but sequencing.

Front-Loaded Engagement

GCM's central submission is this: structured community engagement conducted before design parameters are fixed, and before formal exhibition, has the potential to fundamentally change the social license outcomes of a project.

Proponents who can demonstrate that they have identified and resolved key community friction points before exhibition, and that community input has materially altered project design, should be formally recognised within regulatory frameworks as presenting a materially lower risk profile.

The practical implications are significant. For example, establishing a 'buffer zone' to protect a horticultural area is relatively straightforward when incorporated into a mine plan during the design phase. Attempting to introduce the same buffer after environmental modelling, regulatory documentation and community opposition have formed around its absence is far more difficult and costly.

Early engagement can convert potential objections into design features.

This is what GCM means by proof of concept, not simultaneous concept and proof. The concept, including fundamental design choices, has already been tested against community expectations. The proof in technical verification is what formal assessment provides. Separating these activities, and performing the first before exhibition, makes the second potentially more specific and less adversarial.

GCM's Engagement Architecture

Since the renewal of its Retention Licences in 2024, GCM has developed and implemented an engagement architecture designed specifically to identify and resolve community friction points before formal exhibition.

That architecture was driven in large part by the regulatory requirements set by the Victorian Government as part of the Retention License conditions for stakeholder and community engagement.

The Victorian Government set GCM a challenge: to show that co-existence between critical minerals mining and communities can exist. GCM accepted that challenge and our engagement comprises the following elements:

Community Reference Group

A formal 16-member Community Reference Group (CRG) – comprising residents, primary producers, local business representatives, environmental stakeholders and community leaders – operates under documented Terms of Reference. The CRG meets quarterly, provides structured input into project design, and has demonstrably shaped project outcomes.

The CRG's membership was expanded from 13 to 16 at the request of existing members to broaden representation, a marker of community ownership of the process. Following consultation with the CRG, GCM

will form two sub committees of the CRG designed to increase input into communications and technical workstreams.

Radical Transparency

- A Virtual Office provides 24/7 public access to project updates, regulatory documents and reporting, fact sheets, maps and technical information.
- A physical office at 50 Forge Creek Road, Bairnsdale, gives in-person access to project materials and team members.
- An AskMe chatbot has engaged 447 individuals exchanging 3,932 messages.
- Bi-monthly newsletters reach more than 8,500 recipients, published in two local newspapers. Study scopes, environmental assessments and quarterly engagement reports are published progressively.
- Presentations to the CRG and CRG-approved minutes are publicly available, as are recordings of all webinars and presentations.
- Drop-in sessions bring the conversation to local communities, with the addition of high-traffic visits in 2026 making it even easier to connect with us.
- Visits to homes, letterbox drops
- Scopes of studies are online – even in draft or yet-to-be-finalised form
- Baseline monitoring activities and environmental surveys are communicated on social media
- Social media engagement and answering questions in real time
- Response to community questions and access to experts and project detail as they become available
- Quarterly focus groups assess stakeholder values, expectations, attitudes and priorities

Iterative Attributed Design

Community feedback has directly and traceably altered the project's technical design at the level of fundamental project parameters.

Key design changes resulting from this engagement include the following:

- The **1.5 kilometre buffer** protecting the Lindenow Valley horticultural area from mining was introduced in direct response to one of the project's most significant community friction points
- **New rehabilitation and restoration strategy** focusing on the rapid return to current pastoral land use (as opposed to native vegetation and the 2021 Grassy Woodland Restoration Project) emerged from community consultation about return to farming land
- **Mining and tailings exclusion** of the Perry, Simpson and Lucas Creek gullies from mining activity reflects input identifying these areas as ecologically sensitive.
- **Rail-first logistics strategy**, including relocating the separation plant to enable private-road haulage to a new Fernbank siding without crossing public roads, directly addressed community concern about heavy vehicle movements and heavy mineral concentrate on local roads.
- The **preservation of the Fingerboards Intersection** (relocated in the 2021 proposal) was a direct response to feedback about the historical and social value of the intersection to the local community.
- The **diversified water strategy**, drawing from multiple sources including recycled water, with dam infrastructure designed to become long-term community water security assets beyond the life of the mine, reflects sustained dialogue with farming communities about water security and post-mining land use.
- The **Mining and Rehabilitation Demonstration Pit (MRDP)** was established in direct response to a community request from the 2021 process: to show rehabilitation in action, not just in plans. Its delivery is further evidence of GCM's commitment to iterative, responsive engagement that produces tangible outcomes.
- **Closed storage** of Heavy Mineral Concentrate (HMC) and loading facility replaces previously proposed open air HMC stockpiles, directly addressing concerns from community about wind-blown and fugitive dust, and management of materials potentially containing Naturally Occurring Radioactive Materials (NORMs).
- **Prioritising onshore processing** in Australia aligns with Australia's Critical Minerals Strategy and supports our sovereign processing capability.
- The **new tailings strategy** co-disposes tailings in mined-out pit cells, removing the need for centrifuges as well as the need for an above ground tailings dam – both of which were significant community friction points.
- The **reduction in the proposed mining rate** from 1,500 tonnes per hour to 900 tonnes per hour reflects community feedback around dust, noise, and the intensity of mining activity.

