

Submission Cover Sheet

Fingerboards Mineral Sands Project Inquiry and Advisory
Committee - EES

218

Request to be heard?: Yes

Full Name: Kane Busch
Organisation: Busch Organics Pty Ltd
Affected property: [REDACTED] Glenaladale.
Attachment 1: Kane_Busch_EES_
Attachment 2:
Attachment 3:
Comments: See attached submission.

Dear Inquiry and Advisory Committee members,

Thank you for the opportunity to make a submission in response to the EES for the Fingerboards mineral sands mine project.

We explicitly oppose the creation and operation of a mineral sands mine at The Fingerboards, Glenaladale and wish to express our disappointment in the dismissive nature of the Environmental Effects Statement when assessing and rating the impacts of potential risks to the Horticulture Industry.

Busch Organics is a fourth generation farming business which will enter its 100th year of growing vegetables in 2021. During these 99 years it has fed soldiers at war, families at their dinner tables and supplied large processing companies across Australia. Of the millions of people it has fed and hundreds employed directly or indirectly, not one person to its knowledge has been sick or killed as a result of eating food produced on our farm. One would assume that sound farming and food safety management practices contributed to this. Any threat to our soil, water, employees and clean green image just is not acceptable.

Despite the claim made by RMCG in the Horticulture report that the “greater majority are supportive of the project”, you can be assured that 9 of the 12 horticulturalists in this area openly oppose this project. RMCG presented their findings at a community meeting on October 29th 2019 where I am on record stating that “75% of horticultural growers reject their study”, and again in written communication to past CEO of Kalbar Resources Victor Hugo. Unsurprisingly, the EES doesn’t reflect this overwhelming opposition to the project. When visiting to interview growers, consultants from RMCG seemed uninterested in our concerns and were more interested in ticking a box. Perhaps they would be more attentive if their income could be jeopardised by a major non-conformance relating to food safety. As a Certified Organic producer of 20 years we must comply with a strict National Organic Standard as well as Freshcare food safety standards. This will be particularly difficult if any prohibited substances are detected on or in our produce, whether that is from the prevailing westerly wind or our water source. Any failings in this regard will see Organic Certification be stripped of us for three years. We grow beetroot, leek, beans, broccoli, cabbage and celery, with the latter four lines considered safe to be eaten raw under the Freshcare Standard. It would be negligent to assume that any toxic, radioactive and carcinogenic dust would miraculously disappear from a cabbage or head of broccoli that, at best might get a quick rinse before being consumed.

As you can appreciate, water is vitally important for the production of vegetables. Considering we have been in drought for a number of years, we use water sparingly and have implemented water saving technology to be as efficient as possible. Compare that to the needs of a mineral sands mine and it is clear that using billions of litres of water to simply suppress dust is environmentally reckless. It is astounding how far dust and chemical can travel once in the air. In 1984 a grower sprayed a herbicide which travelled 5km with a Westerly, destroying a whole field of tomato seedlings on our farm which had only just emerged from the ground. The same wind will surely carry the substances proposed to be ripped from up to 45 metres below the ground. Water levels in the Mitchell River are seasonally volatile and irrigators are placed on restrictions ranging from stage 1 to 10, with 10 being total ban which we have regularly experienced during this drought. Water allocations to the tune of 6 gegalitres have been reserved for the expansion of horticulture in Lindenow, but has now has been

earmarked by Kalbar Operations Pty Ltd for use on the project. If that water was utilized in horticulture that would be a more responsible use of water for the long term jobs and food security it creates. Finding skilled and reliable workers is often challenging enough, but if we are competing for the same pool of workers at the proposed mine then horticulture may struggle to find and retain workers.

As a multi-generational family business, we had the foresight to convert to an Organic system for the health of our soil and family, our customers and to remain viable for future generations. We have farmed through the introduction of agricultural chemicals, severe floods and prolonged drought. These challenging times are able to be overcome with optimism and good management, which I wish I could say the same about the proposed mineral sands mine. I cannot be optimistic about something so dangerous and have no faith in Kalbar Operation's management.

Horticulture and mineral sand mining cannot co-exist in Glenaladale.

Yours truly,

Kane Busch

Director, Busch Organics



28 October 2020

Kane Busch

To Whom it May Concern,

Re: Letter of Support for Further Third-Party Environmental Impact Assessments

Australian Organic Limited (AOL) is the leading peak body for the Organic Industry in Australia, a member owned not-for-profit organisation protecting and promoting the future of the Australian Organic Industry.

As a proud supporter and advocate for organic farmers, we take seriously issues brought to us by our members. We have been made aware of a proposed mining project by Kalbar Operations Pty Ltd, the Fingerboards Mineral Sands Project.

Members of AOL have highlighted concerns regarding the potential harm this operation may pose to their Certified Organic status; their ability to operate their day to day business; and environmental damage both locally, domestically, and globally. Concerns held by AOL members are in relation to the continuance of their Organic Certification as a result of the construction and operation of the aforementioned project. Issues such as potential for contamination caused by airborne dust particles, water pollution from run-off and availability of irrigation water among other concerns.

The National Standard for Organic and Bio-Dynamic Produce (2016) requires organic operators to implement strategies to prevent contamination of their produce. Such contamination is not limited to pesticides or synthetic fertilisers, but also includes the prevention of heavy metal, microbial, or other materials which should simply be absent from our food. Our members operating in this area who have, over many years, been producing high quality food for Australians are gravely concerned about the proposed project.

Australian Organic Limited is not opposed to mining. We see sustainable and economically feasible primary production activities such as mining as significant contributors to the prosperity and wellbeing of all Australians. Farming, and mining, are among the most important productive and profitable industries in Australia. Therefore, ensuring only economically, environmentally and socially sustainable farming and mining operations are approved, is of the utmost importance.

We support Australia's strong environmental regulation at Federal, and State level. We commend the Victorian Department of Environment, Land, Water and Planning (DELWP) and Kalbar Operations Pty Ltd for clearly communicating the opportunity for submissions to be made by the public, via the Engage Victoria website. However, we are concerned that some very relevant and likely effects of this project may not have been adequately considered and discussed in the Environmental Effects Statement prepared and submitted by Kalbar Operations Pty Ltd.



We implore the East Gippsland Shire Council, Wellington Shire Council, the DELWP and EPA, and ultimately the Minister for Planning to apply all relevant and appropriate scrutiny to the EES, the Works Approval Application (WAA), and the Planning Scheme Amendment (PSA), to ensure that the best decision is made for the future of Australia.

We also note that the published Terms of Reference for the Fingerboards Mineral Sands Project Inquiry and Advisory Committee (IAC), specifically provides an opportunity for the committee to seek additional specialist expert advice related to agriculture and rural land use; and social impact assessment. We urge the IAC to indeed seek such expert advice on the true cost to the agricultural community in this area, should this project proceed.

We hereby express our support for further environmental impact assessments to be conducted by an independent third-party body.

Yours sincerely,



Niki Ford
CEO Australian Organic