

Our ref: D1-114-OB-DA-210040-RtS-220218

18 February 2022

Chief Executive Officer
North Burnett Regional Council
PO Box 390
GAYNDAH QLD 4625

Dear Sir,

Re: DA210040 – DEVELOPMENT PERMIT FOR MATERIAL CHANGE OF USE FOR “INTENSIVE ANIMAL INDUSTRY” (BEEF CATTLE FEEDLOT) – AND ENVIRONMENTALLY RELEVANT ACTIVITY (ERA 2 1(b)), 326 DOWNIES ROAD, THREE MOON – LOT 52 RW103 AND LOT 53 RW103 – RESPONSE TO SUBMISSIONS

I act for the applicant DJ & SA Olive in regards to the above matter.

This letter provides a response to the issues raised in the submissions to DA 210040, 326 Downies Road, Three Moon – Lot 52 RW103 and Lot 53 RW103.

Issue 1 – Odour

Several submissions raised the issue of odour from the proposed development and cumulative odour resulting from the piggery developments in the local area.

Issue 1 – Response

Matters relating to odour impacts have been adequately addressed in section 6.4.1.9 of the development application (RDC Engineers, 2021). The proposed development meets all required separation distances to sensitive receptors in accordance with the National Guidelines for Beef Cattle Feedlots in Australia 3rd Edition (MLA, 2012). An Environmental Authority (2021-26) has been granted for the proposed development by the Department of Agriculture and Fisheries.

The issue of cumulative odour impacts has been considered and addressed in section 6.4.1.9.6 of the development application (RDC Engineers, 2021). The Odour Impact Assessment from Developments (DEHP, 2013) state that multiple sources of the same type of odorant (e.g. multiple sheds on a poultry farm) to be additive in nature. As odours from a beef cattle feedlot and piggery have different characteristics the impacts are not cumulative

As outlined in section 6.4.1.9.4 of the development application (RDC Engineers, 2021), a worst case surface roughness factor of “Crops only” was assumed which translates into a greater required separation distance.

Issue 2 – Air quality – Dust

Several submissions raised the issue of air quality, in particular dust and zoonotic diseases from the operation of the proposed development including the dust originating from the public road network.

Issue 2 – Response

The proposed development meets all required separation distances to sensitive receptors in accordance with the National Guidelines for Beef Cattle Feedlots in Australia (MLA, 2012a). An Environmental Authority (2021-26) has been granted for the proposed development by the Department of Agriculture and Fisheries.

As outlined in the National Guidelines for Beef Cattle Feedlots in Australia, and stated in section 6.4.1.6 of the development application (RDC Engineers, 2021), if the separation distance is suitable to mitigate against odour impacts, dust impacts are also not expected by default (MLA, 2012).

There are no sensitive receptors adjoining Downies Road north from the subject land entrance to Schimkes Road along the principal haulage route. Consequently, traffic generated dust is not expected to be an issue. The proposed development can easily be conditioned to ensure that this segment of Downies Road is the principal haulage route.

QFever & E-Coli Risks

Various livestock enterprises are conducted within the Monto/North Burnett district including beef cattle breeding, grazing, lot feeding, dairies and piggeries for example. It is more than likely that QFever & E-Coli are present in the region. The bacteria that causes Q Fever is excreted in milk, urine, and faeces of infected animals. Most importantly, during birthing the organisms are shed in high numbers within the amniotic fluids and the placenta.

To minimise impacts from Q Fever (if present in the lot-fed animals) all personnel in direct contact shall be vaccinated for Q Fever, any visitors shall be prevented from having direct contact with animals in the proposed development and dust levels shall be managed in accordance with relevant guidelines. The proposed development meets all required separation distances to sensitive receptors under the relevant guidelines for odour and therefore dust impacts are also not expected due to the separation distances. An Environmental Authority (2021-26) has been granted for the proposed development by the Department of Agriculture and Fisheries.

