

From: [REDACTED]
To: [Fingerboards Inquiry and Advisory Committee \(DELWP\)](#)
Subject: Mitigation Register
Date: Monday, 26 July 2021 11:35:23 AM

[REDACTED]

Dear Mr Wimbush, Chair of the Fingerboards IAC,

This email is to let the IAC know about concerns from our group of horticulture growers about some of the measures that appear in the mitigation register that relate to our industry. These are as follows:

AGO2: "Local agriculture and horticulture industry bodies, such as Food and Fibre Gippsland, will be consulted and engaged with to identify any potential issues at an early stage and enable effective solutions to be implemented."

What local agriculture and horticulture industry bodies are proposed to be consulted with as they don't exist. Food and Fibre Gippsland is a not for profit organisation that is based on members joining and paying a fee to be a member. Their role is to represent and advocate on behalf of their members interests and not to identify and address potential issues of concern broadly in the agriculture/horticulture industries. This measure should be removed as it leads to an expectation that issues can be addressed in this way when this avenue does not exist.

AGO4: "The work plan will be adhered to during construction and operation of the project to achieve agreed environmental and social outcomes."

This is not a mitigation measure it is a compliance measure so should be removed as a mitigation measure.

AGO8: "A community engagement plan will be implemented that identifies approaches to actively manage issues with public perception, including providing objective and factual public communications."

Remove the words "including providing objective and factual public communications" as these words are not needed, it would be expected that the communications would be objective and factual.

AG12: "Local growers will be encouraged to obtain EnviroVeg or Freshcare environmental certification as evidence of 'clean green' production under an environmental management system."

This measure is objected to in the strongest possible terms and must be removed as a mitigation measure in the mitigation register. The growers have already established their 'clean green' status through their on-farm certification and quality assurance requirements. Dr Premier gave evidence about this at the Hearing on 7th June. The growers don't need any further evidence of their 'clean green' status.

AG13: "An annual local community event will be supported that attracts visitors to the region, such as a Harvest Festival, and/or support the East Gippsland Veg Innovation Day."

Having the proponent as an advertised sponsor would only add to the adverse community perception of the impact of having a mineral sands mine in proximity to agriculture and horticulture industry.

AG14: "The amount of land clearance will be minimised wherever possible to minimise loss of agricultural land."

AG15: "Progressive rehabilitation will be conducted to ensure that, where feasible, disturbed agricultural land in the project area can be restored to productive use as soon as possible."

If progressive rehabilitation does not occur as specified in the work plan what penalty will be imposed as a mitigation measure? This would give the growers greater confidence if a penalty was imposed as the work plan can be varied, so progressive rehabilitation is not enforceable. A penalty for failing to progressively rehabilitate needs to be a mitigation measure.

Yours sincerely

John Hine

