



**Victorian
Farmers
Federation**

SUBMISSION

**Environment Effects Statement
Fingerboards Mineral Sands Mine
Independent Advisory Committee**

19 May 2021

OPENING STATEMENT

Thank you for the opportunity to appear today. My name is Lisa Gervasoni and I am the Senior Stakeholder Policy and Advocacy Advisor at the Victorian Farmers Federation. I have qualifications in Planning and Environmental Studies.

The VFF federated in 1979 however its former entities date back to the nineteenth century. Victoria's agricultural production accounts for over a quarter of Victoria's exports, and Victoria is a key supplier of agricultural produce to the Australian market.

The Victorian Farmers Federation (VFF) represents a farming community which creates a profitable, sustainable and socially responsible agriculture sector connecting with consumers. Victoria's farmers produce high quality food and fibre, produced to high standards of safety, with little taxpayer support, and to some of the strictest environmental and highest animal welfare controls in the world.

Our mission is to ensure a community of farmers creating a profitable, sustainable and socially responsible agricultural industry connecting with all Victorians. Increasingly this requires advocating for Government policy and regulatory decisions to support the maintenance and growth of high quality agricultural produce by ensuring proper consideration of projects which conflict on right to farm or lead to the loss of land from production.

Victorian Farmers Federation is becoming increasingly aware of many government agencies lack of knowledge of agriculture. Even in the 'Planning' area the training and focus of many planners is in urban communities and built structures. Even the terms used – "town planning" or "urban planning" reinforce this inherent bias.

In 2011 to support "settlement planning" significant changes to the SPPF in relation to agriculture were made in VC71 – without any real reference to these changes in the explanatory report or the background documents. Agriculture was moved from being "economic development" with other industries to "natural resource management" with 'water'.

This move also reduced key content relating to agriculture and its importance to not only regional economies but the state economy. It seems to the planning system 'agriculture' is synonymous with "soil". Ten years on local content relating to agriculture as an economic driver and an industry to be protected and supported to grow is being removed via the PPF translation process as this content is no longer contained in the scheme.

This allows technical reports not to consider the economic benefits of agriculture or threats to agricultural production. Applications by planning consultants for secondary uses on productive farms nearly always describe the current use as “vacant” – highlighting the failure of many planners to see value in agriculture.

This then becomes an issue in considering ‘net community benefit’ in planning reports, even those undertaken by as experienced a planner as John Glossop. Calculations are made on the footprint only – not potential impacts on surrounding agriculture, a 20 or 25 year change of use where all off site impacts may not be able to be ameliorated is justified as a ‘benefit’ even though the potential losses to agriculture make the net benefit quite marginal.

The VFF wrote to the Minister for Planning with concerns regarding the EES scope and TRG. Initially Agriculture Victoria was not included, and additional agricultural studies have been required. Scoping guidelines often do not identify agricultural issues, and after 30 years of argument over whether Victoria should map ‘productive’ or ‘high quality’ land there is little evidence of any work commencing to actually identify the value of agricultural land.

This is surprising as a vast amount of some of the most highly productive land in Australia is being lost to production. The cumulative impact of this loss is not considered. As Bulmers point out in their submission, 7 of the top 10 salad producers in Australia are in East Gippsland, and the Lindenow Valley is the heart of the production. Bulmers alone employ 170 people in summer.

The production in the Valley is growing – often due to the loss of highly productive land to Melbourne’s urban expansion. Intensive horticultural production requires good soil and reliable water in addition to the appropriate climate. This was not considered in planning evaluations of ‘net community’ gain.

2020 highlighted the importance of local production to food security. Victoria is one of the key producers of food and fibre for the Australian market and a ‘precautionary approach’ must be applied when so little is known by Government about the land that must be protected. The VFF believes decades of inaction has led to a scenario where all land must be considered critical until proven otherwise.

I will now briefly highlight key elements of our submission with reference to other submissions and expert witness statements.