The treatment of solid wastes shall be in accordance with the National Guidelines for Beef Cattle Feedlots (MLA, 2012) and the Beef cattle feedlots: waste management and utilisation manual (MLA, 2015).

E-Coli prevention shall be managed with good hygiene practices both personal and at slaughter and not feedlot hygiene per se.

Issue 3 – Noise

The issue of noise impacts was raised in submissions.

Issue 3 – Response

Matters relating to noise impacts have been addressed in section 6.4.1.2 of the development application (RDC Engineers, Pty Ltd, 2021).

Further, the proposed development is in a rural area with noise generating rural activities such as agricultural vehicles, cropping, livestock handling, pumping of water for example.

Issue 4 – Visual

The issue of incorrectly referenced Photographs 15 and 16 was raised along with views of the proposed development.

Issue 4 – Response

Photograph 15 and Photograph 16 are incorrectly referenced. Photograph 15 should be Photograph 15 – Burnett Highway/Schimkes Road intersection (looking south) and Photograph 16 should be Photograph 16 – Burnett Highway/Schimkes Road intersection (looking north).

It was stated in the development application that houses to the west would not be visually impacted. The closest residential dwelling to the west of the proposed development is 2.5 km. As the proposed development is located towards the top of a low hill, it is difficult to visually screen the proposed development from viewing locations in the west, in particular if any dwellings are elevated above the plains. The photograph below shows that a dwelling to the northwest can be seen from the proposed development site.



View from development site looking west

Issue 5 – Adequate water supply and quality

The issue of adequate supply and quality of groundwater was raised.

Issue 5 – Response

The applicant has 100 ML of surface water from Three Moon Creek and 200 ML of groundwater per water year (July to June). The applicant shall prioritise water use with the agricultural enterprises on the subject land with livestock drinking water within the proposed development taking priority over all other activities such as irrigated cropping operations.

Based on the National Feedlot Guidelines (MLA, 2012) estimate, some 35 ML for the proposed development at full capacity may be required if all of the activities listed in the National Beef Cattle Guidelines (MLA, 2012) were undertaken e.g. feed processing, cattle washing etc. When compared with the 300 ML attached to the subject land there is sufficient water available to service the proposed development.

Since the applicant purchased the property in March 2021, the groundwater quality has been measured every 3 months as a routine part of their crop management program. These data demonstrate that the salinity of the groundwater is in the order of 2,000 ppm and well below the threshold levels for adverse impacts to livestock and crops.

Issue 6 – Animal Welfare and Factory Farming

The issue of animal welfare was raised in particular factory farming and use of shade.

Issue 6 – Response

Animal welfare matters in QLD are governed through legislation including the Animal Care and Protection Act 2001 and Animal Care and Protection Regulation 2012.

The implementation of shade within the proposed development is not a mandatory requirement under relevant acts and guidelines.

Issue 7 – Threat to endangered and vulnerable wildlife species

The issue of impacts to endangered and vulnerable wildlife species was raised in particular the suitability of the proposed development site.

Issue 7 – Response

Matters relating to endangered and vulnerable wildlife species have been addressed in section 5.6.5 and section 5.15.8 of the development application (RDC Engineers, 2021).

Further, the proposed development site has been previously used for cropping and is currently used for livestock grazing on improved pastures.

Issue 8 – Adverse Environmental Impacts

The issue of adverse environmental impacts was raised in particular to surface waters as the site is located within the Burnett drainage basin and through release of contaminants to groundwater.

Issue 8 – Response

The proposed development has been designed and shall be constructed in accordance all relevant guidelines as outlined in the relevant sections of the development application (RDC Engineers, Pty Ltd, 2021). The proposed development complex site is not subject to flooding. Manure and effluent shall be applied at sustainable rates to crops in line with crop uptake requirements.

Issue 9 – Traditional Land Owners

The issue of consultation with traditional owners was raised.

Issue 9 – Response

Matters relating to Aboriginal Cultural Heritage have been addressed in section 5.8 of the development application (RDC Engineers, 2021).

