



Goldfields Honey Bee & Pollination Services Pty Ltd

ABN 91 112 137 783

2319 Mitchell Highway, Vittoria NSW 2799 - Telephone: 02 6368 7160 Fax: 02 6368 7164

Web: www.goldfieldshoney.com

Hello commissioners. I am writing to you in objection to the proposed Regis McPhillamys mine project

I am Sam Lockwood. SQF practitioner, HACCP coordinator and QA manager from Goldfields Honey, Bee and Pollination Services Pty Limited, the founding company, which I will refer to as Goldfields Honey.

Goldfields Honey is a honey packing facility that is located 2km from the mine site. I run this company with my mother Vicki. Her succession plan is for me to take over the company in the years to come.

I would firstly like to say that the lack of any consultation that has been made to our company from both Regis or the DPE is pathetic. My company has had NO communication about the mine. In fact, our company has been confused for another company Goldfields Honey Australia.

Goldfields Australia is a beekeeping operation that is run by my brother Jon. They are two completely different operations. I find it frustrating that Regis have never taken the time to really understand the structure of how our group of companies works. However, I will point out that in a meeting my brother Jon and my mother attended with Tony McPaul many years back the meeting was in regards to Goldfield honey Australia, none of our other companies were mentioned or asked about. I attended the meeting to listen in. I recall the intimidating manner in which Tony addressed the meeting. Tony mentioned that the mine had an 80% chance of succeeding. I took from the meeting that we did not have a chance. I will take my 20% chance, we will not be intimidated, we will not be silenced, and we will fight for what is right.

After the IPC hearing, we were swamped by Regis staff. Reaching out to see if they could assist in any way. Too little, too late. We have been trying to be heard for well over 5 years now.

Goldfields Honey as mentioned is a honey packing facility. We pack our honey for major supermarkets all around Australia. In recent years, we have also exported our honey to many countries including Japan, China, Pakistan, and have new markets in the works for export to the US and Vietnam.

Our factory is SQF accredited. The Safe Quality Food (SQF) Program is a rigorous and credible food safety and quality program that is recognized by retailers, brand owners, and food service providers world-wide. Recognized by the Global Food Safety Initiative (GFSI), the SQF family of food safety and quality codes are designed to meet industry, customer, and regulatory requirements for all sectors of the food supply chain – from the farm all the way to the retail stores.

We are also HACCP accredited (Hazard analyses, critical control points). Food and a potential nearby mine will require a lot more Hazard analyses.

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We currently pack on average 750 ton of Australian Honey. That's roughly 1.3 million bottles of honey per year.

My concerns for the proposed mine are as follows.

HONEY SUPPLY

Goldfields Honey purchases honey from around our local area to be processed and packed. However, Goldfields Honey Australia is by far my biggest supplier supplying 95% of all our honey. My concern is that Goldfields Australia's beekeeping resources and potential contamination risks will cripple GHA's ability to provide my company with enough honey to keep our contracts going. The flow-on affect is immense.

Will Regis Guarantee my business a sustainable honey supply?

HONEY TESTING

Goldfields Honey needs to conduct product testing throughout the year to verify compliance. The frequency of testing is risk based. As the DPE has mentioned in their report that a potential contamination may occur therefore additional testing would be required if there is a known potential risk of environmental contamination or contamination of the honey. A few of the tests we conduct are.

- Biological testing,
- C3, C4 sugar testing
- Pollen analysis
- Reducing sugars,
- Nutritional
- Heavy metals
- MRL residue testing ... just to name a few.

These tests are very costly. These tests are requested directly from the supermarkets themselves.

Water testing. We test our water regularly for potential, heavy metal, chemical and biologic contaminants.

With the risk of contamination higher with a nearby mine our testing schedule will have to increase to maintain certification.

Will Regis compensate for the increase in testing due to a potential risk.

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The risks are:

Dust - Airbourne contamination

The honey processing area is constructed to exclude the entry of dust, however if there is contaminated dust it may settle on the outside of IBCs used for the storage and transport of bulk honey or on the outside of wrapped pallets of packaging materials and be transferred into the storage and production areas with the potential of contaminating the production environment and the honey.

The majority of the water used for the cleaning of equipment in the honey processing area including equipment with direct honey contact is rainwater collected from the factory roof.

If there is contamination on the roof due to dust, it will be collected with the water from the roof and washed into the rainwater tanks. The existing filtration system of the rainwater will not remove heavy metals or other similar contaminants. The presence of contaminants may be transferred to the honey and if it is present at levels higher than the maximum residue limit it would lead to rejection of the product and/or the recall of finished products.

If the mine were to proceed and contamination of our water was to occur would Regis guarantee an immediate clean source of water?

Recall & Traceability

Every kilogram of honey we pack is traceable. Batches can be traced right back to the individual beehive of where the honey was produced.