OUR POSITION

Agriculture is a key primary industry in Victoria and is a major economic driver for the Victorian economy. It is critical that any proposal that impacts directly – and indirectly – on agriculture, food security and

perceptions of clean green produce are considered in a comprehensive manner. If the proposal is approved there must be:

- a high degree of certainty that the control mechanisms are appropriate;
- understanding of the consequences of any control mechanism failure;
- onsite monitoring based on each risk / consequence; and
- certainty to agricultural producers via binding agreements regarding compensation mechanisms and levels for each breach / failure of a control mechanism which impacts on their economic well-being and/or physical and mental health.

This EES process has highlighted some of the knowledge and policy gaps that make it hard to properly consider the impact of projects on agriculture. Loss of knowledge of soils, and failure to identify productive and high quality agricultural land are two such examples that ensure detailed assessment of agricultural impact and cumulative impacts to do occur.

This includes a realisation that the ‘intent’ of clauses 26A to E of the *Mineral Resources (Sustainable Development) Act* are not met where the nature of the proposal may have offsite impacts and where the productive output of ‘neighbouring’ areas exceeds the site itself.

To this end clause 26A of the *Mineral Resources (Sustainable Development) Act* is relevant – and should be considered in a wider context to comply with the ‘precautionary’ principle. As stated in the Earth Resources Regulator’s response to questions by the IAC the regulator must consider Clauses 26A to E and that the exclusion of the Lindenow Flats from being able to be subject to a Mining Licence was based on “*relatively low prospectivity for commercial minerals exploration and development and its high value for horticulture production.*”

This response does not use the same language as the Minister for Resources in announcing that decision – *The future security of prime agricultural land in Gippsland is being safeguarded with new protections from mining and minerals exploration being introduced for the Mitchell River floodplain near Bairnsdale.*

*The exempted area, stretching from Glenaladale to Hillside, is highly valued for its horticultural produce, with farm gate production estimated to be worth over \$100 million per year and providing up to 2000 ongoing and seasonal jobs.*¹

¹ <https://earthresources.vic.gov.au/about-us/news/safeguarding-the-mitchell-river-floodplain>

We believe this is the standard of consideration which should be provided in assessing the EES documents. Do they, when applying the precautionary principle, safeguard the prime agricultural land in the vicinity of the mine and the 2000 ongoing and seasonal jobs?

VFF previously recommended the following higher level objective which the rest of the submission provided greater detail in regard to.

The VFF recommends that on this consideration alone the project requires further investigations to establish the economic cost to production if control mechanisms do not deliver the promised environmental outcomes. Further investigation are required to understand the consequences and allow for the preparation binding agreements with all farmers who may be impacted by the mine. These agreements should respond to each control mechanism, the level of breach, the consequence of breach, how compensation will be calculated and administered and how integrated management systems will respond to key threats to each crop or production system.

In addition to the considerations in our initial submission, the following submissions or expert witness statements highlight or reinforce considerations which the IAC should seriously consider in the context of agricultural and horticultural production being safeguarded during and post operation of the proposed mine.

Water

Water is essential to 'dust' mitigation and to processing. Quality of water and absence of dust is essential to salad / vegetable production. The economic benefit of the allocation of a 'water' to mining or additional horticulture production has not been calculated. Page 16 of the Expert Witness Statement – Horticulture (Kalbar) confirms that the comparison was not part of the study.

The advice from Southern Rural Water raises some considerations – can the IAC be certain that the required water for mitigation of impact will be available and have all risks been considered. There are no new licences for one key source of water – which relies on market trading on an annual or seasonal basis.

- *The proposed groundwater licence will require a trade of existing entitlement and to demonstrate that local and regional impacts are acceptable. A significant issue for consideration is the connection between the three aquifers at the project site. This location is close to the edge of Gippsland's sedimentary basin where the middle and lower aquifers rise towards ground level and the aquitards separating the aquifers are thin. The proponent will need to demonstrate impacts from its pumping will not adversely impact existing users, the environment and the sustainability of the resource.*

- *2,000ML of entitlement will be allocated to local Traditional Owners. All other unallocated water distribution will conform with the abovementioned policy. Unless the Minister for Water directs otherwise, SRW has discretion to issue less than 6,000 ML or issue the allocation in stages to manage uncertainty, but it does not have discretion to distribute more than 6,000 ML. SRW may also quarantine some entitlement for special purposes such as emergency water supplies for stock and fire suppression, which are small users by comparison, important to animal welfare and public safety, but not suited to market based distribution.*

Economic Impact

VFF supports the line of enquiry in the Expert Report by the Australia Institute in reviewing the economic assessment, especially, when considering the precautionary principle:

Is it right for a mine to reduce horticultural output by \$5 million if it pays \$7 million to the state government in royalties?

