



Date: 24 September 2025 Feeding Australia: A National Food Security Strategy

Submission by: The Alliance for Responsible Mining Regulation (ARMR)

Introduction

The Alliance for Responsible Mining Regulation (ARMR) is a coalition of community groups and individuals interested in improving the regulation of mining and quarry industry in the State of Victoria, Australia.

ARMR Vision Statement

ARMR supports financially viable and responsible mining with adequate regulation that is enforced in a timely and effective manner but will oppose proposals that threaten to destroy productive agricultural land, water resources, or negatively impact environmental and human health or that fail to obtain social licence.

Until such time as it can be proven to ARMR's satisfaction that the responsible authorities are regulating existing mines effectively ARMR will strongly oppose any new proposals in Victoria.

Overview

ARMR endorses the Australian Government's commitment to safeguard and enhance Australia's food secure status and to maintaining our position as a reliable and secure source of food for both domestic and international needs.

"Australia is a food secure nation and plays a vital role supporting global food security through exporting around 70% of our agricultural production (ABARES 2025). Our food system is a national asset – underpinned by strong food safety and biosecurity measures, essential not only for nourishing our own population but also for meeting the needs of our trading partners.

"While Australia has a world class food system, we cannot afford to be complacent, or to ignore the new and emerging challenges facing our food and supply chains."

Discussion Question 1

The government, industry and community must prioritise the Right to Farm to support food production.

Discussion Question 4

Missing from key priority areas and whole-of-system considerations necessary for an effective food security strategy are the growing threats to food production, e.g. biosecurity lapses and intrusions of uses and developments that are incompatible with food production, such as mining, wind and solar farms, and peri-urban residential developments.

ARMR Recommendations

To address these threats, ARMOR recommends that the National Food Strategy must, at minimum, contain the following provisions enshrined in legislation:

- The Right to Farm as a priority over other activities in designated farming zones
- The designation of 'No Go' zones which exempt productive farmland from being taken over by mining and other industrial/residential developments
- The establishment of buffer zones around 'No Go' zones of at least 20 kms to help protect food products from mining pollution
- A fully-resourced and practical action plan for protecting and facilitating food production
- Regulatory regimes which protect food production and safety through timely and effective enforcement processes, including meaningful penalties for wrongdoing

This submission largely focuses on mining threats to agriculture in rural/regional Victoria. These threats also apply to renewable projects such as wind and solar farms. They are all incompatible with the objectives of the Farming Zone (FZ) in the Victorian Planning Provisions, which is to protect FZ land for agricultural activities.

The Economic Role of Agriculture to the Victoria

Victorian state and local governments repeatedly acknowledge the important role agriculture plays in their economies. Victorian food production also contributes significant export revenue to the national accounts. The value of agriculture to Victoria is well-recognised by the Government as numerous media releases attest.

The Victorian Government's Economic Growth Statement (updated December 2024) states:

"Victoria's agricultural sector, which is the backbone of our regional economies, continues to underpin our state's food and fibre reputation – and is a key pillar of our merchandise exports.

The sector continues to service growing domestic and global demand for our food and fibre, while maintaining stringent biosecurity measures to protect against agricultural pests and diseases."

The Loddon Mallee North Regional Growth Plan affirms:

"Victoria is Australia's largest producer of food and fibre products, and these make up over half of Victoria's total product exports."¹

"The Loddon Mallee North region's economy is driven by its competitive advantage in agriculture."²

"Greater Shepparton, Moira, Swan Hill, Campaspe, Gannawarra, Mildura and Loddon councils all form part of Victoria's food bowl, which specialises in irrigation-based industries, including dairy, horticulture and viticulture, as well as dry land farming operations and agriculture-related industries, such as food processing, packaging and transport."³

"As the region's economy is dependent on primary production, it is highly exposed to global economic forces such as fluctuations in export prices. For this reason, the Loddon Mallee North region's economy is one of the most globally linked and affected parts of Victoria."⁴

¹ <https://agriculture.vic.gov.au>

² Loddon Mallee North Regional Growth Plan, p19 27/80

³ Ibid., p 5/80

⁴ Ibid., p10, 18/80

Conducted for several generations in this region, “the agricultural industry has demonstrated resilience and capacity to adapt in the face of significant climatic, economic and policy challenges”.⁵

Unfortunately, when such endorsements are compared to what is actually happening to agriculture in Victoria, they come across as duplicitous motherhood statements.

Barriers to Food Security

Land Use Change

The phrase “*land use change*” is only mentioned once in the Discussion Paper. This is a significant oversight given that, apart from climate change, the biggest threat to the security of food production in Victoria is the long-standing and ongoing removal of food-growing land.