Not only does our company do a huge amount of testing to verify compliance and food safety. Our customers and other agencies do random off the shelf testing. As our company already has base line data from before a mine was present it would be quite easy to trace a heavy metal contamination back to the mine. If a contaminant was detected there would have to be a national if not global recall of our honey. This has huge economic ramifications for a lot of parties involved. As you know major food recalls are done through the media. Could you imagine the headlines of a food recall being traced back to a mine site?

Is the DPE, Regis and even the IPC willing to take the risk on a global food recall?
If the contamination was to be traced backed to the mine. Would Regis compensate for major economic losses? Loss of contracts, loss of customer confidence.

Food Security

Our climate is changing in my short lifetime our country has seen some of the biggest disasters in living memory the 2017,18,19 droughts and intense fires the 2021 mouse plague, the recent floods, covid, our population is growing. When will the agriculture sector get a break. When will the government, agencies, mining companies realise food security is real when will we be taken

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seriously. To construct a mine in the middle of a pristine, apiary, beef, lamb, poultry and cropping area is obscured. To put it on a river that feeds, orchards and vineyards down-stream is ludicrous, and not to mention a potential food contamination if it were to proceed.

Jobs

My company has the plan to triple our production and expand our current facility within the next 5 years. I am concerned that if the mine were to proceed the competition for jobs in the local area would be tough.

This expansion will depend on employment. Currently it is very difficult to find good employees, not only for our factory but most of my customers and suppliers have the same problem. Our business cannot survive without teachers, nurses, day care centres, truck drivers, retail outlets, mechanics just to name a few. They are all critically short staffed, please don't allow a mine to not only poach these people, or add to the problem with staff from outside our area adding extra strain to our services.

As mentioned by the Mayor of Bathurst at the IPC hearing, workers will have to be brought in for this project as there is a serve shortage of employees in the local area.

Mars group. Another company for the mine. Also stating it would be hard for them to find more skilled workers for this project.

Macquarie Geotech. Also mentioned the jobs shortage.

Will Regis be also hiring Doctors, nurses, teachers etc for the local community to cater for the extra population they will be bringing into the area?. Our services are maxed out.

Tourism

Tourism plays a huge role in my business. We don't forget our roots. We still attend the Orange Farmers Markets once a month, and have done so for 20 plus years. We attend the Millthorpe Market, which attracts approximately 15,000 tourists to our area twice a year.

Another section of our group of companies is a tourist outlet and honey shop. My business packs a substantial amount of honey which is sold through our tourist outlet.

I am concerned that with the current housing crisis in our area, and Regis stating a lot of workers will need to be brought in for the mine. Where will they stay? Will they be booking out all the local motels, pubs, caravan parks. This has happened before with another local mine. If this is the case where will the tourists be able to stay? Will they have to find another regional area to visit?

For pete's sake they are building dongas right across the road for Cadia.

This will have huge economical disadvantages for hundreds of businesses like mine.

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Tourism is worth \$30 billion dollars to the NSW economy, 44% of that is spent in regional areas like ours.

Future Generation

I am particularly worried about the future of our business if the mine were to proceed. I am the second generation to take on the business which has a lifespan of 40 plus years. I am only 30 years old and have a full working life ahead of me. I have a 2-year-old and another on the way.

In no way will I pressure my children to join the family business ,but if they were to join, I don't see it fair for a mine that has a life span of only 11 years to potentially end the future generations of not just my business but dozens of family run businesses and farms.

As mentioned earlier, we don't forget where we come from. Like my father before me we still attend local markets. This is a great learning experience for the next generation. I am so proud to man the stand with my daughter nieces and nephews. This gives them great life skills, people skills and a start within our family business if they wish to persue. I am deeply saddened that this may not continue if the mine were to proceed just to fill the pockets of foreign investors.

This leaves me with my last and most important concern.

Community

As I recall yesterday Regis stating that 70% of the community are in support of the proposed mine. Well ... where are they all today? It is easy to sit in a shopping centre, or buying people coffees at local markets to just get a few written submissions. Again, where are they all today?

I recently moved to the shire of Blayney. I have found the sense of community amazing. Many businesses within Blayney support our business. The local supermarket, butcher shops, restaurants. And I support there's in return.

I do not want to see my community divided. I do not want to see extra strain put on my fellow community members. I do not want to see local businesses close due to competition from jobs.

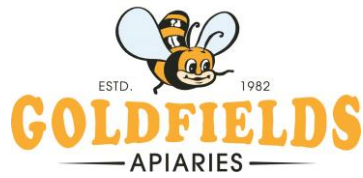
Commissioners with all the submissions we have heard in the last couple of days against the proposed mine I think you can agree with me in saying our community is certainly not for this proposed mine.

Conditions

If the mine were to proceed, I would like the following conditions put into place.

For Regis to pay for any additional honey, and water testing put upon our business to ensure a safe food product.

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For Regis to compensate any costs and damages related to a national, or global recall on our honey if it were to be traced back to the mine.

For Regis to supply an immediate supply of clean water to keep our factory in operation if our water supply were to be contaminated.

For Regis to supply adequate accommodation for their staff, to not damage our tourism industry.

And finally, if you can dig the hole you sure as hell can fill it back in!!