- **Reduced mining footprint** from 1,297 hectares to 961 hectares reflects community feedback about the scale of the project. The addition of a **second weather station** was directly informed by local landowners utilising their knowledge of the area. This is strengthening the project's background monitoring program to build understanding of local climate characteristics and increase community confidence in the assessment of impacts of the project.

East Gippsland-First Procurement plan

Benefit delivery, in the form of jobs, is evident ahead of project approval. Under GCM's East Gippsland-first procurement policy, more than \$1 million in local contracts has already been awarded through the Mining and Rehabilitation Demonstration Pit (MRDP) program.

From the commencement of MRDP works, more than 12 local businesses have been engaged across a range of services, demonstrating how early project activity can begin delivering economic benefits to the region before operations commence.

Young Farmers Program

Gippsland Critical Minerals leases more than 1,470 hectares of company-owned land to local and emerging farmers through transparent, voluntary arrangements as part of its Young Farmers Program.

The program provides practical access to farmland for younger producers and new entrants to agriculture at reduced leasing rates, while ensuring the land remains in productive agricultural use during the project development phase.

This approach supports regional agricultural activity and demonstrates how resource development and farming can operate alongside one another.

Career Mapping and Pathway Development

GCM is working with TAFE Gippsland on a Workforce Development Plan brief, designed to map career pathways and transition opportunities from industries in structural change. The plan will create structured pathways for the region's young people, enabling school leavers to transition from secondary education with recognised qualifications that lead to long-term, skilled employment in the resources and associated sectors.

Rail Freight Taskforce

A preliminary freight economic study commissioned by GCM found the Fingerboards Project could generate enough demand to support a commercially viable Melbourne-to-Bairnsdale freight rail service, a connection East Gippsland has long sought but has not previously had the base load to sustain.

If approved, GCM's operations would underpin more than 10,000 containers per year, supporting around three freight services per week. The service could collect freight from a proposed rail siding at Fernbank before continuing to the Fenning Intermodal Freight Terminal in Bairnsdale, creating freight access for the region's agricultural, horticultural, timber and manufacturing sectors.

The proposal to extend the service through to Bairnsdale originated with local community members. GCM responded by commissioning the freight study, establishing the East Gippsland Freight Rail Taskforce to coordinate regional stakeholders, and designing the project around a rail-first logistics approach.

Outreach and Engagement

Since Retention Licence renewal, GCM has logged more than 280 one-on-one meetings, 20 drop-in events reaching approximately 350 individuals, 3,098 emails, 834 phone calls, and 16,049 website visits with 3,932 chatbot interactions from 447 individuals. Letterbox drops reached 20,000 homes across the region, with a targeted drop to 774 households within five kilometres of the project site, supported by direct home visits to residences within two kilometres.

Positive signs and changes in sentiment As required by the Victorian Government, GCM has commissioned independent, recurring community sentiment research from the Redbridge Group, one of Australia's leading public sentiment firms, through a program alternating quantitative surveys (statistically significant samples) with qualitative focus groups at quarterly intervals.

At the 2021 Inquiry and Advisory Committee process, 35 per cent of surveyed East Gippsland residents who were aware of the Fingerboards Project opposed it. By November 2025, following years of structured

engagement and a fundamentally redesigned project, opposition had declined to 28 per cent. Support has stabilised at 44 per cent, with a further 21 per cent neutral.