Issue 10 – Property valuations

The issue that the proposed development may decrease the value of surrounding dwellings and farming land was raised.

Issue 10 – Response

The proposed development is in a locality with a well established history of intensive livestock development. It could be argued that the proposed development may increase property values.

Issue 11 – Modernisation

The issue was raised in relation to feedlots and adoption of modern technologies and techniques to mitigate some negative effects, for example;

- Conversion of methane waste into power, using up to date technology
- Pelletisation of manure waste
- Limiting use of growth promotants and antibiotics
- Up to date method of composting for plant nutrients

Issue 11 – Response

Collection and utilisation of methane from a dry based system such as a beef cattle feedlot is uneconomical (Davis, RJ et al., 2010). The feedlot industry has investigated pelletisation of manure. To date there is one pelletisation facility in QLD co-located with a cattle feedlot and

this facility has received a funding injection from the Queensland Government's \$150 million Jobs and Regional Growth Fund.

Matters relating to solid waste management and utilisation have been considered in section 4.1.10 and 4.3.6 of the development application (RDC Engineers, 2021).

Issue 12 – Community Support/Jobs

The issue was raised that the proposed development would support only 2 FTE when compared to other intensive livestock developments in the region.

Issue 12 – Response

The workforce is directly proportional to the scale of the development. The applicant has been contacted directly with positive support from many locals and business for the proposed development. These include:

- Monto Grains Cooperative called 29/1/2022 to offer their support.
- Downie family (neighbour on Monto side) came to visit with support.
- Ogle family (Schimkes Road) spoke to the applicant with support.
- Penney family (Mulgildie) spoke to the applicant with support.
- Atkinson family (Mulgildie) spoke to the applicant in support.
- “Goonidicum Station” - Nadia Campbell rang the applicant directly to offer her support.

Whilst the submissions and development application (RDC Engineers, 2021) state that the proposed development as a family owned and operated enterprise may only employ a few workers, where possible, the applicant is a strong supporter of local business within the community through purchasing of seed, fertiliser, chemicals, machinery parts, fuel, livestock fodder (drought feed and lick, dog feed, horse feed), livestock supplies, vet supplies, steel supplies, vehicle and other parts/repairs and maintenance, groceries and household supplies, meat, stationery and supporting schools and after school clubs and committees for example. The applicant is committed to supporting local business first as is demonstrated in their existing agricultural operations and this will continue during the construction and operation of the proposed development (should the Council approve the proposed development). The applicant feels it is important to see all community members thriving, so the town thrives.

Issue 13 – Solid waste management and utilisation

There were several submissions which raised the issue of solid waste (manure and mortality) management and utilisation in particular the spreading of fresh manure on the alluvial plains of Three Moon Creek and management of mortalities.

Issue 13 – Response

Matters relating to solid waste management and utilisation have been considered in section 4.1.10 and 4.3.6 of the development application (RDC Engineers, 2021).

Manure harvested from the production pen area of the proposed development shall be temporarily stockpiled within the solid waste stockpile and carcass composting area. The manure shall be allowed to anaerobically compost over a period of 6-12 months prior to spreading on land and in line with the cropping program. Typical mortalities shall be composted within a dedicated area within the solid waste stockpile and carcass composting area. Manure freshly scraped from the production pens shall not be directly applied to cropping land.

The proposed solid waste management and utilisation practices are in accordance with best practice guidelines for a beef cattle feedlot as outlined in the National Guidelines for Beef Cattle Feedlots (MLA, 2012) and the Beef cattle feedlots: waste management and utilisation manual (MLA, 2015).

In the event of mass mortalities, an appropriate disposal site on the subject land to the south of the proposed development complex shall be identified in consultation with relevant authorities. This location is above flood level and in heavy clay soils.

Issue 14 – Antibiotic Resistance

The issue of human antibiotic resistance to manure in an article in the QLD Country Life dated Thursday January 20th 2022, pg60 heading was raised.

Issue 14 – Response

A link to the article has been provided below.