Please see attached below:

Integrated Food Solutions Report – McPhillamy’s Mine Project

SQF Accrediation

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Potential environmental contamination of honey by the proposed McPhillamys Gold Project

SCOPE

This report covers the potential for environmental contamination of honey being processed for human consumption by Goldfields Honey, Bee and Pollination Services Pty Ltd.

CONSEQUENCES OF HONEY BEING CONTAMINATED

Goldfields Honey, Bee and Pollination Services Pty Ltd needs to ensure that the honey and the processing of the honey complies with the requirements of following legislation, codes and guidelines to meet legal and contractual obligations.

- Australian and New Zealand Food Standards Code.
 - Chapter 1 which includes:
 - Standard 1.4.1 Contaminant and natural toxicants.
 - Standard 1.4.2 Agvet chemicals
 - Chapter 2 Part 2.8 Standard 2.8.2 Honey
 - Schedule 3 Identity and purity
 - Schedule 19 Maximum levels of contaminants and natural toxicants
 - Schedule 20 Maximum residue limits
 - Schedule 21 Extraneous residue limits
 - Schedule 24 Restricted plants and fungi
- NSW Food Act 2003
- NSW Food Regulation 2015
- Codex Alimentarius General Principles of Food Hygiene CXC-1969 (Latest revision 2020).
- Safe Quality Food Institute (SQFI) Food Safety Code: Manufacturing
- Safe Quality Food Institute (SQFI) Food Safety Code: Quality
- Specific retailer supplier requirements including food safety guidelines and testing requirements.

Goldfields Honey, Bee and Pollination Services Pty Ltd needs to conduct product testing throughout the year to verify compliance. The frequency of testing is risk based and additional testing would be required if there is a known potential risk of environmental contamination or contamination of the honey.

Relevant to this report the testing includes the maximum residue limits for bee treatment agents, pollen analysis, pesticides, heavy metals and other environmental contaminants.

If there is not compliance with the specified requirements, the honey cannot be sold and there is the economic loss of the product, packaging and labour. If any of the honey has been sold it would need to be recalled from sale. The direct economic costs of recalls include the product, packaging, labour, transport, retailer handling charges, recall advertising costs, time of company personnel conducting the recall, liaising with



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customers, suppliers and authorities, completing the mandatory post recall reports and the loss of sales of the recalled stock. The indirect economic costs of a recall include the potential loss of sales contracts with retailers and the loss of sales due to low levels of customer confidence after the recall. There is also the ongoing cost due to the damage done to the brands of recalled products. If there is a contractual requirement to replace the recalled stock with compliant stock there is generally increased costs of obtaining the raw materials and packaging required in a shorter time frame and additional labour and transport costs.

CONTAMINATION OF HONEY

The processing of honey involves warming and filtering honey to remove foreign matter (e.g., wax, bee wings and legs) prior to packaging. There is no change or dilution of the honey and as such any contaminants in the honey when it is extracted is present in the finished product for human consumption.

The presence of environmental contaminants including heavy metals can accumulate in bees (Goretti 2020) and there is the bioaccumulation of heavy metals in honey (Gutierrez 2020). There are maximum residue limits for heavy metals and other contaminants in honey and the presence may lead to rejection of the product and/or the recall of finished products.

If the bee colony is unwell due to environmental contamination and the bees need to be treated with antibiotics or other agricultural chemicals, the honey may exceed the minimum residue limits and consequently cannot be used.

There are defined sugar compositional requirements for honey that does not permit the use of sugar syrups to improve colony health if the bees are stressed.

If there are changes to the flora due to environmental contamination, that affects the pollen available and the nature of the honey. The presence of residue from restricted plants would lead to rejection of the product and/or the recall of finished products.

AIRBOURNE CONTAMINATION

The honey processing area is constructed to exclude the entry of dust, however if there is contaminated dust it may settle on the outside of pallets used for the storage and transport of bulk honey or on the outside of wrapped pallets of packaging materials and be transferred into the storage and production areas with the potential of contaminating the production environment and the honey.

The majority of the water used for the cleaning of equipment in the honey processing area including equipment with direct honey product contact is rainwater collected from the production area roof. If there is contamination on the roof, it will be collected with the water from the roof and washed into the rainwater storage tank. The existing filtering and treatment of the rainwater will not remove heavy metals or other similar contaminants. The presence of contaminants may be transferred to the honey and if it is present at levels higher than the maximum residue limit would lead to rejection of the product and/or the recall of finished products.

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CONTAMINATION OF GROUND WATER

When there is not adequate rainwater available, ground water is used for cleaning equipment in the honey processing area. If the ground water is contaminated with heavy metals and/or similar contaminants it has the potential to contaminate the honey as described above for the contaminated rain water.

References:

- Goretta 2020 - Heavy metal bioaccumulation in honey bee matrix, an indicator to assess the contamination level in terrestrial environments.
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- Gutierrez 2020 - Assessing heavy metal pollution by biomonitoring honeybee nectar in Córdoba (Spain).
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