

Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory
Committee - EES

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

Full Name: Andrew Bulmer
Organisation: Bulmer Farms Pty Ltd
Affected property: [REDACTED]
Attachment 1: Submission_to_Fi
Attachment 2:
Attachment 3:
Comments: See attached submission.



Bulmer Farms Pty Ltd

Lindenow, VIC 3865

26/10/2020

Submission to Fingerboards Mineral Sands Project – Environmental Effects Statement

Dear Inquiry and Advisory Committee members,

We are writing this submission on behalf of “Bulmer Farms” widely recognised as one of Australia’s largest producers of Fresh Salad, in relation to concerns raised by the Environmental Effects Statement compiled on behalf of Kalbar for their proposed Fingerboards Mineral Sands Project.

Summary

Bulmer Farms is a fourth-generation family run horticulture enterprise, located in the heart of the Lindenow / Mitchell River Valley.

Specialising in Lettuce, Baby Spinach and Baby Broccoli, Bulmer Farms is credited by Industry as one of Australia’s leading and largest producers of Fresh Salads in Australia. Employing up to 170 people in peak Summer production periods, Bulmer Farms operates year round sowing and harvesting fifty two weeks of the year to deliver primary produce to companies such as Vegco/One Harvest “The Largest Bagged Salad Manufactures in the Southern Hemisphere” located in Bairnsdale, Sydney and Brisbane, McDonalds, Australia’s largest QSR and Hungry Jacks.

Washed salads and other fresh produce lines are supplied daily to Australia’s wholesale domestic Fruit and Vegetable markets, located in Melbourne, Sydney, Brisbane, Adelaide, and Perth.

Gippsland Victoria lays claim to hosting seven of the top ten largest by volume Salad Producers in Australia.

Cementing Gippsland as the Salad Bowl of Australia, the township of Lindenow is approximately ten kilometres east of the proposed mine location and is a jewel in vegetable and salad production of international significance and standards. East Gippsland Vegetable Innovation Days (EGVID) attracts delegates from every state in Australia as well as many International stakeholders; search (Facebook EGVID 2020) for supporting content. EGVID this year partnered with the University of Arkansas in the USA to bring the Tenth International Spinach Conference to the Southern Hemisphere for the very first time. Unfortunately, this conference had to be postponed due to COVID 19 travel restrictions preventing International delegates from travelling to Australia.

Value of Horticulture - World Recognised Production Area

We believe the value of irrigated production has been grossly undervalued within the Environmental Effects Statement reports provided by RMCG. Pages 28 and 29 show data taken from the Bruthen Omeo statistical division. This data is not relevant to the Fingerboards Mineral Sands Project area in the Lindenow Valley. The agricultural pursuits in the Bruthen Omeo statistical division do not compare and should be dismissed in terms of gross economic benefit to the region. Irrigated production from the Lindenow Valley would exceed more than \$120 million dollars annually.

The Multiplication Factor Flowing into the Local Community

For every direct job in agriculture, a figure of 4.26 indirect jobs are created (National Farmers Federation; 2017). Only one indirect job will be created for every direct job from the Kalbar mine (Coffey, 2020; p 29). It also follows that every job lost in horticulture has a four times multiplier flow-on loss effect which will have a major impact on the local economy and is a significant adverse effect should loss of jobs occur to the horticulture industry as a result of the mine. It is believed that there are over 2,000 jobs associated to the horticultural industry in the Mitchell River Valley.

Water Security for the Region

Water security is vital to the ongoing success of any Horticulture enterprise. Surprisingly, little is mentioned within the Horticultural Impact Assessment conducted by RMCG for the Environmental Effects Statement. It is stated in the Agriculture Impact Assessment final report by Hamilton Sierra Con on page 29, 5.1.2 (Impact on the neighbouring Vegetable Industry), a key consideration for vegetable production is the availability of irrigation water, Kalbar has stated that the project will not create additional competition with local farmers water needs, and in this regard it will be incumbent on the water authority to ensure that a new water allocation does not impact on the existing water right holders.

Many irrigators from the Lindenow Valley / Mitchell River have accessed funding through the Lindenow Valley Water Security Scheme to build water security infrastructure projects to support their own business water security. The water required for these infrastructure projects will come from current allocations and will help mitigate risks associated with drought conditions in the region and add significant economic value to the industry over peak production periods.

Kalbar are requesting access to a very significant volume of water from the governing authority. Irrigators in the region have made applications to access this water allocation to the authority in the past without success. The Authority has set aside six thousand megalitres of winter flow water license that has never been allocated, when this volume was set aside it was envisaged that the water would go to irrigators for Agricultural production not mining. The Mitchell Valley could realise a significant increase in the value of its produce production if more water were released for Agricultural purposes. Therefore, it is a very real prospect that the proposed mining operations will have an impact on the water rights of existing licence holders.