GCM's community trust rating of 43 per cent (moderate-to-high trust) is effectively on par with the principal organised opposition group, Mine Free Glenaladale (46 per cent). The November 2025 Redbridge survey found 73 per cent of East Gippslanders consider it important for Australia to develop new critical minerals projects.

The survey also found that the top issues for East Gippsland residents were local infrastructure (33 per cent), local services including health and education (20 per cent), and creating more secure local jobs (18 per cent). These priorities reflect a community expressing a clear need for the economic benefits the project could deliver – a need that drives support for the project, provided environmental outcomes are protected.

This distinction matters. The quantitative research and community group engagement consistently show that environmental impacts on farmland, the broader environment, and water are of paramount importance to how residents assess the project itself.

Regional economic priorities and environmental expectations are not in tension; together, they define the conditions under which community support is available.

Response to Terms of Reference

Effectiveness of Engagement with Communities, Traditional Owners and Stakeholders

The National Challenge

The dominant model conflates consultation with engagement. Consultation, Level 2 in the IAP2 spectrum, creates no binding relationship between community input and project outcomes. When communities repeatedly experience the gap between 'we listened' and 'nothing changed,' trust erodes and organised opposition fills the vacuum.

Australia's critical minerals sector will not resolve its social licence challenges through better communication. It will resolve them by changing the structural relationship between community input and design outcomes.

Ultimately, governments must be prepared to make decisions in the national interest, weighing the views of affected communities alongside broader public considerations. It is to the nation's detriment when decisions are determined by the loudest voices in a debate.

GCM's Experience

GCM's engagement has consistently operated at Collaboration and Empowerment, Levels 4 and 5 of the IAP2 spectrum. Community input has not merely been received and acknowledged, it has materially altered the project across every major design dimension.

This applies to major design designs. There are also perational with examples including, the CRG's recommendation to pause and redesign the Community Grants Program which was acted upon, and the community's desire to extend rail freight to the Bairnsdale intermodal terminal, which was actioned through the Rail Freight Taskforce.

Policy Implication

Regulatory frameworks should formally distinguish between consultation activities and engagement outcomes. The measure of effective engagement is not the number of sessions held or the volume of materials distributed, but whether community input demonstrably changed the project.

Proponents that demonstrate design changes attributable to community engagement should be recognised in their respective regulatory pathway.

Engagement with Traditional Owners

The National Challenge

Rapid critical minerals project growth intersects with Indigenous rights and Country at scale. Engagement with Traditional Owner organisations too often occurs late, varies across jurisdictions, and imposes disproportionate administrative burden on organisations with significantly fewer resources than project proponents.

Where several projects are progressing concurrently, which is increasingly common across Victoria and other jurisdictions, the cumulative consultation burden can be unmanageable for Traditional Owner organisations with limited staffing and infrastructure.

The structural imbalance risks reducing engagement to a compliance exercise.

GCM's Experience

GCM acknowledges the Gunaikurnai People as the Traditional Custodians of the Country encompassing the Fingerboards Project area.

GCM also acknowledges that First Nations engagement conducted for the earlier project between 2014 and 2021 was not adequate. The redesigned project approach is directly informed by that acknowledgement.

GCM will not complete project design until First Nations views have been properly sought. Cultural Heritage Protection and First Nations Empowerment is the first pillar of GCM's Early Benefit Sharing Plan. Engagement with Traditional Custodians through the Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC) is ongoing and reflects GLaWAC's own framework, timeline and priorities.

GCM seeks to develop a specific First Nations Engagement and Benefit Sharing Plan co-designed with GLaWAC, addressing cultural heritage protection, land stewardship, and long-term empowerment opportunities across the life of the project and beyond.

Policy Implication

The Australian Government, potentially through the National Indigenous Australians Agency (NIAA), should establish a coordinated entry point for consultation requests from project proponents.

In many regions, Traditional Owner organisations are approached simultaneously by mining, energy and infrastructure projects seeking engagement. A coordinated system would allow Traditional Owner organisations to manage requests on their own terms, assess the resources required to respond, and sequence consultation across competing projects.

The model should recognise that two different forms of engagement occur. The first is statutory engagement, including Cultural Heritage Management Plans and Registered Aboriginal Party processes under environmental and impact assessment frameworks.

The second involves broader discussions about community benefit, employment and economic participation. These streams involve different governance processes within Traditional Owner organisations.