Is 15 years of 200 mining jobs worth a longer-term reduction of 100 horticultural jobs?

The following is the type of economic comparison exercise which Section 26A of the Mineral Resources (Sustainable Development) Act envisages.

Another approach could have been to provide decision makers with some basic estimates of the potential impacts and tradeoffs involved. For example:

57. The HIS and AIA include estimates of the gross value of the output of the local horticulture industry of between \$63 million and \$120 million per year. (AIA page 57–58)

58. The industry covers some 4,700 hectares with average margins of between \$4,000 and \$5,000 per hectare, suggesting a surplus of between \$18.8 million and \$23.5 million per year. (AIA page 57)

59. Employment in horticulture and vegetable processing varies seasonally between 2,316 and 1,446 in a local government area with just 14,000 workers. (AIA page 58) 16

60. Based on these estimates, even relatively small impacts on the horticulture industry could have considerable local economic impacts, calculated in Table 1 below:

Table 1: Basic estimates of impacts on annual horticultural output and employment

Reduction	Value of production	Surplus/profit	Employment
1%	\$630,000–\$1.2m	\$188,000–\$235,000	14–23
5%	\$3.2m–\$6m	\$940,000–\$1.2m	72–116
10%	\$6.3m–\$12m	\$1.9m–\$2.4m	145–232

Source: Agricultural impact assessment, author calculations

61. Table 1 shows the impacts on horticultural value of production, surplus and employment of arbitrary reductions of 1%, 5% and 10%. While the reductions here are arbitrary and actual impacts impossible to predict with any certainty based on available information, the BAEconomics assessment makes an unlikely estimate of zero. The point of Table 1 is to demonstrate to decision makers that even seemingly small impacts on horticulture could reduce output and farm profits by millions and reduce employment by a substantial number of jobs in this small region. While necessarily imprecise, these estimates demonstrate the economic basis for local opposition to the project.

62. When possible impacts are estimated, as in Table 1, distributional questions are raised for decision makers. Is it right for a mine to reduce horticultural output by \$5 million if it pays \$7 million to the state government in royalties? Is 15 years of 200 mining jobs worth a longer-term reduction of 100 horticultural jobs? These are not questions that economists can answer. Economics has little to say about fairness or how costs and benefits should be distributed. Questions such as these are for decision makers and the governments and parliaments that they are responsible to. In my view, the assumptions made by BAEconomics on the potential external costs of the project works to obscure the reality that these kinds of questions exist.

Knowledge of soil and other inputs

VFF believed that the project was not well scoped given it's location in a highly productive agricultural district. VFFs mining principles highlight the importance of understanding soil, water and air resources / quality before the project so that impacts can be avoided, monitored and resolved.

The soil and rehabilitation Expert Witness Statement prepared for Environmental Justice Australia highlights many deficiencies in knowledge of soil which may impact on the impact of the mine and rehabilitation standards.

Radioactivity and potential risk to food production.

VFF wishes to draw the IAC's attention to Expert Evidence by Gavin Mudd and Rod Campbell which highlight potential knowledge gaps or assumptions which do not appropriately consider the actual risks to agricultural production which must be addressed to deliver the assurances of the Minister for Resources.

The relevant considerations from the expert evidence of Gavin Mudd are:

A2 Considerable further work is required to ascertain the levels of radionuclides naturally present in crops and vegetables as well as in surface water and groundwater.