The very best land and climate for growing food was originally in the peri-urban locations of our largest cities: Melbourne, Sydney and Brisbane. Now the **last crop** is for housing and industry. To its credit, the Victorian government introduced an action plan for protecting Melbourne’s peri-urban land being used for food production: ***Planning for Melbourne’s Green Wedges and Agricultural Land, 2024***. Unfortunately, this protection has not been extended to high-productivity agriculture in regional Victoria, e.g. cereal and lentils cropping and horticulture from mineral sands and gold mining.

Victorian Farmland Lost to Mining

Lily D’Ambrosio, Minister for Resources, speaking for the Mineral Resources Amendment Bill said: “**Social licence for the resources sector is critical** [because] Victoria is a relatively small, densely populated state with a diverse economy.”⁶ It is also in regional areas where most of our food and fibre is now grown. There is **NO** social licence for mines that are evicting farming families from their homes and businesses. Large areas of highly productive and expensive agricultural land, 5000 hectares or more, has been approved for new mineral sands mines in the last year alone.

There is nothing unpredictable about these losses. State and Federal governments encourage and facilitate them through their pro-mining strategies. Both the Victorian and Commonwealth governments have developed Critical Minerals Strategies which are counter-productive to the objectives of a Food Security Strategy. There is also documented evidence of the Minerals Council of Australia’s influence on government policy (see below).

Reputational Risk

Australia prides itself on its international reputation for growing “clean, green” healthy food. As we saw with China’s bans on barley, lobsters, meat and wine, reputation is hard won and easily lost.

Retired Air Vice Marshall ADF John Blackburn, now Chair of Integrated Economics Research, said on ABC radio (3/8/23), that food is much more important to our national security than the AUKUS subs because food shortages in neighbouring countries would threaten regional harmony.

ARMR shares Mr. Blackburn’s alarm at “*a dangerous lack of strategic planning and government inaction*” in relation to food security and agriculture.⁷

⁵ Loddon Mallee North Regional Growth Plan, p19 27/80

⁶ Hansard Legislative Assembly – Proof Mineral Resources (Sustainable Development) Amendment Bill 2023, second reading Wednesday 21 June 2023

⁷ Beef Central, James Nason, 4 June 2025 <https://www.beefcentral.com/news/fuel-blind-national-security-expert-warns-australia-still-ignoring-a-crisis/>

ARMR cannot understand how the Victorian government is allowed to cause reputational harm to Australia. The Commonwealth government must have powers to override state actions which are not in our national interest.

Victoria's Critical Minerals Roadmap

The Victorian Labor government is hell bent on approving mines which will erase some of the most fertile cropping land in Victoria. The statistics do not support their misguided belief that mining critical minerals will be the saviour of its flagging economy.

The "rare earth" critical minerals that exist in Victoria are found in tiny amounts in the ancient mineral sands, such as the Parilla Sands in the Wimmera/Mallee. As the video ***Inside Victoria's \$2B Goschen Project Digging for Rare Earths***⁸ explains rare earth mining is like looking for a needle in a haystack. To obtain 64,000 tonnes of Heavy Metal Concentrate (HMC) and 300 tonnes of Rare Earth Mineral Concentrate (REMC), 5 million tonnes of earth must be removed. To separate the ore, large quantities of water and chemicals, e.g. acids and, flocculents are used and the toxic slurry is returned to the earth or stockpiled. The ore produced releases radioactive silica dust into the atmosphere and poisons all around it.

Mineral sands mining destroys the biota of the fertile topsoil where the crops are grown which, despite best efforts, can never be restored. These mines turn highly-productive farmland into barren toxic wastelands, polluted waterways and aquifers. The average mine life is about 20 years, if it ever gets going because these mines chew up a lot of money. Mining is not a long-term sustainable operation like inter-generational family businesses which are the backbone of communities and community resilience.

Examples:

Goschen mineral sands mine

In 2024, Minister for Planning, Sonja Kilkeny, approved ASX: VHM's mineral sands mine, which was subject of an EES because it was a controlled action under the EPBC Act and Matters of Environmental Significance (MNES). This mine will permanently erase the Cannie Ridge, some of the most fertile cropping land in the Mallee.