<https://www.queenslandcountrylife.com.au/story/7583779/using-feedlot-manure-as-fertiliser-could-be-worsening-antibiotic-resistance-in-humans/>

The research undertaken by UNE at Tullimba Feedlot related to fresh manure. The Australian Feedlot industry introduced mandatory antimicrobial rules (transitioned in from 2018) which were being praised in the article. The results, which Australia has adopted, was that stockpiling manure for at least 5 months dramatically reduced the level of antibiotic resistant bacteria.

The proposed development proposes to stockpile manure and does not propose to spread fresh manure.

Issue 15 – Hormone Growth Promotants (HGP)

The issue of using Hormone Growth Promotants (HGP) was raised.

Issue 15 – Response

Olive Beef is currently registered with EU accreditation and at this stage does not use HGP.

Issue 16 – Expansion of carrying capacity

The issue of expansion of the proposed development was raised.

Issue 16 – Response

Relevant approvals such as planning and environmental would need to be sought for any future expansion of the proposed development through a future development application.

Issue 17 – Site soil characteristics - Black soil

The issue was raised relating to the proposed development site being located on black soil with reference to the Dowling Feedlot which was stated as causing a smell and pugging occurring within the pens as its located on the black soil plains.

Issue 17 – Response

The proposed development has been designed and shall be constructed with adequate pen slope and drainage in accordance with the National Guidelines for Beef Cattle Feedlots in Australia (MLA, 2012) . Further, the pen areas shall have a compacted gravel surface. Consequently, the pens shall drain quickly following rainfall and the pen surface will not be subject to pugging by the action of the cattle.

Issue 18 – Fly Population

The issue of a potential increase in the fly population as a result of the proposed development was raised.

Issue 18 – Response

MLA research has shown that flies breed right across the feedlot wherever there is undisturbed manure, spilt feed and moisture. The main fly breeding sites are under fence lines, in drains, sedimentation basins and silage pits. Keeping grass short to minimise fly resting places is also a known method of reducing fly populations.

A high level of feedlot hygiene (pen/drain cleaning, spoilt feed removal, controlling weeds, maintaining grass short etc) and implementation of a tailored integrated pest management (IPM) program shall minimise any adverse impacts from flies.

Further, the applicant is willing to adopt methods and participate in trials in accordance with feedlot best practice guidelines.

Issue 19 – Rural Residential vs Rural

The issue of whether the locality was a Rural Residential zone with smaller blocks and houses in close proximity was raised.

Issue 19 – Response

The subject land is zoned **Rural zone (Intensive agriculture precinct)** under the NBRC planning Scheme.

Issue 20 – Waste disposal Rainfall and waste storage ponds

An issue was raised in relation to the capacity of the effluent runoff pond.

Issue 20 – Response

The effluent holding pond has been designed in accordance with relevant guidelines. An Environmental Authority (2021-26) has been granted for the proposed development by the Department of Agriculture and Fisheries.

References

Davis, RJ, Watts, PJ and McGahan, EJ 2010, Quantification of feedlot manure output for BEEF-BAL model upgrade, RIRDC Project No. PRJ-004377, Rural Industries Research and Development Corporation, Canberra.

Department of Environment and Heritage Protection, 2013, guideline: Odour Impact Assessment from Developments, Department of Environment and Heritage Protection, Brisbane.

Meat and Livestock Australia, 2012, National Guidelines for Beef Cattle Feedlots in Australia 3rd Edition, Meat & Livestock Australia, North Sydney, NSW.

Meat and Livestock Australia, 2015, Beef cattle feedlots: waste management and utilisation, Meat and Livestock Australia, North Sydney, NSW.

RDC Engineers Pty Ltd, 2021, Development Application – Material Change of Use for Intensive Animal Industry (Beef cattle feedlot) on the property “Creek Paddock”, DJ & SA Olive, D1-114B/V1R2 RDC Engineers Pty Ltd, Toowoomba, QLD, 4350.

Should you require any additional information or clarification in relation to this matter, please do not hesitate to contact the undersigned.

Yours sincerely



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