Any coordination model should be designed and governed by First Nations organisations themselves. In regions where several projects are advancing at the same time, regional coordination frameworks could help manage the cumulative consultation burden on Traditional Owner organisations.

Strategic Contribution to Regional and National Economic Development

The National Challenge

Critical minerals resources are essential for new and emerging technologies, for the energy transition and they offer Australia a geopolitical opportunity. Critical minerals projects themselves generate substantial economic value, yet the frameworks used to evaluate regional benefit are narrow in scope. Environmental impact during operations is the primary public metric, underweighting employment, infrastructure legacy, supply chain development, regional growth, ancillary or multiplier impacts on local economies, workforce transition pathways, and community investment delivered before and beyond project approval.

GCM Experience

GCM's direct economic contribution includes a \$295 million investment, approximately 400 construction jobs

and 300 ongoing direct operational positions, more than \$180 million in Victorian state royalties, and \$90 million in projected annual operating expenditure.

Local workforce and training pathways exist and are transferable from industries in structural transition, including energy and timber, with work already underway to map career progressions into project roles.

The project's global strategic significance, including rare earth supply representing 7.1 per cent of global heavy rare earth and 7.2 per cent of global zircon production, and its status as a high-quality heavy rare earths project with no Chinese ownership or offtake partners, positions Fingerboards as a nationally strategic asset confirmed by Major Project Status.

Community-directed legacy benefits already in delivery include:

- More than 1,470 hectares leased to local and young farmers at a discounted rate so they can start farming
- The East Gippsland Rail Freight service pursuing a Melbourne-to-Bairnsdale service, here the project will provide the base load of three services per week with broad agricultural, horticultural and manufacturing benefit
- Water storage infrastructure designed to unlock long-term water availability and security for farming beyond the life of the mine
- Regional leadership investment through the Gippsland Community Leadership Program scholarship

Policy Implication

Regional economic contribution should be evaluated across the full lifecycle of benefit delivery, including legacy infrastructure, skills development and supply chain capacity, not only direct employment during operations.

GCM's benefits delivered prior to project approval demonstrate genuine unconditional commitment, distinct from conditional post-approval promises.

Workforce Participation, Skills Development and Employment Pathways

The National Challenge

Concerns about workforce importation through fly-in, fly-out (FIFO) arrangements are widespread in regional communities hosting critical minerals projects. Without credible and documented pathways for local employment, communities have legitimate reason to question whether project-related jobs will flow to local residents or be filled by workers brought in from outside the region, with potential impacts on housing availability and local services.

There is also concern that new projects could increase competition with local agriculture for a limited regional workforce.

GCM's Experience

GCM will not operate with a FIFO workforce. The project is designed to support a locally based workforce drawn primarily from East Gippsland and the broader Gippsland region.

This approach is supported by an East Gippsland-first jobs and procurement policy with documented contracting obligations; a TAFE Gippsland Workforce Development Plan mapping apprenticeship, trade and technical pathways; and engagement with local businesses on supplier capability through the East Gippsland Major Projects Summit co-delivered with the Bairnsdale Chamber of Commerce and Industry.

First Nations employment and enterprise pathways are embedded in Pillar 1 of the Early Benefit Sharing Plan, supporting cultural participation, enterprise development and future land use opportunities.

Policy Implication

GCM has provided access to 1,470 hectares of owned land to local and young farmers at under market rates, a direct, ongoing economic benefit for the region that is independent of project approval status.

Workforce participation frameworks for critical minerals projects should require documented local-first employment and procurement commitments, with measurable contracting obligations and auditable outcomes, as a condition of regulatory recognition.

Role of Commonwealth, State and Local Governments

The National Challenge

A small number of technical topics recur across critical minerals project assessments in Australia. Radiation and naturally occurring radioactive materials (NORMs), tailings management, water use and rehabilitation outcomes are among the most common.

In each case, community understanding of these topics is shaped by whatever baseline information is available before a project enters formal assessment. That baseline is often fragmentary, contested, and sourced from parties with a direct stake in the outcome or are simply anti-mining.

This creates a structural credibility problem. Technical information provided by a proponent with a commercial interest in approval is received differently from the same information provided by an independent scientific institution. The gap is rarely about accuracy. It is about source. Proponents cannot close it unilaterally, regardless of the quality of their communications or the rigour of their technical work.