The mine also threatens the viability of the aquifer and waterways which flow all the way to the Ramsar Murray Darling Basin. The heavy metal toxins pollution of the Murray, already half-dead, will decimate its ecosystems and biodiversity and harm the Basin's irrigated food-growing businesses. Even Adelaide's water supply could be affected. VHM estimates the mine life will be barely 20 years or less. In its prospectus, VHM warned potential investors that this is a "highly speculative" proposal.⁹

Avonbank mineral sands mine

In the same year, against all scientific evidence, Minister Kilkeny also approved WIM Resource's Avonbank mineral sands mine near Horsham in the Wimmera. This mine is in the middle of a highly-productive lentils cropping area. This project contemplated the construction of the Wet Concentrator Plant (WCP) **outside** the designated mine site adjacent Farm Frite Australia's newly-established potato products processing factory.

In what is an extraordinary departure from the purpose of the Victorian Planning Provisions (VPPs) to protect farming zoned land for agriculture, Minister Kilkeny approved the siting of the WCP, even though WIM Resource's admitted in their EES reports that this was a prohibited

⁸ Megabuild, [Goschen Digging for Rare Earths](#)

⁹ VHM Prospectus p63, 103/432 – ASX announcement

use and development under the VPPs. ARMOR's vehement objection to this perversion of the planning regulations was summarily dismissed. Furthermore, due to poor and dishonest community consultation, affected farmers did not learn until after the EES process that they stood to lose their homes and farm businesses. The Avonbank mine will seriously disrupt their cropping operations which will put at risk their considerable business investments: high-tech machinery costs millions of dollars.¹⁰ Bankruptcies and suicides are not inconceivable.

Fingerboards mineral sands mine

In July 2019, the Minister for Resources, Jaclyn Symes, exempted 4000 hectares of prime irrigated horticultural land at Glenaladale, East Gippsland from mining and minerals exploration. Unfortunately, at the time, the proposed Kalbar Fingerboards mineral sands project, barely 150 metres away, was subject of an Environment Effects Statement (EES). The Minister for Planning, Richard Wynne, ruled the environmental effects were "*unacceptable*" due to—among 49 matters—the impacts of radioactive silica dust and toxic chemicals on the vegetables.

Glenaladale produces a large part of Australia's domestic and export fresh vegetables.¹¹

Dr. Robert Premier, B.Sc., M. Env. Science, M. Biotech., PhD (Melbourne University) who devised the Quality Assurance (QA) system submitted to the Fingerboards EES that:

"All growers that supply supermarkets and processors must have an "on farm" QA system in place, this can be FreshCare, Global GAP, BR, SQF, in addition growers that supply supermarkets and processors that supply supermarkets in their house brands are also required to have an additional QA system in place (HARPS)

- *Aldi, Coles, Costco, Metcash (IGA) and Woolworths have all signed on to the Harmonised Australian Retailer Produce Scheme (HARPS).*
- *So everyone supplying a supermarket needs a QA system in place plus HARPS*
- *These QA systems are audited by a third party auditor , HARPS is audited by a third party auditor and the processing industry also audits the grower. So growers must pass three audits to obtain market access to supermarkets and processors."¹²*

Dr. Premier said that to prevent spoilage fresh vegetables are not washed prior to sale. Therefore, the radioactive silica dust would completely shut down the horticulture industry, along with 2000 local jobs.

Yet, in what may be perceived as an act of willful blindness to Minister Wynne's EES ruling, Victoria's Resources Regulator issued Kalbar P/L (now renamed Gippsland Critical Minerals) a Retention Licence to resurrect its ill-conceived project. For over eleven years, this company has caused intense and prolonged stress and anxiety to local farmers and communities condemned to a hellish limbo.

To exempt prime horticultural businesses from mining and then facilitate a mine that will ruin them is irrational and stupid. Food production must be quarantined from mineral sands mining by at least a 20 km buffer. They cannot safely coexist any closer.

In addition, this mine threatens the health of the Ramsar Gippsland Lakes, already under serious and protracted stress from human activities.

¹⁰ <https://www.abc.net.au/news/2024-11-16/land-may-be-acquired-wim-resource-avonbank-mineral-sands-mine/104601848>

¹¹ <https://www.premier.vic.gov.au/gippslands-foodbowl-safe-farmers-win-certainty>

¹² Fingerboards EES Submission 482: *Presentation to the IAC on the environmental effects of the proposed Fingerboards Mineral Sands Project* and Submission 496, p7/31