3.3 Radionuclides in Crops 26. This sub-section (5.3) is very short and rather terse – plus the values given in Table 4 are calculated only and not directly measured. The transfer factors are not given, nor a basic explanation of the calculations undertaken to derive the values in Table 4. Although it is asserted that the transfer factors are appropriate for the region, there is no direct evidence presented to support this – such as previous scientific studies nor direct sample analyses of crops from the Glenaladale region. 27. Section 13, the 'Future Work Plan', notes the need to assess radionuclides in vegetables in Lindenow – yet I believe this work should have already been completed and presented through the EES process.

The relevant considerations from the expert evidence of Rod Campbell are:

While the BAEconomics assessment assumes zero costs, the EES Horticultural Impact Statement identifies "moderate risks" to crops, livelihoods, local employment, landscape, regional reputation, water supply and water quality based on "standard mitigation". Valuing such risks and impacts is difficult and subjective. Some analyses respond by presenting qualitative discussion prominently alongside quantitative estimates. For example, a 2013 report for former project owners Rio Tinto states in the summary, body of report and conclusion that the viability of the project was "dependent on mitigation of risks associated with securing a suitable water supply". No such prominent qualifications are found in the BAEconomics report.

Data in the EES can be used to make illustrative estimates of impacts on the environment and horticulture. For example, if horticultural output is reduced by 5% due to dust and water impacts, this would cut the annual value of production by \$3.2 million to \$6 million, reduce horticultural profits by around \$1 million and affect around 100 jobs. Including even small impacts to horticulture in the assessment demonstrates the economic basis for local opposition to the Fingerboards project and raises important distributional questions.

...

48. BAEconomics appear not to have been to the project site, or conducted any assessment of these economic costs independently, referring only to other parts of the EES that are also based on only brief visits to the project area. The Horticultural Impact Statement (HIS) for example is based on discussions with 11 people during “one site visit to the Lindenow Valley between the 27 – 30 August 2018”. Aside from these “semistructured interviews”, the HIS is based largely on other parts of the EIS, rather than independent analysis. The “Impact and risk assessment” section even states that this part of the report is “independent from consultation feedback” (page 66). Other studies such as the Socioeconomic Impact Assessment and Agricultural Impact Assessment (AIA) refer back to the BAEconomics estimates of project value for justification, creating a circular reference with little critical or independent assessment.

49. One of the key risks of the Kalbar project is impacts on the high-value horticulture industry that operates adjacent to the project site and other agricultural industries in the area. Impacts through water quantity, quality, dust and noise are key concerns of local stakeholders

... In fact, the HIS states that under “standard mitigation” the project presents “moderate” risks to crops, livelihoods, local employment, landscape, regional reputation, water supply and water quality. These risks require “additional mitigation” to be reduced to “low” risk. Additional mitigation include amorphous measures such as: a. Work with landholders to develop further mitigation as required. b. Support an annual community event e.g. a Harvest Festival to celebrate the local industry and community. c. Implementation of a stakeholder engagement plan to manage issues of perception about markets and employment. d. Sustained communication and engagement with adjacent horticulture landholders to develop solutions if issues are identified. (pages 70–73)

55. Given the risks facing the horticultural industry and the reality that mitigation measures are not always sufficient or complied with, the economic assessment should not have simply assumed zero impact. One approach that could have been taken would be to emphasise the difficulty in valuing these impacts and to include qualitative discussion of them. While BAEconomics acknowledge that some impacts need to be considered qualitatively, there is no mention of these impacts in the summary and overall conclusion sections of the report.

Transport

The Victorian Department of Transport has raised concerns that there is *insufficient information to be able to support this proposal*.

What do producers think – cumulative impacts

Bulmers

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.

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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.

Food and Fibre Gippsland

Food & Fibre Gippsland is the peak advocacy body representing Gippsland's food and fibre sector, producing around \$7b of the regional \$15b GDP. Produce from East Gippsland region has a well-established reputation as clean, green, and trusted.