GCM's Experience

GCM has encountered this dynamic directly. Community concerns about radiation and NORMs, tailings containment, rehabilitation and water use have been persistent features of engagement throughout the Fingerboards Project community engagement process.

GCM has invested substantially in addressing them, through a Mining Rehabilitation and Demonstration Pit designed to conduct full scale rehabilitation trials, providing early study scopes online, updates in real-time of our monitoring activities, the Community Reference Group with detailed presentations, and the Radical Transparency framework, all of which provides transparent access to project technical documentation.

These efforts have shifted understanding among some engaged community members. They have not resolved the underlying structural issue. Where organised opposition groups cite the same technical topics to argue against project approval, community members face competing claims from parties they have no reliable means to independently assess. The effect is sustained uncertainty on questions that are, in most cases, answerable by reference to established science.

The problem is not that proponents communicate poorly. It is that proponent communications occupy a compromised credibility position regardless of their content.

Policy Implication

Commonwealth and State governments are well placed to address this gap directly. Independent scientific institutions including CSIRO, universities, and relevant government agencies carry public credibility that proponents structurally cannot. A government-led program of accessible, plain-language public information on technical topics that recur across critical minerals assessments would establish a shared baseline before communities enter project-level engagement.

This is not a proposal for governments to advocate for particular project outcomes. It is a proposal that communities should have access to trusted, independent information on how radiation is regulated, how tailings facilities are designed and monitored, and what rehabilitation standards require, before they are asked to engage with project-specific technical documentation.

The practical effect would be significant. Proponents would spend less time relitigating established science and more time addressing genuine project-specific questions. Communities would be better equipped to distinguish between evidence-based concern and strategic misinformation. Assessment processes would be more efficient and more substantive.

Recommendations

Recommendation 1: Formal Recognition of Pre-Exhibition Engagement

That Commonwealth and State regulatory frameworks formally recognise documented, auditable, pre-exhibition community engagement. Recognition should be for projects where community engagement

demonstrably results in changes, reducing the regulatory risk profile of a project, and delivering against clear criteria by which such engagement qualifies proponents for expedited assessment progression.

Recommendation 2: National Community Engagement Standards Framework

That the Commonwealth, in collaboration with States and Territories, develop a National Community Engagement Standards Framework for critical minerals projects, establishing minimum standards for pre-exhibition engagement, auditable evidence requirements, and the regulatory recognition available to proponents who meet them.

The framework should be grounded in a five-level engagement maturity model adapted from the IAP2 framework to reflect Australian critical minerals governance requirements.

Recommendation 3: Risk-Based Sequencing of Approvals

That regulatory frameworks enable risk-based sequencing of approvals for critical minerals projects that have demonstrated pre-exhibition structured engagement to the required standard, including the capacity to advance certain licensing or permitting steps in parallel with EES assessment processes.

This does not diminish environmental assessment requirements; it recognises that community input needs to be sought and incorporated before exhibition. Further, that projects with resolved community friction points present a materially lower risk profile warranting concurrent rather than sequential processing.

Recommendation 4: Government Leadership on Public Information

That Commonwealth and State governments take a stronger role in providing clear, accessible public information on technical issues that commonly arise in critical minerals project assessments, including radiation, tailings management and rehabilitation. When communities have access to trusted baseline information on these topics, engagement at the project level becomes more informed and constructive.

Independent technical institutions such as CSIRO, universities and government agencies carry significant public credibility and are well placed to provide this information.

Recommendation 5: Investment in First Nations Engagement Resources

That the Australian Government consult with the First Nations communities to assist in the coordination of incoming consultation requests across concurrent projects, provide dedicated resourcing and technical support to Traditional Owner organisations, and manage competing consultation timelines.

Any model should be self-determined in its operation, under the governance direction of First Nations organisations, and should explore regional coordination frameworks to address the cumulative consultation burden on organisations managing engagement across multiple simultaneous project demands.

Further Engagement

Gippsland Critical Minerals welcomes the opportunity to provide further evidence to the Committee and is available to appear at a public hearing if the Committee considers this would be of assistance.

The Fingerboards Project represents a documented, evidence-based case study in pre-exhibition community engagement within Australia's critical minerals sector. GCM is prepared to provide additional materials, data or briefings to support the Committee's deliberations.

Michelle Wood

Chief Executive Officer Gippsland Critical Minerals Pty Ltd