Donald Mineral Sands Mine

Astron's (ASX code ATR) Donald Mine site is not far away. Its lease covers **27 sq. km.** of farmland. Although Rio judged the fine-grained deposit to be uneconomic and relinquished the licences in 1998, the 2008 EES IAC found that "*feasibility studies by the company had shown that the deposits were now economic to develop.*" The mine was approved in 2008. In June 2025 (17 years later) ATR was granted a Work Plan. The fact it wants to export uranium to the USA is contentious. Like VHM, ATR continues to claim the Donald deposit is one of the largest undeveloped mineral sands deposits in the world. However, Astron's financial reports to the ASX in 2020, 2022 and 2023 disclosed "material uncertainty" as to "its ability to continue as a going concern". Its 30 June 2025 Annual Financial Statements disclose that "***the technical feasibility and economic viability of extracting the mineral resources have not been completed and hence are not demonstrable at this time.***"¹³

The outputs of each of these mines – in particular rare earths concentrates – will be sold to China for processing in breach of the Commonwealth's *Made in Australia* and Critical Minerals Strategy, which align with international efforts to reduce China's dominance of rare earths.¹⁴

For Victorians the result will be that our sustainable food-growing businesses and our environment will be irrevocably polluted by radioactive heavy metals, uranium and thorium, respirable crystalline silica (RCS) and other toxic Chemicals of Concern (CoCs). If there are any profits because the financial viability of the "penny dreadfuls" is doubtful, they will flow to China, not to local communities, at a huge cost to Australia's food security and environmental and human health.

Rehabilitation Failure

Although the Mineral Resources (Sustainable Development) Act 1990 requires that mines must be returned to their original condition, many closed or abandoned mines in Victoria have not been rehabilitated.

For example, a large area of Iluka's Douglas mine site remains unusable for agriculture due to subsidence and contaminated soils. Its Pit 23 is now used as a regional radioactive toxic waste dump. After Kralpocic and Stockman's (Benambra) went into administration, rehabilitation became the responsibility of the Victorian government. It has spent millions trying to rehabilitate these mines without success.

It is estimated that about 80,000 mines in Australia are unrehabilitated. Recent media reports disclose that there are unrehabilitated coal mines on Queensland farmland.¹⁵ The NSW EPA sat on the report that lead dust from the Broken Hill silver mine is falling directly on homes and schools where children play¹⁶ because it did not want to upset the mining company. Toxic tailings pits and heavy metals have destroyed soil biota and fertility and contaminated farmland everywhere. In Victoria alone, old gold mines have left a legacy of thousands of tonnes of arsenic on former farmland. This should be a national disgrace but regulators cover it up.

Insurance Liabilities

When farmers are forced to have mines on their land, they do not realise that if the mine is left unrehabilitated, the legal responsibility for rehabilitation falls on the landowner into perpetuity.

¹³ ASX Announcement, 17 September 2025

¹⁴ China has banned domestic mining of monazite mining because of issues with the disposal of thorium. Instead it seeks to import from countries willing to mine and process monazite and deal with thorium disposal. Export processing of rare earths is illegal in China. (The Rare Earths Observer 27 December 2024 - <https://treo.substack.com/p/pseudo-rare-earth-projects-victorias>)

¹⁵ Hinchcliffe, Joe, The Guardian, 14 September 2025 [Queensland farmland barren and broken](#)

¹⁶ ABC Woodburn Joanna and Bill Ormonde, 17 September 2025 [Lead poisoning cover up](#)

The economic impacts can be so significant as to destroy rural/regional communities which depend on agriculture and tourism, e.g. Balmoral, Victoria. Iluka promised jobs and prosperity. Instead, it is now almost a ghost town of empty shops and businesses.

When estimating the economic viability of agriculture versus mining, the financial costs of lost farmland, including devalued land valuations, lost agri-business revenue, mounting debt, bankruptcies, the transfer of rehabilitation costs to landowners, human health impacts and environmental degradation, damage to roads, agricultural jobs lost and hollowed-out communities must be calculated and specified in net benefit analyses.

Biosecurity Risks of Mining

Mining also increases biosecurity risks from pathogens and foreign pest species such as the deadly fire ants and uncontrollable noxious weeds imported by trucks, equipment and employees. Yet the Victorian government displays a general ignorance of, and wilful blindness, to the scientific evidence that mining will intensify Australia's biosecurity crisis. This should be a matter of grave concern to the DAFF and the Albanese government.

Victorian Legislation Destroys Food Security

The Human Right to property and the peaceful enjoyment of one's home can be overridden if lawful. Despite its purported support for agriculture, the Victorian government is working hard to create barriers to growing food by legalising through Acts of Parliament the occupation of farms for mining and solar/wind developments.