Our organisation supports a comprehensive process for all parties when considering establishment and future operations of Kalbar and its proposed location in East Gippsland. We acknowledge the importance of economic development and creation of jobs as part of regional development and the part Kalbar Sand Mine may contribute to this. On behalf of our industry sector we highlight certain aspects of the Environmental Effects Statement (EES) where it is viewed sufficient detail is not sufficiently robust. Work undertaken on the EES must ensure rigorous studies have been undertaken to provide assurance to local agriculture and horticulture businesses and hold the relevant information to understand the future impacts of the development.

Plume modelling and re-distribution of particulates and metal attenuation into the environment has taken a standardised multi-year approach. It does not however consider future risk scenarios – for instance local weather conditions that exceed +/- standard deviation of existing ensemble data series for wind and plume dispersion. These data sets would be of interest for local businesses as future climate change predictions identify a number of changes in weather aspects that affect eastern Victoria.

The impact statements on provenance and supply chain issues are not supported by current consumer information. It is critical to existing horticultural businesses to understand the impacts of the development and how those impacts (if any) are mitigated. The reports on this issue clearly state the consultants engaged did not investigate the actual current consumer perception of produce from the Lindenow Valley or how the vicinity of a sand mine may affect it.

Fresh produce is normally consumed directly by the consumer – perception of a product is key to its successful adoption by the consumer. If the studies did not consider the consumers opinion, how can the risk matrices provide advice on mitigation strategies if an event did occur? Furthermore, sustainable production practices are becoming more important to consumers, especially amongst urban population, even if they do not understand farming practices. It is not clear whether consumers would assume that a sand mine would influence sustainable practices on farm. This is critical to many growers and a number of enterprises – for instance organic producers.

Food & Fibre Gippsland highlight through the above, a desire for further work to be conducted addressing more detail on these aspects. Whilst some risks in the EES are noted as unlikely, it is imperative to ensure full consideration has been undertaken on consequences to provenance, image, and future sustainability, should risks occur that irrevocably impair the brand and consumer perception of East Gippsland produce, specifically from the Lindenow Valley area.

Our Recommendations

Project considerations

1. The VFF recommends that on this consideration alone the project requires further investigations to establish the economic cost to production if control mechanisms do not deliver the promised environmental outcomes. Further investigation are required to understand the consequences and allow for the preparation binding agreements with all farmers who may be impacted by the mine. These agreements should respond to each control mechanism, the level of breach, the consequence of breach, how compensation will be calculated and administered and how integrated management systems will respond to key threats to each crop or production system.
2. VFF recommends that very careful consideration is given to all elements of Chapter 9 relating to agriculture. Is it comprehensive in its understanding of risk and consequence? Have / can the issue be appropriately controlled? What are the long term risks if there is a catastrophic failure? How will producers be compensated for impact of any non compliance issue / failure.

3. In relation to the mine site and land access the VFF recommends closer consideration of the following issues:
 - Loss of carrying capacity – there may be a requirement for producers to change how they run their operation with significant economic losses accumulating over time. Reduced genetic potential/breeding history (through sale of stock), reduced stock numbers impacting annual income e.g. wool or meat sales, agistment fees if producer is required to retain head numbers, increased input costs e.g. fertiliser, feed to boost carrying capacity.
 - Management of pest animals and weeds on buffer zones
 - Biosecurity risk concerns particularly early on in the establishment of access routes onto and between properties
 - Dust/water pollution. Increased dust pollution may have impacts on livestock health particularly in drought/dry seasons, for example increased dust in feedlots contributes to the prevalence of Bovine respiratory disease (BRD).
 - Impact of dust on wool quality, quantity and value
 - Fire risk/emergency response – fire risk from the mine and management of traffic routes during times of emergency for example increased need for immediate access to truck stock or move stock along roads
 - Asset loss and compensation – livestock should be classified as assets/infrastructure
 - Uncertainty – inability for producers to forward plan with short term and long term plans uncertain. This has become a crucial part of business management for producers in the area particularly after drought.
4. VFF supports the preparation of the management plans for considerations such as noise, dust / air quality and water. These management plans should not purely focus on a dwelling as there will be significant numbers of agricultural workers exposed to noise and dust in the paddocks – and often much closer than the dwellings which are the main focus, demonstrating a more urban based understanding of risk.
5. The VFF recommends that:
 - That Kalbar commit to grow and improve local housing stock
 - That Kalbar seeks support from the Federal Government for visa programs to target any shortages in agricultural workforce
 - That Kalbar commit to ensure the community benefits from the mine through a grants process
6. The VFF recommends the EPA Works Approval application should be revised to clearly address issues relating to the beneficial uses of land for agriculture.