Workforce Security of the Horticulture Sector

Workforce security is critical to the local Horticulture Industry. The RMCG report references that the horticultural farmers are not concerned about the impact that Kalbar would have on their workforce. This is not a sentiment shared by Bulmer Farms. Bulmer Farms acknowledges that workers have the right to seek employment opportunities as they wish, however as there is a lack of machinery operators and drivers in the region we believe the mining operations will lead to a loss of key personal from the local horticultural business sector, labour market testing conducted by Bulmer Farms this year showed that approximately a dozen tractor driving positions were being advertised throughout the Gippsland Horticulture footprint. From our business experiences in East Gippsland no suitable applicants were sourced for these roles.

Were Kalbar serious about job creation? With the opportunity that mineral sands mining presents, they should explore the opportunity of value adding right here in the region. With Australia set to re-embrace manufacturing, it seems there would be no better time to invite those value added manufacturing skills required to turn this commodity mineral and rare earth into something of much greater value in the region it is sourced from. Wealth and opportunity from value adding through manufacturing within a region such as East Gippsland that has experienced significant drought, bushfire and Covid financial strain, would be welcomed ahead of just stripping out a commodity and sending it offshore to process and sending money and job creation opportunities to others overseas. If a significant loss of skilled operators from the horticulture Industry was to occur, we would invite Kalbar to invest with industry around workforce planning opportunities to see a stream of people, identified and trained to gain employment across industry with regards to machinery operations.

Traffic and Truck Movements

If the Kalbar mining operations project were to advance, Bulmer Farms would welcome the addition of a rail siding to move the ore body away from the region. The addition of forty B Double trucks on the Lindenow Dargo Road operating twenty-four seven in an area that is home to slow moving agricultural machinery and many families presents significant risks for road related fatalities to occur. The area has already witnessed fatalities on our local road and many near miss accidents, proposed truck volume of this magnitude presents an unacceptable risk to the local community.

A Proven Established Industry and Co-Existing

The question of whether mineral sands mining and Agriculture can harmoniously co-exist is an interesting concept, the answer may be yes but stringent safeguard's must be put in place to not put at risk an already substantial, established industry in Horticulture, one that has a clean, green image and delivers valuable food sources and underpins a region with its economic value. With continued environmental sustainable stewardship of the land in the Lindenow / Mitchell River Valley, farming practices will well outlast mining in the region, and will continue to play a significant part in feeding our country and others internationally as well as continued and new employment opportunities for the people of East Gippsland well into the future.

Environmental Standards Upheld to the Highest Possible Standard

Many mines operating in Australia do not have a good track record of completing land and mine rehabilitation, regardless of the provision of a land rehabilitation program, causing significant disrepair to the landscape and leaving behind an ugly scar and land not able to be used for any other purpose following the mining operations once the commodities have been stripped and sold on. Bulmer Farms would seek the highest assurances from the Minister and the regulating body should Kalbar be granted a license to mine that bind Kalbar and any future owner of the license of the mine should it be sold to the uppermost standards in relation to the environment, water usage, containment of tailings on-site, site operations and safety standards. All bonds and assurance should be set at the highest attainable level to deter the opportunity of a mishap or tainting of the clean, green image of our region that many have worked so tirelessly to establish and maintain.

Good Corporate and Community Minded Citizens

Bulmer Farms would encourage the advisory panel to investigate fully the extent to which the environmental effects statement has been compiled, as Kalbar funded both of the Agriculture Impact Assessment studies and in reading them it would appear they are bias toward Kalbar, and the advisory panel conduct your due diligence on what has been presented and what might be missing and seriously consider the economic and social impacts both good and bad this project will have on our community and region in recommendations to the Minister for consideration. It also needs to be noted that the Agriculture Value Statements, income and expense values are outdated or not relevant to the region the mining operation is intending to operate in.

All business in rural, regional and remote Australia play a greater part in the community than just operating a business and providing employment. They become part of the social fabric of the community and the people who drive that business can have a significant impact on the lives of the locals that far out reaches any motivating drivers that bought them to be there in the beginning.

Bulmer Farms would call on Kalbar to become good corporate citizens and give back to the community from which they are set to financially benefit from if they are to be granted a license to operate.

Conclusion

Bulmer Farms would like to state that we are not anti-mining with many of the machines, powerplant and devices that we use daily having been derived initially from mining enterprises. Bulmer Farms would also like to state that we are not against Kalbar as a company or their right to mine as it is currently legislated, we morally disagree with the legislation that allows them access to Individuals land. Bulmer Farms throughout the whole process has maintained conducive and open dialogue with Kalbar and Mine Free Glenaladale. The project has definitely been decisive in splitting public opinion within the community and Bulmer Farms have tried to maintain a mutual position taking into account perspectives from each side both for and against the proposed mining operation.

Bulmer Farms is very keen for the region to continue to be promoted as the "Salad Bowl" not the "Dust Bowl" of Australia.

Regards,



Andrew Bulmer
Managing Director
Bulmer Farms