The **Mineral Resources Sustainable Development) Act 1990 (MRSDA)** permits a mining company to takeover farms if compensation is paid. But fair compensation is not guaranteed in law as it is in the **Land Acquisition and Compensation Act 1986**. Under this Act compensation for compulsory acquisition must have regard for market value, pecuniary loss, special value to the owner, severance, disturbance, and professional cost. Even the threat of a mine or the mining company buying land where the proposed mine site sits can drive down farm prices. Anxious and stressed farmers, whose lives are put on hold, withhold farm improvements and business expansion, which has a collective impact on agricultural production in the area.

The **National Electricity (Victoria) Amendment (VicGrid Stage 2 Reform) Bill 2025** includes the imposition of fines up to \$12,210 on landowners who refuse entry to wind and solar companies and possible imprisonment for non-payment. This draconian measure is a breach of international human rights law and a denial of citizen's democratic rights. The more these projects infiltrate rural/regional areas, the more our food security is put at risk.

Regulatory Oversight

Both Resources Victoria, whose dual role as mining regulator and licensor is conflicted, and the Environment Protection Authority (EPA) have consistently failed to monitor and control the adverse impacts of mining on food growing and the ecosystems that support it.

In Victoria, recent legislative changes have significantly weakened the regulators' powers:

- The EPA's General Environmental Duty (GED), which relies on self-reporting, substantially transfers the EPA's regulatory duties to the mining company.
- The Mineral Resources (Sustainable Development) Amendment Act 2023 eliminates the need for mining companies to have Work Plans.
- Planning Scheme Amendment VC242 transfers regulatory responsibilities from Resources Victoria to local government councils who have neither the resources nor expertise to perform this role, especially the monitoring and management of mineral sands heavy metals ore (HMC) which, being radioactive, require ARPANSA licensing.

- Certain mining projects can be approved by Invest Victoria which has no mineral sands mining expertise, including about radioactive ores.

Political Interference Harms Food Security

In 2023, the MRSDA was amended and renamed the Extractive Industries Act 1990 to reflect its role to fast-track mining and quarrying. The removal of the words “sustainable development” from the title is an ominous signal that in the government’s frantic pursuit of mining as somehow a way to mend the budget blackhole, its duty to protect the environment and food-growing no longer matters.

During the debate of the second reading of the Mineral Resources Sustainable Development Amendment Bill 2023, David Southwick, MP thanked the Minerals Council of Australia for its contribution to the wording of the amended Act. He revealed that, the MCA and other industry stakeholders were “*certainly stakeholders that [he, as Shadow Minister for Resources] spent a lot of time talking to, in fact going out and visiting a number of properties, seeing what is done and seeing what they contribute*”; and verified they had been “*in direct contact with the minister*” [Lily D’Ambrosio, Minister for Resources].¹⁷

These arrangements were made behind closed doors with no community knowledge or consultation and, presumably without the consultation of the Minister for Agriculture who did not speak during the Mining Amendment Bill debate.

This major public policy failure of the Victorian Government to protect the livelihoods, health and safety of its rural/regional citizens and future generations as well as the integrity of our unique and precious biodiversity and ecological systems is a profound breach of its duty of care and fiduciary responsibility to act in the best interests of its citizens.

Conclusion

There could not be any industry more critical to the global economy and human welfare than food production. To risk Australia’s international reputation as a producer of “clean, green” food and fibre is reckless in the extreme, especially at this time of capricious global political and economic disruption and rapid climate change.

The area of Australia’s climate and soils capable of producing food is rapidly running out. We will not be a food secure nation if our governments refuse to protect what little productive agricultural land remains and the environment that supports it.

A national food security strategy will fail if it does not have strong legal protections for agriculture to reverse the systemic problem of the ongoing loss of fertile land. Protections must include the preservation and improvement of clean water, waterways and aquifers, fertile soils and clean air. When estimating the economic viability of food production versus mining, the unspecified cost of the consequent permanent loss of unrehabilitated farmland and lost agricultural revenue must be paramount in decision-making.

If the Albanese government is genuinely committed to a food security strategy as a matter of national interest, it must give precedence to agricultural activities that further that ambition.

Food security is closely tied to other national interest concerns, such as biosecurity and defence. A national strategy must be for the long-term but able to be assessed and reviewed on a regular basis. It has been a long time coming and must be implemented as a matter of urgency.

¹⁷ Hansard Legislative Assembly – Proof Mineral Resources (Sustainable Development) Amendment Bill 2023, second reading Wednesday 21 June 2023

What Mining Does to Farmland



Lead and silver mine stockpile Broken Hill NSW



Unrebilitated open cut coal mine in Bluff Queensland



Wet Concentrator Plant