Systemic considerations – considerations of agriculture

7. The VFF believes that all EES scoping documents for proposals on or with potential impact to agricultural land should be forwarded to the VFF for comment – and distributed to landholders in the area. Landholder knowledge and agricultural considerations are critical to the effectiveness of the assessment of impacts to the environment and the reliance on landholders seeing a notice in a paper rather than using modern consultation is not conducive to the level of transparency and oversight envisaged by the legislation.
8. The VFF recommends that the Minister review his decision to only have government representatives on Technical Reference Groups when agricultural land is involved. Councils, CMAS and government agencies rarely have the level of understanding of different commodities or production systems within commodities to be able to properly give oversight of technical documents relating to agriculture.

9. **VFF recommends that DELWP review its internal guidance on / understanding of the potential impacts of proposals on different agricultural commodities and production systems. The VFF would welcome the opportunity to work with DELWP to ensure more holistic and rigorous considerations of project impacts on agriculture.**
10. **VFF recommends that DELWP provides to the VFF a copy of each scoping document for an EES in an agricultural area for comment prior to its finalisation.**

The Victorian Farmers Federation

Victoria's agricultural production accounts for over \$13 billion of Victoria's economy and over 25 per cent of the State's exports per annum. Victoria's farmers produce high quality food and fibre, produced to high standards of safety, with little taxpayer support, and to some of the strictest environmental and highest animal welfare controls in the world.

The Victorian Farmers Federation (VFF) represents a farming community which creates a profitable, sustainable and socially responsible agriculture sector connecting with consumers.

We have a proud history representing Victoria's farm businesses since 1979 – primarily family farms that produce the eggs, grain, fruit and vegetables, meat, and milk that help to feed Victoria's six million people, and the bigger global community, every day.

The VFF consists of commodity groups: dairy (United Dairyfarmers of Victoria), grains, horticulture (including Flowers Victoria), intensives (chicken meat, eggs and pigs), and livestock – and expert committees representing; water, land management, agricultural and veterinarian chemicals, farm business and rural development, and workplace relations.

Our purpose is to make Victorian farmer's lives better; enhancing Victoria's future.

Our mission is to ensure a community of farmers creating a profitable, sustainable and socially responsible agricultural industry connecting with all Victorians.



Our place in Victoria

What we do



- Victoria's **20,775 farms** cover **10.6 million** hectares
- We are **24.2%** of Australian farmers
- **91%** family operated, with only **2%** foreign owned



- We employ **87,800** people mostly in regional areas
- **\$4739** of food consumed each year by every Australian
- As a net exporter we have long term food surity






- Our annual production is **\$13.16 billion**, **3.5%** of Victoria's economy
- **27.8%** of Victoria's exports are agricultural product valued at **\$11.9 billion**

How we do it



-  Farmers invest **\$80 million** in R&D
-  Every R&D **\$1** converts to **\$12** in farmer generated impact
-  **2.7%** productivity growth through innovative efficiency gains
-  Farmers receive less than **1.5%** in government support



-  **63%** reduction in greenhouse gas emissions between 1996-2016
-  Water consumption reduced by **7%** from 2014-2015
-  Land conservation has increased to **18%** of total land mass.
-  Farmers spend **\$20,000** annually on feral animals and pest weeds



-  **3.5 million** beef cattle
-  **140 million** chickens
-  **1.1 million** dairy cows producing **6.186 billion** litres of milk
-  **65,992** sows
-  **13.1 million** breeding ewes and a fleece clip of **66,100 tonnes**
-  **6.5 million** tonnes of grain
-  **\$2.35 billion** in horticultural production